

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

General Instructions for Completing the OGE Form 278e

Should I Use This Form?

Candidate: Yes, you should file your report using this form.

Other Category of Filer: In most cases, individuals will file their public financial disclosure reports through an electronic financial disclosure system. Do not use this form if you plan to file using an electronic financial disclosure system.

When Must I File?

Candidate: Within 30 days of becoming a candidate for nomination or election to the office of President or Vice President, or by May 15 of that calendar year, whichever is later, but at least 30 days before the election, and on or before May 15 of each succeeding year you continue to be a candidate.

Nominee: No later than 5 days after nomination by the President

New Entrant: Within 30 days of assuming a covered position

Annual: No later than May 15 annually

Termination: Within 30 days of leaving a covered position

Extensions

The employing agency may grant you an extension of up to 45 days for good cause shown with the possibility of one additional extension of up to 45 days. Extensions for candidates are granted by the Federal Election Commission.

Late Filing

You will be subject to a \$200 late filing fee if you file your report more than 30 days after the due date (including any extensions). A report is considered to be filed when it is received by the agency. Agencies may waive this fee if the delay was caused by extraordinary circumstances. Unless waived, the agency will collect the fee for deposit with the United States Treasury.

Warnings

Knowing and willful falsification of information, or failure to file or report information required to be reported by section 102 of the Ethics in Government Act of 1978, as amended (the Act), may subject you to a civil monetary penalty and to disciplinary action by your employing agency or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

Instructions for Completing Part 1 of the OGE Form 278e: Filer's Positions Held Outside United States Government

Applicability: All filers complete Part 1.

Reporting Period:

Candidate, Nominee or New Entrant: Preceding two calendar years and current year to filing date

Annual: Preceding calendar year and current year to filing date

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

Report any positions that you held at any time during the reporting period (excluding positions with the United States Government). Reportable positions include those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any for-profit or non-profit organization (whether compensated or uncompensated).

Exceptions:

Do not report the following: (1) positions held as part of your official duties with the United States Government; (2) positions with religious, social, fraternal, or political entities; (3) positions solely of an honorary nature; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

In addition, you do not need to report service as a member of an advisory board or committee if the following criteria are met: (1) the advisory board or committee is that of a non-profit or governmental organization; (2) your service is unpaid; (3) you have no fiduciary duties of the sort exercised by officers, directors, or trustees; and (4) your role does not involve sufficient supervision by the organization to create a common law employee-employer relationship.

Completing the Fields:

Organization Name: Provide the name of the organization.

City/State: Provide the city and state in which the organization is located.

Organization Type: Describe the type of organization.

Position Held: Provide the title or a brief functional description of the position you hold or held.

From: Provide the month and year in which you began in the position.

To: Provide the month and year in which the position ended. If you still hold the position, write "present."

Nothing to Report: If you do not have anything to report, write "None."

Instructions for Completing Part 2 of the OGE Form 278e: Filer's Employment Assets & Income and Retirement Accounts

Applicability: All filers complete Part 2.

Reporting Period:

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

- Report each source of your earned and other non-investment income over \$200 during the reporting period (e.g., salary, fees, partnership share and other
- Report each asset related to your business, employment, or other income-generating activities if the value of the asset at the end of the reporting period exceeded \$1,000 or if more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/ accounts and their underlying holdings as appropriate, anticipated payments such as severance payments, deferred compensation, and intellectual property, such as book deals and patents).

Exceptions:

Do not include assets or income from United States Government employment. In addition, do not include assets that were acquired separately from your business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in Part 6.

Completing the Fields:

Description: Provide a description sufficient to identify the asset or source being reported.

EIF: If you are reporting an investment vehicle that invests in assets of its own you need to report each underlying asset that was individually worth more than \$1,000 at the end of the reporting period or from which more than \$200 in income was received during the reporting period. As an exception to this requirement, however, you do not need to report the underlying assets of an investment vehicle that qualifies as an excepted investment fund (EIF). Indicate

Value: Report the value of an asset by selecting the appropriate category.

Income Type:

- (1) Income Less than \$201: Leave this field blank.
- (2) Asset Qualifies as an EIF: Leave this field blank.
- (3) Dividends, Interest, Capital Gains, or Rent or Royalties: Enter these types of income into the field.
- (4) Other Income: Provide an appropriate description (e.g., "salary").

Income Amount:

- (1) Income Less than \$201: Select "None (or less than \$201)."
- (2) Asset Qualifies as an EIF: Select the category that corresponds to the total amount of income received during the reporting period.
- (3) Dividends, Interest, Capital Gains or Rent or Royalties: Select the category that corresponds to the total amount of income received during the reporting period.
- (4) Other Cases: Provide the exact amount of income received during the reporting period in the space provided.

