

# CHECKLIST FOR ANNUAL SF 278 FILERS

JAR Feb 2004

<b>Make Sure You Use the Current Form</b>	You must use current report: SF 278 (Rev. 03/2000) in upper left hand corner of page 1 <u>and</u> Supervisor's Certification in the comment section on the bottom of page 1. Do not use older versions. Download current form from the following web site: <a href="http://www.defenselink.mil/dodgc/defense_ethics/index.html">http://www.defenselink.mil/dodgc/defense_ethics/index.html</a> (Provided Excel version should be current form.)
<b>PAGE 1</b>	
<b>Date of Appointment</b>	Your DOR as a brigadier general.
<b>Reporting Status</b>	Check Incumbent and enter previous calendar year, e.g., 2001 for the annual report due on 15 May 2002.
<b>Title of Position</b>	Your grade, e.g., Major General. (You file because of your grade, not the billet you hold.)
<b>Department or Agency</b>	United States Marine Corps.
<b>Address:</b>	Your title and duty address, e.g., Commanding General, 2d Marine Division, PSC Box 20003, Camp Lejuene, NC 28542-0003.
<b>Telephone No.</b>	Your office phone.
<b>Title of Position(s) and Dates Held</b>	Previous assignments within past 12 months.
<b>Presidential Nominees Subject to Senate Confirmation</b>	Leave This Section Blank.
<b>Certification</b>	Sign and Date before 15 May 2002.
<b>SCHEDULE A: Assets and Income</b>	
<b>What to Report in Block A</b>	<p>List assets belonging to you, your spouse, or dependent children that <b>either</b>:</p> <p>(1) Have a value of more than \$1,000.00 as of the end of the reporting period. For annual reports, this is 31 Dec of the previous year, e.g., for annual reports due 15 May 2002, the date for valuing assets is 31 Dec 2001; <b><u>or</u></b></p> <p>(2) Generated more than \$200.00 income during the reporting period (1 Jan to 31 Dec of the previous year).</p> <p>Exception: Threshold is \$5,000.00 vice \$1,000.00 for cash accounts (savings, CD's, money market funds) in a single institution. If less than \$5,000.00, do not list regardless of income earned.</p> <p>Put <b>(S) before spouse</b> assets and <b>(C) before children's</b>.</p>
<b>How to Determine Value in</b>	Good faith estimate of fair market value as of 31 Dec of previous year is sufficient. Methods include: Purchase price, recent appraisal, year-end value of mutual funds,

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<b>Block B Block B (Cont.)</b>	corporate stock, market appraisal of property for tax purposes, net worth of business or partnership, equity value of an individually owned business, last sale on stock exchange. Place X in appropriate column for <i>Value</i> .
<b>Block C</b>	Place X in column for <i>Type of Income</i> and an X in column for <i>Income Amount</i> . If no income, X first column under <i>Income Amount</i> and do not X the <i>Income Type</i> , but see EIF under <b>Mutual Funds</b> below.
<b>Bank Accounts</b>	List only if total cash deposits are more than \$5,000.00. Provide Bank Name, City, State, e.g., Navy Federal Credit Union, Merrifield VA, CD, savings, checking. X <i>Value</i> . X <i>Income Type</i> as <b>interest</b> . X <i>Income Amount</i> .
<b>Mutual Funds</b>	List Complete Name of Fund, e.g., Fidelity Magellan, not just Fidelity. X <i>Value</i> . X <i>Income Type</i> : <b>dividends</b> and <b>capital gains</b> or <b>Excepted Investment Fund (EIF)</b> . Most mutual funds are EIFs (widely held or widely diversified holdings and independently managed). You may place X in the <i>EIF</i> column instead of placing Xs in dividend and capital gains columns. X <i>Income Amount</i> .
<b>Stocks &amp; Bonds</b>	List Full Name unless AOL, IBM etc. For example, Midway may refer to 6 different companies, 2 of which are defense contractors. X <i>Value</i> . X <i>Income Type</i> : <b>dividends</b> and <b>capital gains</b> for stocks, <b>interest</b> for bonds. X <i>Capital Gains</i> only if you <b>realized them</b> . If so there should be a corresponding <b>sale</b> transaction entry in Schedule B. X <i>Income Amount</i> .
<b>US Treasury Bill and Savings Bonds</b>	List. X income as interest. You must list <b>unrealized interest income</b> , even though you have not redeemed the securities or U.S. Savings Bonds.
<b>Rental Property</b>	List property and address, e.g., Rental Property, 11 Main St., Frostbite Falls, MN. X <i>Value</i> . X <b>Rent</b> as <i>Income Type</i> . X <i>Income Amount</i> . Do not list <b>your home</b> as an asset on Schedule A unless it is being rented.
<b>Earned Income</b>	Do not list your <b>military pay</b> and allowances as income on Schedule A. Identify the source of any outside earned income you may have and the amount. List source of <b>spouse's</b> earned income but <u>not</u> the amount, but <u>do not</u> list spouse's income if it's from the <b>Federal Government</b> . Example (S) Salary Professor, Whatsamatta U. Do not list any <b>income or benefits from the Federal Government</b> . Do not list income of <b>dependent children</b> .
<b>IRAs &amp; 401Ks</b>	Do not list Federal Retirement assets such as <b>TSP</b> . List spouses IRAs, 401Ks, or other retirement plans. If your IRA is in one investment list as follows: Fidelity Magellan (IRA). If it is in multiple investments (common in <b>Brokerage IRAs</b> ), you must list each investment individually, i.e., each mutual fund, CD, stock on Schedule A, not Paine Webber IRA. For IRAs you must list <b>unrealized income</b> and X <i>Income Amount</i> . Spouse example: (S) Pension with Whatammatta U. X <i>Value</i> , X <i>Income Type</i> .

