Annual Report 2023 for Calendar Year 2022 | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (Updated Nov. 2021)

# Executive Branch Personnel

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

### Filer's Information

Bachus, Spencer

Member, Board of Directors, Export-Import Bank

Report Year: 2023

Other Federal Government Positions Held During the Preceding 12 Months: None

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/ Bachus, Spencer [electronically signed on 05/14/2023 by Bachus, Spencer in Integrity.gov]

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/ Terry, Lisa, Certifying Official [electronically signed on 06/16/2023 by Terry, Lisa in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 07/14/2023 by Granahan, Megan in Integrity.gov]

Data Revised 06/23/2023

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

None

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

None

## 3. Filer's Employment Agreements and Arrangements

None

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Traditional IRA #1	No			
1.1	Berkshire Hathaway Inc. (BRKB)	No	\$15,001 - \$50,000		None (or less than \$201)
1.2	iShares Gold Trust (IAU)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	DoubleLine Low Duration Bond Fund Class I Shares (DBLSX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.4	FPA New Income, Inc (FPNIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	BlackRock Systematic Multi-Strategy Fund Institutional Class Shares (BIMBX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	Calamos Market Neutral Income Fund Class I Shares (CMNIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	FPA Crescent Fund (FPACX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.8	GMO Quality Fund Class I Shares (GQLIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.9	Goldman Sachs Rising Dividend Growth Fund Institutional Class Shares (GSRLX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.10	MainStay EpochGlobal Equity Yield Fund Class I Shares (EPSYX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.11	Merger Fund Institutional Class Shares (MERIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	Roth IRA Account	No		Cash Distribution	\$11,000
2.1	FPA New Income, Inc (FPNIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

# 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Bank Account #1	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	U.S. Bank Account #2	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Nationwide, Variable Annuity	No		-	
3.1	PIMCO VIT Low Duration	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.2	Large Cap International Portfolio Institutional Class Shares (DFALX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.3	PIMCO All Asset Fund Institutional Class Shares (PAAIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.4	PIMCO Short-Term Fund Institutional Class Shares (PTSHX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	U.S. Bank Account #3	N/A	\$100,001 - \$250,000		None (or less than \$201)

