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November 23, 2011

Mr. 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 Lobbying Organizations)

Dear Mr. Fox:

The Heartland Community Bankers Association appreciates the opportunity to comment on proposed rule RIN 3209-AA04, which restricts all executive branch employees of the Federal Government from using certain exceptions to accept gifts from registered federal lobbyist and lobbying organizations, including widely attended gatherings ("WAGs").

The Heartland Community Bankers Association (HCBA) is a small regional thrift organization (501c) representing savings and loan associations and savings banks in the Midwest states of Kansas, Colorado, Oklahoma, Nebraska, and Missouri. As a small organization of 32 members the interaction we have with federal regulators... OCC, FDIC, and Fed... is critical to the knowledge of operations and compliance expectations for our members.

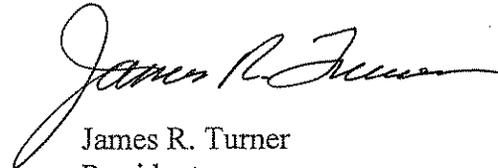
We support ethical standards, however, we are concerned that the proposal will be subject to such narrow interpretation that regulators will be precluded from knowledge sharing with our members.

HCBA is not a federally registered organization but we do, as previously mentioned, utilize federal regulators on the program of our annual meeting, compliance exchange groups, and educational forum for institution directors. The presence of the federal regulators is critical even though we have **never** provided gifts, rooms, or registrations to these individuals. Our fear is that "possible" exclusions for federal lobbyist will result in government employees avoiding all gatherings of trade associations. This would have a crippling effect upon the concept of knowledge sharing.

HCBA would urge OGE to revise its proposed exception for gifts to allow federal employees to attend substantive educational programs and events held by trade associations, for the same reasons that this exception has been extended to the other types of organizations listed in the proposed rule

Thank you for your consideration.

Sincerely,



James R. Turner
President

JRT/da

cc: Kansas Congressional Delegation
cc: Colorado Congressional Delegation