May 16, 2022

Emory A. Rounds, III Director U.S. Office of Government Ethics 1201 New York Avenue, N.W., Suite 500 Washington DC 20005-3917

Dear Mr. Rounds:

I am enclosing an amendment to Shereef Elnahal's nominee public financial disclosure report, signed on March 2, 2022, and a supplement to his ethics agreement, signed on April 19, 2022. Based on my review of this additional information, I continue to believe that Dr. Elnahal is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

Catherine Mitrano 708051 Date: 2022.05.16 08:07:37

Digitally signed by Catherine Mitrano 708051

Catherine Mitrano Designated Agency Ethics Official Principal Deputy General Counsel

Enclosures

### 5/15/2022

Catherine Mitrano Designated Agency Ethics Official Principal Deputy General Counsel Department of Veterans Affairs 810 Vermont Ave. NW, Washington, D.C., 20005

### **Re: Amendment to Financial Disclosure Report of Shereef Elnahal**

Dear Ms. Mitrano:

The purpose of this document is to amend my financial disclosure report, signed on March 2, 2022. In my Senate Questionnaire responses to the Senate Veterans Affairs Committee before my hearing, I disclosed my membership on the Juvenile Diabetes Research Foundation International Research Committee. The Committee is comprised of both Board Members of the Juvenile Diabetes Research Foundation and non-Board Member experts. Because my particular role on this committee is as a non-Board Member, I do not personally have fiduciary responsibility for decisions that impact the organization; my role is advisory. Therefore, I assumed that disclosure in the OGE form itself was not necessary.

However, after further consultation with VA ethics and the Office of Government Ethics, we determined that because there are Research Committee members who are also full Board Members and do have fiduciary responsibility, the committee itself is technically a fiduciary committee by virtue of their power to vote on decisions that impact the organization.

Therefore, out of an abundance of caution, I am filing an amendment to fully disclose my participation as a non-Board Member of the Research Committee of the Juvenile Diabetes Research Foundation, in addition to my previous disclosure of this role to the United States Senate.

### Part 1

Organization Name	City/State	Organization Type	Position Held	From	То
Juvenile Diabetes Research Foundation	New York, New York	Non-Profit	Research Committee Member	06/2021	Present

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,

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Shereef Elnahal

Nominee Report | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (Updated Nov. 2021)

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

Elnahal, Shereef

Under Secretary for Health, Department of Veterans Affairs

Other Federal Government Positions Held During the Preceding 12 Months:

Expert Consultant, US Department of Veterans Affairs (1/2021 - 1/2022)

Names of Congressional Committees Considering Nomination:

• Committee on Veterans' Affairs

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/ Elnahal, Shereef [electronically signed on 03/02/2022 by Elnahal, Shereef 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/ Mitrano, Catherine C, Certifying Official [electronically signed on 04/19/2022 by Mitrano, Catherine C in Integrity.gov]

Other review conducted by

/s/ Daugherty, Brenna, Ethics Official [electronically signed on 04/19/2022 by Daugherty, Brenna in Integrity.gov]

U.S. Office of Government Ethics Certification /s/ Apol, David, Certifying Official [electronically signed on 04/20/2022 by Apol, David in Integrity.gov]

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	ТО
1	University Hospital, Newark	Newark, New Jersey	Non-Profit	President and CEO	7/2019	Present
2	New Jersey Performing Arts Center	Newark, New Jersey	Non-Profit	Board Member	5/2020	Present
3	New Jersey Hospital Association	Princeton, New Jersey	Non-Profit	Board Member	1/2021	Present
4	America's Essential Hospitals	Washington, District of Columbia	Non-Profit	Board Member	6/2021	Present
5	Hospital Alliance of New Jersey	Trenton, New Jersey	Non-Profit	Board Member	7/2019	Present
6	New Jersey Health Care Quality Institute	Princeton, New Jersey	Non-Profit	Board Member	10/2019	Present
7	Rutgers New Jersey Medical School	Newark, New Jersey	University/Colleg e	Clinical Associate Professor	12/2019	Present
8	Biden-Harris Transition Team ("PT Fund, Inc.")	Washington, District of Columbia	Non-Profit	Landing Team Member for the Department of Veterans Affairs	11/2020	1/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	University Hospital, Newark	N/A		Salary/Bonus	\$1,045,065

