



**UNITED STATES MARINE CORPS**  
MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION  
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MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION-MARINE CORPS BASE QUANTICO  
BULLETIN 5500

From: Commander, Marine Corps Installations National Capital Region-Marine  
Corps Base Quantico  
To: Distribution List

Subj: CALENDAR YEAR 2015 CONFIDENTIAL FINANCIAL DISCLOSURE REPORT (OGE 450)  
SUBMISSION AND ANNUAL ETHICS TRAINING COMPLETION

Ref: (a) 5 C.F.R. §§ 2634.901 to 909  
(b) DoD 5500.07-R, Joint Ethics Regulation  
(c) 5 C.F.R. § 2638.705  
(d) 18 U.S.C. § 208  
(e) 5 C.F.R. § 2635.502

Encl: (1) Office of Government Ethics Worksheet, "Determining  
Which Positions should File a Confidential Financial  
Disclosure Report," August 2009  
(2) Tips for Filling-Out the CY 2015 OGE Form 450  
(3) Sample OGE 450 Filer's Report Filing and Annual  
Ethics Training Completion Tracking Spreadsheet

1. Situation. This Bulletin establishes procedures and guidelines for submission of the Calendar Year 2015 (CY15) Confidential Financial Disclosure Report (OGE Form 450) and completion of the 2015 annual ethics training requirements for Marine Corps activities who receive Standards of Conduct/Government Ethics support from the Quantico Area Counsel Office (QACO). The financial disclosure system preserves the public's trust in the integrity of Government employees and Marines by identifying and preventing potential criminal conflicts of interest or the appearance of a lack of impartiality in the performance of official duties. The financial disclosure reporting process focuses on individuals in key positions with duties or responsibilities that have a direct and substantial effect on the financial interests of non-Federal entities. The OGE Form 450 is the standardized report used by required filers in the Executive Branch of the Federal Government.

2. Mission. As required by references (a) and (b), certain military and civilian personnel must file an OGE Form 450 covering CY15 and receive required annual ethics training.

3. Execution

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. QACO will provide ethics counselor review and certification of OGE Form 450 reports for Marine Corps Combat Development Command and its subordinate organizations, to include Capabilities Development Directorate, Operations Analysis Division, Futures Division, Marine Corps

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Warfighting Laboratory, and Training and Education Command. QACO will also support Marine Corps Base, Quantico, Marine Corps Intelligence Activity, Marine Corps Information Operation Center, Marine Corps Non-Appropriated Fund Audit Service, Marine Corps Air Facility, Marine Corps Network Operations and Security Command, Marine Corps Operational Test and Evaluation Activity, and Joint Non-Lethal Weapons Directorate. QACO will provide live annual ethics training sessions in December 2015 for all New Entrant OGE Form 450 filers, and all annual filers who require live training in 2015. **All annual OGE 450 filers must receive live training once every three years;** this means that filers who did not receive live ethics training in 2014 and 2013 must attend a live ethics training session in December 2015. For filers eligible to take web-based annual ethics training, the Department of the Navy 2015 Annual Ethics Training is available online on the Total Workforce Management Services (TWMS) webpage. To access the training brief, after logging on to TWMS, click on the "Online Training & Notices" tab, in the "Tools/Action" section of the webpage.

(2) Concept of Operations. QACO is available to provide annual ethics training to all OGE 450 report filers from supported commands, even if they file their OGE Form 450 with another Counsel or Ethics Office. Supported commands may also request/schedule from QACO live annual ethics training sessions within their command spaces. QACO is also available to answer questions from report filers about preparing and filing their OGE Form 450 reports, and from supervisors with questions about the review of submitted OGE Form 450 reports. Additional resources for OGE Form 450 report filers are available at the Office of Government Ethics website:  
<http://www.oge.gov/Financial-Disclosure/Confidential-Financial-Disclosure-450/OGE-Form-450-FAQs/OGE-Form-450-FAQs/>.

b. Subordinate Element Missions

(1) Unit Commanders and Division Directors will appoint an Action Officer (AO) for this project and forward the name and contact information of their AO to their division supervisors and to the QACO Point of Contact (POC), Mr. Eric Rodriguez, via e-mail at: [eric.rodriguez@usmc.mil](mailto:eric.rodriguez@usmc.mil), and by phone at: (703) 784-3009, by no later than Monday, 5 December 2015.

