

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Dettelbach, Steven

Director, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Department of Justice

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Committee on the Judiciary
-

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/ Dettelbach, Steven [electronically signed on 02/01/2022 by Dettelbach, Steven 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/ Lofthus, Lee, Certifying Official [electronically signed on 05/05/2022 by Lofthus, Lee in Integrity.gov]

Other review conducted by

/s/ Shaw, Cynthia K, Ethics Official [electronically signed on 04/28/2022 by Shaw, Cynthia K in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 05/13/2022 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 | Baker & Hostetler LLP | Cleveland, Ohio | Law Firm | Partner | 6/2016 | Present |
| 2 | Legal Aid Society of Greater Cleveland | Cleveland, Ohio | Non-Profit | Member of Board of Directors | 1/2017 | Present |
| 3 | Hawken School | Gates Mills, Ohio | Non-Profit | Member of Board of Trustees | 11/2017 | Present |
| 4 | Family Trust #1 | Solon, Ohio | Trust | Co-Trustee | 4/2017 | Present |
| 5 | Cleveland Marshall College of Law | Cleveland, Ohio | University/College | Member of the Board of Visitors | 6/2016 | Present |

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

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|---|-----|----------------------|-------------|---------------------------|
| 1 | IRA #1 | No | | | |
| 1.1 | American Funds Developing World Growth & Income (DWGHX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.2 | American Funds Emerging Markets Bond (EBNFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.3 | American Funds Global Balanced (GBFLX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.4 | American Funds New Economy (NFFFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|---|-----|----------------------|-------------|---------------------------|
| 1.5 | American Funds Income Fund of America (AMEFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.6 | American Funds New Perspective (ANWFX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.7 | American Funds New World (NFFFX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.8 | American Funds Small Cap World (SMCFX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.9 | Blackrock Multi-Asset Income (BIICX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.10 | U.S. brokerage account (cash) | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.11 | DFA Emerging Markets Small Cap (DEMSX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.12 | Dodge & Cox Global Stock (DODWX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.13 | JP Morgan Global Allocation (GAOSX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.14 | Natixis Gateway (GTEYX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.15 | PIMCO Foreign Bond (PFORX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.16 | Prudential Jennison Natural Resources (PNRZX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.17 | Water Island Event-Driven Fund (AEDNX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 1.18 | DFA International Core Equity (DFIEX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|--------|--|-----|-----------------------|-------------|---------------------------|
| 1.19 | DFA International Vector Equity (DFVQX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 2 | Baker & Hostetler LLP (Law Firm) | | | | |
| 2.1 | Baker & Hostetler LLP Retirement Program (Supplemental/401k & Basic/Step-Rate) | No | | | |
| 2.1.1 | Fidelity International Capital Appreciation Fund | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 2.1.2 | Dodge & Cox International Stock Fund | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 2.1.3 | American Funds Emerging Markets Fund | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 2.1.4 | Principal Small Cap Fund R-6 (PSMLX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 2.1.5 | Loomis Small Cap Growth Fund | Yes | \$100,001 - \$250,000 | | None (or less than \$201) |
| 2.1.6 | Fidelity Mid-Cap Index Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.1.7 | John Hancock Disciplined Value Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.1.8 | Fidelity Growth Fund | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 2.1.9 | T. Rowe Price Dividend Growth Fund | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 2.1.10 | JP Morgan Equity Income Fund | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 2.1.11 | PIMCO High Yield Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.1.12 | PIMCO Real Return Fund | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|--------|--|-----|-------------------------|---------------------------------|---------------------------|
| 2.1.13 | Metwest Total Return Bond Fund | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 2.1.14 | WA Core Bond Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.1.15 | Fidelity Money Market Govt | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.1.16 | Fidelity Puritan Fund | Yes | \$100,001 - \$250,000 | | None (or less than \$201) |
| 2.2 | BakerHostetler Cash Balance Plan, (pension plan) | N/A | \$250,001 - \$500,000 | | None (or less than \$201) |
| 2.3 | Baker & Hostetler LLP (law firm) | N/A | | Partnership Share Distributions | \$1,704,443 |
| 2.4 | BakerHostetler Capital Account | N/A | \$500,001 - \$1,000,000 | | None (or less than \$201) |
| 2.5 | BakerHostetler Retirement Benefits Enhancement Plan, cash balance pension plan | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3 | Baker & Hostetler LLP (law firm) anticipated partnership share | N/A | \$100,001 - \$250,000 | | None (or less than \$201) |