Nothing to Report: If you do not have anything to report, write "None."

Definitions:

Definition of "Excepted Investment Fund": An excepted investment fund is an investment fund that is (1) widely held; (2) either publicly traded or available or widely diversified; and (3) independently managed, meaning you neither exercise control nor have the ability to exercise control over the financial interests held by the fund. A fund is widely diversified if it does not have a stated policy of concentrating its investments in any industry, business, or single country other than the United States or bonds of a single state within the United States.

Definition of "Received": You have received income when you have the right to exercise control over the income regardless of whether you have taken actual possession.

whether your entry qualifies as an excepted investment fund. If your entry is not an investment vehicle at all, select "N/A."

Instructions for Completing Part 3 of the OGE Form 278e: Filer's Employment Agreements and Arrangements

Applicability: All filers must complete Part 3.

Reporting Period:

Candidate, Nominee, or New Entrant: As of the date of filing

Annual: Preceding calendar year and current year to filing date

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

Report any agreements or arrangements that you had during the reporting period for the following: (1) continuing participation in an employee welfare or benefit plan maintained by a former employer; (2) leave of absence; (3) future employment; or (4) continuation of payments by a former employer (e.g., severance payments).

Exceptions:

Do not report the following: (1) agreements and arrangements with the United States Government, such as your participation in the Federal Employees Retirement System or the Civil Service Retirement System; (2) agreements and arrangements of your spouse or your dependent children; and (3) if you are filing a Nominee, New Entrant, or Candidate report, any agreement or arrangement that will end before you file your report.

Completing the Fields:

Employer or Party: Provide the parties to the agreement or arrangement, other than yourself. In most cases, the other party will be your employer.

City/State: Provide the city and state of the other parties.

Status and Terms: Briefly describe the type of agreement or arrangement, its terms (in particular, the timing and form of any payments), and its current status.

Date: Provide the month and year in which the agreement or arrangement began. In many cases, this will be when you joined the employer or otherwise became eligible for coverage under the agreement or arrangement.

Nothing to Report: If you do not have anything to report, write "None."

Instructions for Completing Part 4 of the OGE Form 278e: Filer's Sources of Compensation Exceeding \$5,000 in a Year

Applicability: Complete Part 4 if you are filing a Nominee or New Entrant report. Otherwise, leave this Part blank.

Reporting Period:

Nominee or New Entrant: Preceding two calendar years and current year to filing date

Other Reports: N/A

Reporting Requirement:

Report any source (except the United States Government) that paid more than \$5,000 for your services during any year of the reporting period. Report employers and any clients to whom you personally provided services. You must report a source even if the source made its payment to your employer and not to you. Do not report a client who paid your employer if you did not provide the services for which the client made the payment.

Exception:

The name of a source of compensation may be excluded only if that information is specifically determined to be confidential as a result of a privileged relationship established by law and if the disclosure is specifically prohibited:

- by law or regulation,
- by a rule of a professional licensing organization, or
- by a client agreement that at the time of engagement of the filer's services expressly provided that the client's name would not be disclosed publicly to any person.

If you exclude the name of any source, you must indicate in the report that such information has been excluded, the number of sources excluded, and, if applicable, a citation to the statute, regulation, rule of professional conduct, or other authority pursuant to which disclosure of the information is specifically prohibited.

Completing the Fields:

Source Name: Provide the name of the source.

City/State: Provide the city and state in which this source is located.

Brief Description of Duties: Provide a brief description of your duties or the type of services rendered.

Nothing to Report: If you do not have anything to report and you are filing a Nominee or New Entrant report, write "None."

Instructions for Completing Part 5 of the OGE Form 278e: Spouse's Employment Assets & Income and Retirement Accounts

Applicability: All filers complete Part 5.

Reporting Period:

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

- Report each source of earned income, excluding honoraria, for your spouse over \$1,000 during the reporting period.
- Report each source of honoraria for your spouse over \$200 during the reporting period.
- Report each asset related to your spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents).

Exceptions:

Do not include assets or income from United States Government employment. In addition, do not include assets that were acquired separately from your spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in Part 6.

Completing the Fields:

Complete these fields using the instructions from Part 2 with two exceptions. First, you do not need to provide the exact amount of your spouse's earned income, other than honoraria. Instead, simply describe the type of income in the Income Type field and leave the Income Amount field blank. Second, the value and income amount fields include a category labeled "Over \$1,000,000." You may use this category or you may use the higher value and amount categories.

Nothing to Report: If you do not have anything to report, write "None."

Instructions for Completing Part 6 of the OGE Form 278e: Other Assets and Income

Applicability: All filers complete Part 6.