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<b>Partnerships &amp; Business Interests</b>	List partnerships, e.g., Joes Bar and Grill (Restaurant), Nashville, TN, X <i>Value</i> , X <i>Income Type</i> , or if applicable write <b>Net Distributive Share</b> in the <i>Other Income</i> column. X <i>Income Amount</i> . You must make a corresponding entry on Schedule D, Part I: Positions Held Outside U.S. Government. If <b>spouse is sole proprietor</b> of a business, list as follows: (S) Occoquan Antique Shop (Sole Owner, Antique Shop) Occoquan, VA. X <i>Value</i> , write Gross Income in the <i>Other Income</i> block.
<b>Real Estate Investment Trusts (REITS)</b>	List REITS and fully identify. X fair market <i>Value</i> . X <i>Income Type</i> as Dividends. X <i>Income Amount</i> .
<b>Life Insurance and Annuities</b>	Do not list <b>Term</b> policies. For <b>whole life</b> and <b>cash value policies</b> , list name of insurance company and type of insurance, e.g., USAA Universal Life or Hartford Whole Life). X cash <i>Value</i> . X <i>Income Type</i> (Dividends and capital gains (if applicable)). X <i>Income Amount</i> . Beneficiaries must report the amount of <b>death benefits</b> received.
<b>Trusts</b>	See page 5 of Instructions.
<b>SCHEDULE B, Part I: Transactions</b>	
<b>What to Report</b>	Transactions that involve more than \$1,000.00 <b>and</b> are either real property, or stocks, bonds, mutual funds and other securities.
<b>Cash Accounts</b>	Do not report cash account transactions, i.e., deposits, withdrawals, transfers in <b>savings or checking accounts or money market funds</b> .
<b>Real Estate</b>	Do not report the sale or purchase of your <b>personal residence</b> , but do report transactions involving <b>rental properties</b> or <b>undeveloped land</b> .
<b>Periodic Transactions</b>	Do not report individual transactions that do not exceed <b>\$1,000.00</b> , e.g., if you invest \$500.00 per month in a mutual fund, those transactions are not reportable. If you invest \$1,100.00 per month, report it. Identify the mutual fund, or other investment, X the <i>Purchase</i> column, put monthly in the <i>Date</i> column, and place an X in the <i>Amount</i> column that represents the total amount of all investments, e.g., \$1,100.00 x 12 = \$13,200.00, X the \$1,000.00 - \$15,000.00 column.
<b>Treasury Bills, Notes, and Savings Bonds</b>	Do not report transactions.
<b>Stock Splits</b>	Do not report transactions, but if you receive shares in a new entity, e.g., AT&T spin off of Lucent, report new entity on schedule A if value is more than \$1,000.00 or new stock earns more than \$200.00 in income.