# 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	US Large Cap Value Portfolio Institutional Class Shares (DFLVX)	Purchase	06/01/2022	\$50,001 - \$100,000
2	PIMCO All Asset Fund Institutional Class Shares (PAAIX)	Purchase	06/01/2022	\$15,001 - \$50,000
3	PIMCO Short-Term Fund Institutional Class Shares (PTSHX)	Purchase	06/01/2022	\$50,001 - \$100,000
4	Growth Fund of America Class A Shares (AGTHX)	Sale	09/30/2022	\$15,001 - \$50,000
5	International Growth & Income Fund Class A Shares (IGAAX)	Sale	09/30/2022	\$15,001 - \$50,000
6	BlackRockGlobal Allocation Fund, Inc Investor A Shares (MDLOX)	Sale	09/30/2022	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
7	JP Morgan Insurance Trust Global A	Sale	09/30/2022	\$15,001 - \$50,000
8	PIMCO Dynamic Bond Fund Institutional Class Shares (PFIUX)	Sale	09/30/2022	\$15,001 - \$50,000
9	Vanguard Equity Income Fund Investor Shares (VEIPX)	Sale	09/30/2022	\$15,001 - \$50,000
10	Vanguard Mid-Cap Index Fund Institutional Shares (VMCIX)	Sale	09/30/2022	\$15,001 - \$50,000
11	Vanguard Short-Term Investment-Grade Fund Investor Shares (VFSTX)	Sale	09/30/2022	\$50,001 - \$100,000
12	DoubleLine Shiller Enhanced CAPE Class I Shares (DSEEX)	Sale	02/07/2022	\$1,001 - \$15,000
13	Dodge & Cox International Stock Fund (DODFX)	Purchase	02/08/2022	\$1,001 - \$15,000
14	iShares MBS ETF (MBB)	Sale	03/03/2022	\$1,001 - \$15,000
15	iShares 1-3 Year Treasury Bond ETF (SHY)	Purchase	03/03/2022	\$1,001 - \$15,000
16	iShares 7-10 Year Treasury Bond ETF (IEF)	Purchase	03/03/2022	\$1,001 - \$15,000
17	SPDR S&P Regional Banking ETF (KRE)	Sale	03/03/2022	\$1,001 - \$15,000
18	Angel Oak Multi-Strategy Income Fund Institutional Class Shares (ANGIX)	Sale	03/03/2022	\$1,001 - \$15,000
19	Fidelity Intermediate Bond Fund (FTHRX)	Sale	03/03/2022	\$1,001 - \$15,000
20	PIMCO Income Fund Institutional Class Shares (PIMIX)	Sale	03/03/2022	\$1,001 - \$15,000
21	Dodge & Cox International Stock Fund (DODFX)	Purchase	03/03/2022	\$1,001 - \$15,000
22	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)	Sale	03/03/2022	\$1,001 - \$15,000
23	iShares Gold Trust (IAU)	Purchase	06/21/2022	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
24	iShares 1-3 Year Treasury Bond ETF (SHY)	Sale	06/27/2022	\$1,001 - \$15,000
25	iShares 7-10 Year Treasury Bond ETF (IEF)	Purchase	06/27/2022	\$1,001 - \$15,000
26	Vanguard FTSE All-World ex US Index Fund ETF Shares (VEU)	Purchase	06/27/2022	\$1,001 - \$15,000
27	Guggenheim Macro Opportunities Fund Institutional Class Shares (GIOIX)	Purchase	06/21/2022	\$1,001 - \$15,000
28	Angel Oak Multi-Strategy Income Fund Institutional Class Shares (ANGIX)	Sale	06/27/2022	\$1,001 - \$15,000
29	Baird Intermediate Bond Fund Institutional Class Shares (BIMIX)	Purchase	06/27/2022	\$15,001 - \$50,000
30	DoubleLine Core Fixed Income Fund Class I Shares (DBLFX)	Sale	06/27/2022	\$1,001 - \$15,000
31	DoubleLine Low Duration Bond Fund Class I Shares (DBLSX)	Purchase	06/27/2022	\$1,001 - \$15,000
32	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)	Sale	06/27/2022	\$1,001 - \$15,000
33	EuroPacific Growth Fund Class F3 Shares (FEUPX)	Sale	06/21/2022	\$1,001 - \$15,000
34	BlackRock Systematic Multi-Strategy Fund Institutional Class Shares (BIMBX)	Purchase	06/21/2022	\$1,001 - \$15,000
35	Calamos Market Neutral Income Fund Class I Shares (CMNIX)	Purchase	06/21/2022	\$1,001 - \$15,000
36	Dodge & Cox International Stock Fund (DODFX)	Sale	06/21/2022	\$1,001 - \$15,000
37	Fidelity 500 Index Fund (FXAIX)	Sale	06/21/2022	\$15,001 - \$50,000
38	MFS International Growth Fund Class I Shares (MQGIX)	Sale	06/21/2022	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
39	MFS New Discovery Value Fund Class I Shares (NDVIX)	Sale	06/21/2022	\$1,001 - \$15,000
40	Schwab Small-Cap Index Fund (SWSSX)	Sale	06/21/2022	\$1,001 - \$15,000
41	Merger Fund Institutional Class Shares (MERIX)	Purchase	06/21/2022	\$1,001 - \$15,000
42	Fidelity 500 Index Fund (FXAIX)	Sale	06/27/2022	\$1,001 - \$15,000
43	Schwab Small-Cap Index Fund (SWSSX)	Sale	06/27/2022	\$1,001 - \$15,000
44	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)	Purchase	06/27/2022	\$1,001 - \$15,000
45	iShares Edge MSCI Min Vol USA ETF (USMV)	Purchase	08/23/2022	\$1,001 - \$15,000
46	SPDR Bloomberg Barclays 1-3 Month T-Bill ETF (BIL)	Purchase	08/23/2022	\$1,001 - \$15,000
47	Vanguard FTSE All-World ex US Index Fund ETF Shares (VEU)	Sale	08/23/2022	\$1,001 - \$15,000
48	Fidelity 500 Index Fund (FXAIX)	Sale	08/23/2022	\$1,001 - \$15,000
49	MFS New Discovery Value Fund Class I Shares (NDVIX)	Sale	08/23/2022	\$1,001 - \$15,000
50	Schwab Small-Cap Index Fund (SWSSX)	Sale	08/23/2022	\$1,001 - \$15,000
51	iShares Edge MSCI Min Vol USA ETF (USMV)	Sale	09/21/2022	\$1,001 - \$15,000
52	iShares 1-3 Year Treasury Bond ETF (SHY)	Sale	09/21/2022	\$1,001 - \$15,000
53	iShares 7-10 Year Treasury Bond ETF (IEF)	Sale	09/21/2022	\$1,001 - \$15,000
54	SPDR Bloomberg Barclays 1-3 Month T-Bill ETF (BIL)	Sale	09/21/2022	\$1,001 - \$15,000
55	Technology Select Sector SPDR Fund (XLK)	Sale	09/21/2022	\$1,001 - \$15,000

