General Instructions for Completing the OGE Form 278e

Should I Use This Form?

<u>Candidate</u> 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?

<u>Candidate</u>: 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:

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

Annual: Preceding calendar year and current year to filing date

Termination: End of period covered by last report to termination date

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 organization;
- (2) your service is unpaid; and (3) you have no fiduciary duties of the sort exercised by officers, directors, or trustees.

Completing the Fields:

Organization Name: Provide the name of the organization.

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

Organization Type: Describe the type of organization.

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

<u>From:</u> Provide the month and year in which you began in the position.

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

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:

<u>Candidate, Nominee, or New Entrant</u>: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

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 business income, honoraria, scholarships, and prizes).
- 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 the asset produced more than \$200 in income 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:

<u>Description</u>: Provide a description sufficient to identify the asset or source being reported.

<u>EIF</u>: 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 that individually produced more than \$200 in income 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 whether your entry qualifies an excepted investment fund. If your entry is not an investment vehicle at all, select "N/A."

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 holds no more than 5% of the value of its portfolio in the securities of any one issuer (other than the United States Government) and no more than 20% in any particular economic or geographic sector.

<u>Value</u>: Report the value of an asset by selecting the appropriate category.

(Instructions continue on the following page.)

Nothing to Report: If you do not have anything to report, write "None." 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 produced during the reporting period. (3) Dividends, Interest, Capital Gains or Rent or Royalties: Select the category that corresponds to the total amount of income produced

during the reporting period.

the reporting period in the space provided.

(4) Other Cases: Provide the exact amount of income produced during

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

<u>Termination</u>: End of period covered by last report to termination date

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; (3) if you are a Presidential nominee, any agreement or arrangement that will end before you file your Nominee report; and (4) if you are filing a New Entrant report, any agreement or arrangement that ended prior to the beginning of your appointment to your current position.

Completing the Fields:

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

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

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

<u>Date</u>: 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.

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:

In certain rare cases, you need not provide the identity of confidential clients. In those cases, indicate the number of confidential clients that have not been disclosed (e.g., "2 confidential clients not disclosed").

Completing the Fields:

Source Name: Provide the name of the source.

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

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

- * Confidential Clients: You do not need to report the identity of a client if the client's identity is protected by a court order or is under seal. In limited circumstances, the exception may also apply if the client is considered confidential because:
- 1. the client is the subject of a pending grand jury proceeding or other non-public investigation in which there are no public filings, statements, appearances, or reports that identify him or her;
- 2. disclosure is prohibited by a rule of professional conduct that can be enforced by a professional licensing body; or
- 3. a privileged relationship was established by a written confidentiality agreement, entered into at the time that your services were retained, that expressly prohibits disclosure of the client's identity.

A client will not be deemed confidential merely based on the filer's belief that the client would prefer not to be disclosed or based on the fame or social standing of the client.

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:

<u>Candidate, Nominee, or New Entrant</u>: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

<u>Termination</u>: End of period covered by last report to termination date

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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 incomegenerating 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.

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

Applicability: All filers complete Part 6.

Reporting Period:

<u>Candidate, Nominee, or New Entrant</u>: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

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 that produced more than \$200 in income 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; (5) shares in a single money market mutual fund aggregating \$5,000 or less; (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.

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

<u>Termination</u>: End of period covered by last report to termination date

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 of 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 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:

<u>Description</u>: Provide the name of the asset.

<u>Type</u>: Specify the type of transaction as a purchase, sale, or exchange

<u>Date</u>: Provide the month, day, and year of the transaction.

<u>Amount</u>: Report the amount of 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.

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

Applicability: All filers complete Part 8.

Reporting Period:

<u>Candidate, Nominee, or New Entrant</u>: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

Reporting Requirement:

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

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

(Instructions continue on the following page.)

Completing the Fields:

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

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

<u>Type</u>: 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.

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

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: End of period covered by last report to termination date

Reporting Requirement:

- Gifts totaling more than \$375 that you, your spouse, and your dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 or less; and (3) add the value of those items valued at more than \$150. If the total is more than \$375, then you must report each item valued at more than \$150.

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.

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

<u>Brief Description</u>: 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.

