

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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Adler, Michael

United States Ambassador to the Kingdom of Belgium, Department of State

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Names of Congressional Committees Considering Nomination:

- Committee on Foreign Relations
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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Adler, Michael [electronically signed on 04/30/2021 by Adler, Michael in Integrity.gov]

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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).

/s/ Huitema, David, Certifying Official [electronically signed on 10/07/2021 by Huitema, David in Integrity.gov]

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Other review conducted by

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U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 10/18/2021 by Apol, David in Integrity.gov]

## 1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Adler 13th Floor Camelot Station, LP	Miami, Florida	Limited Partnership	President	3/2015	Present
2	Adler AD Holdings, LLC	Miami, Florida	LLC	President	6/2016	Present
3	Adler AD Manager, LLC	Miami, Florida	LLC	President	6/2016	Present
4	Adler Camelot Station, LLC	Miami, Florida	LLC	President	10/2014	Present
5	Adler Dadeland Manager, LLC	Miami, Florida	LLC	President	5/2016	Present
6	Adler Development Holdings, LLC	Miami, Florida	LLC	President	1/2015	Present
7	Adler Douglas Station Manager, LLC	Miami, Florida	LLC	President	3/2015	Present
8	Adler Fund Investment, LLC	Miami, Florida	LLC	President	7/2015	Present
9	Adler Kabel-X B, LLC	Miami, Florida	LLC	President	5/2009	Present
10	Adler Kovens Douglas, LLC	Miami, Florida	LLC	President	5/2016	Present
11	Adler Lancelot, LLC	Miami, Florida	LLC	President	7/2015	Present
12	Adler Lancelot Manager, LLC	Miami, Florida	LLC	President	7/2015	Present
13	AH Camelot Station, LLC	Miami, Florida	LLC	President	12/2016	Present
14	ICC Norfolk 22, Ltd.	Miami, Florida	Limited Partnership	President	10/2008	Present
15	KUSA Manager, LLC	Miami, Florida	LLC	President	12/2014	Present
16	Lancelot Miami River, LLC	Miami, Florida	LLC	President	5/2015	Present
17	National Jewish Golf Association, Inc.	Miami, Florida	Corporation	President	9/2007	Present
18	Senior Jewish Golf Association, Inc.	Miami, Florida	Corporation	President	9/2007	Present
19	United States Jewish Golf Association, Inc.	Miami, Florida	Corporation	President	9/2007	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO	
20	Women's Jewish Golf Association, Inc.	Miami, Florida	Corporation	President	9/2007	Present	
21	AOA Office, LLC	Miami, Florida	LLC	President	8/2008	Present	
22	AH Lancelot, LLC	Miami, Florida	LLC	President	6/2015	Present	
23	Adler 13th Floor Douglas Station, LP	Miami, Florida	Limited Partnership	President	3/2015	Present	
24	Adler 13th Floor Douglas Station GP, LLP	Miami, Florida	LLC	President	3/2015	Present	
25	AH Link, LLC	Miami, Florida	LLC	President	5/2019	Present	
26	Adler Link, LLC	Miami, Florida	LLC	President	6/2019	Present	
27	Kabel-X USA, LLC	Miami, Florida	LLC	President	3/2007	Present	
28	KX Holdings, LLC	Miami, Florida	LLC	President	8/2014	Present	
29	Adler Technologies, LLC	Miami, Florida	LLC	President	11/2006	Present	
30	Southern General Builders, LLC	Miami, Florida	LLC	Vice President	5/2018	Present	
31	Orlando Sunport Flexxspace, Ltd.	Miami, Florida	Limited Partnership	President	6/1999	Present	
32	Orlando Sunport Flexxspace 2, LLC	Miami, Florida	LLC	President	7/2005	Present	
