

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

## Filer's Information

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Bledsoe Downes, Ann Marie

Deputy Solicitor Indian Affairs, Department of the Interior

Date of Appointment: 01/20/2021

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Other Federal Government Positions Held During the Preceding 12 Months:

Senior Counselor to the Secretary (1/2021 - 3/2021)

Board of Trustee Member, Institute of American Indian Arts - Santa Fe, New Mexico (1/2021 - Present)

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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/ Bledsoe Downes, Ann Marie [electronically signed on 04/29/2021 by Bledsoe Downes, Ann Marie in Integrity.gov] - Filer received a 90 day filing extension.

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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/ Garcia, Monica L, Certifying Official [electronically signed on 06/18/2021 by Garcia, Monica L in Integrity.gov]

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Other review conducted by

/s/ Steuber, Curtis, Ethics Official [electronically signed on 06/11/2021 by Steuber, Curtis in Integrity.gov]

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Data Revised 06/18/2021

Data Revised 06/17/2021

Data Revised 06/11/2021

Data Revised 06/07/2021

Data Revised 05/26/2021

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Ho-Chunk, Inc.	See Endnote	Winnebago, Nebraska	Tribally Owned Corporation	Executive Vice President	5/2017	1/2021
2	Arizona State University	See Endnote	Phoenix, Arizona	University/College	Director and Professor of Practice	8/2019	1/2021
3	Winnebago Comprehensive Helathcare System		Winnebago, Nebraska	Tribal Healthcare System	Board of Director	5/2017	1/2021
4	All Native Federal Systems Company		Winnebago, Nebraska	Tribal corporation	Board of Director	12/2019	1/2021
5	All Native Managed Services		Winnebago, Nebraska	Tribal corporation	President	4/2019	1/2021
6	All Native Synergies Company		Winnebago, Nebraska	Tribal corporation	Board of Director	10/2017	1/2021
7	Bear Mountain Services		Winnebago, Nebraska	Tribal corporation	Board of Director	12/2018	1/2021
8	Bear Ridge Services Company		Winenbago, Nebraska	Tribal corporation	Board of Director	12/2018	1/2021
9	Bear Eagle Solutions		Winnebago, Nebraska	Tribal corporation	Board of Director	12/2018	1/2021
10	Black Birch Managed Services Company		Winnebago, Nebraska	Tribal corporation	Board of Director	12/2018	1/2021
11	Blue Earth Marketing		Winnebago, Nebraska	Tribal corporation	Board of Director	12/2017	1/2021
12	Dynamic Systems		Winnebago, Nebraska	Tribal corporation	Board of Director	9/2019	1/2021
13	Fire Creek Company		Winnebago, Nebraska	Tribal corporation	Board of Director	12/2017	1/2021

