From: Craig Lundgren
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:45:08 PM

It is clear to everyone that the Office of Government Ethics was challenged by the unethical behavior of the Trump administration. In particular, u understand that political organizations were set up to hand out cash to allies of the white house that were under criminal investigation. So long as the cronies remained loyal, there was money for attorneys, but if they broke ranks, the cash was gone. This is a system that undermines legal and ethical standards.

I understand that the Office of Government Ethics has proposed to revise its Legal Expense Fund Regulation to address this but, has added an exception that makes compliance optional. I believe that OGE should remove the exception that makes compliance with the regulation optional. Unethical politicians and bureaucrats will take advantage of such a clause. .

Further, the proposed regulation only imposes a short period of time to prevent public officials from benefiting donors. We need a broader 5-year recusal requirement. This is essential to prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.

Further, the regulations appear to allow recusal decisions to be made by the official themselves, where, if in their opinion, recusal is unnecessary, they will not recuse. That must be changed.

Additionally, I understand that regulation provides that big law firms — which make over a billion dollars a year and represent foreign governments and regulated industries — can provide unlimited legal support to officials, BUT it says nonprofits can't hire lawyers for whistleblowers. that is insane. I don't believe there is any basis for such a provision.

Also, please remove the offensive example involving an accused sexual harasser.

Thank you for your consideration of these objections.

Craig Lundgren