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Public Comments on Standards of Ethical Conduct for Employees of the Executive Branch: Limiting Gifts from Registered Lobbyists and Lobbying Organizations:=====

Title: Standards of Ethical Conduct for Employees of the Executive Branch: Limiting Gifts from Registered Lobbyists and Lobbying Organizations

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Office of Government Ethics

Suite 500, 1201 New York Avenue, NW.

Washington, DC 20005-3917

Attention: Richard M. Thomas, Associate General Counsel

To Whom It May Concern:

I am writing regarding the proposed changes to 5 CFR Part 2635: the Standards of Ethical Conduct for Employees of the Executive; Proposed Amendments Limiting Gifts From Registered Lobbyists and Lobbying Organizations.

This prohibits gifts given to persons of official positions for private gain, but with exceptions, which are found in subpart B in 5 CFR 2635.204 and limitations of the exceptions are found in 5 CFR 2635.202 (c). In 2009, President Obama imposed the Executive Order 13490, in which full time political employees signed a Pledge on "Lobbyist Gift Ban," being subject to more limitations on existing gift regulations due to scandals.

The exception to the rule is under section 2635.204(g)(2), where attendance to certain events, such as training opportunities, fundraisers, and gala celebrations. It is 2635.202 (c)(6) that would exclude this section if the gift is offered by a registered lobbyist or lobbying organization.

"The Pledge permits full-time political appointees to accept the following: Gifts based on a personal relationship, under section 2635.204(b); discounts

and similar benefits, under section 2635.204(c)..."

The Office of Governmental Ethics should critically analyze the exceptions mentioned above. These appear as loopholes to the rule proposed. Without close inspection, gifts passed on by means of personal relationship could still be construed as suspicious, depending on the definition of a personal relationship. I support the rule proposed limiting and checking gifts accepted by politicians. Extravagant gifts could lead anyone to forget their ethical pledge and duty. Therefore, consequences to unethical behavior should be well defined and concrete.

With regards of upright virtue,

Student