From: Will Slack
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation
Date: Thursday, June 16, 2022 11:35:20 PM

Re: U.S. Office of Government Ethics (OGE) 3209–AA50

Thank you for your work preparing these draft materials!

While I am glad to see a draft regulation out, I oppose OGE's proposed legal expense fund regulation as drafted.

In my personal view, OGE should remove the exception that makes compliance with the regulation optional (through a subpart B exception).

In addition, regarding "Proposed § 2635.1009: Pro Bono Legal Services," I think OGE should allow charities to hire legal counsel for whistleblowers. It would be a mistake to only allow in-house counsel to serve in this way, and against the public interest.