From: Steven N. Fiering
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 6:30:14 AM

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.

Thank you
Steve

Steve Fiering PhD
Professor of Microbiology and Immunology
Geisel School of Medicine at Dartmouth
622 Rubin DHMC
Lebanon, NH 03756
Desk 603 646-5365
Cell 603 520 4274

The most exciting phrase in science, the one that heralds new discoveries is not "Eureka!" (I found it) but "That's funny..." Isaac Asimov (1920-1992)