

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Cleveland, Sarah

Legal Adviser, Department of State

Other Federal Government Positions Held During the Preceding 12 Months:

Department of State, Advisory Committee on International Law (8/2011 - Present)

Names of Congressional Committees Considering Nomination:

- Committee on Foreign Relations
-

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/ Cleveland, Sarah [electronically signed on 05/02/2021 by Cleveland, Sarah 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/ Visek, Richard, Certifying Official [electronically signed on 08/12/2021 by Visek, Richard in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 08/16/2021 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	Columbia University		New York, New York	University/College	Professor of Law	7/2007	Present
2	Sciences-Po University	See Endnote	Paris, Outside U.S.	University/College	Visiting Professor	1/2021	4/2021
3	Human Rights First		New York, New York	Non-Profit	Board of Directors	2/2021	Present
4	International Bar Association Human Rights Institute		London, Outside U.S.	Non-Profit	Council Member	4/2013	Present
5	Columbia Journal of Transnational Law		New York, New York	Non-Profit	Board of Directors	11/2007	Present
6	UN Development Program		New York, New York	International organization	Consultant	11/2018	12/2019
7	Committee on the Elimination of All Forms of Racial Discrimination, Office of the High Commissioner for Human Rights, United Nations		Geneva, Outside U.S.	International Organization	Ad Hoc Conciliation Commission, Qatar v. United Arab Emirates	2/2020	Present
8	Global Campaign on Media Freedom	See Endnote	London, Outside U.S.	UK-Canadian Diplomatic Initiative	Member, High Level Panel of Legal Experts on Media Freedom	7/2019	Present
9	European Commission for Democracy Through Law, Council of Europe	See Endnote	Strasbourg & Venice, Outside U.S.	International Organization	Member	4/2013	4/2019
10	Microsoft Technology and Human Rights Advisory Council		Redmond, Washington	Corporation	Member	2/2021	Present
11	International Commission of Jurists		Geneva, Outside U.S.	Non-Profit	Commissioner	2/2018	Present

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
12	International Bar Association		London	Non-Profit	Co-Vice Chair, Human Rights Committee	1/2020	12/2020
13	International Committee of the Red Cross		Geneva, Outside U.S.	Non-Profit	Board of Editors, International Review of the Red Cross	3/2015	12/2020
14	Israel Democracy Institute and Yad Vashem		Jerusalem, Outside U.S.	Non-Profit	Steering Committee, Recommendations for Reducing Online Hate Speech	8/2018	12/2019
15	Centre for Civil & Political Rights	See Endnote	Geneva, Outside U.S.	Non-Profit	Advisory Board	1/2020	Present
16	Geneva Human Rights Platform, Geneva Academy of International Humanitarian Law and Human Rights	See Endnote	Geneva, Outside U.S.	University/College	Advisory Board	3/2020	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Columbia University	N/A		Salary	\$579,851
2	Sciences-Po University	N/A		Salary	\$24,128
3	IRA #1	No			
3.1	American Funds Growth & Income Portfolio A	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	IRA #2	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.1	American Funds Balanced Fund Class A	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.2	American Funds Capital World Bond Fund Class A	Yes	\$15,001 - \$50,000		None (or less than \$201)
5	Columbia University Voluntary Retirement Plan	No			
5.1	Vanguard Institutional Target Retirement 2030 Fund	Yes	\$250,001 - \$500,000		None (or less than \$201)
6	Columbia University TIAA-CREF Voluntary Contribution Plan	No			
6.1	Vanguard Institutional Target Retirement 2030 Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	University of Texas Defined Contribution Plan	No			
7.1	VY TRowePrice Captital Appreciation Portfolio Inst	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.2	Voya Russell Lrg Cap Index Portfolio I	Yes	\$100,001 - \$250,000		None (or less than \$201)
7.3	VY TRowePrice Growth Equity Portfolio I	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.4	Voya Large Cap Growth Portfolio Inst	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.5	VY Baron Growth Portfolio - Service Class	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.6	VY JPMorgan Sm Cp Core Eq Prt Inst	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.7	Voya Russell Mid Cap Index Portfolio I	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.8	American Funds New Perspective R4	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	Columbia University Defined Contribution Plan	No			
8.1	Vanguard Institutional Target Retirement 2030	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
9	UN Development Program	N/A		Consultancy Fee	\$10,500
10	European University Institute - 06/30/2020	See Endnote	N/A	Honorarium for book chapter	\$1,170
11	"Human Rights," 2d Ed., Foundation Press/LEG, Inc. Publishing (value not readily ascertainable)	N/A		Rent or Royalties	\$201 - \$1,000
12	"The Restatement and Beyond: The Past, Present, and Future of U.S. Foreign Relations Law," Oxford University Press (value not readily ascertainable)	See Endnote	N/A		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Columbia University	New York, New York	I will take an unpaid, three-year leave of absence from my faculty position.	5/2021
2	Columbia University	New York, New York	I am eligible for the following tuition benefits for my two children: (1) a "College Tuition Scholarship" that pays 50 % of the tuition at other universities and (2) a "Tuition Exemption" for tuition at Columbia and Barnard. I currently receive benefit (1) for one child and will also receive benefit (2) for a second child beginning fall 2021. Columbia will continue to provide both of these benefits during my unpaid leave of absence while my children are in college.	8/2019
3	University of Texas	Austin, Texas	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	1/1997

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
4	Columbia University	New York, New York	I will continue to participate in these defined contribution plans. The plan sponsor will not make further contributions while I am on leave.	7/2007

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Columbia University	New York, New York	Law professor
2	Sciences-Po University	Paris, Outside U.S.	Visiting professor
3	UN Development Program	Hanoi, Outside U.S.	Provided expert trainings for review of Government of Vietnam by the UN Human Rights Committee.

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

None

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Residential real estate, New York, NY	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
2	VA (CollegeAmerica) 529 College Savings Plan #1	No		cash payments	\$41,059
2.1	American Funds The Investment Company Of America	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.2	American Funds The Growth Fund Of America	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	American Funds New Perspective Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	American Funds Washington Mutual Investors Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.5	American Funds Amcap Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
3	VA (CollegeAmerica) 529 College Savings Plan #2	No			
3.1	American Funds The Growth Fund Of America	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	American Funds Washington Mutual Investors Fund	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.3	American Funds Amcap Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	Farm land, Wilton, AL, leased for cash rent	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
5	U.S. bank #1 (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	HSBC (France) (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	U.S. bank #2 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8	TIAA-CREF Account - Dependent Child	No			
8.1	TIAA-CREF Growth & Income Fund - Retail Class	Yes	\$1,001 - \$15,000		None (or less than \$201)

7. Transactions

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

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Bank of America	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2012	4.25	30 years

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	2	Also served as visiting professor during the spring semesters in 2020 and 2019.
1.	8	Note: My service on the High Level Panel of Legal Experts on Media Freedom ended in June 2021, after my nominee financial disclosure report was submitted.
1.	9	Previously served as Observer Member from 10/2010 - 4/2013
1.	15	Previous work with the Centre for Civil and Political Rights before the reporting period included missions to Guatemala (2019) and Namibia (2016). Current position included on report because I have participated in workshops and advised on reports while serving on Advisory Board.

PART	#	ENDNOTE
1.	16	Advisory Board position included in report because I also have participated in workshops and assisted the organization with planning events.
2.	10	Draft delivered; book not yet published.
2.	12	Co-editor with Paul Stephen.

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.

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