From: Virginia Culbert
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 11:21:05 AM

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 interest;- 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,

Virginia Culbert