



**DEPARTMENT OF DEFENSE  
OFFICE OF THE GENERAL COUNSEL**  
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WASHINGTON, DC 20301-1600

MAR 11 2025

MEMORANDUM FOR DIRECTOR, DOD STANDARDS OF CONDUCT OFFICE

SUBJECT: Exception to Policy & Waiver Permitting Non-Attorney Personnel to Certify Certain OGE 450 Confidential Financial Disclosure Reports

Pursuant to DoD Directive 5500.07, Ethics and Standards of Conduct (May 15, 2024), section 2.1.d., in my capacity as the DoD Designated Agency Ethics Official (DAEO), I approve the following limited exception and waiver to DoD Joint Ethics Regulation (JER), section 6.104.b.2.(c) and Appendix A, Ethics Official definition.

A non-attorney employed under the supervision of a DoD ethics official attorney may be designated as an ethics official for the limited purpose of certifying:

- Annual OGE 450 Confidential Financial Disclosure Reports that are:
  - Identified as “blank” in the Financial Disclosure Management (FDM) system, or would be if filed in that system; and
  - Do not contain any changes from the immediately preceding report submitted by the filer.
- OGE 450 Confidential Financial Disclosure Reports submitted by individuals meeting the definition of Special Government Employee (SGE) at 18 U.S.C. § 202 that are identified as “blank” in the Financial Disclosure Management (FDM) system, or would be if filed in that system.

I find that this exception to policy and waiver is in the Department’s interest and will enable ethics officials to more efficiently allocate and focus resources based upon mission needs.

A handwritten signature in black ink, appearing to read "Ruth M.S. Vetter".

Ruth M.S. Vetter  
Designated Agency Ethics Official