From: Lyndall Culbertson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 2:17:48 PM

Dear Office of Government Ethics,

I am sending a comment to voice my concern about the amount of corruption in our government. These ethics requirements should not be optional!

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.

Sincerely,

Lyndall Culbertson