3. Filer's Employment Agreements and Arrangements

| # | EMPLOYER OR PARTY | CITY, STATE | STATUS AND TERMS | DATE |
|---|--|-----------------|---|--------|
| 1 | Baker & Hostetler LLP Retirement Program | Cleveland, Ohio | I will continue to participate in both defined contribution plans. The plan sponsor will not make further contributions into either plan after my separation. | 6/2016 |

| # | EMPLOYER OR PARTY | CITY, STATE | STATUS AND TERMS | DATE |
|---|---|-----------------|--|--------|
| 2 | BakerHostetler Cash Balance Plan | Cleveland, Ohio | This plan terminated in June 2021, no further contributions to this plan have been made by the plan sponsor or the filer since that time. Pursuant to the terms of the ERISA 202(h) Notice of Intent to Terminated the Cash Balance Plan, the filer will be entitled to and will receive a lump sum distribution from the plan in 2022. | 6/2016 |
| 3 | BakerHostetler Retirement Benefits Enhancement Plan | Cleveland, Ohio | I will continue to participate in this cash balance pension plan. The plan sponsor will not make further contributions after my separation. | 6/2016 |
| 4 | Baker & Hostetler LLP Capital Investment | Cleveland, Ohio | Pursuant to the partnership agreement, following my withdrawal from the firm, I will receive a lump-sum payment of my capital account. This payment will be calculated as of the date of my withdrawal. | 6/2016 |
| 5 | Baker & Hostetler LLP Partnership Share | Cleveland, Ohio | Pursuant to the terms of the partnership agreement, I will receive my final partnership share in one lump-sum payment within 90 days of my departure from the firm. The total amount of the payment will be my pro rata share of the firm's 2022 earnings through the date of my departure, minus the amount I have already been paid in 2022 at the time of my departure. | 6/2016 |
| 6 | BakerHostetler Discretionary Bonus | Cleveland, Ohio | Pursuant to my partnership agreement, I may receive a performance-based bonus for services rendered up to the date of my departure from the firm. This bonus will be paid prior to my assuming the duties of the position of Director or I will forfeit it. | 6/2016 |

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

| # | SOURCE NAME | CITY, STATE | BRIEF DESCRIPTION OF DUTIES |
|---|----------------------------|-----------------|-----------------------------|
| 1 | Baker & Hostetler LLP | Cleveland, Ohio | Partner at firm |
| 2 | Aleris International, Inc. | Beachwood, Ohio | Legal representation |
| 3 | Cardinal Health, Inc. | Dublin, Ohio | Legal representation |

| # | SOURCE NAME | CITY, STATE | BRIEF DESCRIPTION OF DUTIES |
|----|--|---------------------------|-----------------------------|
| 4 | CBIZ, Inc. | Independence, Ohio | Legal representation |
| 5 | Charles Rizzo | Detroit, Michigan | Legal representation |
| 6 | Cleveland Clinic Foundation | Cleveland, Ohio | Legal representation |
| 7 | Clutterbuck Capital Management | Cleveland, Ohio | Legal representation |
| 8 | Crocs, Inc. | Broomfield, Colorado | Legal representation |
| 9 | Deloitte, Ltd. | New York, New York | Legal representation |
| 10 | Armond Budish | Beachwood, Ohio | Legal representation |
| 11 | Eli Taieb | Miami, Florida | Legal representation |
| 12 | Epsilon Data Management, Inc. | Irving, Texas | Legal representation |
| 13 | Latham & Watkins, LLP | New York, New York | Legal representation |
| 14 | Official Committee of Tort Claimants of PG&E Corporation | San Francisco, California | Legal representation |
| 15 | S & K Technologies, Inc. | St. Ignatius, Montana | Legal representation |
| 16 | U.S. Beverage Advertising Corporation | Ridgefield, Connecticut | Legal representation |
| 17 | University Hospital of Cleveland | Cleveland, Ohio | Legal representation |
| 18 | LabTech Diagnostics, Inc./Joseph Labash | Anderson, South Carolina | Legal representation |
| 19 | Biglari Holdings. Inc. | San Antonio, Texas | Legal representation |

| # | SOURCE NAME | CITY, STATE | BRIEF DESCRIPTION OF DUTIES |
|----|------------------|--------------|---|
| 20 | Charles E. Jones | Akron, Ohio | Legal representation fees paid by client's former employer First Energy Corporation. Filer does not have an attorney-client relationship with First Energy Corporation. |
| 21 | Karen Paulsen | Dayton, Ohio | Legal representation fees paid by client's former employer Booz, Allen Hamilton, Inc. Filer does not have an attorney-client relationship with Booz, Allen Hamilton, Inc. |

