

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

Filer's Information

KLASS, ALEXANDRA

Deputy General Counsel for Litigation, Regulation, and Enforcement, Department of Energy

Date of Appointment: 04/24/2022

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/ KLASS, ALEXANDRA [electronically signed on 05/03/2022 by KLASS, ALEXANDRA 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/ Seibert, Apple, Certifying Official [electronically signed on 07/13/2022 by Seibert, Apple in Integrity.gov]

Other review conducted by

/s/ Seibert, Apple, Ethics Official [electronically signed on 07/13/2022 by Seibert, Apple in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 07/13/2022

Data Revised 05/14/2022

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(04/13/2022, Gordon, Wayne P.): Section 208: University of Minnesota, University of Arizona, University of Michigan, Foundation for Natural Resources and Energy Law, Minnesota State Bar Association, Nilan, Johnson, and Lewis PA and their clients, Apple
N/A	N/A	General	(07/13/2022, Seibert, Apple): OA: Outside writing activity - Natural Resources Law: A Place-Based Book of Problems and Cases (approved).

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	University of Minnesota	Minneapolis, Minnesota	University/College	Professor	6/2006	Present
2	University of Arizona	Tucson, Arizona	University/College	Visiting Professor	1/2022	Present
3	National Council of Bar Examiners	Madison, Wisconsin	Non-Profit	MBE Torts Committee Member	10/2021	4/2022
4	Foundation for Natural Resources and Energy Law	Westminster, Colorado	Non-Profit	Law School Trustee	8/2019	4/2022
5	Minnesota State Bar Association	Minneapolis, Minnesota	Non-Profit	Governing Council Member, Public Utilities Section	7/2020	Present
6	Minnesota Center for Environmental Advocacy	Saint Paul, Minnesota	Non-Profit	Board President	1/2022	4/2022
7	Governor's Advisory Council on Climate Change	Saint Paul, Minnesota	Advisory Council created by Minnesota Governor Tim Walz Executive Order in 2019	Advisory Council Member	10/2020	4/2022

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	University of Minnesota	N/A		Salary	\$194,835

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	University of Arizona	N/A		Salary	\$43,776
3	National Council of Bar Examiners - October 26 2021	N/A		Honorarium	\$4,000
4	Duke University - December 13 2021	N/A		Honorarium	\$2,500
5	"Natural Resources Law: A Place-Based Book of Problems and Cases," 4th ed., Walters Kluwer (value not readily ascertainable)	N/A		Rent or Royalties	\$201 - \$1,000
6	University of Minnesota Faculty Retirement 401(a)	No			
6.1	Calvert US Large-Cap Core Responsible Index Fund Class R6 Shares (CSXRX)	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
6.2	Calvert Bond Fund Class R6 Shares (CBORX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.3	Vanguard Extended Market Index Fund Institutional Plus Shares (VEMPX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.4	Vanguard Developed Markets Index Fund Institutional Plus Shares (VDIPX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.5	Vanguard Total Bond Market Index Fund Institutional Plus Shares (VBMPX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	University of Minnesota Faculty Retirement 403(b)	No			
7.1	Calvert US Large-Cap Core Responsible Index Fund Class R6 Shares (CSXRX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
7.2	Vanguard Total Bond Market Index Fund Institutional Plus Shares (VBMPX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
7.3	Vanguard Developed Markets Index Fund Institutional Plus Shares (VDIPX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.4	Vanguard Extended Market Index Fund Institutional Plus Shares (VEMPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	University of Nebraska - November 11, 2021	N/A		honorarium	\$250
9	Washington Analytics - June 9, 2021	N/A		honorarium	\$1,000
10	"Energy Law and Policy," West Academic Publishing (value not readily ascertainable)	N/A		Rent or Royalties	\$2,501 - \$5,000
11	"Energy Law: Concepts and Insight Series," 2d ed., Foundation Press (value not readily ascertainable)	N/A		Rent or Royalties	\$201 - \$1,000
12	"The Practice and Policy of Environmental Law," 4th ed., Foundation Press (value not readily ascertainable)	N/A		Rent or Royalties	\$1,001 - \$2,500

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	University of Minnesota	Minneapolis, Minnesota	I will take an unpaid leave of absence from my faculty position during my employment with DOE.	3/2022
2	University of Arizona	Tucson, Arizona	Visiting Professor position will end weekend of 5/14. No future agreement for employment.	3/2022
3	University of Michigan Law School	Ann Arbor, Michigan	Pending appointment to position on faculty. The position will be in unpaid leave of absence status during my employment with DOE.	8/2022
4	University of Minnesota	Minneapolis, Minnesota	I will continue to participate in these defined contribution plans (401(a) and 403(b)). The plan sponsor will not make contributions during my leave of absence.	3/2022