33	Oakes Flexxspace 2, LLC	Miami, Florida	LLC	President	7/2005	Present	
34	Newco Acquisition Partner, Ltd.	Miami, Florida	Limited Partnership	President	12/1997	Present	
35	Kissimmee Flexxspace, Ltd.	Miami, Florida	Limited Partnership	President	3/1999	Present	
36	Kissimmee Flexxspace 2, LLC	Miami, Florida	LLC	President	7/2005	Present	
37	Ives Dairy, Inc.	Miami, Florida	Corporation	President	11/1993	Present	
38	ICC Norfolk Flexxoffice 22, Inc.	Miami, Florida	Corporation	President	10/2008	Present	
39	Edgewater Grove, LLC	See Endnote	Miami, Florida	LLC	President	6/2007	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
40	Crossroads FO, Inc.	Miami, Florida	Corporation	President	11/2001	Present
41	Crossroads Flexxoffice, Ltd.	Miami, Florida	Limited Partnership	President	11/2001	Present
42	Adler Properties Limited Partnership	Miami, Florida	Limited Partnership	President	12/1992	Present
43	Adler Properties, Inc.	Miami, Florida	Corporation	President	11/1992	Present
44	Adler Office Associates, Ltd.	Miami, Florida	Limited Partnership	President	1/1998	Present
45	Adler Office Associates, Inc.	Miami, Florida	Corporation	President	1/1998	Present
46	Adler Newco GP 2, Inc.	Miami, Florida	Corporation	President	11/1999	Present
47	Adler NAP-G.P., Inc.	Miami, Florida	Corporation	President	11/1997	Present
48	Adler Management Services, Inc.	Miami, Florida	Corporation	President	8/1991	Present
49	Adler Helios MM I, LLC	Miami, Florida	LLC	President	6/2008	Present
50	Adler Helios B Investor I, LLC	Miami, Florida	LLC	President	7/2008	Present
51	Adler Group Property Management, LLC	Miami, Florida	LLC	President	5/2012	Present
52	Adler Fund HC, Inc.	Miami, Florida	Corporation	President	12/1997	Present
53	Adler Development, LLC	Miami, Florida	LLC	President	1/2013	Present
54	Adler Development Manager, LLC	Miami, Florida	LLC	President	8/2019	Present
55	Adler Deerfield GP, LLC	Miami, Florida	LLC	President	8/2004	Present
56	Adler Art Partners, LLLP	Miami, Florida	LLLP	President	6/2020	Present
57	Adler Art, LLC	Miami, Florida	LLC	President	3/2010	Present
58	Adler Acquisition AP-GP, Inc.	Miami, Florida	Corporation	President	12/1997	Present
59	Adler Realty Services, LLC	Miami, Florida	LLC	President	5/2006	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
60	AD Equipment, LLC	Miami, Florida	LLC	President	7/2002	Present
61	ADCO, Ltd.	Miami, Florida	Limited Partnership	President	12/1997	Present
62	ADCO Acquisition Partner, Ltd.	Miami, Florida	Limited Partnership	President	12/1997	Present
63	Adler Group 1031, LLC	Miami, Florida	LLC	President	2/2003	Present
64	AOA Flexx, LLC	Miami, Florida	LLC	President	8/2008	Present
65	Adler Acquisition Associates, LLC	Miami, Florida	LLC	President	10/2011	Present
66	Adler Group, LLC	Miami, Florida	LLC	President & CEO	12/2017	Present
67	Adler Oakes, LLC	Miami, Florida	LLC	President	7/2008	Present
68	Adler Oakes GP 2, LLC	Miami, Florida	LLC	President	7/2008	Present
69	Adler Development Acquisitions I, LLC	Miami, Florida	LLC	President	6/2013	Present
70	Adler RA, LLC	Miami, Florida	LLC	President	12/2015	Present
71	Adler Development Acquisitions I Manager, LLC	Miami, Florida	LLC	President	12/2017	Present
72	FXE Business Center, LLC	Miami, Florida	LLC	President	10/2018	Present
73	Adler FXE, LLC	Miami, Florida	LLC	President	11/2018	Present
74	Adler FXE 2, LLC	Miami, Florida	LLC	President	2/2019	Present
75	Adler Sponsor FXE, LLC	Miami, Florida	LLC	President	11/2018	Present
76	TRINET HR II Inc (PEO for Adler Group, LLC)	Miami, Florida	Corporation	Employee of Adler Group, LLC Compensated through PEO	1/2018	3/2021
77	Adler Adco G.P., Inc.	Miami, Florida	Corporation	President	12/1997	Present

