January 17, 1995

Cheryl Kane-Piasecki
Office of Government Ethics
Suite 500
1201 New York Avenue, NW
Washington, D.C. 20005-3917

RE: AARB Staff Filing of Public and Confidential Financial Disclosure Statements

Dear Cheryl,

This is to inform you that, in my capacity as Designated Agency Ethics Officer, I have received completed financial disclosure statements from all Board staff who are required to file such forms.

The following persons have filed public financial disclosures, based on the legal standards set out in the applicable statutory provisions and relevant regulations: David Marwell, Executive Director, Sheryl Walter, General Counsel, Jeremy Gunn, Head of Research, and Thomas Samoluk, Public Affairs Officer. The Board's Administrator, Tracy Shycoff, has filed a Confidential Disclosure Form. As the agency's ethics officer, I will promptly review the forms for possible conflicts and direct that a copy be put on file to the extent required by law. I have enclosed the original of my form for your review.

This letter is also to request a waiver of the filing deadline for all of the above persons and a waiver of the late filing fee for good cause. As you know, we are a brand new independent agency that does not operate under the oversight of any existing executive branch entity. Not until mid-December of 1994 did we receive any formal ethics advice, at which time we learned of our responsibilities to file financial disclosures in a timely fashion. In particular, Mr. Marwell, the Board's executive director, was never informed by GSA of the financial disclosure filing deadlines although he was appointed some months ago. Upon learning of the need to file timely disclosures, we have made this a priority and have now fulfilled our filing requirement. As ethics officer, I shall ensure that all future filings will be made within the legal time limits.

We greatly appreciate your consideration of our request for a waiver. If you have any questions or need additional information, please don't hesitate to give me a call. Thanks too for all of your assistance as we gear up -- it's been a great help and we really appreciate it.

Sincerely,

General Counsel