I-World ex US Index Fund	Sale		
	Sale	09/21/2022	\$1,001 - \$15,000
ap Growth Index Fund ETF	Sale	09/21/2022	\$1,001 - \$15,000
dex Fund ETF Shares	Sale	09/21/2022	\$1,001 - \$15,000
	Sale	09/21/2022	\$15,001 - \$50,000
te Bond Fund (FTHRX)	Sale	09/21/2022	\$15,001 - \$50,000
o Opportunities Fund Shares (GIOIX)	Sale	09/21/2022	\$1,001 - \$15,000
	Sale	09/21/2022	\$1,001 - \$15,000
nd Institutional Class	Sale	09/21/2022	\$1,001 - \$15,000
uration Bond Fund Class I	Purchase	09/29/2022	\$15,001 - \$50,000
Inc (FPNIX)	Purchase	09/29/2022	\$15,001 - \$50,000
Fund Class F3 Shares	Sale	09/21/2022	\$1,001 - \$15,000
national Stock Fund	Sale	09/21/2022	\$1,001 - \$15,000
Fund (FXAIX)	Sale	09/21/2022	\$50,001 - \$100,000
ap Growth Fund Class I	Sale	09/21/2022	\$1,001 - \$15,000
Growth Fund Class I	Sale	09/21/2022	\$1,001 - \$15,000
	ap Growth Index Fund ETF  index Fund ETF Shares  Bond Fund Institutional (IX)  ite Bond Fund (FTHRX)  ro Opportunities Fund Shares (GIOIX)  I Return Bond Fund Shares (GIBIX)  und Institutional Class  puration Bond Fund Class I  Inc (FPNIX)  h Fund Class F3 Shares  rnational Stock Fund  Fund (FXAIX)  Cap Growth Fund Class I  Growth Fund Class I	Index Fund ETF SharesSalea Bond Fund Institutional IIX)Salea Bond Fund (FTHRX)Salero Opportunities Fund Shares (GIOIX)SaleI Return Bond Fund Shares (GIBIX)SaleI Return Bond Fund Shares (GIBIX)SaleInd Institutional ClassSalePurchasePurchaseInc (FPNIX)Purchaseh Fund Class F3 SharesSaleFund (FXAIX)SaleCap Growth Fund Class ISale	Index Fund ETF SharesSale09/21/2022Bond Fund InstitutionalSale09/21/2022Bond Fund InstitutionalSale09/21/2022Ite Bond Fund (FTHRX)Sale09/21/2022ro Opportunities Fund Shares (GIOIX)Sale09/21/2022I Return Bond Fund Shares (GIBIX)Sale09/21/2022Ind Institutional ClassSale09/21/2022Inc (FPNIX)Purchase09/29/2022Inc (FPNIX)Purchase09/29/2022Inc (FXAIX)Sale09/21/2022Fund (FXAIX)Sale09/21/2022Cap Growth Fund Class ISale09/21/2022

#	DESCRIPTION	TYPE	DATE	AMOUNT
71	MFS New Discovery Value Fund Class I Shares (NDVIX)	Sale	09/21/2022	\$1,001 - \$15,000
72	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)	Sale	09/21/2022	\$1,001 - \$15,000
73	FPA Crescent Fund (FPACX)	Purchase	09/29/2022	\$15,001 - \$50,000
74	GMO Quality Fund Class I Shares (GQLIX)	Purchase	09/29/2022	\$15,001 - \$50,000
75	Goldman Sachs Rising Dividend Growth Fund Institutional Class Shares (GSRLX)	Purchase	09/29/2022	\$15,001 - \$50,000
76	MainStay EpochGlobal Equity Yield Fund Class I Shares (EPSYX)	Purchase	09/29/2022	\$15,001 - \$50,000
77	Berkshire Hathaway Inc. (BRKB)	Purchase	09/29/2022	\$15,001 - \$50,000
78	iShares Core S&P 500 ETF (IVV)	Sale	09/19/2022	\$1,001 - \$15,000
79	iShares Core US Aggregate Bond ETF (AGG)	Sale	09/19/2022	\$1,001 - \$15,000
80	Vanguard Short-Term Bond Index Fund ETF Shares (BSV)	Sale	09/19/2022	\$1,001 - \$15,000
81	FPA New Income, Inc (FPNIX)	Purchase	09/29/2022	\$1,001 - \$15,000

# 8. Liabilities

None

# 9. Gifts and Travel Reimbursements

Endnotes

## 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 OGÉ 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).