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

OGE Form 278e (March 2014)		
U.S. Office of Government Ethics; 5 C.F.R	. part 2634 Form Approved: OM	B 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 Consideration	dering Nomination (No	minees only):			
Filer's Certification - I certify that the state	ements I have made in t	his report are true, co	omplete and correct to the best of	f my knowledge:	
Signature:			Date:		
Agency Ethics Official's Opinion - On the	basis of information c	ontained in this repo	rt, I conclude that the filer is in c	ompliance with applicab	le laws and regulations
(subject to any comments below)					
Signature:			Date:		
Other Review Conducted By:					
Signature:			Date:		
U.S. Office of Government Ethics Certific	ation (if required):				
Signature:			Date:		
Comments of Reviewing Officials:					

<u>Instructions for Part 1</u>

		ude account numbers	s, street addresses, or family member r	names. See instructions for required i					
File	er's Name				Page Number				
Pa	Part 1: Filer's Positions Held Outside United States Government								
#	Organization Name	City/State	Organization Type	Position Held	From	То			
1.									
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									
11.									
12.									
13.									
14.									
15.									
16.									
17.									
18.									
19.									
20.									

<u>Instructions for Part 2</u>

	te: This is a public form. Do not include account number	s, stre	et addresses, or family memb	er names. See instruct	tions for required informati	ion.			
File	er's Name					Page Number			
Pa	Part 2: Filer's Employment Assets & Income and Retirement Accounts								
#	Description	EIF	Value	Income Type	Income Amount				
1.									
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									
11.									
12.									
13.									
14.									
15.									
16.									
17.									
18.									
19.									
20.						_			

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

		i. Do not include a	account numbers, street addresses, or family member names. See instructions for required		
File	er's Name			Page Nun	nber
Pa	rt 3: Filer's Employ	ment Agreemer	nts and Arrangements		
	Employer or Party	City/State	Status and Terms		Date
1.	party see a see				
2.		\Box			
3.	 				
3.					
4.		+			
5.					
6.	 				
υ.					
7.					
_					
8.					
9.	 	+			
٠.					
10.					
	 				
11.					
12.					

<u>Instructions for Part 4</u>

		include account num	bers, street addresses, or family member names. S	
File	r's Name			Page Number
Pai	rt 4: Filer's Sources of Com	pensation Exceedi	ng \$5,000 in a Year	•
#	Source Name	City/State	Brief Description of Duties	
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17				
18.				
19.				
20.				

<u>Instructions for Part 5</u>

	te: This is a public form. Do not include account number	rs, stree	et addresses, or family memb	er names. See instruc	tions for required informat	ion.			
File	er's Name					Page Number			
Pa	Part 5: Spouse's Employment Assets & Income and Retirement Accounts								
#	Description	EIF	Value	Income Type	Income Amount				
1.									
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									
11.									
12.									
13.									
14.									
15.									
16.									
17.									
18.									
19.									
20.									

<u>Instructions for Part 6</u>

No.	te: This is a public form. Do not include account number	rs, stre	et addresses, or family memb	er names. See instruc	tions for required informat	ion.
File	er's Name					Page Number
	rt 6: Other Assets and Income					
#	Description	EIF	Value	Income Type	Income Amount	
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
17.						
18.						
19.						
20.						

Instructions for Part 7

	te: This is a public form. Do not include account numbers, street address	ses, or family member n							
File	er's Name	Page Number							
Pa	art 7: Transactions								
#	Description	Type	Date	Amount					
1.									
2.									
3.									
4.									
5.									
6. 7.									
7. 8.									
9. 10.									
10.									
12.									
12.									
13. 14.									
15.									
15. 16.									
10. 17.									
17.									
10. 19.									
20.									

<u>Instructions for Part 8</u>

	e: This is a public form. Do not include acc	ount numbers, street addresses, c	r family member names. Se	e instructions for	required information			
File	r's Name					Page Number		
Part 8: Liabilities								
#	Creditor Name	Type	Amount	Year Incurred	Rate	Term		
1.								
2.								
3.								
4.								
5.								
٥.								
6.								
_								
7.								
8.								
9.								
10.			+					
10.								
11.								
10								
12.								
13.								
14.								
15.								
16.								
17.								
1/.								
18.								
1.0								
19.								
20.								

<u>Instructions for Part 9</u>

Not	te: This is a public form. Do not i	include account nu	mbers, street addresses, or family member names.	See instructions for required information.	
File	r's Name			Page Number	
Par	rt 9: Gifts and Travel Reimb	oursements			
	Source Name	City/State	Brief Description		Value
1.					
2					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					
16.					
17.					
18.					
19.					
20.					

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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 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 \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 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.

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. 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 another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. 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 three 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, NW., 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).