

From: [REDACTED]

To: USOGE

Subject: Proposed Amendments to Part 2635

Date: Friday, September 30, 2011 2:56:16 PM

To the Office of Government Ethics

RIN 3209-AA04

ATTN: Richard M. Thomas, Associate General Counsel

I am writing this comment as an individual familiar with the ethics regulations, not as a representative of any federal agency.

It appears to me that the proposed amendment to Part 2635, concerning gifts from lobbyists, means that before a Government employee may accept a \$5 coffee cup from a contractor employee, we must first go online and (1) check the House of Representatives database to see if that particular company employs a registered lobbyist. Then we have to (2) determine if the lobbyist has filed a termination of registration or (3) been de-listed by the contractor, or (4) hasn't appeared on a quarterly lobbying report for three consecutive quarters as a result of the lobbyist's actual cessation of lobbying activities. Then, we are to (5) check the Senate database to see if that particular company employs a registered lobbyist. Then we have to (6) determine if the lobbyist has filed a termination of registration or (7) been de-listed by the contractor, or (8) hasn't appeared on a quarterly lobbying report for three consecutive quarters as a result of the lobbyist's actual cessation of lobbying activities.

Presumably, this handy 8-step process must be conducted each time a coffee cup is offered, because in the interim time period a company that had not previously employed a lobbyist may have hired one.

Is that about correct?

Rather than impose that process on Government employees and deputy ethics officials, why not just simplify the process by prohibiting all gifts from contractors?

Thank you,

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