

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

## Filer's Information

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Wolfson, Paul

Deputy Associate Attorney General, Department of Justice

Date of Appointment: 08/23/2021

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Wolfson, Paul [electronically signed on 11/30/2021 by Wolfson, Paul in Integrity.gov] - Filer received a 75 day filing extension.

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Gupta, Vanita, Certifying Official [electronically signed on 05/25/2022 by Gupta, Vanita in Integrity.gov]

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Other review conducted by

/s/ Shaw, Cynthia K, Ethics Official [electronically signed on 05/25/2022 by Shaw, Cynthia K in Integrity.gov]

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U.S. Office of Government Ethics Certification

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Data Revised 05/25/2022

Data Revised 05/24/2022

Data Revised 05/19/2022

Data Revised 05/12/2022

Data Revised 03/29/2022

Data Revised 02/08/2022

Data Revised 01/20/2022

Data Revised 01/19/2022

Data Revised 01/18/2022

Data Revised 01/03/2022

Data Revised 01/02/2022

Data Revised 12/29/2021

Data Revised 12/27/2021

Data Revised 12/21/2021

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Wilmer Cutler Pickering Hale and Dorr LLP	Washington, District of Columbia	Law Firm	Partner	12/2002	8/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Merrill Guided Investing IRA Edge 54X-86649 CIO Moderate ETF Core	Yes	\$100,001 - \$250,000		\$15,001 - \$50,000
2	Wilmer Cutler Pickering Hale and Dorr LLP 401(k)	No			
2.1	Dodge & Cox Income Fund (DODIX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2.2	American Century Mid Cap Value Fund Class R6 Shares (AMDVX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.3	NatixisLoomis Sayles Growth Fund Class N Shares (LGRNX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2.4	MFS Mid Cap Growth Fund Class R3 Shares (OTCHX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.5	VanguardTax-Managed Small-Cap FundAdmiral Shares (VTMSX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.6	EuroPacific Growth Fund Class R5 Shares (RERFX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2.7	Harbor Large Cap Value Fund Institutional Class Shares (HAVLX)	Yes	\$250,001 - \$500,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Wilmer Cutler Pickering Hale and Dorr LLP, defined benefit plan (value not readily ascertainable)	N/A			

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Wilmer Cutler Pickering Hale and Dorr LLP	Washington, District of Columbia	I will continue to participate in this defined contribution plan. The plan sponsor will no longer make contributions.	12/2002
2	Wilmer Cutler Pickering Hale and Dorr LLP	Washington, District of Columbia	I will continue to participate in this defined benefit plan. The plan sponsor will no longer make contributions.	1/2005

