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Allen Brooks
Acting Deputy Associate Director
U.S. Office of Personnel Management
Accountability and Workforce Relations
U.S. Office of Personnel Management

RE: Amendments to Regulations in Title 5, Code of Federal Regulations
Proposed Rule: 5 CFR Parts 210, 212, 213, 302, 432, 451 and 752
Docket Number: OPM-2025-0004
RIN 3206-AO80

Dear Director Brooks,

Please accept this letter as my comment on the proposed rule identified above. The proposed rule has nothing to do with increasing career employee accountability. There has been no evidence provided that there is a problem with accountability. Presumably, accountability means misconduct, employees who perform poorly or who undermine democratic processes by intentionally subverting Presidential directives. As noted above, no evidence of the targeted employees engaging in misconduct or performing poorly has been provided. As for undermining democratic processes by subverting Presidential directives, it is clear by the number of Presidential directives that have been enjoined by the federal courts, and will soon be determined to be illegal by the courts, that it's the Presidential directives that undermine the democratic process. It is time to call the Presidential directives what they are – a deliberate attempt to harm federal employees' rights and benefits and to cripple union representation.

Sincerely,

Neil C. Bonney

