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Sent: Thursday, November 10, 2011 2:29 PM

To: USOGE

Subject: Proposed Amendments to Part 2635 Comments from the Navy League of the United States

The Navy League of the United States submits the attached comment regarding proposed amendment to Part 2635, RIN 3209-AA04. They are also copied below. The comments filed should be attributed to the Navy League of the United States, not to any individual. Thank you!

OGE and the Law of Unintended Consequences

As with so many government regulations, a new rule proposed by the Office of Government Ethics (OGE) to further restrict federal employees from attending events with registered lobbyists will have ramifications far beyond K Street and put in doubt the very survival of many voluntary military service and non-profit organizations.

The mission of the non-profit Navy League of the United States is to provide support to the men and women of the Navy, Marine Corps, Coast Guard and U.S.-flag Merchant Marine and their families. This support comes in many forms, from scholarships for military dependents, to sponsoring ship commissioning events attended by elected officials (to include the President and First Lady), homecoming celebrations, to holding charitable events for the families of deployed troops.

To help fund this support, the Navy League hosts the annual Sea Air Space Exposition, a professional development symposium that brings together U.S. and foreign military personnel, members of Congress and their staff, civilian employees from the Departments of Defense and Homeland Security, and representatives from industry and the press. The show provides attendees the opportunity to learn and observe the latest advances in maritime-related military technology, and to participate in panel discussions and other forums that address current issues of critical importance to today's military professional. Additionally, senior DOD and DHS officials speak at a variety of luncheons and dinners, and discuss current policy guidance.

In the past, federal employees, elected officials and military personnel have attended the Sea-Air-Space Exposition events free of charge under the widely attended gatherings exemption that recognized that some events have an inherent educational value and are of benefit to the employee and the government. Under the new rules, the widely attended gathering exemption has been eliminated and replaced instead with a confusing array of rules -- that on the one hand appear to exempt non-profit institutions, but on the other hand seem to specifically forbid participation in some events regardless of the status of the institution.

The lack of clarity in the new rules could be devastating for the Navy League and other military service organizations that rely on conferences, professional trade

shows and other widely attended gatherings to help raise revenue that directly supports the men and women of the U.S. military. The service general counsels are likely to prohibit attendance at many of these events as the low risk choice for federal employees and military personnel regardless of the intent of the authors. After 110 years in operation, this loss of income will directly and negatively affect the ability of the Navy League of the United States to provide much needed support to our military service members and their families, and in the worst case scenario could force our non-profit to simply cease functioning.

It is imperative, therefore, that OGE take the necessary time to fully understand the ramifications of its actions with regards to non-profits and volunteer service organizations. We highly recommend that any change to current policy include specific language exempting non-profit volunteer military service organizations such as the Navy League.

Let us not allow the law of unintended consequences to impact the professional development benefits of conferences such as Sea-Air-Space, and the absolutely vital support the Navy League provides to our Soldiers, Sailors, Airmen, Marines, Coast Guardsmen, and U.S. –Flag Merchant Marines, and their families.

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