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	AGCS Marine Insurance Co.	Chicago, Illinois	legal services
2	Dutra Group	San Rafael, California	legal services
3	Columbia University	New York, New York	legal services
4	Continental Resources, Inc.	Oklahoma City, Oklahoma	legal services
5	Deutsche Telekom AG	Bonn Germany, Outside U.S.	legal services
6	Harvard University	Cambridge, Massachusetts	legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
7	Johns Hopkins University	Baltimore, Maryland	legal services
8	Medtronic, Inc.	Minneapolis, Minnesota	legal services
9	Monsanto Co.	St. Louis, Missouri	legal services
10	Bayer US	Whippany, New Jersey	legal services
11	Northrop Grumman Corp.	Falls Church, Virginia	legal services
12	Franchise Tax Board	Sacramento, California	legal services
13	Twin Metals Minnesota LLC	Ely, Minnesota	legal services
14	University of Pennsylvania	Philadelphia, Pennsylvania	legal services
15	Ally Financial	Detroit, Michigan	legal services
16	American Property Casualty Insurance Association	Chicago, Illinois	legal services
17	Bristol-Myers Squibb Co.	New York, New York	legal services
18	DNC Services Corporation	Washington, District of Columbia	legal services
19	Biden for President	Philadelphia, Pennsylvania	legal services
20	Ernst & Young LLP	New York, New York	legal services
21	Fluor Enterprises, Inc.	Irving, Texas	legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
22	T-Mobile Inc.	Bellevue, Washington	legal services
23	Liberty Mutual Insurance Co.	Boston, Massachusetts	legal services
24	National Collegiate Athletic Association	Indianapolis, Indiana	legal services
25	NiSource Inc.	Merillville, Indiana	legal services
26	Pharmaceutical Care Management Association	Chicago, Illinois	legal services
27	Planned Parenthood of Central and Western New York	Rochester, New York	legal services
28	POET LLC	Sioux Falls, South Dakota	legal services
29	Taylor Energy Company LLC	New Orleans, Louisiana	legal services
30	Franconia Minerals LLC	Brooklyn Center, Minnesota	legal services
31	Walt Disney Company	Burbank, California	legal services
32	Warner Media LLC	New York, New York	legal services
33	Waterfront Commission of New York Harbor	New York, New York	legal services
34	Becton, Dickinson & Co.	Franklin Lakes, New Jersey	legal services
35	Democratic National Committee	Washington, District of Columbia	legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
36	National Indian Gaming Association	Washington, District of Columbia	legal services
37	Sault Ste Marie Tribe	Sault Ste. Marie, Michigan	legal services
38	Kewadin Casinos Gaming Association	Sault Ste Marie, Michigan	legal services
39	Internet Association	Washington, District of Columbia	legal services
40	Twitter, Inc.	San Francisco, California	legal services
41	Wells Fargo & Co.	San Francisco, California	legal services
42	Georgetown University	Washington, District of Columbia	legal services
43	Moderna, Inc.	Cambridge, Massachusetts	legal services
44	Montgomery County, Maryland	Rockville, Maryland	legal services
45	Montgomery County Public Schools	Rockville, Maryland	legal services
46	NatWest Group plc	New York, New York	legal services
47	Sunrise Senior Living LLC	McLean, Virginia	legal services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	International VAT Consulting, Inc. (VAT Consulting) value is not readily ascertainable	N/A			
1.1	International VAT Consulting, Inc.	N/A		Salary	
2	T. Rowe Price IRA	No			
2.1	T Rowe Price Equity Income Fund (PRFDX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2.2	T Rowe Price Extended Equity Market Index Fund (PEXMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	T Rowe Price Latin America Fund (PRLAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Vanguard IRA	No			
3.1	Vanguard Windsor Fund Admiral Shares (VWNEX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
4	Merrill Lynch IRA	No			
4.1	iShares Core S&P US Growth ETF (IUSG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	iShares Core S&P US Value ETF (IUSV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	Vanguard Emerging Markets Stock Index Fund ETF Shares (VWO)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	Vanguard Developed Markets Index Fund ETF Shares (VEA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.5	Vanguard Russell 2000 Index Fund ETF Shares (VTWO)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	Vanguard Windsor Fund Admiral Shares (VWNEX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
5	Charles Schwab IRA	No			



