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

Donilon, Michael C

Assistant to President and Senior Adviser, Executive Office of the President, White House - Biden-Harris Administration

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/ Donilon, Michael C [electronically signed on 05/01/2023 by Donilon, Michael C 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/ Crotty, Sean M, Certifying Official [electronically signed on 05/01/2023 by Crotty, Sean M in Integrity.gov]

Other review conducted by

/s/ Crotty, Sean M, Ethics Official [electronically signed on 05/01/2023 by Crotty, Sean M in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 05/05/2023 by Granahan, Megan in Integrity.gov]

Data Revised 05/01/2023

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

None

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	TIAA/CREF Van Inst Tg Rtm 30 Inst	Yes	\$50,001 - \$100,000		None (or less than \$201)
2	SEP-IRA	No			
2.1	iShares Core S&P Small-Cap ETF (IJR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	iShares Trust Core MSCI EAFE ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	iShares INC Core MSCI Emerging MKTS ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	iShares Trust Currency Hedged MSCI EAFE ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	Vanguard S&P 500 Growth Index Fund ETF Shares (VOOG)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.6	Vanguard Small-Cap Value Index Fund ETF Class Shares (VBR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.7	Vanguard Index Fund Vanguard Value	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.8	Vanguard International Equity Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.9	Vanguard Real Estate ETF	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	University of Delaware	Newark, Delaware	I will continue to participate in this defined contribution plan, but I have made no contributions since my separation (6/2020).	6/2017