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
78	Mount Sinai Medical Center Foundation		Miami Beach, Florida	Non-Profit	Board Member	1/2000	Present
79	Greater Miami Jewish Federation		Miami, Florida	Non-Profit	Board Member	1/1980	Present
80	National Coalition Supporting Eurasian Jewry		Washington, District of Columbia	Non-Profit	Board Member	1/2012	Present
81	AREP Manager, LLC		Miami, Florida	LLC	Executive Vice President	6/2012	Present
82	Helios AR Real Estate Fund I, LLC		Miami, Florida	LLC	President	6/2008	12/2020
83	Adler Deerfield Associates		Miami, Florida	General Partnership	Managing Partner	10/2004	3/2021
84	Adler Kawa Real Estate Fund II, LLC		Miami, Florida	LLC	Member of Investment Committee	12/2016	Present
85	Crossroads Associates		Miami, Florida	General Partnership	Managing Partner	11/2001	Present
86	Adler Dadeland, LLC		Miami, Florida	LLC	President	5/2016	Present
87	Adler Norfolk Associates		Miami, Florida	General Partnership	Managing Partner	1/2007	Present
88	David Scott Adler Irrevocable Inter Vivos Trust	See Endnote	Miami, Florida	Trust	Trustee	4/2008	Present
89	Michael M. Adler Trust		Miami, Florida	Trust	Trustee	6/1997	Present
90	Michael M Adler Trust created under the Irrevocable Trust Agreement dated July 24, 1968 f/b/o Michael M Adler	See Endnote	Miami, Florida	Trust	Trustee	1/2009	Present
91	David Scott Adler Insurance Trust	See Endnote	Miami, Florida	Trust	Trustee	4/2008	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Adler Group LLC, Compensated by TRINET HR II, Inc as PEO (Commercial Real Estate Property Management Leasing and Development)	N/A		Salary	\$1,000,001
2	Adler Development, LLC	See Endnote	No	\$1,000,001 - \$5,000,000	None (or less than \$201)
2.1	AH Lancelot, LLC	See Endnote	No		
2.1.1	Lancelot Miami River, LLC	See Endnote	No		
2.1.1.1	Lancelot Miami River (Commercial Real Estate, Miami, FL)	N/A		Capital Gains	None (or less than \$201)
2.2	AH Camelot Station, LLC	See Endnote	No		
2.2.1	Adler 13th Floor Camelot Station, LP	See Endnote	No		
2.2.1.1	A13 Link T2, LLC	See Endnote	No		
2.2.1.1.1	Miami Douglas Two, LP 1	See Endnote	No		
2.2.1.1.1	Link Tower Two (Commercial Real Estate, Miami, FL)	N/A		Capital Gains	None (or less than \$201)
2.2.1.2	A13 Link T1, LLC	See Endnote	No		
2.2.1.2.1	Miami Douglas One, LP 1	See Endnote	No		
2.2.1.2.1	Link Tower One 1.1		No		
2.2.1.2.1.1	Adler 13th Floor Douglas Station, LP 1.1.1	See Endnote	No		
2.2.1.2.1.1.1	Douglas Station (Commercial Real Estate, Miami, FL)	N/A		Capital Gains	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.2.1.2. 1.1.2	Commercial Real Estate, Miami, FL	N/A	\$500,001 - \$1,000,000	Capital Gains	None (or less than \$201)