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	New Jersey Public Employees Retirement System; defined benefit plan (value not readily ascertainable): upon vesting, eligible for \$11,363/mo. at age 60 (University Hospital and the New Jersey Department of Health)	N/A			None (or less than \$201)
3	New Jersey Defined Contribution Retirement Plan (University Hospital)	No			
3.1	Prudential DCP Stable Value Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	Johns Hopkins University School of Medicine 403B Retirement Plan	No			
4.1	TIAA-CREF Lifecycle 2050 Fund Institutional Class Shares (TFTIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	University Hospital, Newark, anticipated incentive compensation	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	University Hospital, Newark	Newark, New Jersey	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	7/2019
2	New Jersey Department of Health	Trenton, New Jersey	I will continue to participate in this defined benefit plan.	1/2018
3	University Hospital, Newark	Newark, New Jersey	Pursuant to my employment agreement with the hospital, I am eligible for an annual year-end performance incentive payment if I work the full fiscal year. I am not entitled to this payment for this fiscal year if I depart before June 30, 2022. If I work through June 30, 2022, I am eligible for this payment for work done through June 30th, 2022. This is to be paid by October 31st, 2022 at the latest.	7/2021

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
4	Johns Hopkins University School of Medicine	Baltimore, Maryland	I will continue to participate in this defined contribution plan. The plan sponsor no longer makes contributions.	7/2013

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	University Hospital, Newark	Newark, New Jersey	President and CEO

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT			
1	New Jersey Department of Environmental Protection	N/A		Salary				
2	New Jersey Public Employees Retirement System; defined benefit plan (value not readily ascertainable)	N/A			None (or less than \$201)			
6. Oth	6. Other Assets and Income							
#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT			

1	U.S. bank (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
2	Residential real estate, Vienna, VA	N/A	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE INCOME TYPE	INCOME AMOUNT
3	MassMutual Whole Life Insurance	N/A	\$100,001 - \$250,000	None (or less than \$201)
4	Brokerage account	No		
4.1	Tencent holdings LTD	N/A	None (or less Capital Gains than \$1,001)	\$201 - \$1,000
4.2	Energy Select Sector SPDR Fund (XLE)	Yes	\$1,001 - \$15,000	\$1,001 - \$2,500
4.3	Financial Select Sector SPDR Fund (XLF)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.4	Industrial Select Sector SPDR Fund (XLI)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.5	iShares Russell 2000 ETF (IWM)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.6	iShares US Real Estate ETF (IYR)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.7	SPDR S&P Bank ETF (KBE)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.8	SPDR S&P Regional Banking ETF (KRE)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.9	SPDR S&P Oil & Gas Exploration & Production ETF (XOP)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.10	Accenture Plc (ACN)	N/A	\$1,001 - \$15,000	None (or less than \$201)
4.11	Chubb Ltd. (CB)	N/A	\$1,001 - \$15,000	None (or less than \$201)
4.12	Invesco Developing Markets Fund Class Y Shares (ODVYX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
4.13	Air Products and Chemicals, Inc. (APD)	N/A	\$1,001 - \$15,000 Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.14	Alaska Air Group, Inc. (ALK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.15	Alphabet, Inc. (GOOGL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.16	Amazon.com, Inc. (AMZN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.17	American Electric Power Co., Inc. (AEP)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.18	Ameren Corp. (AEE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.19	Apple, Inc. (AAPL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.20	Arista Networks, Inc. (ANET)	N/A	\$1,001 - \$15,000	Capital Gains	\$1,001 - \$2,500
4.21	AT&T Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.22	Automatic Data Processing, Inc. (ADP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.23	Bank of America Corp. (BAC)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.24	Berry Global Group, Inc. (BERY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.25	Booz Allen Hamilton Holding Corp. (BAH)	N/A	None (or less than \$1,001)		None (or less than \$201)
4.26	Charles River Laboratories International, Inc. (CRL)	N/A	None (or less than \$1,001)		None (or less than \$201)
4.27	Charter Communications, Inc. (CHTR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.28	Citigroup, Inc. (C)	N/A	\$1,001 - \$15,000	Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.29	Constellation Energy (CEG)	N/A	None (or less than \$1,001)		None (or less than \$201)
4.30	Danaher Corp. (DHR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.31	Dell Technologies, Inc. (DELL)	N/A	\$1,001 - \$15,000	Capital Gains	\$201 - \$1,000
4.32	Exelon Corp. (EXC)	N/A	None (or less than \$1,001)		None (or less than \$201)
4.33	Fortive Corp. (FTV)	N/A	\$1,001 - \$15,000	Capital Gains	\$201 - \$1,000
4.34	The Home Depot, Inc. (HD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.35	JPMorgan Chase & Co. (JPM)	N/A	\$1,001 - \$15,000	Capital Gains	\$201 - \$1,000
4.36	Keysight Technologies, Inc. (KEYS)	N/A	None (or less than \$1,001)		None (or less than \$201)
4.37	Lowes Companies Inc (LOW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.38	Masimo Corp. (MASI)	N/A	None (or less than \$1,001)		None (or less than \$201)
4.39	Meta Platforms, Inc. (FB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.40	Microsoft Corp. (MSFT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.41	NextEra Energy, Inc. (NEE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.42	NVIDIA Corp. (NVDA)	N/A	\$1,001 - \$15,000	Capital Gains	\$2,501 - \$5,000
4.43	Progressive Corp. (PGR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.44	Prologis, Inc. (PLD)	N/A	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.45	ServiceNow, Inc. (NOW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.46	Signature Bank (New York, New York) (SBNY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.47	Union Pacific Corp. (UNP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.48	iShares Core US Aggregate Bond ETF (AGG)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.49	iShares TIPS Bond ETF (TIP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.50	iShares 1-5 Year Investment Grade Corporate Bond ETF (IGSB)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.51	iShares Silver Trust (SLV)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.52	SPDR Gold Trust (GLD)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
4.53	Proshares Short QQQ (PSQ)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.54	Proshares Short S&P500 (SH)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.55	Adobe, Inc. (ADBE)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.56	Agilent Technologies, Inc. (A)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.57	Alibaba (BABA)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.58	Altice USA, Inc. (ATUS)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.59	American Tower Corporation (REIT) (AMT)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
					-

DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
Amphenol Corporation (APH)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
Analog Devices, Inc. (ADI)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
C4 Therapeutics (CCCC)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
CME Group, Inc. (CME)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
Crowdstrike Holdings Inc CL A	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
Dominion Energy, Inc. (D)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
FTC Solar Inc. (FTCI)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
Invesco EQV Emerging Markets All Cap Fund Class Y Shares (GTDYX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
iShares Russell 2000 ETF (IWM)	Yes	None (or less than \$1,001)		\$201 - \$1,000
Johnson & Johnson (JNJ)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
Keysight Technologies, Inc. (KEYS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
Materials Select Sector SPDR Fund (XLB)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
Morgan Stanley (MS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
PayPal Holdings, Inc. (PYPL)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
	Amphenol Corporation (APH)Analog Devices, Inc. (ADI)C4 Therapeutics (CCCC)CME Group, Inc. (CME)Crowdstrike Holdings Inc CL ADominion Energy, Inc. (D)FTC Solar Inc. (FTCI)Invesco EQV Emerging Markets All Cap Fund Class Y Shares (GTDYX)iShares Russell 2000 ETF (IWM)Johnson & Johnson (JNJ)Keysight Technologies, Inc. (KEYS)Materials Select Sector SPDR Fund (XLB)Morgan Stanley (MS)	Amphenol Corporation (APH)N/AAnalog Devices, Inc. (ADI)N/AC4 Therapeutics (CCCC)N/ACME Group, Inc. (CME)N/ACrowdstrike Holdings Inc CL AN/ADominion Energy, Inc. (D)N/AFTC Solar Inc. (FTCI)N/AInvesco EQV Emerging Markets All Cap Fund Class Y Shares (GTDYX)YesiShares Russell 2000 ETF (IWM)YesJohnson & Johnson (JNJ)N/AKeysight Technologies, Inc. (KEYS)N/AMorgan Stanley (MS)N/A	Amphenol Corporation (APH)N/ANone (or less than \$1,001)Analog Devices, Inc. (ADI)N/ANone (or less than \$1,001)C4 Therapeutics (CCCC)N/ANone (or less than \$1,001)C4 Therapeutics (CCCC)N/ANone (or less than \$1,001)CME Group, Inc. (CME)N/ANone (or less than \$1,001)Crowdstrike Holdings Inc CL AN/ANone (or less than \$1,001)Dominion Energy, Inc. (D)N/ANone (or less than \$1,001)FTC Solar Inc. (FTCI)N/ANone (or less than \$1,001)Invesco EQV Emerging Markets All Cap Fund Class Y Shares (GTDYX)YesNone (or less than \$1,001)iShares Russell 2000 ETF (IWM)YesNone (or less than \$1,001)Johnson & Johnson (JNJ)N/ANone (or less than \$1,001)Materials Select Sector SPDR Fund (XLB)YesNone (or less than \$1,001)Morgan Stanley (MS)N/ANone (or less than \$1,001)PayPal Holdings, Inc. (PYPL)N/ANone (or less than \$1,001)	Amphenol Corporation (APH)N/ANone (or less than \$1,001)Capital GainsAnalog Devices, Inc. (ADI)N/AN/ANone (or less than \$1,001)Capital GainsC4 Therapeutics (CCCC)N/ANone (or less than \$1,001)Capital GainsC4 Therapeutics (CCCC)N/ANone (or less than \$1,001)Capital GainsCME Group, Inc. (CME)N/ANone (or less than \$1,001)Capital GainsCrowdstrike Holdings Inc CL AN/ANone (or less than \$1,001)Capital GainsDominion Energy, Inc. (D)N/ANone (or less than \$1,001)Capital GainsFTC Solar Inc. (FTCI)N/ANone (or less than \$1,001)Capital GainsInvesco EQV Emerging Markets All Cap Fund Class Y Shares (GTDYX)YesNone (or less than \$1,001)Capital GainsIshares Russell 2000 ETF (IWM)YesNone (or less than \$1,001)Capital GainsJohnson & Johnson (JNJ)N/ANone (or less than \$1,001)Capital GainsKeysight Technologies, Inc. (KEYS)N/ANone (or less than \$1,001)Capital GainsMaterials Select Sector SPDR Fund (XLB)YesNone (or less than \$1,001)Capital GainsMorgan Stanley (MS)N/ANone (or less than \$1,001)Capital GainsPayPal Holdings, Inc. (PYPL)N/ANone (or less than \$1,001)Capital Gains