## 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

None

### 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Based Bank #1 (Cash)	N/A	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
2	Brokerage acct #1	No			
2.1	FIDELITY GOVERNMENT CASH RESERVES (FDRXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	EDGEWOOD GROWTH FUND INSTL CL (EGFIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.3	CHAMPLAIN SMALL COMPANY CLASS INSTL (CIPNX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	GOLDMAN SACHS MID CAP VALUE-INSTL SH (GSMCX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	GOLDMAN SACHS LARGE CAP VALUE INSTL (GSLIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.6	PEAR TREE POLARIS FRGN VALUE INSTL (QFVIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.7	BOSTON PARTNERS SM CAP VALUE II INST (BPSIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.8	SOUND SHORE FUND INSTITUTIONAL (SSHVX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.9	GOLDMAN SACHS SHORT DURATION GOVT INSTL (GSTGX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.10	GOLDMAN SACHS HIGH YIELD INSTITUTIONAL (GSHIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.11	GOLDMAN SACHS GOVT INCOME- INSTITUTIONAL (GSOIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.12	WELLS FARGO CORE BOND FD INSTL (MBFIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.13	ALPS ETF TR ALERIAN MLP (AMLP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.14	ISHARES INC MSCI PAC JP ETF (EPP)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.15	ISHARES CORE S&P 500 (IVV)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2.16	ISHARES S&P 500 GROWTH ETF (IVW)	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.17	ISHARES CORE S&P MID-CAP 400 INDEX FUND (IJH)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.18	ISHARES S&P MID CAP 400 GROWTH ETF (IJK)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.19	ISHARES CORE S&P SMALL-CAP E (IJR)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.20	ISHARES INC CORE MSCI EMERGING MKTS ETF (IEMG)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.21	ISHARES INC MSCI JPN ETF NEW (EWJ)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.22	VANGUARD INTL EQUITY INDEX FDS FTSE EUROPE ETF (VGK)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.23	ISHARES TR ISHS 1-5YR INVS (IGSB)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3	Brokerage Acct #2	No			
3.1	Fidelity Government Cash Reserves (FDRXX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.2	SPDR S&P500 ETF TRUST S&P 500 ETF USD DIS (SPY)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.3	VANGUARD INDEX FDS VANGUARD GROWTH ETF FORMERLY VANGUARD INDEX TR VIPERS (VUG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	Brokerage Acct #3	No			
4.1	FIDELITY GOVERNMENT CASH RESERVES (FDRXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	AMG YACKTMAN FOCUSED I (YAFIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	AQR MANAGED FUTURES FUND CL I (AQMIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE INCOM	ME TYPE INCOME AMOUNT
4.4	JOHCM INTERNATIONAL SELECT FUND CL I (JOHIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.5	ARTISAN THEMATIC FD ADVISOR CL (APDTX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.6	CALAMOS MARKET NEUTRAL INCOME CL I (CMNIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.7	AKRE FOCUS FUND INSTL (AKRIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.8	RIVER CANYON TOTAL RETURN BOND INSTL (RCTIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.9	CHIRON CAPITAL ALLOCATION FUND CL I (CCAPX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.10	BLACKROCK STRATEGIC INC OPP PORT CL K (BSIKX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.11	JOHN HANCOCK INCOME FUND CLASS I (JSTIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.12	BRANDYWINEGLOBAL GLBL UNCONSTRAN BD I (LROIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.13	PIMCO INCOME FUND INSTITUTIONAL FUND (PIMIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.14	TCW EMERGING MKTS INCOME CL I (TGEIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.15	LEGG MASON WESTERN ASSET MACRO OPP I (LAOIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.16	BNY MELLON GLOBAL REAL RETURN I (DRRIX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
5	U.S. based bank #2 (cash)	N/A	\$500,001 - Interes \$1,000,000	st \$201 - \$1,000