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

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|--|-----|----------------------|-------------|---------------------------|
| 1 | IRA #1 | No | | | |
| 1.1 | American Funds Europacific Growth (AEPFX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.2 | American Funds AmCap (AMCFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.3 | American Funds Capital World Growth and Income (WGIFX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.4 | American Funds Emerging Markets Bond (EBNFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.5 | American Funds Global Balanced (GBLFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.6 | American Funds International Growth and Income (IGFFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.7 | American Funds Washington Mutual (WMFFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.8 | U.S. brokerage account (cash) | N/A | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.9 | DFA Emerging Markets (DFEVX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|---|-----|----------------------|-------------|---------------------------|
| 1.10 | DFA Emerging Markets Small Cap (DEMSX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.11 | DFA Emerging Markets Core (DFCEX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.12 | DFA International Vector Equity (DFVQX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.13 | DFA International Small Cap Value (DISVX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.14 | SFA Selectively Hedged Equity (DSHGX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.15 | DFA US Micro Cap (DFSCX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.16 | Dreyfus Global Real Return (DRRIX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.17 | Fidelity Advisor Total Emerging Markets (FIQNX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.18 | JP Morgan Income Builder (JNBSX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 1.19 | Natixis ASG Managed Futures (AFSYX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.20 | Templeton Global Total Return | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.21 | Vanguard Small Cap Value (VBR) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 2 | Jewish Federation 403b | No | | | |
| 2.1 | Metropolitan West Total Return Bond Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.2 | MFS Value Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|---|-------------|---------------------|-------------|---------------------------|
| 2.3 | T. Rowe Price Growth Stock Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.4 | Vanguard Small Cap Index Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.5 | Vanguard Developed Markets Index Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.6 | American Funds EuroPacific Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.7 | Invesco Developing Markets Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3 | Roth IRA | No | | | |
| 3.1 | Capital Income Builder Class A Shares (CAIBX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 4 | Ohio Public Employee Retirement System - HSA | No | | | |
| 4.1 | Cash | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 5 | Joseph and Florence Mandel Jewish Day School | N/A | | Salary | |
| 6 | Jewish Community Federation of Cleveland | See Endnote | | Salary | |

