From: Kathleen Gohn
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 3:51:03 PM

Dear Office of Government Ethics,

I was a federal employee for 34 years, and I was proud to serve my country and its people. Most of those I worked with had high ethical standards, but unfortunately not all of them did. Your proposed rules need some changes to keep all government employees to the high ethical standards that our country deserves.

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

- remove the exception that makes compliance with the regulation optional;
- 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; 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 for the work you do to serve the Nation.
Kathleen Gohn