6	Brokerage Acct #4	No		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.1	U.S. Based Bank #3 (Cash)	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
6.2	ISHARES S&P 100 ETF (OEF)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.3	SPDR S&P 500 ETF TRUST (SPY)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
6.4	ISHARES RUSSELL 1000 GROWTH ETF (IWF)	Yes	\$250,001 - \$500,000		None (or less than \$201)
6.5	ISHARES CORE DIVIDEND GROWTH ETF (DGRO)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.6	ISHARES RUSSELL 1000 VALUE ETF (IWD)	Yes	\$250,001 - \$500,000		None (or less than \$201)
6.7	ISHARES CORE S&P MID-CAP ETF (IJH)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.8	ISHARES CORE S&P SMALL-CAP ETF (IJR)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.9	ISHARES MSCI CANADA ETF (EWC)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.10	VANGUARD FTSE EUROPEAN ETF ETF (VGK)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.11	ISHARES, INC ISHARES MSCI UNITED KINGDOM ETF (EWU)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.12	ISHARES, INC.MSCI JAPAN ETF MUTUAL FUND (EWJ)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.13	ISHARES MSCI PACIFIC EX JAPAN ETF (EPP)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.14	ISHARES CORE MSCI EMERGING MARKETS ETF (IEMG)	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.15	ISHARES MSCI EUROZONE ETF (EZU)	Yes	\$250,001 - \$500,000		None (or less than \$201)
6.16	SPDR S&P BANK ETF (KBE)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.17	WISDOM TREE JAPAN HEDGED EQUITY FUND (DXJ)	Yes	None (or less than \$1,001)		None (or less than \$201)
6.18	WISDOMTREE EUR HDGD EQ FD CMN (HEDJ)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
7	Blizzard LLC	No			
7.1	U.S. Based Bank #4 (Cash)	N/A	\$1,001 - \$15,000	Interest	\$1,001 - \$2,500
8	Brokerage Acct #5	No			
8.1	U.S. Based Bank #5 (Cash)	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
8.2	ALASKA ST GO 5% 08/01/26-CA FA GO BDS 2016 A UT BEO SR LIEN	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.3	ALASKA ST HSG FIN CORP REV 5% 12/01/24 JD ST CAP PROJ BDS II 2015B BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.4	ARLINGTON CNTY VA INDL DEV REV 5% 02/15/28-CA FA AUTH REV REF BDS 2017 BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.5	CELINA TEX DB 5% 09/01/29-CA MS TAX WTR WORKS SWR SYS REV CTFS OBLIG 2018 UT BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.6	CITY OF NY GEN OBLIGATION BDS GO 5.0000% 08/01/25-CA FA FISCAL 2015 SERIES C AND D BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.7	CORPUS CHRISTI TEX ISSUES DTD GO 5.0000% 03/01/26-CA MS PRIOR TO 12/01/1989 IN 220111 GEN IMPT LT BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE INCOME TY	/PE INCOME AMOUNT
8.8	DISTRICT COLUMBIA GO 5% 10/15/28 AO GO BDS 2019 A UT BEO	N/A	\$50,001 - \$100,000	None (or less than \$201)
8.9	DORM AUTH OF THE STATE OF NY REV 5.0000% 10/01/27 AO SCH DISTS REV BD FING PROG REV BONDS SER 2017A	N/A	\$15,001 - \$50,000	None (or less than \$201)
8.10	EL PASO TEX DB 5% 08/15/29-CA FA COMB TAX AND REV CTFS OF OBLIG 2019 UT BEO	N/A	\$100,001 - \$250,000	None (or less than \$201)
8.11	HAMPTON ROADS SANTN DIST VA REV 5% 08/01/33 FA WASTEWATER REV REV BDS 2016 A PRERE 08/01/26 BEO SUB LIEN	N/A	\$15,001 - \$50,000	None (or less than \$201)
8.12	HONOLULU HAWAII CITY & COUNTY GO 5.0000% 09/01/28 MS - BEO	N/A	\$50,001 - \$100,000	None (or less than \$201)
8.13	HOUSTON TEX UTIL SYS REV 5.0000% 11/15/23 MN RFDG-COMBINED-FIRST LIEN- SER B BEO	N/A	\$15,001 - \$50,000	None (or less than \$201)
8.14	ISLE WIGHT CNTY VA GO 5% 07/01/24 JJ GO REF BDS 2017 B UT BEO	N/A	\$50,001 - \$100,000	None (or less than \$201)
8.15	JACKSONVILLE FLA SPL REV REV 5% 10/01/24 AO REV REF BDS A BEO	N/A	\$15,001 - \$50,000	None (or less than \$201)
8.16	LEANDER TEX INDPT SCH DIST GO 0% 08/15/24 ULTD TAX REF BDS 2013 A PRERE 08/15/23 UT BEO OID	N/A	\$1,001 - \$15,000	None (or less than \$201)
8.17	LEANDER TEX INDPT SCH DIST GO 0% 08/15/24-CA ULTD TAX REF BDS 2013 A UT BEO OID	N/A	\$1,001 - \$15,000	None (or less than \$201)
8.18	LOUDOUN CNTY VA ECONOMIC DEV REV 5.0000% 12/01/27-CA JD AUTH PUB FAC LSE REV BDS LNDN CNTY PUB FACS PROJ 2016 B BEO	N/A	\$15,001 - \$50,000	None (or less than \$201)