(2) Supervisors of all OGE Form 450 filers will:

(a) Notify all identified subordinate employees (see paragraph 1(a), enclosure (1) "Who must file", of their requirement to file the Confidential Financial Disclosure Report;

(b) Forward a list of all identified OGE Form 450 filers to their AO;

(c) Encourage employees to promptly submit their OGE Form 450 so that supervisors will have time to review the reports and request clarification if necessary. OGE Form 450 reports cover CY15, **and may not be submitted or dated before 31 December 2015**. OGE Form 450 reports must be signed by filer **no later than 16 February 2016**;

(d) Collect and review their subordinates' OGE Form 450 reports to determine that each report section is completed and that there are no actual or apparent conflicts of interest between the filer's official duties and the filers reported financial interests; financial interests of the filer's spouse and/or dependent children, and the filer's reported outside employment/activities; and

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(e) Upon completion of the conflicts of interest review, sign and date the OGE Form 450 reports and forward to their AO.

(f) Investigate the circumstances surrounding any required OGE Form 450 subordinate employee's failure to file a complete report by 16 February 2016. In accordance with the references, employees who fail to submit their OGE Form 450 report on time, or who deliberately provide or omit required information, may be subject to administrative or disciplinary measures. For any filers that fail to file their report within the filing deadline, report to the QACO POC (Mr. Rodriguez) any administrative or disciplinary measures taken in response. Note that report filers may request from their supervisors an extension of time to complete the report, if they request the extension before the filing deadline. A QACO Ethics Counselor (EC) may grant a filing extension to a filer for up to 45 days for the first extension; and upon good cause shown, a grant up to another 45 days for a second filing extension, for a total extension of up to 90 days.

(3) AO will:

(a) Act as the liaison between the supported command/activity and the QACO POC;

(b) Prepare a Microsoft Excel spreadsheet listing their OGE 450 Filers and include all information provided in the sample report tracking spreadsheet (enclosure 3);

(c) Record annual ethics training completion of their OGE Form 450 report filers, using the information provided in enclosure (3), to include date of training completion and method of training (live or via internet/TWMS);

(d) Review completed OGE Form 450 reports to ensure: (1) filers have completed each section of the report; (2) the report contains the necessary signatures (filer and reviewing supervisor); reports **are not** dated before 31 December 2015; and

(e) Submit all of their filer's OGE Form 450 reports as well as the report filing and annual ethics training completion spreadsheets to the QACO POC, Mr. Eric Rodriguez, by either in-person delivery to Lejeune Hall, Suite 216, 3250 Catlin Ave., Quantico, VA, or e-mail at (eric.rodriguez@usmc.mil), or fax at: (703) 784-5128, beginning on Monday, 4 January 2016, and no later than Wednesday, 17 February 2016.

(4) QACO will:

(a) Provide in person 2015 Annual Ethics Training Briefs;

(b) Receive OGE Form 450 reports and conduct the Ethics Counsel review and final certification of the report. If additional information is required from the report filer, QACO will directly contact the filer;

(c) Review, and if warranted, grant requests from report filers for a filing deadline extension; and

(d) Compile and update OGE Form 450 report tracking spreadsheets received from AOs and record final certification of reports.

4. Administration and Logistics

a. Enclosure (1) provides guidance concerning who must file an OGE Form 450. Please keep in mind that the Marine/employee's immediate supervisor has primary responsibility for determining whether the duties of the position require filing this report.

b. All filers must complete annual ethics training either on-line via TWMS or attend ethics training given by the QACO no later than Thursday, 31 December 2015.

c. All filers must use the current edition of the OGE 450 Form located at: [http://www.dod.mil/dodgc/defense\\_ethics/](http://www.dod.mil/dodgc/defense_ethics/). Click on the "Ethics Resource Library" tab, then click on "Forms," and then scroll down to the link for "OGE Form 450 (Jun 2015 edition)." Reports submitted on an outdated version of the form will not be accepted. Filers should review enclosure (2) (listing of common errors in preparation of the OGE Form 450) before completing their financial disclosure reports.

d. Live Annual Ethics Training. QACO will conduct live, in-person annual ethics training on Thursday, 10 December and Tuesday, 15 December, at the Grey Research Center. Two sessions will be offered each day; the first from 1000 to 1100, and the second from 1300 to 1400. Additionally, AO's are encouraged to contact the QACO POC, Mr. Eric Rodriguez, to schedule in-person annual ethics training for their OGE 450 filers at their command spaces.

e. The OGE Form 450 report covers the period from 1 January 2015 through 31 December 2015.

**Note: Although this version of the form is capable of accepting digital signatures, the Department of Defense has not authorized any activities to accept forms with digital signatures. For the 2014 filing season, each filer must place an actual signature on the form and submit a paper copy of the form to QACO.**

f. Once an OGE Form 450 is filed with the QACO, it is safeguarded to protect the filer's privacy. This report is protected under the Privacy Act, and is not subject to release to the public under the Freedom of Information Act. The report may only be used for the purposes stated in the instructions on the form.

