



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

Office Of The General Counsel

18 February 2016

MEMORANDUM FOR ALL PUBLIC FINANCIAL DISCLOSURE REPORT FILERS

FROM: SAF/GCA

SUBJECT: OGE 278e Public Financial Disclosure Reports

The U.S. Office of Government Ethics (OGE) 278e Public Financial Disclosure Report filing season is underway. If you have filled out your report in the Financial Disclosure Management system (FDM), thank you for submitting your report early.

If you have not filed your report, this is a reminder that the deadline for submitting the report is Monday, May 16, 2016. Pursuant to a memorandum from the Deputy Secretary of Defense, all DoD filers must use the Financial Disclosure Management system (FDM) to file their report in 2016. The program is located at <https://www.fdm.army.mil> and may be accessed by CAC login.

As you complete your report for this year, please keep in mind the following:

- Completed forms must be electronically signed by **May 16, 2016**.
- Similar to tax forms, your 2016 OGE 278e covers finances for **calendar year 2015**.
- Brokerage statements may **not** be attached in lieu of making individual entries on the OGE 278e.
- For good cause, (e.g. illness, deployment, etc.) you may be granted up to 45 additional days to complete the form. To avoid a \$200 late filing fee imposed by law, send your request in writing (email is acceptable) to your **local ethics counsel BEFORE May 16, 2016**.

To assist you in filling out your report, I have attached a list of the information that filers most often fail to provide on the OGE 278e. If you omit this information, you will be required to amend the report to add the information before the ethics counselor can certify that you are in compliance with both the financial disclosure law and regulation and the conflict of interest laws.

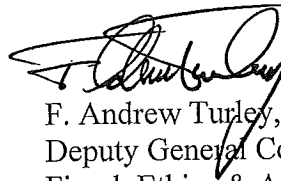
As you e-sign your report in FDM, please be sure to indicate you wish for it to be transmitted to your supervisor for their review, as well as to your ethics counselor. To ensure that your supervisor is aware that your report is available for review, send a follow-up e-mail to your supervisor to let him or her know that you have completed your report. Supervisor signature on OGE 278e reports (other than the Termination report) is required by the Joint Ethics Regulation, DoD 5500.7-R, Section 7-206.

Once your supervisor signs and transmits your report to your ethics counsel, the ethics counselor will review it for completeness and to identify any entities in which you have a financial interest that do business with the Department of Defense. While it is not illegal to own stock in, or have a spouse who may work for a defense contractor, these interests are the most likely to cause an actual or apparent conflict of interest with official duties. You will be advised

in writing of any actual or potential conflicts of interests that are identified, and we will work with you on the best approach to resolve any conflicts.

The OGE 278e process reinforces the Air Force core value "*Integrity First.*" As senior leaders, our decisions, recommendations, and advice impact those both inside and outside of the Air Force. We are prohibited by law from taking any official action that could have a direct and predictable effect on our own financial interests, as well as those of our spouse and dependent children. The OGE 278e is a visible demonstration of our commitment to the highest ethical standards and provides public reassurance that our official actions are not influenced in any way by personal interests or affiliations.

Designated ethics counselors at your local legal office are available to assist you with any questions you may have regarding how to comply with this important ethics requirement. We encourage you to contact them for assistance. Completing and filing your OGE 278e demonstrates your commitment to "*Integrity First.*" Your timely participation and compliance with this requirement is greatly appreciated.



F. Andrew Turley, SES
Deputy General Counsel
Fiscal, Ethics & Administrative Law

Attachments:

List of Information Commonly Omitted from the
OGE 278e

Commonly Omitted Information
OGE Form 278e, Public Financial Disclosure Report

The following is a list of the financial interests that must be reported on the OGE Form 278e but that are often omitted from the first draft of a filer's report.

Assets and Income

- Each underlying holding (stocks, mutual funds, municipal bonds, government bonds, etc.) in the following investment vehicles held by you, your spouse, your dependent child:
 - Individual retirement account (IRA)
 - 401(k) account with a current or former employer
 - 403(b) account with current or former employer
 - Defined benefit plan with an entity other than the Federal Government
 - Brokerage account
 - Managed account (e.g., First Command accounts)
 - Asset management account
 - Any other investment account
 - Variable annuity
 - Variable life insurance
 - TIAA-CREF account
 - 529 or college savings plan – it is sufficient to report name of specific portfolio you/your spouse chose for plan and name of state/financial institution offering plan
 - Trust created by you, your spouse, or your dependent child
 - Irrevocable trust if you, your spouse, or your dependent child is beneficiary
- Spouse's employer (add description of line of business if not publicly traded company)
- Spouse's business (sole proprietorship, S Corp, etc.) and brief description of line of business
- Capital gains from sale of real estate
- Rental income from real estate
 - Sold the rental property during the reporting period?
 - Report rental income received prior to sale of the property.
 - Because you no longer own the property, select "none" as the value of the property.
- Capital gains from sale of stocks or mutual funds (include dividends, if any, paid before the sale)
- Brief description of line of business for stock that is not publicly traded
- Undeveloped land, even if not income-producing
- Royalties, advances for books and other published materials

Liabilities

- PAS and GOs only – mortgage on home (including primary residence, vacation home, second family home)

Agreements

- Your continued participation in retirement plan(s), other benefit plans with a former, non-Federal employer
- Reservists/Guard – continued employment with current civilian employer and continuing participation in retirement plan(s) and other benefit plans with current employer, if not the Federal Government

Positions (all of your non-Federal Government positions, both paid and unpaid)

- Trustee of any trust, including your own living trust
- Member of board of directors of non-profit organization
- Position with a professional organization
- Managing member of limited liability corporation (e.g., family LLC)
- Reservists/Guard – position (as employee or other) with current civilian employer, if not the Federal Government