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
14	Fire Creek Services	Winnebago, Nebraska	Tribal corporation	Board of Director	12/2017	1/2021
15	Flatwater Office Solutions	Winnebago, Nebraska	Tribal corporation	Board of Director	10/2019	1/2021
16	Flatwater Professional Services	Winnebago, Nebraska	Tribal corporation	Board of Director	6/2018	1/2021
17	Flatwater, Inc	Winnebago, Nebraska	Tribal corporation	Board of Director	10/2017	1/2021
18	HCI Investment Company	Winnebago, Nebraska	Tribal corporation	Board of Director	10/2019	1/2021
19	HCI Real Estate	Winnebago, Nebraska	Tribal corporation	Board of Director	8/2019	1/2021
20	Ho-Chunk Shared Services	Winnebago, Nebraska	Tribal corporation	Board of Director	10/2018	1/2021
21	Little Buffalo Company	Winnebago, Nebraska	Tribal corporation	Board of Director	12/2018	1/2021
22	Protege Health Services, LLC	Winnebago, Nebraska	Tribal corporation	Board of Director	10/2017	1/2021
23	Red Buffalo, Inc.	Winnebago, Nebraska	Tribal corporation	President	10/2018	1/2021
24	Red Buffalo Services	Winnebago, Nebraska	Tribal corporation	President	10/2018	1/2021
25	Thunder Ridge, Inc.	Winnebago, Nebraska	Tribal corporation	Board of Director	10/2018	1/2021
26	White Wolf Managed Services	Winnebago, Nebraska	Tribal corporation	Board of Director	12/2018	1/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Ho-Chunk, Inc.	N/A		Salary/Bonus	\$189,702
2	Ho-Chunk, Inc., anticipated bonus	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Arizona State University	N/A		Salary	\$60,160
4	Institute of American Indian Arts	N/A		Meeting stipend	\$1,000
5	Traditional IRA	No			
5.1	Akre Focus Fund Institutional Class (AKRIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	Alger Spectra Fund Class Z Shares (ASPZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	Columbia Small Cap Index Fund Institutional 2 Class (CXXRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	DoubleLine Shiller Enhanced CAPE Class I Shares (DSEEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	Fidelity Advisor Emerging Asia Fund Class I Shares (FERIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.6	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.7	Insured Deposit Program - Level (IDPL)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.8	iShares TIPS Bond ETF (TIP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.9	PIMCO Income Fund Institutional Class Shares (PIMIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.10	SPDR Portfolio Long Term Treasury ETF (SPTL)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.11	Sterling Capital Equity Income Fund Institutional Class Shares (BEGIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.12	T Rowe Price Capital Appreciation Fund Class I Shares (TRAIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Roth IRA	No			
6.1	AMCAP Fund Class F2 Shares (AMCFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	American Mutual Fund Class F2 Shares (AMRFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.3	Baird Aggregate Bond Fund Institutional Class Shares (BAGIX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.4	Capital World Bond Fund Class F-2 (BFWFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.5	Credit Suisse Commodity Return Strategy Fund Institutional Class Shares (CRSOX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.6	EuroPacific Growth Fund Class F2 Shares (AEPFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.7	Insured Deposit Program - Money Market Fund (AIGI)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.8	International Growth & Income Fund Class F2 Shares (IGFFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.9	New World Fund, Inc Class F2 Shares (NFFFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.10	Northern Funds Small Cap Value Fund (NOSGX)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.11	American SMALLCAP World Fund, Inc Class F2 Shares (SMCFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
7	Ho-Chunk, Inc, 401k	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.1	Standard Stable Asset Fund A (XSAFA)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.2	Vanguard Total Bond Market Index Fund Admiral Shares (VBTLX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.3	Vanguard Value Index Fund Admiral Shares (VVIAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.4	Fidelity 500 Index Fund (FXAIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.5	Fidelity Large Cap Growth Index Fund (FSPGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.6	Vanguard Mid-Cap Value Index Fund Admiral Class Shares (VMVAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.7	MFS Mid Cap Growth Fund Class R6 Shares (OTCKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.8	Schwab Small-Cap Index Fund (SWSSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.9	Vanguard Developed Markets Index Fund Admiral Class Shares (VTMGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8	Ho-Chunk, Inc., 409a Plan	No			
8.1	Invesco World Bond Factor Fund Class Y Shares (AUBYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.2	American Century Disciplined Core Value Fund I Class (AMGIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.3	Artisan Developing World Fund Advisor Class Shares (APDYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.4	BlackRock Technology Opportunities Fund Institutional Shares (BGSIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.5	Federated MDT All Cap Core Fund Institutional Class Shares (QIACX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.6	Federated MDT Large Cap Growth Fund Institutional Class Shares (QILGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.7	Fidelity Investment Grade Bond Fund (FBNDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.8	Fidelity Select Retailing Portfolio (FSRPX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.9	Heartland Value Plus Fund Investor Class Shares (HRVIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.10	JPMorgan Short Duration Core Plus Fund Class I Shares (JSDSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.11	Janus Henderson Contrarian Fund Class I Shares (JCONX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.12	JPMorgan Emerging Markets Equity Fund Class I Shares (JEMSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.13	ClearBridge Select Fund Class I Shares (LBFIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.14	LoCorr Long/Short Commodities Strategy Fund Class I Shares (LCSIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.15	MFS International Diversification Fund Class I Shares (MDIJX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.16	Morgan Stanley Institutional Fund Trust Growth Portfolio Class I Shares (MSEQX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.17	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.18	Morgan Stanley Insight Fund Class I Shares (CPODX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.19	PGIM QMA International Equity Fund Class Z Shares (PJIZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.20	Wasatch Ultra Growth Fund Investor Class Shares (WAMCX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.21	Weitz Partners III Opportunity Fund Institutional Class Shares (WPOPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.22	Western Asset Core Bond Fund Class I Shares (WATFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.23	SPDR S&P 500 ETF Trust (SPY)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.24	SPDR Dow Jones Industrial Average ETF Trust (DIA)	Yes	\$1,001 - \$15,000		None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Ho-Chunk, Inc.	Winnebago, Nebraska	Bonus is not guaranteed as it is dependent on company profitability. Per standard company policy and timing, I may receive an incentive payment in 2021 for work performed during the last calendar quarter of 2020 (October-December 2020), for services rendered prior to DOI onboarding. This the last incentive payment I will be eligible for unless or until I rejoin the company.	5/2017
2	Ho-Chunk, Inc, 401k	Winnebago, Nebraska	I will continue to participate in this defined contribution plan. The plan sponsor will not make contributions while I am on leave.	5/2017
3	Ho-Chunk, Inc., 409a	Winnebago, Nebraska	I will continue to participate in this defined contribution plan. The plan sponsor will not make contributions while I am on leave.	5/2017
4	Arizona State University	Phoenix, Arizona	I will take an unpaid leave of absence from my faculty position.	1/2021