2.3	Adler H Dadeland LLC	See Endnote	No		
3	Adler Dadeland, LLC	No			
3.1	Adler H Dadeland, LLC	No			
3.1.1	Adler 13th Floor Dadeland, LP	No			
3.1.1.1	Pellinore Dadeland, LP	No			
3.1.1.1. 1	Dadeland (Commercial Real Estate, Miami, FL)	N/A	\$500,001 - \$1,000,000	Capital Gains	None (or less than \$201)
4	Adler Lancelot, LLC	See Endnote	No		
4.1	AH Lancelot, LLC	See Endnote	No		
5	Crossroads Associates	See Endnote	No		
5.1	Crossroads Flexxoffice, Ltd.	See Endnote	No		
5.1.1	Crossroads (Commercial Real Estate, Winter Park, FL)	N/A	None (or less than \$1,001)	Rent or Royalties	\$15,001 - \$50,000
6	Crossroads FO, Inc.	See Endnote	No		
6.1	Crossroads Flexxoffice, Ltd.	See Endnote	No		
7	Adler Deerfield Associates	See Endnote	No		
7.1	Commercial Real Estate, Deerfield, FL	N/A	None (or less than \$1,001)	Rent or Royalties	\$5,001 - \$15,000
8	Adler FXE, LLC	See Endnote	No		
8.1	Commercial Real Estate, Fort Lauderdale, FL	N/A	None (or less than \$1,001)	Rent or Royalties	\$5,001 - \$15,000
9	Adler Properties Ltd Partnership	See Endnote	No		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.1	NEWCO Acquisition Partner, Ltd. See Endnote	No			
9.1.1	Kissimmee Flexxoffice, Ltd. (Commercial Real Estate, Kissimmee, FL)	N/A	None (or less than \$1,001)	Rent or Royalties	\$5,001 - \$15,000
9.1.2	Orlando Sunport Flexxoffice, Ltd. (Commercial Real Estate, Orlando, FL)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
9.1.3	Helios AR Real Estate Fund, I LLC See Endnote	No			
9.1.3.1	Commercial Real Estate, Davie, FL	N/A	None (or less than \$1,001)	Rent or Royalties	\$201 - \$1,000
9.1.3.2	Commercial Real Estate, Naples, FL	N/A	None (or less than \$1,001)	Rent or Royalties	\$201 - \$1,000
9.2	Adler Office Associates, Ltd. (Commercial Real Estate, Doral, FL)	N/A	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000
10	NEWCO Acquisition Partner, Ltd. (See Line 9.1 for Underlying Holdings)	No			
11	Adler Properties, Inc.	No			
11.1	Adler Properties Ltd Partnership (See Line 9 for Underlying Holdings)	No			
12	Adler NAP GP, Inc.	No			
12.1	NEWCO Acquisition Partner, Ltd. (See Line 9.1 for Underlying Holdings)	No			
13	Adler NEWCO GP 2, Inc. See Endnote	No			
13.1	Kissimmee Flexxoffice, Ltd. (Commercial Real Estate, Kissimmee, FL)	N/A	None (or less than \$1,001)	Rent or Royalties	\$5,001 - \$15,000
13.2	Orlando Sunport Flexxspace, Ltd. (Commercial Real Estate, Orlando, FL)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