Reporting Period:

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

Each asset held for investment or the production of income, not already reported in Part 2 or Part 5, that ended the reporting period with a value greater than \$1,000 or from which more than \$200 in income was received during the reporting period. For purposes of the value and income thresholds, aggregate your interests with those of your spouse and your dependent children.

Exceptions:

Do not report any of the following: (1) a personal residence that you did not rent out during the reporting period; (2) retirement benefits from the United States Government, including the Thrift Savings Plan; (3) income from social security, veterans' benefits, and other similar United States Government benefits; (4) deposits in a single financial institution aggregating \$5,000 or less in money market accounts, certificates of deposit, savings accounts, checking accounts or other cash deposits (unless the income exceeded \$200); (5) shares in a single money market mutual fund aggregating \$5,000 or less (unless the income exceeded \$200); (6) loans made by you or your spouse to each other or to a parent, sibling, child, or grandchild; (7) interests of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; (8) interests of a former spouse or a spouse from whom you are permanently separated; and (9) payments from a spouse or former spouse associated with a divorce or permanent separation.

Completing the Fields:

Complete these fields using the instructions from Part 2 with one exception. The value and income amount fields include a category labeled "Over \$1,000,000."

You may use this category only for your spouse's or dependent child's assets. Do not use this category for your assets or assets held jointly with your spouse or dependent child.

Nothing to Report: If you do not have anything to report, write "None."

Instructions for Completing Part 7 of the OGE Form 278e: Transactions

Applicability: Complete Part 7 if you are filing an Annual or Termination report. Otherwise, leave this Part blank.

Reporting Period:

Candidate, Nominee, or New Entrant: N/A

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

Report any purchase, sale, or exchange of real property or securities in excess of \$1,000 that was made by you, your spouse, or your dependent child during the reporting period.

Exceptions:

Do not report the following: (1) a personal residence, unless the personal residence was rented out at any point during the reporting period; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, notes, and bonds; (4) Thrift Saving Plan accounts; (5) an underlying asset held within an excepted investment fund, an excepted trust, or a qualified trust; (6) transactions that you already reported in your periodic transaction report (OGE Form 278-T), unless your agency requires duplicate reporting; (7) transactions that occurred when you were not a public financial disclosure filer or an employee of the United States Government; (8) transactions that occurred solely by and between you, your spouse, and your dependent children; (9) interests of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; and (10) interests of a former spouse or a spouse from whom you are permanently separated.

Completing the Fields:

Description: Provide the name of the asset.

Type: Specify the type of transaction as a purchase, sale, or exchange.

Date: Provide the month, day, and year of the transaction.

Amount: Report the amount of the transaction by selecting the appropriate category. You may use the "Over \$1,000,000" category only for transactions involving your spouse's or dependent child's assets. Do not use this category for your assets or assets held jointly with your spouse or dependent child.

Nothing to Report: If you do not have anything to report, write "None."

Instructions for Completing Part 8 of the OGE Form 278e: Liabilities

Applicability: All filers complete Part 8.

Reporting Period:

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

Report liabilities over \$10,000 that you, your spouse, or your dependent child owed at any time during the reporting period.

Exceptions:

Do not report the following: (1) loans secured by a personal motor vehicle, household furniture, or appliances, provided that the loan does not exceed the item's purchase price; (2) revolving charge accounts, such as credit card balances, where the outstanding liability did not exceed \$10,000 at the end of the reporting period; (3) personal liabilities owed to a spouse, parent, sibling, or child of yours, your spouse, or your dependent child; (4) liabilities of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; (5) liabilities of a former spouse or a spouse from whom you are permanently separated; and (6) obligations arising from divorce or permanent separation.

Additional Exception for Certain Mortgages:

- If you are not a nominee or appointee to a Presidentially-appointed, Senate-confirmed (PAS) position, you do not need to report a mortgage or home equity loan secured by your personal residence, unless you rented out the personal residence during the reporting period. However, you must report mortgages or home equity loans on properties that do not qualify as personal residences.
- If you are a nominee or appointee to one of the three types of PAS positions listed below, you do not need to report a mortgage or home equity loan secured by your personal residence, unless you rented out the personal residence during the reporting period. However, you must report mortgages or home equity loans on properties that do not qualify as personal residences. The three types of PAS positions are: (1) a position in which you will serve as a special Government

ambassador; or (3) a position in the uniformed services for which the pay grade prescribed by section 201 of title 37, United States Code is O-6 or below.

- If you are a nominee or appointee to any other type of PAS position, you must report a mortgage or home equity loan secured by your personal residence as you would a mortgage on any other property.

Completing the Fields:

Creditor Name: Provide the name of the creditor/lending institution.

Type: Identify the type of liability.