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
5	Ho-Chunk, Inc.	Winnebago, Nebraska	I will take an unpaid leave of absence from my position with Ho-Chunk, Inc. I will not perform any duties in an official or unofficial capacity.	1/2021

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Ho-Chunk, Inc.	Winnebago, Nebraska	As Exec. VP for community impact and engagement I was the primary liaison with the tribal community, tribal government, and state and federal partners.
2	Arizona State University	Phoenix, Arizona	As a professor of practice and director of gaming and governance programs, I taught courses in related subject matter and was responsible for recruitment and retention of students.

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Elk Valley Rancheria (Native American Tribe)	N/A		salary	
2	Bledsoe Downes PC (solo legal practice)	N/A	\$1,001 - \$15,000	legal fees (solo legal practice)	
3	Xavier Prep High School	N/A		salary	
4	Elk Valley Rancheria, 401k	No			
4.1	Fidelity Advisor Freedom 2025 Fund Class A Shares (FATWX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	Fidelity Advisor Freedom 2030 Fund Class A Shares (FAFEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	Fidelity Advisor Freedom 2035 Fund Class A Shares (FATHX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.4	Fidelity Advisor Freedom 2040 Fund Class A Shares (FAFFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.5	Fidelity Advisor Freedom 2045 Fund Class A Shares (FFFZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	Fidelity Advisor Freedom 2050 Fund Class A Shares (FFFLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.7	Vanguard Target Retirement 2035 Fund Investor Class Shares (VTTHX)	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
4.8	Virtus Ceredex Mid-Cap Value Equity Fund Class A Shares (SAMVX)	Yes	None (or less than \$1,001)		None (or less than \$201)
5	Traditional IRA	No			
5.1	American Funds Preservation Portfolio Class F2 Shares (PPEFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	BlackRock Tactical Opportunities Fund Institutional Shares (PBAIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.3	BlackRock Technology Opportunities Fund Institutional Shares (BGSIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	BNY Mellon Appreciation Fund, Inc Class I Shares (DGIGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	Fidelity Advisor Growth Opportunities Fund Class I Shares (FAGCX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.6	Fidelity Select Retailing Portfolio (FSRPX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.7	Fidelity Stock Selector Small Cap Fund Stock Selector Small Cap Shares (FDSCX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.8	Franklin Utilities Fund Advisor Class (FRUAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.9	Insured Deposit Program - Level (IDPL)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.10	Neuberger Berman Large Cap Value Fund Institutional Class (NBPIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.11	PGIM Global Total Return Fund Class Z Shares (PZTRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.12	Touchstone Mid Cap Fund Class Y Shares (TMCPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.13	USAA Intermediate-Term Bond Fund Fund Class Shares (USIBX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.14	USAA International Fund (USIFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.15	Virtus KAR Emerging Markets Small-Cap Fund Class I Shares (VIESX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	SEP IRA	No			
6.1	Aberdeen Global Absolute Return Strategies Fund Institutional Class Shares (AGCIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	AMG Yacktman Fund Class I Shares (YACKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.3	BlackRock Emerging Markets Fund, Inc Institutional Shares (MADCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.4	BNY Mellon Global Real Return Fund Class I Shares (DRRIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.5	Boston Trust Midcap Fund (BTMFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.6	Carillon Reams Core Bond Fund Class I Shares (SCCIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.7	Hartford Schroders International Stock Fund Class I Shares (SCIEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.8	Insured Deposit Program - Level (IDPL)	Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.9	iShares Expanded Tech-Software Sector ETF (IGV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.10	iShares Russell Top 200 ETF (IWL)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.11	Putnam Short Duration Bond Fund Class Y Shares (PARYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.12	SPDR SSGA US Small Cap Low Volatility Index ETF (SMLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.13	Transamerica Capital Growth Class I Shares (TFOIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.14	VanEck Vectors Retail ETF (RTH)	Yes	\$1,001 - \$15,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US bank #1 (cash account)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2	US bank #2 (cash account)	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	US bank #3 (cash account)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	US credit union #1 (cash account)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5	US credit union #2 (cash account)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6	USAA, NV 529 #1	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.1	Moderately Aggressive	Yes	\$15,001 - \$50,000		None (or less than \$201)
7	USAA, NV 529 #2	No			
7.1	Growth	Yes	\$15,001 - \$50,000		None (or less than \$201)

## 7. Transactions

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

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	1	Currently on official leave of absence.
1.	2	Currently on official leave of absence.

# 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

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).

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