14	Oakes Flexxspace 2, LLC See Endnote	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.1	Helios AR Real Estate Fund I, LLC (See Line 9.1.3 for Underlying Holdings)	No			
15	Adler Helios MM I, LLC	See Endnote	No	None (or less than \$1,001)	None (or less than \$201)
15.1	Helios AR Real Estate Fund I, LLC (See Line 9.1.3 for Underlying Holdings)	No			
16	Adler Real Estate Fund IV, LLC	No	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000
16.1	Helios AR Real Estate Fund I, LLC (See Line 9.1.3 for Underlying Holdings)	No			
16.2	Commercial Real Estate, Baltimore, MD	N/A			
16.3	Commercial Real Estate, Cary/Raleigh, NC	N/A			
16.4	Commercial Real Estate, Deerfield Beach, FL	N/A			
16.5	Commercial Real Estate, Dallas, TX	N/A			
16.6	Commercial Real Estate, Charlotte, NC	N/A			
16.7	Commercial Real Estate, Tampa, FL	N/A			
16.8	Commercial Real Estate, Jacksonville, FL	N/A			
16.9	Commercial Real Estate, Davie and Naples, FL	N/A			
16.10	Commercial Real Estate, Birmingham, AL	N/A			
17	ICC Norfolk Flexxoffice 22, Inc.	See Endnote	No		
17.1	ICC Norfolk 22, Ltd. (Commercial Real Estate, Norfolk, VA)	N/A	\$100,001 - \$250,000	Capital Gains	None (or less than \$201)
18	Adler Norfolk Associates	See Endnote	No		
18.1	ICC Norfolk 22, Ltd. (Commercial Real Estate, Norfolk, VA)	See Endnote	N/A		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	ADCO, Ltd. See Endnote	No			
19.1	Adler Office Associates, Ltd. (Commercial Real Estate, Doral, FL) See Endnote	N/A			
20	Adler ADCO GP, Inc. See Endnote	No			
20.1	ADCO, Ltd. See Endnote	No			
21	Adler Fund Investment, LLC	No	\$1,000,001 - \$5,000,000	Capital Gains	\$15,001 - \$50,000
21.1	Commercial Real Estate, Charlotte, NC	N/A			
21.2	Commercial Real Estate, Boca Raton, FL	N/A			
21.3	Commercial Real Estate, South Florida	N/A			
21.4	Commercial Real Estate, Birmingham, AL	N/A			
21.5	Commercial Real Estate, Los Angeles, CA	N/A			
21.6	Commercial Real Estate, Austin, TX	N/A			
21.7	Commercial Real Estate, Baltimore, MD	N/A			
21.8	Commercial Real Estate, Cary/Raleigh, NC	N/A			
21.9	Commercial Real Estate, Dallas, TX	N/A			
22	Adler Office Associates, Inc. See Endnote	No			
22.1	Adler Office Associates, Ltd. (Commercial Real Estate, Doral, FL) See Endnote	N/A			
23	AREP Manager, LLC (Commercial Real Estate Fund Management)	N/A	\$1,000,001 - \$5,000,000	Capital Gains	None (or less than \$201)
24	ADCO Acquisition Partner, Ltd. See Endnote	No			
24.1	ADCO, Ltd. See Endnote	No			
24.1.1	Adler Office Associates, Ltd. See Endnote	N/A			