8.19	LOUISIANA ST GO 5% 03/01/27 MS GO BDS 2019-A UT BEO	N/A	\$50,001 - \$100,000	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.20	MANSFIELD TEX ECONOMIC DEV REV 4% 08/01/23 FA CORP SALES TAX REV REV BDS 2016 BEO SR LIEN	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.21	MASSACHUSETTS ST GO 5% 09/01/29 MS REF BDS 2018C UT BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.22	MEMPHIS TENN GO 5% 11/01/23 MN GO IMPT REF BDS 2014A UT BEO SR LIEN	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.23	MIAMI-DADE CNTY FLA TRAN SYS REV 5% 07/01/25 JJ SALES SURTAX REV REF BDS 2019 BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.24	MISSISSIPPI ST GO 5% 10/01/26 AO GO REF BDS 2017 A UT BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.25	RHODE ISLAND ST & PROVIDENCE GO 5.0000% 08/01/25-CA FA PLANTATIONS RFDG-CONS CAP DEV LN-SER D BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.26	STATE OF CONNECTICUT GO 5.0000% 08/01/26-CA FA BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.27	VA COE BG VA EL FS CY EQP PG REV 7.7350% 02/01/30 FA TAXABLE REF BDS 2020B TAXBL BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.28	VA ST RES AUTH INFRASTR FOR REV 5.0000% 11/01/23 MN PREV ISS UNREF BAL-RFDG NON AMT NON ACE-ST MORAL OBLIG VA	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.29	VA ST RES AUTH INFRASTRUCTURE REV 5.0000% 11/01/23 MN PREREFUNDED- RFDG SR LIEN	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.30	VA ST RES AUTH INFRASTRUCTURE REV 5.0000% 11/01/27 MN INFRASTRUCTURE- VA POOLED FING PROG-SER B GUA BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.31	WASHINGTON D C MET AREA TRAN REV 5% 07/01/28-CA JJ AUTH GROSS REV REV TRANSIT REF BDS A-1 BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.32	WASHINGTON ST GO 5% 02/01/30-CA FA VARIOUS PURP GO BDS 2019 C UT BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.33	WEST FARGO N D DB 5% 05/01/25 MN REF IMPT BDS 2017 A UT INS BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.34	VIRGINIA COLLEGE BLDG AUTH VA REV 5% 02/01/26 FA EDL FACS REV REV REF BDS B BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.35	Virginia St Pub Sch Auth S0on Rev 4% 10/01/30 AO Oblig Prince Willian	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.36	Norfolk VA GO 5% 03/01/32	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.37	Roanoke VA GO 5% 04/01/31	N/A	\$100,001 - \$250,000		None (or less than \$201)
9	Brokerage Acct #6	No			
9.1	GOLDMAN SACHS FIN SQ GOVT FST INSTL (FGTXX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	iShares Core MSCI Emerging Markets ETF (IEMG)	Purchase	11/07/2022	\$15,001 - \$50,000
2	Fairfax Cnty VA Economic Dev A Rev 4% 04/01/34 AO	Purchase	08/11/2022	\$50,001 - \$100,000
3	iShares MSCI Eurozone ETF (EZU)	Purchase	06/17/2022	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
4	Charlottesville VA GO 5% 06/15/29 JD	Purchase	06/07/2022	\$100,001 - \$250,000
5	University VA Univ Revs 5% 06/01/43 JD	Purchase	05/03/2022	\$100,001 - \$250,000
6	Richmond VA GO 5% 07/15/31 CA JJ	Purchase	04/29/2022	\$100,001 - \$250,000
7	Roanoke VA GO 5% 04/01/32 AO	Purchase	04/29/2022	\$100,001 - \$250,000
8	Hampton Rds VA Transn Rev 5.5% 07/01/57-CA JJ	Purchase	04/26/2022	\$100,001 - \$250,000
9	Loudoun Cnty VA GO 5% 12/01/24 JD	Purchase	04/26/2022	\$100,001 - \$250,000
10	Loudoun Cnty VA GO 5% 12/01/30 JD	Purchase	04/22/2022	\$100,001 - \$250,000
11	Montgomery Cnty VA Economic Rev 5% 02/01/26 FA	Purchase	04/22/2022	\$100,001 - \$250,000
12	Virginia St Pub Bldg Auth Pub Rev 5% 08/01/28	Purchase	04/21/2022	\$100,001 - \$250,000
13	Virginia St Res Auth Rev 5% 11/01/26 MN	Purchase	04/20/2022	\$100,001 - \$250,000
14	Goochland Cnty VA GO 5% 01/15/31 JJ	Purchase	03/02/2022	\$50,001 - \$100,000
15	Loudoun Cnty VA GO 3% 12/01/32 CA JD	Purchase	01/05/2022	\$15,001 - \$50,000
16	Fidelity Government Cash Reserves (FDRXX)	Purchase	09/30/2022	\$1,001 - \$15,000
17	American Beacon AHL Managed Futures Strategy Fund Class Y Shares (AHLYX)	Purchase	03/31/2022	\$1,001 - \$15,000

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION	VALUE
1	Meridian International Center	Washington, District of Columbia	Free attendance at the Meridian Ball	\$5,000
2	The Washington Post	Washington, District of Columbia	Free attendance at the White House Correspondents Dinner.	\$700
3	The Irelands Fund	Washington, District of Columbia	Free attendance at The Irelands Fund National Gala.	\$2,000

# 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).