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.1	Schwab US REIT ETF (SCHH)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	Invesco FTSE RAFI US 1500 Small-Mid ETF (PRFZ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	Invesco Dividend Income Fund Class Y Shares (IAUYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	Schwab Emerging Markets Equity ETF (SCHE)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.5	Schwab Fundamental Emerging Markets Large Company Index ETF (FNDE)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.6	Schwab Fundamental International Large Company Index ETF (FNDF)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.7	Schwab Fundamental US Large Company Index ETF (FNDX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.8	Schwab Fundamental US Small Company Index ETF (FNDA)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.9	Schwab International Equity ETF (SCHF)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.10	Schwab International Small-Cap Equity ETF (SCHC)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.11	Schwab US Large-Cap ETF (SCHX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.12	QS Growth Fund Class A Shares (SCHAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.13	vanguard intermediate-term core etf VCIT	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.14	Xtrackers International Real Estate ETF (HAUZ)	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. brokerage account (cash)	N/A	\$50,001 - \$100,000	Interest	\$201 - \$1,000
2	U.S. bank #1 (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
3	U.S. bank #2 (cash)	N/A	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000
4	U.S. bank #3 (cash)	N/A	\$500,001 - \$1,000,000	Interest	\$2,501 - \$5,000
5	U.S. bank #4 (cash)	N/A	\$250,001 - \$500,000	Interest	\$2,501 - \$5,000
6	U.S. bank #5 (cash)	N/A	\$15,001 - \$50,000	Interest	\$5,001 - \$15,000
7	U.S. bank #6 (cash)	N/A	\$250,001 - \$500,000	Interest	\$1,001 - \$2,500
8	U.S. bank #7 (cash)	N/A	\$250,001 - \$500,000	Interest	\$2,501 - \$5,000
9	U.S. bank #8 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	U.S. bank #9 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
11	ETRADE SPDR S&P 500 (SPDR S&P 500 ETF Trust (SPY))	Yes	\$50,001 - \$100,000		\$201 - \$1,000
12	Janus Henderson Forty Fund Class D (JFRDX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
13	Alibaba Group Holding Limited (BABA)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	Alphabet Inc. (GOOG)	N/A	\$100,001 - \$250,000	Capital Gains	\$1,001 - \$2,500
15	Amazon.com, Inc. (AMZN)	N/A	\$100,001 - \$250,000		None (or less than \$201)
16	Berkshire Hathaway Inc. (BRK-B)	N/A	\$1,001 - \$15,000		None (or less than \$201)
17	Bristol-Myers Squibb Company (BMY)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
18	Charter Communications, Inc. (CHTR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
19	Comcast Corporation (CMCSA)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
20	Constellation SE (CSTM)	N/A	\$15,001 - \$50,000		None (or less than \$201)
21	Meta Platforms, Inc. (FB)	N/A	\$15,001 - \$50,000		None (or less than \$201)
22	FedEx Corporation (FDX)	N/A	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
23	Ford Motor Company (F)	N/A	\$1,001 - \$15,000		None (or less than \$201)
24	Gentex Corporation (GNTX)	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
25	The Goldman Sachs Group, Inc. (GS)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
26	iShares Gold Trust (IAU)	N/A	\$1,001 - \$15,000	Dividends	\$1,001 - \$2,500
27	LAM Research Group stock (Lam Research Corporation (LRCX))	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
28	Liberty Latin America Ltd. (LILA)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
29	Lockheed Martin Corporation (LMT)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
30	Microsoft Corporation (MSFT)	N/A	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
31	The Procter & Gamble Company (PG)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
32	PTC Inc. (PTC)	N/A	\$15,001 - \$50,000		None (or less than \$201)
33	Twitter, Inc. (TWTR)	N/A	\$15,001 - \$50,000		None (or less than \$201)
34	United Parcel Service, Inc. (UPS)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
35	Vanguard Real Estate Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
36	Xilinx, Inc. (XLNX)	N/A	\$50,001 - \$100,000		None (or less than \$201)
37	AT&T Inc. (T)	N/A	\$15,001 - \$50,000		None (or less than \$201)
38	ConocoPhillips (COP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
39	IAC/InterActiveCorp (IAC)	N/A	\$15,001 - \$50,000		None (or less than \$201)
40	KLA Corporation (KLAC)	N/A	\$50,001 - \$100,000		None (or less than \$201)
41	Live Nation Entertainment, Inc. (LYV)	N/A	\$1,001 - \$15,000		None (or less than \$201)
42	Match Group, Inc. (MTCH)	N/A	\$15,001 - \$50,000		None (or less than \$201)
43	Phillips 66 (PSX)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
44	Vimeo, Inc. (VMEQ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
45	Zimmer Biomet Holdings, Inc. (ZBH)	N/A	\$1,001 - \$15,000		None (or less than \$201)
46	Pfizer Inc. (PFE)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
47	Intel Corporation (INTC)	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
48	Seagate Technology Holdings PLC (STX)	N/A	\$15,001 - \$50,000	Capital Gains	\$201 - \$1,000
49	Caterpillar, Inc. (CAT)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
50	JPMorgan Chase & Co. (JPM)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
51	Apple, Inc. (AAPL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
52	International Business Machines Corp. (IBM)	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
53	Expedia Group, Inc. (EXPE)	N/A	\$15,001 - \$50,000		None (or less than \$201)
54	The PNC Financial Services Group, Inc. (PNC)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
55	Cisco Systems, Inc. (CSCO)	N/A	\$15,001 - \$50,000	Capital Gains	\$1,001 - \$2,500
56	Toll Brothers, Inc. (TOL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