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
25	Adler Acquisition AP-GP, Inc.	See Endnote	No			
25.1	ADCO Acquisition Partner, Ltd.	See Endnote	No			
25.1.1	ADCO, Ltd.		No			
25.1.1.1	Adler Office Associates, Ltd.	See Endnote	N/A			
26	Adler Kawa Real Estate Fund II, LLC		No			
26.1	Commercial Real Estate, Boca Raton, FL	See Endnote	N/A	\$1,001 - \$15,000	Capital Gains	None (or less than \$201)
27	Receivable from Adler Group Property Management, LLC		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
28	Adler 13th Floor Camelot Station, LP	See Endnote	No			
29	Adler Kovens Douglas, LLC	See Endnote	No			
29.1	Adler Camelot Station, LLC	See Endnote	No			
30	Adler Camelot Station, LLC	See Endnote	No			
30.1	AH Camelot Station, LLC	See Endnote	No			
31	Helios AR Real Estate Fund I, LLC		N/A		Non Employee Guarantor Fee	\$75,000

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Adler Group Property Management, LLC	Miami, Florida	Sale of Interest, Monthly payments of \$40,523 over three years for a total payment \$1,458,863.	1/2021

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Adler Group, LLC Compensated by Trinet HR II, Inc as PEO	Miami, Florida	COO/President of Adler Group, LLC and its Affiliates Adler Development LLC & Adler Group Property Management, LLC
2	Helios AR Real Estate Fund I, LLC	Miami, Florida	Guarantor Fee

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

None

#### 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank #1 (Cash)	N/A	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
2	U.S. bank #2 (Cash)	N/A	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
3	Synovus Financial Corp	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
4	Apollo Bancshares, Inc.	N/A	\$50,001 - \$100,000	Dividends	None (or less than \$201)
5	Brokerage Account	No			
5.1	AT&T INC.	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
5.2	BP PLC SPON ADR	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.3	BLACKROCK INTERNATIONAL DIVIDEND FUND CLASS A (BREAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.4	CALAMOS MARKET NEUTRAL INCOME FUND CLASS A (CVSIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.5	EXXON MOBIL CORP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
5.6	FIRST EAGLE OVERSEAS FUND CLASS C (FESOX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.7	IVY NATURAL RESOURCES FUND CLASS A (IGNAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.8	IVY ASSET STRATEGY FUND CLASS A (WASAX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
5.9	FRANKLIN MUTUAL GLOBAL DISCOVERY FUND CLASS A (TEDIX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
5.10	AMERICAN FUNDS NEW WORLD F-1 (NWFFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.11	PIONEER FLEXIBLE OPPORTUNITIES FUND CLASS A (PMARX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.12	FRANKLIN/TEMPLETON GLOBAL BOND FUND CLASS A (TPINX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
5.13	THORNBURG INTERNATIONAL EQUITY FUND CLASS A (TGVAX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
5.14	U.S. BROKERAGE ACCOUNT (cash)	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)
6	Michael M. Adler Trust	See Endnote	No		None (or less than \$201)
6.1	Adler Deerfield Associates	See Endnote	No		
6.2	Adler Properties Ltd Partnership	See Endnote	No		

## 7. Transactions

(N/A) - Not required for this type of report

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM	
1	Key Bank	Boat Loan	\$100,001 - \$250,000	2006	1.99	20 Years	
2	Synovus Bank	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2017	3.875	30 Years	
3	Synovus Bank	Home Equity Line of Credit	\$500,001 - \$1,000,000	2016	5.5	10 Years	
4	Key Bank	2nd Home Mortgage	\$1,000,001 - \$5,000,000	2015	4.25	30 Years	
5	Adler Properties Limited Partnership	Partner Loan	\$5,000,001 - \$25,000,000	2011	Short Term AFR	Revolving	
6	Hilco, Inc & John Chen	See Endnote	Personal Loan	\$1,000,001 - \$5,000,000	2021	10%	3 Year
7	UBS Financial Services, Inc.	Margin Loan	\$250,001 - \$500,000	2013	3%	Revolving	
8	Adler Real Estate Fund IV, LLC	Capital Commitment	\$100,001 - \$250,000	2018	None	On Demand	
9	American Express Bonvoy	Credit Card	\$15,001 - \$50,000	2021	APR 15.25%	Revolving	
10	CitiBusiness Card	Credit Card	\$15,001 - \$50,000	2021	APR 23.24%	Revolving	

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
11	Chase-Amazon	Credit Card	\$10,001 - \$15,000	2021	APR 19.24%	Revolving

## 9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

## Endnotes

PART	#	ENDNOTE
1.	39	This entity holds the filer's personal residence.
1.	88	The filer's grandchildren are the beneficiaries of this trust.
1.	90	This entity holds no assets and is not currently funded.
1.	91	This entity holds no assets and is not currently funded.
2.	2	This value reflects the operating entity, excluding the underlying investments.
2.	2.1	The full value and income for this Asset are disclosed at line 2.1.1.1.
2.	2.1.1	The full value and income for this Asset are disclosed at line 2.1.1.1.
2.	2.2	The full value and income for this Asset are disclosed at line 2.2.1.1.1.1.
2.	2.2.1	The full value and income for this Asset are disclosed at line 2.2.1.1.1.1.
2.	2.2.1.1	The full value and income for this Asset are disclosed at line 2.2.1.1.1.1.
2.	2.2.1.1.1	The full value and income for this Asset are disclosed at line 2.2.1.1.1.1.
2.	2.2.1.2	The full value and income for this Asset are disclosed at line 2.2.1.2.1.1.