5. Command and Signal

a. Command. This Bulletin does not apply to the following tenant activities: FBI Academy, Fourth Light Armored Reconnaissance Battalion, Marine Corps Recruiting Command, Manpower and Reserve Affairs, Wounded Warrior Regiment, Marine Corps Systems Command, Marine Corps Tactical System Support Activity East, Marine Helicopter Squadron One, Marine Corps Embassy Security Group, National Geospatial-Intelligence Agency, and the Naval Criminal Investigative Service. These activities should coordinate with their Counsel or Ethics Office for instructions on how to comply with financial disclosure reporting requirements and completing their ethics training.

b. Signal. This Bulletin is effective the date signed.

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A handwritten signature in black ink, appearing to read "X All D Broughton", is positioned above a horizontal line.

ALLEN D. BROUGHTON

Chief of Staff

Signed by: BROUGHTON.ALLEN.DALE.1168122922

DISTRIBUTION: A



**CONFIDENTIAL  
FINANCIAL  
DISCLOSURE**

# **OGE JOB AID**

## **A TOOL FOR ETHICS OFFICIALS**

This job aid is designed to assist you in determining whether a career employee should file a Confidential Financial Disclosure Report (OGE Form 450). Some special Government employees and Schedule C employees may also be required to file an OGE Form 450.

**AUGUST 2009**

## Determining Which Positions Should File A Confidential Financial Disclosure Report: A Worksheet

This job aid is designed to assist ethics officials in determining whether a career employee should file a Confidential Financial Disclosure Report (OGE Form 450). Some Special Government Employees and Schedule C employees may also be required to file confidential financial disclosure reports. If you have questions about the criteria listed below, contact your agency's Ethics Office.

<b>I. Pay</b>		
<p>1. <input type="checkbox"/> Is the employee's position classified at or below the GS-15 level?</p> <p style="text-align: center;"><b>OR</b></p> <p><input type="checkbox"/> If the employee is not paid on the GS scale, is the employee's rate of basic pay less than 120% of the minimum rate of basic pay for the GS-15 level?</p> <p>For 2009, this means that the employee's <b>rate of basic pay is less than \$117,787.20</b>. Basic pay does not include locality payments, bonuses, etc. For reemployed annuitants, the rate of basic pay is the employee's basic pay before any salary offset is applied.</p>	<p><input type="checkbox"/> <b>Yes</b></p> <p>Go to question 2.</p>	<p><input type="checkbox"/> <b>No</b></p> <div style="text-align: center;">  </div> <p>Your agency's Ethics Office will determine if this employee must file a public financial disclosure form.</p>
<b>II. Type of Work Done By the Employee</b>		
<p>2. Does the employee's work involve at least one of the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> contracting or procurements above \$2,500;</li> </ul> <p style="padding-left: 20px;">Example: A GS-7 Office Automation Clerk is issued a purchase card to buy office supplies for her work unit as needed. Such an employee is generally excluded from filing.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> administering, awarding, monitoring, or making determinations regarding grants, subsidies, licenses, or other federal benefits;</li> <li><input type="checkbox"/> regulating, auditing, or inspecting non-federal entities*;</li> <li><input type="checkbox"/> performing other activities, when those activities will have a direct and substantial effect on the financial interests of non-federal entities.</li> </ul> <p>*<i>Non-federal entities</i> include, for example, businesses, non-profit organizations, and state and local governments.</p>	<p><input type="checkbox"/> <b>Yes</b></p> <p>Go to question 4.</p>	<p><input type="checkbox"/> <b>No</b></p> <p>Go to question 3.</p>
<p>3. Is the employee serving in any other position where there is a potential for conflict of interest, appearance of favoritism or loss of impartiality?</p> <p>Examples include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> investigating or prosecuting violations of criminal or civil law;</li> <li><input type="checkbox"/> representing the United States in litigation or other proceedings;</li> <li><input type="checkbox"/> scientific or social science research, when the research will have a direct and substantial effect on the financial interests of non-federal entities.</li> </ul>	<p><input type="checkbox"/> <b>Yes</b></p> <p>Go to question 4.</p>	<p><input type="checkbox"/> <b>No</b></p> <div style="text-align: center;">  </div> <p>If you said "no" to questions 2 <u>and</u> 3, the employee does not need to file.</p>