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	University of Minnesota	Minneapolis, Minnesota	Professor of Law -- Teaching, scholarly writing, advising students, serving on law school and university-wide committees
2	University of Arizona	Tucson, Arizona	Visiting Professor of Law -- Teaching for one semester, participating in faculty workshops, advising students

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Nilan Johnson Lewis PA (Law Firm)	N/A		salary, bonus	
2	Shares in Nilan, Johnson Lewis	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Stephen Warch 401k (Nilan Johnson Lewis)	No			
3.1	T Rowe Price Stable Value	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.2	Vanguard Inflation-Protected Securities Fund Admiral Shares (VAIPX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.3	TCW Total Return Bond Fund Class I Shares (TGLMX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.4	PIMCO High Yield Fund Institutional Class Shares (PHIYX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.5	MainStay MacKay Convertible Fund Class I Shares (MCNVX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.6	Invesco Comstock (ACSHX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.7	MainStay Winslow Large Cap Growth Fund Class R6 Shares (MLRSX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.8	JP Morgan Mid Cap Value (FLMVX)	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.9	Vanguard Mid-Cap Growth Fund (VMGRX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.10	Victory Integrity Sm Cap Value (MVSSX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.11	Loomis Sayles Small Cap Growth Fund Institutional Class (LSSIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.12	American EuroPacific (RERFX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.13	Transamerica International Equity Class R6 Shares (TAINX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Commonwealth Annuity (Warch)	No			
1.1	GIAt BlackRock Disciplined Core	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	GIAt Blackrock Disciplined Intl Core	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	GIAt BlackRock Disciplined Value	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	GIAt BlackRock Disclplnd Mid Cap Gr CL II	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	GIAt BlackRock High Yield	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	GIAt BlackRock High Yield	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Commonwealth Annuity (Klass)	No			
2.1	GIAt BlackRock Disciplined Core	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	GIAt Blackrock Disciplined Intl Core	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	GIAt BlackRock Disciplined Value	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	GIAt BlackRock Mid Cap GR CI II	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	GIAt BlackRock High Yield	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	VigiLanz Corporation Stock	N/A	\$50,001 - \$100,000		None (or less than \$201)
4	Alexandra Klass IRA	No			
4.1	iShares Core S&P 500 ETF (IVV)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.2	Brown Advisory Growth Equity Fund Investor Class Shares (BIAGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.3	Calvert Small Cap Fund Class I Shares (CSVIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.4	Eaton Vance Floating-Rate Advantage Fund Class I Shares (EIFAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.5	Federated Institutional High Yield Bond Fund Institutional Shares (FIHBX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.6	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.7	JPMorgan Income Fund Class I Shares (JMSIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.8	JPMorgan Equity Income Fund Class I Shares (HLIEX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.9	Lord Abbett Short Duration Income Fund Class F Shares (LDLFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.10	Madison FDS (MDCIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.11	MFS Growth Fund Class I Shares (MFEIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.12	MFS Value Fund Class I Shares (MEIIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.13	Parnassus Mid Cap Fund Institutional Class Shares (PFPMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.14	PGIM Jennison International Opportunities Fund Class Z Shares (PWJZX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.15	Vanguard Financials Index Fund Admiral Shares (VFAIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.16	Vanguard High Dividend Yield Index Fund Admiral Class Shares (VHYAX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	Successor Decedent IRA				
5.1	iShares Core S&P 500 ETF (IVV)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.2	Brown Advisory Growth Equity Fund Investor Class Shares (BIAGX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.3	Calvert Small Cap Fund Class I Shares (CSVIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.4	Eaton Vance Floating-Rate Advantage Fund Class I Shares (EIFAX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.5	Federated Institutional High Yield Bond Fund Institutional Shares (FIHBX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.6	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.7	JPMorgan Income Fund Class I Shares (JMSIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.8	JPMorgan Equity Income Fund Class I Shares (HLIEX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.9	Lord Abbett Short Duration Income Fund Class F Shares (LDLFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.10	Madison Fds (MDCIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.11	MFS Growth Fund Class I Shares (MFEIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.12	MFS Value Fund Class I Shares (MEIIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.13	Parnassus Mid Cap Fund Institutional Class Shares (PFPMX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.14	PGIM Jennison International Opportunities Fund Class Z Shares (PWJZX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.15	Vanguard Financials Index Fund Admiral Shares (VFAIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.16	Vanguard High Dividend Yield Index Fund Admiral Class Shares (VHYAX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6	Stephen Warch Individual Inherited Account	No			