PART	#	ENDNOTE
2.	2.2.1.2.1	The full value and income for this Asset are disclosed at line 2.2.1.2.1.1.
2.	2.2.1.2.1.1.1	The full value and income for this Asset are disclosed at line 2.2.1.2.1.1.1.1.
2.	2.3	The full value and income for this Asset are disclosed at line 3.1.1.1.1.
2.	4	The full value and income for this Asset are disclosed at line 2.1.1.1.
2.	4.1	The full value and income for this Asset are disclosed at line 2.1.1.1.
2.	5	The full value and income for this Asset are disclosed at line 5.1.1.
2.	5.1	The full value and income for this Asset are disclosed at line 5.1.1.
2.	6	The full value and income for this Asset are disclosed at line 5.1.1.
2.	6.1	The full value and income for this Asset are disclosed at line 5.1.1.
2.	7	The full value and income for this Asset are disclosed at line 7.1.
2.	8	The full value and income for this Asset are disclosed at line 8.1.
2.	9	The only asset owned as of the reporting date is 9.2 Adler Office Associates, Ltd.
2.	9.1	The underlying assets are no longer held as of the reporting date.
2.	9.1.3	The filer no longer holds this asset as of the reporting date.
2.	13	The filer no longer holds this asset as of reporting date.
2.	14	The filer no longer holds this asset as of reporting date.
2.	15	The filer no longer holds this asset as of reporting date.
2.	17	The full value and income for this Asset are disclosed at line 17.1.
2.	18	The full value and income for this Asset are disclosed at line 17.1.
2.	18.1	The full value and income for this Asset are disclosed at line 17.1.
2.	19	The full value and income for this Asset are disclosed at line 9.2.
2.	19.1	The full value and income for this Asset is disclosed at line 9.2.

PART	#	ENDNOTE
2.	20	The full value and income for this Asset is disclosed at line 9.2.
2.	20.1	The full value and income for this Asset is disclosed at line 9.2.
2.	22	The full value and income for this Asset are disclosed at line 9.2.
2.	22.1	The full value and income for this Asset are disclosed at line 9.2.
2.	24	The full value and income for this Asset are disclosed at line 9.2.
2.	24.1	The full value and income for this Asset are disclosed at line 9.2.
2.	24.1.1	The full value and income for this Asset are disclosed at line 9.2.
2.	25	The full value and income for this Asset are disclosed at line 9.2.
2.	25.1	The full value and income for this Asset are disclosed at line 9.2.
2.	25.1.1.1	The full value and income for this Asset are disclosed at line 9.2.
2.	26.1	The full value and income for this Asset are disclosed at line 26.
2.	28	The full value and income for this Asset are disclosed at line 2.2.1.
2.	29	The full value and income for this Asset are disclosed at line 2.2.1.1.
2.	29.1	The full value and income for this Asset are disclosed at line 2.2.1.1.
2.	30	The full value and income for this Asset are disclosed at line 2.2.1.1.
2.	30.1	The full value and income for this Asset are disclosed at line 2.2.1.1.
6.	6	As of reporting date no assets owned by the Trust.
6.	6.1	The full value and income for this Asset are disclosed at Part 2, Line 7.1.
6.	6.2	The full value and income for this Asset are disclosed at Part 2, Line 9.2.
8.	6	Loan for investment in Lancelot

# 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.

## 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

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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).

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