Amount: Select the appropriate category of amount or value. For revolving charge accounts, use the value of the liability at the end of the reporting period. For all other liabilities, select the category that corresponds to the highest amount owed during the reporting period. You may use the "Over \$1,000,000" category only for your spouse's or dependent child's liabilities. Do not use this category for your liabilities or a joint liability for you and your spouse or dependent child.

Year Incurred: Provide the year that the liability was incurred.

Rate: Provide the interest rate. Describing the rate in reference to a prime rate, such as "prime + 1," is also sufficient.

Term: Specify, in years or months, the time that the loan allows for repayment. If applicable, you may write "on demand" or "revolving."

Nothing to Report: If you do not have anything to report, write "None."

employee (SGE); (2) a position as a Foreign Service Officer below the rank of

Instructions for Completing Part 9 of the OGE Form 278e: Gifts and Travel Reimbursements

Applicability: Complete Part 9 if you are filing an Annual or Termination report. Otherwise, leave this Part blank.

Reporting Period:

Candidate, Nominee, or New Entrant: N/A

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

Reporting Requirement:

- Gifts totaling more than \$415 that you, your spouse, and your dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 that you, your spouse, and your dependent children received from any one source during the reporting period.

If more than one gift or travel reimbursement was received from a single source: (1) Determine the value of each item received from that source; (2) exclude each item valued at \$166 or less; and (3) add the value of those items valued at more than \$166. If the total is more than \$415, then you must report each item valued at more than \$166.

Exceptions:

Do not report the following: (1) anything received from a relative; (2) bequests and other forms of inheritance; (3) suitable mementos of a function honoring you (e.g., retirement party); (4) food, lodging, transportation, and entertainment or reimbursements provided by a foreign government within a foreign country or by the United States Government, the District of Columbia, or a State or local government; (5) food and beverages not consumed in connection with a gift of overnight lodging; (6) anything given to your spouse or dependent child totally independent of their relationship to you; (7) gifts in the nature of communications to your office, such as subscriptions to newspapers and periodicals; (8) gifts of hospitality (food, lodging, entertainment) on the donor's personal or family premises, as defined in 5 C.F.R. Part 2634; (9) any gifts and travel reimbursements received when you were not an employee of the United States Government; and (10) any reimbursements you received for political trips that were required to be reported under section 304 of the Federal Election Campaign Act of 1971 (2 U.S.C. § 434).

Completing the Fields:

Source Name: Provide the identity of the source.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the item or reimbursement received. For travel-related gifts and reimbursements, include a travel itinerary, the dates of travel, and the nature of the expenses. Although not required, it is helpful to specify your relationship to the source or note the basis on which you accepted the gift or reimbursement.

Value: Provide the fair market value of the gift(s) or travel reimbursement(s).

Nothing to Report: If you do not have anything to report, write "None."

OGE Form 278e (Updated July 2020) (Expires 12/31/21)

U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type:	
Year (Annual Report only):	
Date of Appointment/Termination:	



Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information				
Last Name	First Name	MI	Position	Agency
Other Federal Government Positions Held During the Preceding 12 Months:				
Name of Congressional Committee Considering Nomination (Nominees only):				
Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:				
Signature:			Date:	

Agency Ethics Official's Opinion – On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below)	
Signature:	Date:
Other Review Conducted By:	
Signature:	Date:
U.S. Office of Government Ethics Certification (if required):	
Signature:	Date:

Comments of Reviewing Officials:



[Instructions for Part 1](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number

Part 1: Filer's Positions Held Outside United States Government

#	Organization Name	City/State	Organization Type	Position Held	From	To
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[Instructions for Part 2](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number
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Part 2: Filer's Employment Assets & Income and Retirement Accounts

#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
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[Instructions for Part 3](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number

Part 3: Filer's Employment Agreements and Arrangements

#	Employer or Party	City/State	Status and Terms	Date
1.				
2.				
3.				
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[Instructions for Part 4](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number

Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	Source Name	City/State	Brief Description of Duties
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[Instructions for Part 5](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number
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Part 5: Spouse's Employment Assets & Income and Retirement Accounts

#	Description	EIF	Value	Income Type	Income Amount
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2.					
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[Instructions for Part 6](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number
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Part 6: Other Assets and Income

#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
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[Instructions for Part 7](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number
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Part 7: Transactions

#	Description	Type	Date	Amount
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[Instructions for Part 8](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number
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Part 8: Liabilities

#	Creditor Name	Type	Amount	Year Incurred	Rate	Term
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[Instructions for Part 9](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name	Page Number
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Part 9: Gifts and Travel Reimbursements

#	Source Name	City/State	Brief Description	Value
1.				
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Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation. This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period. The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children. This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period. This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period. This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$166 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food,

lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

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Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, N.W., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).