6. Other Assets and Income

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|--|-----|-----------------------|-------------|--------------------|
| 1 | Family Trust #1 (revocable) | No | | | |
| 1.1 | Capital Income Builder Class F2 Shares (CAIFX) | Yes | \$100,001 - \$250,000 | | \$5,001 - \$15,000 |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|--|-----|-----------------------|--------------|---------------------------|
| 1.2 | American High-Income Municipal Bond Fund Class F2 Shares (AHMFX) | Yes | \$100,001 - \$250,000 | | \$5,001 - \$15,000 |
| 1.3 | U.S. brokerage account (cash) | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 1.4 | Fidelity Advisor Strategic Income Fund Class Z Shares (FIWDX) | Yes | \$15,001 - \$50,000 | | \$1,001 - \$2,500 |
| 1.5 | Fidelity Advisor Total Emerging Markets Fund Class Z Shares (FIQNX) | Yes | \$50,001 - \$100,000 | | \$1,001 - \$2,500 |
| 1.6 | Fidelity Emerging Markets Index Fund (FPADX) | Yes | \$15,001 - \$50,000 | | \$201 - \$1,000 |
| 1.7 | Fidelity International Sustainability Index Fund (FNIDX) | Yes | \$50,001 - \$100,000 | | \$1,001 - \$2,500 |
| 1.8 | Fidelity Small Cap Value Index Fund (FISVX) | Yes | \$50,001 - \$100,000 | | \$1,001 - \$2,500 |
| 1.9 | Fidelity US Sustainability Index Fund (FITLX) | Yes | \$50,001 - \$100,000 | | \$1,001 - \$2,500 |
| 1.10 | Principal Spectrum Preferred and Capital Securities Income Fund Institutional Class Shares (PPSIX) | Yes | \$50,001 - \$100,000 | | \$2,501 - \$5,000 |
| 2 | CollegeAmerican Virginia 529 Plan FBO Child 1 | No | | Cash Payment | \$44,561 |
| 2.1 | American Funds US Government Money Market Fund Class 529-A Shares (AAFXX) | N/A | \$250,001 - \$500,000 | | None (or less than \$201) |
| 2.2 | AMCAP Fund Class 529-A Shares (CAFAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.3 | American Funds Emerging Markets Bond Fund Class 529A Shares (CBNAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.4 | American Funds Developing World Growth and Income Fund Class 529-A Shares (CDWAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|---|-----|-----------------------|-------------|---------------------------|
| 2.5 | American Funds Global Balanced Fund Class 529-A Shares (CBFAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.6 | Income Fund of America Class 529-A Shares (CIMAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.7 | New Perspective Fund Class 529-A Shares (CNPAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.8 | New World Fund, Inc Class 529-A Shares (CNWAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 2.9 | American SMALLCAP World Fund, Inc Class 529-A Shares (CSPAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3 | CollegeAmerican Virginia 529 Plan FBO Child 2 | No | | | |
| 3.1 | AMCAP Fund Class 529-A Shares (CAFAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.2 | American Funds Emerging Markets Bond Fund Class 529A Shares (CBNAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.3 | American Funds Strategic Bond Fund Class 529A Shares (CANAX) | Yes | \$250,001 - \$500,000 | | None (or less than \$201) |
| 3.4 | American Funds Developing World Growth and Income Fund Class 529-A Shares (CDWAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.5 | American Funds Global Balanced Fund Class 529-A Shares (CBFAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.6 | Income Fund of America Class 529-A Shares (CIMAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.7 | New World Fund, Inc Class 529-A Shares (CNWAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.8 | American SMALLCAP World Fund, Inc Class 529-A Shares (CSPAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|---|-----|-------------------------|-------------|---------------------------|
| 4 | CollegeAdvantage Ohio 529 Plan FBO Child 1 | No | | | |
| 4.1 | BlackRock College Advantage 529 - College (BZOAX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 4.2 | BlackRock College Advantage 529 - College (BZOCX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 5 | CollegeAdvantage Ohio 529 Plan FBO Child 2 | No | | | |
| 5.1 | High Yield Bond 529 Option (BOHCX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 5.2 | Multi-Asset Income 529 Option (BOICX) | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 6 | Delaware Life Fixed Annuity | N/A | \$100,001 - \$250,000 | Interest | \$1,001 - \$2,500 |
| 7 | TerraClear Series Seed-2 (Farm Equipment) Preferred Stock | N/A | \$50,001 - \$100,000 | | None (or less than \$201) |
| 8 | Lincoln - Universal Life - Hybrid Long Term Care Insurance Policy | N/A | \$50,001 - \$100,000 | | None (or less than \$201) |
| 9 | Lincoln - Universal Life - Hybrid Long Term Care Insurance Policy | N/A | \$50,001 - \$100,000 | | None (or less than \$201) |
| 10 | U.S. bank #1 (cash) | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 11 | U.S. bank #2 (cash) | N/A | \$50,001 - \$100,000 | | None (or less than \$201) |
| 12 | U.S. bank #3 (cash) | N/A | \$500,001 - \$1,000,000 | Interest | \$201 - \$1,000 |
| 13 | U.S. bank #4 (cash) | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 14 | Child 2 (UTMA) | No | | | |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|---|-----|-----------------------------|--------------|---------------------------|
| 14.1 | Fidelity Government Money Market Fund (SPAXX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 15 | CollegeAmerica Virginia 529 Plan FBO Child 1 | N/A | None (or less than \$1,001) | Cash Payment | \$35,852 |

7. Transactions

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

8. Liabilities

| # | CREDITOR NAME | TYPE | AMOUNT | YEAR INCURRED | RATE | TERM |
|---|---------------|--------------------------------|-----------------------|---------------|---------------|-----------|
| 1 | Wells Fargo | Mortgage on Personal Residence | \$50,001 - \$100,000 | 2012 | 3.875 % | 20 years |
| 2 | Key Bank | Partner Capital Loan | \$100,001 - \$250,000 | 2017 | prime - 1.90% | 84 months |

9. Gifts and Travel Reimbursements

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

Endnotes

| PART | # | ENDNOTE |
|------|---|---|
| 5. | 6 | Spouse's employment ended in 2020. Spouse received balance of salary in 2021. |

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).
