



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, UNITED STATES ARMY CADET COMMAND AND FORT KNOX  
1ST CAVALRY REGIMENT ROAD  
FORT KNOX, KENTUCKY 40121-5123

ATCC-SJA

OCT 19 2016

**MEMORANDUM FOR**

Commanders, All Units Reporting Directly to this Headquarters  
Professors of Military Science, USACC  
Deputy Chiefs of General Staff and Chiefs of Special Staff Offices, HQ USACC

**SUBJECT: Policy Letter 12 - Filing of Confidential Financial Disclosure Reports  
(OGE Form 450)**

1. Reference. DOD 5500.07-R, "Joint Ethics Regulation" (JER), ¶ 7-300, Confidential Financial Disclosure Report (OGE Form 450), Individuals Required to File.
2. Upon assumption of their duties, Soldiers and Civilians assigned to the U.S. Army Cadet Command must perform their duties according to the highest levels of ethics, especially those individuals in leadership, financial, or contract oversight positions.
3. Throughout their military or civilian careers, all Government employees must understand and discuss their ethical obligations with their immediate supervisor. Further, key Government employees must further their understanding of Government ethics rules by contacting their assigned ethics counselor. These ethics reviews are especially important for employees assigned to covered positions required to file an OGE Form 450. The OGE Form 450 helps to memorialize the required discussions between an employee and supervisor, as well as discussions between an employee and their ethics counselor.
4. With the importance of appropriate discussion and full disclosure in mind, I hereby direct that the following personnel file a New Entrant OGE Form 450 not later than 30 days after assuming their assigned position, and thereafter will file an Annual OGE Form 450 beginning 1 January and not later than 15 February each year:
  - a. Deputy Commanding Officer, USACC & FKKY
  - b. Brigade Commanders, USACC
  - c. Chief of Staff, USACC
  - d. Deputy Chief of Staffs, USACC
  - e. Deputy Chiefs of General Staff (G-1 thru G-9 & JROTC), USACC

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- f. Inspector General, USACC & FKKY
- g. Staff Judge Advocate, USACC & FKKY
- h. Professors of Military Science, USACC

All new PMSs will file a New Entrant OGE Form 450 in September upon assuming their new duties. All PMSs will file an Annual OGE Form 450 beginning 1 January and not later than 15 February. Incoming PMSs with an arrival date after 1 October must file a new entrant report not later than 30 days after assuming their assigned position.

5. The preceding paragraph does not provide an exhaustive list of covered positions. In consultation with their ethics counselor, commanders and supervisors must independently determine whether additional individuals under their supervision fill covered positions. For example, officers or employees serving as Contracting Officer's Representatives (CORs) fill covered positions and should file an OGE Form 450. By determining that a specific individual is not required to file an OGE 450, supervisors certify that individual's interaction with nonfederal entities is minimal or subject to substantial supervision and review. Regardless of whether an individual files a Confidential Financial Disclosure Report, he or she remains subject to conflict of interest statutes and regulations. Commanders and supervisors may change their view concerning subordinates' filing status at any time.

6. The Army requires that OGE Form 450 filing occur in the Financial Disclosure Management system, <https://www.fdm.army.mil/>. Specific questions concerning this policy letter and the OGE Form 450 filing should be addressed to the Office of the Staff Judge Advocate at (502) 624-6122.



CHRISTOPHER P. HUGHES  
Major General, USA  
Commanding