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OGC Has Reviewed

OGC 73-1217 2 July 1973

MEMORANDUM FOR:

25X1A

SUBJECT

: Statement of Financial Interests by Former Directors

You have inquired as to whether it is necessary to require former Directors, Deputy Directors, and Executive Directors who are retained as consultants to submit the financial interests statements required by section 735 of Title 5 of the Code of Federal Regulations. After consulting with Mr. Houston, it is our view that it is not necessary to require such statements. As you know, the Civil Service Commission, by regulation, has provided that a person who is a specialist appointed for intermittent confidential intelligence consultation of brief duration is not required to file the statements. See 5 CFR 735.412. It is our understanding that Agency use of former Directors, Deputy Directors and Executive Directors puts those persons within that definition. Accordingly, the forms are not required.

25X1A



Associate General Counsel

OGC:RHL:cav

Orig - Addse

OGC Subj: Conflicts of Interest

1 - RHL Signer

1 - Chrono