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From: Kirby Vining

Sent: Monday, September 16, 2013 12:52 PM

To: BEGA General Mailbox

Subject: Public Comment: Prohibit lobbyists from serving on DC boards and commissions.

I feel very strongly that lobbyists should be prohibited from serving on all DC boards and commissions because of the PROBABILITY of a conflict of interest arising. A person paid as an advocate for a topic cannot be expected to take a neutral stance on that topic, and probably on related issues, and cannot be expected to be open to challenges to a topic the lobbyist is paid to advocate.

I feel as strongly that lobbyists should be prohibited for serving on any DC board or commission for a period of time after separation from that lobbying interest.

The federal government guidelines which govern my own activity cite five years from separation is required for any lobbying activity, and I think that that is a reasonable time. A lobbyist is paid to advocate an issue, and in five years (so the federal statute considers) issues will have changed enough that information relevant to the issue is obsolete. Also, five years seems a reasonably and deliberately long enough period to prevent the "revolving door" of consultants and lobbyists serving in a government capacity with hopes of returning to that consultant position.

Enforcement of these provisions, however they are determined, is as essential as the ethical and legal basis for them, and an elected Attorney General would be of immense assistance in enforcement. I can think of a number of current cases of apparent conflict of interest which such a prohibition, and enforcement of such a prohibition, would have prevented.

Thank you.

Kirby Vining