From: kate@plainkate.com
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 5:37:43 PM

Dear Office of Gov't. Ethics,

I oppose OGE's proposed legal expense fund regulation as drafted. Ethics cannot be optional, particularly in light of what we have all witnessed since 2016.

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!

Kate Powers

I have long experience facilitating radical acceptance; I have written and taught inclusive and anti-racist practices. I have held spaces that foster the feeling of being not merely accepted, but sought out, connected, useful, celebrated as one's authentic self without fear of judgment. Now I am looking to leverage my strategic planning, curriculum design, research, analysis, writing, critical and collaborative skills to fight for justice, equity, diversity, and inclusion. I think art can help.

Artistic Director, *The Redeeming Time Project*
(she / her)

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