<p>4. Does the employee:</p> <p><input type="checkbox"/> only provide information?</p> <p>Example: A GS-13 librarian for the Patent and Trademark Office (PTO) shows PTO staff members how to research the uniqueness of an invention and design complex search queries of the agency's electronic databases. The librarian does not make decisions on the patentability of the invention.</p> <p><b>OR</b></p> <p><input type="checkbox"/> only work on administrative or peripheral matters?</p> <p>Example: A draftsman prepares the drawings to be used by an agency in soliciting bids for construction work on a bridge. He is not involved in the contracting process associated with the construction.</p> <p>Example: An agency has just hired a GS-5 Procurement Assistant who is responsible for typing and processing procurement documents, answering status inquiries from the public, performing office support duties such as filing and copying, and maintaining an online contract database. The Assistant has no actual contracting or procurement responsibilities.</p>	<p><input type="checkbox"/> <b>Yes</b></p> <p></p> <p>The employee does not need to file a confidential financial disclosure report.</p>	<p><input type="checkbox"/> <b>No</b></p> <p>Go to question 5.</p>
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### III. Employee's Level of Responsibility

<p>5. Does the employee:</p> <p><input type="checkbox"/> engage in the work activity identified in Section II by exercising significant judgment in performing any of the following job functions?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> making decisions;</li> <li><input type="checkbox"/> approving or disapproving;</li> <li><input type="checkbox"/> making recommendations;</li> <li><input type="checkbox"/> conducting investigations;</li> <li><input type="checkbox"/> rendering advice or opinions.</li> </ul> <p><b>OR</b></p> <p><input type="checkbox"/> actively supervise a subordinate's performance of any of the above-listed job functions?</p>	<p><input type="checkbox"/> <b>Yes</b></p> <p>Go to question 6.</p>	<p><input type="checkbox"/> <b>No</b></p> <p></p> <p>The employee does not need to file a confidential financial disclosure report.</p>
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<p>6. Does the employee receive substantial supervisory review?</p> <p>Example: A GS-13 employee at an independent grant making agency conducts the initial agency review of grant applications from nonprofit organizations and advises the Deputy Assistant Chairman for Grants and Awards about the merits of each application. Although the process of reviewing the grant applications entails significant judgment, the employee's analysis and recommendations are reviewed by the Deputy Assistant Chairman, and the Assistant Chairman, before the Chairman decides what grants to award.</p>	<p><input type="checkbox"/> <b>Yes</b></p> <p></p> <p>The employee does not need to file a confidential financial disclosure report.</p>	<p><input type="checkbox"/> <b>No</b></p> <p></p> <p>The employee should file a confidential financial disclosure report.</p>
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## **Tips for Filling out your Calendar Year 2014 OGE Form 450, Confidential Financial Disclosure Report**

The following is a list of tips to help avoid common mistakes in filling out Form 450s. The form is due by February 17th.

The form itself contains instructions and examples. Additional tips can be found at:

<http://www.oge.gov/Financial-Disclosure/Confidential-Financial-Disclosure-450/OGE-Form-450-FAQs/OGE-Form-450-FAQs/>

If you have questions at any time, please consult an ethics official at your Command, or at the Quantico Area Counsel Office (QACO), at (703) 784-3009.

Questions in middle of First Page: There are questions on the first page. Read the instructions carefully. Ensure you fill in all of the background information, including your name, phone number, and e-mail address. Check "no" if you have nothing to list in a particular Part (there are five (5) parts to the report).

### **PART I: ASSETS AND INCOME**

In General: On Part I, you are filling out information for yourself, your spouse and dependent children. (You may distinguish any entry for a family member by preceding it with (S) for spouse, (DC) for Dependent Child, (J) for jointly held.

Ex: (S) Lockheed Martin The threshold for filling out PART I is if the asset:

- has a value greater than \$1,000 at the end of the reporting period OR
- the asset produced more than \$200 in income during the reporting period

Mutual Funds - **Do not list Diversified Mutual Funds.**

Ex: Vanguard Total Stock Market Fund.

List only Sector Funds. A Sector Fund is a mutual fund that concentrates its investments in an industry, business, single country other than the United States, or bonds of a single state within the United States.

Ex: Vanguard Health Care Fund (List on form because all of the investments concentrate in a sector -- i.e., healthcare.); Fidelity Select Defense & Aerospace

Employment - Do not list "Marine Corps" if you are a civil servant. (You do not need to list Federal government employment.) List your spouse's employer (if you spouse made over \$1,000). List any part-time jobs you hold outside of the Marine Corps (Ex: Northern Virginia Community College Adjunct Professor)

Note that you will also have to list outside positions again in Part III.