6.1	Apple, Inc. (AAPL)	N/A	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
6.2	iShares Core S&P 500 ETF (IVV)	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
6.3	Brown Advisory Growth Equity Fund Investor Class Shares (BIAGX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.4	Calvert Small Cap Fund Class I Shares (CSVIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.5	Emerald Banking & Finance Fund Institutional Class Shares (HSSIX)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
6.6	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
6.7	JPMorgan Equity Income Fund Class I Shares (HLIEX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
6.8	Madison Fds (MDCIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.9	MFS Growth Fund Class I Shares (MFEIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.10	MFS Value Fund Class I Shares (MEIIX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
6.11	Parnassus Mid Cap Fund Institutional Class Shares (PFPMX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.12	PGIM Jennison International Opportunities Fund Class Z Shares (PWJZX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.13	Pioneer High Income Municipal Fund Class Y Shares (HIMYX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
6.14	Vanguard Financials Index Fund Admiral Shares (VFAIX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7	Joint Investment Account	No			
7.1	iShares Core S&P 500 ETF (IVV)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
7.2	Brown Advisory Growth Equity Fund Investor Class Shares (BIAGX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.3	Calvert Small Cap Fund Class I Shares (CSVIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.4	Eaton Vance Floating-Rate Advantage Fund Class I Shares (EIFAX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
7.5	Emerald Banking & Finance Fund Institutional Class Shares (HSSIX)	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
7.6	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7.7	JPMorgan Equity Income Fund Class I Shares (HLIEX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.8	Madison Fds (MDCIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.9	MFS Growth Fund Class I Shares (MFEIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.10	MFS Value Fund Class I Shares (MEIIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.11	Parnassus Mid Cap Fund Institutional Class Shares (PFPMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.12	PGIM Jennison International Opportunities Fund Class Z Shares (PWJZX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.13	Vanguard Financials Index Fund Admiral Shares (VFAIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.14	Vanguard Intermediate-Term Tax-Exempt Fund Admiral Shares (VWIUX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.15	Vanguard High-Yield Tax-Exempt Fund Admiral Shares (VWALX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.16	Vanguard High Dividend Yield Index Fund Admiral Class Shares (VHYAX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
8	Municipal Bond Account	No			
8.1	Minnesota St Go St Various	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.2	St Of Minnesota G/O St Var	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
9	Owl Rock	No			
9.1	Owl Rock Technology Finance	Yes	\$100,001 - \$250,000		None (or less than \$201)
10	Stephen Warch IRA	No			
10.1	iShares Core S&P 500 ETF (IVV)	Yes	\$50,001 - \$100,000		None (or less than \$201)
10.2	Brown Advisory Growth Equity Fund Investor Class Shares (BIAGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.3	Calvert Small Cap Fund Class I Shares (CSVIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
10.4	Eaton Vance Floating-Rate Advantage Fund Class I Shares (EIFAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.5	Federated Institutional High Yield Bond Fund Institutional Shares (FIHBX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.6	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
10.7	JPMorgan Income Fund Class I Shares (JMSIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.8	JPMorgan Equity Income Fund Class I Shares (HLIEX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.9	Lord Abbett Short Duration Income Fund Class F Shares (LDLFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.10	Madison Fds (MDCIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.11	MFS Growth Fund Class I Shares (MFEIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.12	MFS Value Fund Class I Shares (MEIIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.13	Parnassus Mid Cap Fund Institutional Class Shares (PFPMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.14	PGIM Jennison International Opportunities Fund Class Z Shares (PWJZX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
10.15	Vanguard Financials Index Fund Admiral Shares (VFAIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10.16	Vanguard High Dividend Yield Index Fund Admiral Class Shares (VHYAX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
11	Successor Decedent IRA No. 2	No			
11.1	Vanguard Total World Stock Index Fund Admiral Class Shares (VTWAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
12	VigiLanz Corporation Stock	N/A	\$50,001 - \$100,000		None (or less than \$201)
13	Checking Account (US Bank)	N/A	\$15,001 - \$50,000		None (or less than \$201)
14	Savings Account (US Bank)	N/A	\$250,001 - \$500,000		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

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).