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<b>Transactions between Spouse and Dependent Children</b>	Do not report.
<b>Business or Employment Assets</b>	Do not report transactions involving an entity listed on schedule A, e.g., do not report transactions involving a partnership, or a business owned by you or your spouse, or payments to your spouse, such as <b>salary, commissions, or bonuses</b> paid by your <b>spouse's</b> employer.
<b>Relationship to Schedule A Assets</b>	<b>Purchases</b> on Schedule B should normally be listed as assets on Schedule A, but transactions may involve assets not reflected on Schedule A. For example, you purchase \$25,000.00 in stock, the stock loses \$5,000.00 in 5 months and is sold for \$20,000.00. It is not listed as an asset on Schedule A because you no longer hold it and it did not generate more than \$200.00 in income. If you sell all of an investment or the <b>sale</b> results in the value dropping below \$1,000.00 as of the end of the reporting period (31 Dec of previous year), then do not list on Schedule A <b>unless it earned more than \$200.00</b> in income during the calendar year.
<b>SCHEDULE B, Part II: Gifts, Reimbursements and Travel Expenses</b>	
<b>What to Report</b>	Report only Gifts of a value of \$260.00 or more. Unlikely you will have any gifts to report. Gifts of Travel and Travel Expenses accepted by you in connection with official travel under 31 U.S.C. § 1353 are not reportable. Also excluded are gifts to your spouse or dependent children unrelated to your official position; anything from a relative including a fiancé; bequests and other forms of inheritances; and food, lodging, and transportation provided by a foreign government in a foreign country. About the only gift reportable would be one from a friend.
<b>Check the None Box</b>	If none, check the None Box.
<b>SCHEDULE C, Part I: Liabilities</b>	
<b>What to Report</b>	You must report, your's, your spouse's, and your dependent's debts to any one creditor that exceeded \$10,000.00 at any time during the reporting period ( <b>except for revolving credit accounts</b> ), e.g., if the debt is now less than \$10,000.00 at the end of the calendar year, but was more than \$10,000.00 earlier in the year it must be reported. For all liabilities, fully identify the creditor, type of liability, date incurred, interest rate, term if applicable, and value of the debt as of the end of the reporting period (31 Dec of previous year).
<b>Home mortgage</b>	Do not report mortgage or home equity loans secured by your personal residence <b>unless it is rented out.</b>

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<b>Other Secured Loans</b>	Do not report secured loans such as <b>automobile or boat loans</b> , or loans for other personal property such as furniture.
<b>Revolving Credit</b>	As an exception to the valuation rule, do not report <b>credit cards</b> unless the debt exceeds \$10,000.00 as of 31 Dec of the previous year.
<b>Check the None Box</b>	If none, check the None Box.
<b>Schedule C, Part II: Agreements or Arrangements</b>	
<b>What to Report</b>	This section is most likely to apply only to <b>Reserve</b> officers. List any agreements or arrangements you have regarding <b>future employment, leaves of absence, severance payments</b> , or continued participation in a former employer' s welfare, retirement, benefit, or <b>pension plans</b> . Do not list such arrangements for your <b>spouse or dependent children</b> . Give a general description of the agreement, identify the other parties with city and state, and date of agreement. Note: <b>Continuing employment</b> relationships are listed on Schedule D, Part I: Outside Positions.
<b>Check the None Box</b>	If none, check the None Box.
<b>Schedule D, Part I: Positions Held Outside U.S. Government</b>	
<b>What to Report</b>	All compensated and uncompensated positions you held at any time during the reporting year. Positions include officer, director, trustee, general partner, proprietor, representative, employee, or consultant for any profit or nonprofit entity. Do not report positions of your spouse or dependent children; positions in religious, social, fraternal, or political organizations; honorary positions; or positions filled in an official capacity as a representative of the Government. Provide name and address of organization, type of organization, position held, and dates.
<b>DoD Restrictions</b>	A Reserve or Regular officer on active duty may not participate in their official DoD capacity in the management of a non-Federal entity without prior authorization from the DoD General Counsel. See Section 3-202 of the Joint Ethics Regulation, DoDD 5500-7R. This does not preclude personal participation. If you hold a position outside DoD, you should consult your ethics counselor (SJA).
<b>Check the None Box</b>	If none, check the None Box.
<b>SCHEDULE D, Part II: Compensation in Excess of \$5,000.00 Paid by One Source</b>	
<b>Leave Blank</b>	Not applicable to annual report filers. Only new entrants (first time filers) complete this section.

## ANNUAL SF 278 CHECKLIST (Cont.)

### Submitting your Report

**Sign & Date** in Certification Block on page 1 "Signature of Reporting Individual." Retain copy and submit to your SJA (JAR if HQMC) or ethics counselor to review and submit to your superior for the "Superior's Certification" signature in the comment section of page 1. Submit to your SJA by 15 May. Submission to your SJA stops the filing clock.

### Creating Additional Sheets in Excel

You can add additional Schedule A Continuation Sheets, Schedule B Continuation Sheets, and any other sheet by following these steps:

1. The sheet you want copied should be on your screen
2. Click on "EDIT" on the toolbar on the top of your screen
3. Click on "Move or Copy Sheet"
4. Click on where you want the new sheet to be located (choose which sheet you want it to come before)
5. Check the "Create a Copy" box, and Click "OK". Your new sheet will be added. (If you get an error message, ignore and click "OK".)