From: Carol Goodwin
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:27:04 AM

I understand that the OGE recently issued a draft regulation that would place limits on federal officials accepting large gifts of cash from individuals who may be seeking to influence policy, which is great news. However, the draft regulation would also allow those officials to decide whether the regulation applies to them, making compliance with this conflict-of-interest rule optional.

Therefore, I oppose the OGE's proposed legal expense fund regulation as drafted and urge the OGE to:

1) Remove the exception that makes compliance with the regulation optional;
2) 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;
3) Remove the offensive example involving an accused sexual harasser;
4) 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.