

MEMORANDUM

To: File No 3.1.6  
From: Dennis J. Quinn, Designated Agency Ethics Officer  
Date: June 14, 1995

Subj: Extension of SF-278 Filing Deadline for David Marwell and Tom Samoluk

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I spoke today to Cheryl Kane-Piasecki, our Desk Officer at the Office of Government Ethics (OGE). I told Cheryl that there was some confusion here regarding the deadline for filing Annual/Incumbent Financial Disclosure Reports. Members of the staff were under the impression that they were required to file annual reports on the anniversary date of their appointments. Cheryl confirmed for me that this was incorrect, and that those individuals who worked more than 60 days during 1994 needed to file their annual report on or before May 15, 1995.

I asked Cheryl for her opinion about whether the New Entrant Reports filed by the Senior Staff in January of this year could also count as Annual/Incumbent Reports, since the both reports would cover calendar year 1994. She said that would only apply to anyone who worked less than 60 days last year. Otherwise, combining reports is only allowed for annual and termination reports.

Cheryl also advised me that those individuals who were required to file by May 15 were not yet late, since there is a 30-day grace period. She also advised me that as the DAEO I was authorized to grant a 45-day extension if the individual so requested. We agreed that any such letter from me should be in writing.