From: Vincent Buquicchio
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 12:13:35 PM

I oppose the Office of Government Ethics' (OGE's) proposed legal expense fund regulation as drafted. OGE should:

- remove the exception that makes compliance with the regulation optional – recent history makes clear it needs to be mandatory to be even remotely effective;

- replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;

- remove the offensive example involving an accused sexual harasser – as a retired Air Force judge advocate I can vouch that such an illustration being used as an example is both unnecessarily provocative and hostile, and counter to notions of accountability inherent in military good order and discipline (not to mention that any such military member would be provided a defense attorney free of charge); and,

- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you very much.

Sincerely,

/s/

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