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.74	Proshares Short QQQ (PSQ)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.75	Proshares Short S&P500 (SH)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.76	salesforce.com, inc. (CRM)	N/A	\$1,001 - \$15,000	Capital Gains	\$1,001 - \$2,500
4.77	The Sherwin-Williams Co. (SHW)	N/A	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
4.78	SPDR S&P Regional Banking ETF (KRE)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.79	SPDR S&P Oil & Gas Exploration & Production ETF (XOP)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
4.80	Block, Inc. (SQ)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.81	Synopsys, Inc. (SNPS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.82	T-Mobile US, Inc. (TMUS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.83	TE Connectivity Ltd. (TEL)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.84	Thermo Fisher Scientific, Inc. (TMO)	N/A	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
4.85	UnitedHealth Group, Inc. (UNH)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.86	Vanguard FTSE Developed Markets ETF (VEA)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
4.87	VMware, Inc. (VMW)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.88	Zoetis, Inc. (ZTS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	New York 529 Aggressive age-based option, Age 5-6	Yes	\$15,001 - \$50,000		
6	New York 529 Aggressive age-based option, Age 0-4	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	New York 529 Aggressive age-based option, Age 0-4	Yes	\$1,001 - \$15,000	-	None (or less than \$201)

### 7. Transactions

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

### 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Wells Fargo	Mortgage (investment/rent al property)	\$250,001 - \$500,000	2016	4.0%	30 years
2	Fulton Bank	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2019	3.50%	30 years
3	Chase Bank	Credit Card	\$10,001 - \$15,000	2022	19.99%	Revolving

### 9. Gifts and Travel Reimbursements

Endnotes

### Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

#### 6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

#### 7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

#### 8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

### 9. Gifts and Travel Reimbursements

#### This section discloses:

- Gifts totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$166 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

#### **Privacy Act Statement**

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub, L, 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U.S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal. State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record: (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGÉ Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order: (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

#### Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, N.W., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).