From: Alan Fahnestock
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:16:19 AM

I vehemently oppose OGE's proposed legal expense fund regulation as drafted.:

It is clearly insane to include an exception that makes compliance with the regulation optional: ethics cannot be "optional".

Donors of cash gifts must be restricted from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests. This restriction, ideally, would be permanent, but, at the very least should remain in place for no less than five years.

I do not understand why the rule must include an offensive reference to sexual harassment

Nonprofit charities (501(c)(3) organizations) need to be treated at least equally with large law firms by allowing them to hire legal counsel for whistleblowers.

Rules need to be rules, and need to apply equitably. They must also actually address the obvious ethical problems within our government. Let's get real.

Thank you,
Alan Fahnestock
Winthrop, Washington