

From: Cheryl Dotson [<mailto:cheryl@themeetingedge.com>]
Sent: Friday, November 18, 2011 2:06 PM
To: USOGE
Subject: RE: RIN 3209-AA04

November 17, 2011

Submitted Online

Don Fox
Acting Director and General Counsel
Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3917

Re: RIN 3209-AA04
[Proposed Amendments Limiting Gifts from Registered Lobbyists and Lobbying Organizations]

Dear Mr. Fox:

The Meeting Edge appreciates the opportunity made available to the public to comment on proposed rule RIN 3209-AA04, which considers amending the regulation governing standards of ethical conduct for executive branch employees of the Federal Government, to impose limits on the use of gift exceptions by all employees to accept gifts from registered lobbyists and lobbying organizations, including invitations to widely attended gatherings (WAGs).

The Meeting Edge is an association management/event planning business in Denver, Colorado. Our clients are non-profit organizations whose objectives are to educate and improve the business culture for their industry. One of the ways that many of our groups achieve this goal is by actively engaging in the legislative process to further the goals of their membership. This includes inviting public officials to attend membership gatherings which by the definition of this bill could be referred to as a 'trade show' as there are vendors in attendance. The purpose of inviting the public officials is to use the gathering of members as an effective means to address and educate the members on the merits of new legislation, how the changes will affect their businesses and the best methods to assure compliance. This exchange of information is of mutual benefit to the associations, their membership and regulatory agencies as there is a heightened understanding of the purpose and mechanics of the regulations.

While we all see the merits of restricting the acceptance of gifts as a method of influencing public officials, the restrictions regarding attendance at membership gatherings constrains valuable communication between public officials and members of our organizations. We respectfully request that the OGE reconsider what appears to be a subjective, overly simplistic definition of the business of trade associations, and conduct appropriate research that we believe would demonstrate that the OGE has erred in its interpretation.

Thank you in advance for your consideration of these comments. If you have any questions, please contact me.

Sincerely,

Cheryl Dotson

President

The Meeting Edge, Inc.

303-457-2119 (Tel)

303-451-7567 (Fax)

cheryl@themeetingedge.com