57	Starbucks Corp. (SBUX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
58	Alleghany Corp. (Y)	N/A	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
59	Apollo Global Management Inc Class A (APO)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
60	Corning Incorporated (GLW)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
61	DocuSign, Inc. (DOCU)	N/A	\$50,001 - \$100,000		None (or less than \$201)
62	Enstar Group Ltd. (ESGR)	N/A	\$50,001 - \$100,000		None (or less than \$201)
63	Enterprise Products Partners L.P. (EPD)	N/A	\$100,001 - \$250,000	Capital Gains Dividends	\$5,001 - \$15,000
64	Fairfax Financial Holdings (FRFHF)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
65	iShares Core S&P US Growth ETF (IUSG)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
66	Linde Plc (LIN)	N/A	\$50,001 - \$100,000		None (or less than \$201)
67	Oaktree Specialty Lending Corp (OCSL)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
68	PT Telekomunikas	N/A	\$50,001 - \$100,000	Dividends	\$2,501 - \$5,000
69	Pan American Silver Corp. (PAAS)	N/A	\$15,001 - \$50,000	Capital Gains Dividends	\$15,001 - \$50,000
70	Royalty Pharma plc (RPRX)	N/A	\$1,000,001 - \$5,000,000	Capital Gains Dividends	\$100,001 - \$1,000,000
71	SPDR Dow Jones	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
72	Square, Inc. (SQ)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
73	Wells Fargo & Co (WFC)	N/A	\$15,001 - \$50,000	Dividends	\$2,501 - \$5,000
74	Charles Schwab (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
75	Nexstar Media Group, Inc. (NXST)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
76	Invesco QQQ Trust, Series 1 (QQQ)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
77	iShares Russell 2000	Yes	\$250,001 - \$500,000		None (or less than \$201)
78	KraneShares CSI China Internet ETF (KWEB)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
79	Vaneck Junior Gold Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
80	VanEck Vietnam ETF (VNM)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
81	Optum Bank cash HSA	N/A	\$15,001 - \$50,000	Dividends	None (or less than \$201)
82	Charles Schwab US REIT ETF (SCHH)	Yes	\$1,001 - \$15,000		None (or less than \$201)
83	P.H. Glatfelter Co. (GLT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
84	Schwab Emerging Markets Equity ETF (SCHE)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
85	Charles Schwab Fundamentals Intl	Yes	\$15,001 - \$50,000		\$201 - \$1,000
86	TripAdvisor, Inc. (TRIP)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
87	Charles Schwab International	Yes	\$15,001 - \$50,000		\$201 - \$1,000
88	Charles Schwab US Large Caps	Yes	\$1,001 - \$15,000		\$201 - \$1,000
89	Charles Schwab US Small Caps	Yes	\$1,001 - \$15,000		\$201 - \$1,000
90	iShares MSCI Total Intl	Yes	\$15,001 - \$50,000		None (or less than \$201)
91	Columbia MidCap Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
92	Wealthfront US Direct indexing	Yes	\$500,001 - \$1,000,000		\$1,001 - \$2,500
93	Vanguard FTSE Developed Markets	Yes	\$500,001 - \$1,000,000		\$1,001 - \$2,500
94	Vanguard FTSE Emerging Markets	Yes	\$500,001 - \$1,000,000		\$2,501 - \$5,000
95	Vanguard Tax Exempt Bond Index	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
96	Vanguard Dividend Appreciation	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
97	Energy Select SPDR	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
98	Schwab Strategic US Small Cap ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
99	Vanguard Energy Index Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
100	Vanguard International Equity Index Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
101	Vanguard Health Care ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
102	Vanguard Real Estate ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
103	SPDR S&P 500 Trust	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
104	Oberweis Intl Opportunities Fund	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
105	Schwab US Dividend Equities	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
106	iShares National Municipal Bonds	Yes	\$15,001 - \$50,000		\$201 - \$1,000
107	iShares Core S&P US	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
108	iShares Core S&P	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
109	SPDR Bloomberg Barclays	Yes	\$1,001 - \$15,000		\$201 - \$1,000
110	Vaneck High Yield Municipal Bonds	Yes	\$1,001 - \$15,000		None (or less than \$201)
111	Vanguard Russell 20001	Yes	\$1,001 - \$15,000		None (or less than \$201)
112	YieldStreet Short Term Note Series Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
113	YieldStreet Supply Chain Financing Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
114	CIM Commercial Trust Corp. (CMCT)	Yes	\$1,001 - \$15,000		None (or less than \$201)
115	Wolfson Investment Partners Lp	No			
116	GHI Stratford Holdings LLC (Limited Partnership)	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
116.1	Commercial real estate, Louisiana	N/A	\$50,001 - \$100,000		None (or less than \$201)
117	Sunrise Partners Real Estate	No			
117.1	Commercial real estate, Fort Lauderdale, Florida	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$2,501 - \$5,000
118	Rosemawr Capital limited partnership interest (municipal debt)	No	\$15,001 - \$50,000		None (or less than \$201)
119	Rosemawr Capital IV limited partnership interest (municipal debt investment fund)	No	\$100,001 - \$250,000		None (or less than \$201)
120	RM Charter Partners limited partnership interest (municipal debt investment fund)	No	\$100,001 - \$250,000		None (or less than \$201)
121	Steelhead Pathfinders limited partnership interest (convertible bond arbitrage fund)	No	\$100,001 - \$250,000		None (or less than \$201)
122	Dialyze Holdings LLC limited partnership interest (pharmaceuticals)	No	\$100,001 - \$250,000		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

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## 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).

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