From:	Virginia Culbert
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Friday, June 17, 2022 3:37:01 PM

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to Whom It May Concern:

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 ffirms by allowing them to hire legal counsel for whistleblowers..

Sincerely.

Virginia Culbert