Retirement Accounts - Do not list your Thrift Savings Plan. (Federal Government retirement benefits do not have to be listed.) If your retirement account contains only diversified mutual funds, you do not

need to list the account at all. If you have a Defined Benefit Pension Plan, you must identify the plan but do not need to list any of its contents. State if the Plan holds any stock with the company. (This is the older type of plan before 401k's where the former employer guarantees payments in a certain amount to the employee when he or she retires.

Ex: Incorrect: The Boeing Company

Correct: Boeing Defined Benefit Pension Plan - (contains no stock) If you have a Defined Contribution Retirement Plan which allows you to pick the investments (such as an IRA, 401K, 403B), you MUST LIST:

(1) the full name of the retirement account

Ex: Incorrect: "IRA"

Correct: "Bank of America IRA"

(2) all of the holdings (other than diversified mutual funds).

Ex: Bank of America IRA

- Microsoft

- Boeing (etc.) TIAA-CREF - Identify who holds the account and list the funds.

Ex: Incorrect: (S) TIAA-CREF Account

Correct: (S) TIAA-CREF Account (University of Maryland, College Park)

- TIAA Traditional Annuity

- CREF Real Estate Annuities Fund

Annuities- Give full name of annuity and state whether fixed or variable. If variable, list the holdings.

Life Insurance- Give full name of company and type (whole, universal, or variable). If variable, list the holdings. You do not need to list term life insurance accounts

Brokerage or other Investment Accounts- You must list the holdings in these accounts. This includes 529 education plans.

Trusts - You must list the holdings of a trust in which you have a vested beneficial interest, even if it is uncertain when your right to possession will begin.

Private Limited Partnerships (LP) - You must list or provide a printout of all the holdings in the private LP.

## PART II: LIABILITIES

The threshold for listing a liability is: over \$10,000 owed at any time during the reporting period, other than a loan from a financial institution or business entity granted on terms made available to the general public a loan over \$10,000 from an individual, such as a friend or business associate.

Do not list: Your mortgage, student loan or credit card (if from a financial institution or business entity granted on terms made available to the general public) Loans secured by automobiles, household furniture, or appliances (unless the loan exceeds the purchase price of the item it secures.) Personal loans you owe to family members (such as spouse, parent, sibling, or child of you, your spouse, or your dependent child).

**PART III: OUTSIDE POSITIONS** Only list your own (and not anyone else's) outside positions. (These are personal positions you hold outside your official position with the Marine Corps. Do not list any position you hold as part of your official Marine Corps duties.) You must list positions with business entities, non-profit or volunteer organizations, and educational institutions (whether or not you are paid) if you hold one of the following positions:

- employee
- consultant
- officer
- director
- trustee
- general partner
- proprietor
- representative
- executor

Do not list positions with religious, social, fraternal, or political entities. If you list any outside positions, you should contact your local Staff Judge Advocate office if you do not have a current approved outside activity request.

**PART IV: AGREEMENTS OR ARRANGEMENTS:** If you (this section is not for your spouse's information) have a retirement plan through a former employer, then you must report the plan in Part IV because it is an agreement or arrangement with your former employer.

Ex: Column 1: Column 2:

The Boeing Company. Will receive pension benefits

(Orlando, Florida) (defined benefit plan) List severance payments here if your former employer is continuing payments. List any agreements or arrangements for future employment, including the date you accepted the employment offer.

Ex: Column 1: Column 2:

Hartford & Brown Employment agreement with Hartford & Brown.

(San Diego, CA) Starting work as an attorney in July 2009.

Entered into agreement in October 2008.

**PART V: GIFTS AND TRAVEL REIMBURSEMENTS** This section only applies to you (and not your spouse or children.) Do not list anything you received:

- gifts of travel in connection to official Marine Corps travel (such as if an entity paid for your expenses to travel to a meeting to participate or be a speaker on behalf of the Marine Corps)
- from relatives
- as bequests or inheritance
- as gifts of hospitality at the donor's residence or personal premises
- by your spouse or dependent children independent of you.

**SIGNATURE:** Before signing, you must review the PDF of the form to ensure it is complete and accurate.

**QACO CALENDAR YEAR 2014 CONFIDENTIAL FINANCIAL DISCLOSURE REPORTS AND ANNUAL ETHICS TRAINING**

Filer Name (Last, First, MI)	Filer e-mail	Filer Supervisor	Supervisor e-mail	Filer Status (Annual/New Entrant)	If New Entrant - Date entered into position/Date notified to file	Date Filer Signed Report	Date of Supervisor Review	Date received by QACO	EC Certification Date	Annual Ethics Training Completion Date	Method of Annual Ethics Training (Live/Internet)	Notes
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