

Deadline for Comments on OGE Proposed Ban on Lobbyist Gifts Extended to December 14

November 2011

Comments from individuals and entities to the Office of Government Ethics' (OGE) proposed rule to restrict gifts from registered lobbyists and their employing organizations to *all* executive branch employees must be submitted to OGE by December 14, 2011. As discussed in the September edition of *Election Law News*, the proposed rule goes beyond the current executive branch ban on gifts from interested persons and on gifts given because of an individual's official position in that the proposed rule would eliminate a number of widely used exceptions where the gift donor is also a lobbyist or lobbyist employer.

The exceptions that would be eliminated include those that currently, and routinely, permit acceptance of: *de minimis* value gifts of \$20 or less (with an annual limit from one source of \$50); attendance at widely attended gatherings; meals and entertainment to U.S. Government personnel in foreign countries, including in connection with business and trade promotional activities; and social invitations. By eliminating these exceptions, the proposed rule will adversely affect the operation and competitiveness of corporations and trade associations that employ in-house lobbyists because all employees of such entities will be subject to the ban.

Wiley Rein can assist in drafting comments on the proposed rule and in submitting the comments to OGE in a timely manner.

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