

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

## Filer's Information

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Anderson, James Herbert

Assistant Secretary (Strategy, Plans, and Capabilities), Department of Defense

Report Year: 2019

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Other Federal Government Positions Held During the Preceding 12 Months:

Vice President of Academic Affairs, Marine Corps University (7/2015 - 8/2018)

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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/ Anderson, James Herbert [electronically signed on 05/09/2019 by Anderson, James Herbert in Integrity.gov]

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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/ Thompson, Scott F, Certifying Official [electronically signed on 10/23/2019 by Thompson, Scott F in Integrity.gov]

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Other review conducted by

/s/ Rishel, Eric C, Ethics Official [electronically signed on 06/25/2019 by Rishel, Eric C in Integrity.gov]

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U.S. Office of Government Ethics Certification

Data Revised 10/21/2019

Data Revised 07/28/2019

Data Revised 07/10/2019

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
8.	1	Wells Fargo Bank	(07/10/2019, Rishel, Eric C): Filer paid off mortgage from prior reporting period.

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Family Trust #2	Clifton, Virginia	Trust	Trustee	1/1984	Present
2	Family Trust #3	Clifton, Virginia	Trust	Trustee	1/2002	Present
3	Family Trust #4	Clifton, Virginia	Trust	Co-trustee	7/2001	Present
4	Palo Duro Resource Play Joint Venture	Floyd County, Texas	Joint Venture	General Partner	10/2014	2/2018
5	Family Trust #5	Clifton, Virginia	Trust	Trustee	1/2006	Present
6	Family Trust #6	Clifton, Virginia	Trust	Trustee	6/2009	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Vanguard Energy Fund Investor Shares	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2	Vanguard Small-Cap Index Fund Admiral Shares	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
3	"Leading Dynamic Seminars" Palgrave (value not readily ascertainable)	N/A			None (or less than \$201)

## 3. Filer's Employment Agreements and Arrangements

None

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	USAA Precious Metals and Minerals Fund (USAGX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
2	USAA Emerging Markets Fund (USEMX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	USAA Small Cap Stock Fund (USCAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

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#### 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Dodge & Cox Stock Fund	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
2	Prosper Funding LLC	See Endnote	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
3	Palo Duro Resource Play Joint Venture (Development of oil well in Floyd County, Texas.	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	Family Trust #1	No			

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#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.1	Bank of America Private Wealth Management Dividend Income Common Trust Fund	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
4.2	Columbia Contrarian Core Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.3	Select Sector SPDR TR FINANCIAL SHS BEN INT	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
4.4	Touchstone Sands Capital Select Growth C	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
4.5	Bank of America Private Wealth Management Mid Cap Growth CTF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
4.6	Vanguard REIT ETF	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
4.7	Vanguard Mid-Cap Value ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
4.8	iShares Russell 2000 Index	Yes	\$50,001 - \$100,000		\$201 - \$1,000
4.9	Ishares Russell 2000 Growth ETF	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
4.10	Bank of America Private Wealth Management Emerging Markets Stock Common Trust Fund	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
4.11	BlackRock Strategic Income Opps Instl	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
4.12	Powershares DB Commodity Index Tracking Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.13	Bank of America Private Wealth Management Interim Term Tax Ex Bond CTF	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
4.14	Columbia AMT-Free Virginia Intermediate Muni Bond	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
4.15	Vanguard FTSE Developed Markets ETF	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.16	U.S. bank account #1 (cash)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
4.17	iShares Core MSCI Emerging Markets ETF	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
4.18	iShares Core S&P Mid-Cap ETF	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
4.19	iShares Core S&P Small-Cap ETF	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
4.20	iShares Core S&P 500 ETF	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
5	Family Trust #2	No			
5.1	Citigroup Inc	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
5.2	Endeavour Silver Corp (EXK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.3	Consolidated Edison Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
5.4	Dominion Energy Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
5.5	Goldman Sachs Group Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.6	KHC	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.7	Ford Motor Co. (F)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
5.8	JP Morgan Chase & Co	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6	Family Trust #3	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.1	Invesco Ltd	N/A	\$50,001 - \$100,000	Dividends	\$2,501 - \$5,000
6.2	Medtronic Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.3	Adobe Systems Inc	N/A	\$100,001 - \$250,000		None (or less than \$201)
6.4	Apple Inc. - Common Stock	N/A	\$250,001 - \$500,000	Dividends	\$5,001 - \$15,000
6.5	The Bank of New York Mellon Corp	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6.6	Biogen Idec Inc. - Common Stock	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6.7	Cigna Corporation	N/A	\$250,001 - \$500,000		None (or less than \$201)
6.8	Enbridge Inc	N/A	\$50,001 - \$100,000	Dividends	\$5,001 - \$15,000
6.9	Facebook, Inc. - Class A Common Stock	N/A	\$100,001 - \$250,000		None (or less than \$201)
6.10	Gilead Sciences, Inc. - Common Stock	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6.11	Home Depot Inc	N/A	\$250,001 - \$500,000	Dividends	\$5,001 - \$15,000
6.12	Intercontinentalexchange Group	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
6.13	Kimberly-Clark	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6.14	Lam Resh Corp	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.15	Marathon Petroleum Corp.	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
6.16	Mondelez International, Inc. - Class A Common Stock	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6.17	Newmont Mining Corp	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
6.18	Regions Financial Corp	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
6.19	Salesforce.Com Inc	N/A	\$50,001 - \$100,000		None (or less than \$201)
6.20	Schlumberger Ltd	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
6.21	Taiwan Semiconductor Mfg Co Ltd ADR	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
6.22	The Travelers Companies, Inc	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
6.23	Visa Inc	N/A	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
6.24	Wells Fargo and Company	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
6.25	BNY Mellon Emerging Markets Fund	Yes	\$50,001 - \$100,000		\$201 - \$1,000
6.26	iShares MSCI EAFE Index	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
6.27	Dreyfus High Yield Fund	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6.28	Newport News VA (Bond)	N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.29	Virginia ST CmwltH Transprtn (Bond)	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
6.30	Prince William Cnty VA Svc Aut (Bond)	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
6.31	Virginia College Bldg Auth VA Edl (Bond)	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
6.32	Richmond VA Public Utility Rev (Bond)	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
6.33	U.S. bank #1 CRA money market account (cash)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
6.34	JP Morgan Chase & Co	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
7	Virginia 529 Plan	No			
7.1	American Funds AMCAP 529A	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
7.2	American Funds American Mutual 529A	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
7.3	American Funds Capital World G/I A	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
7.4	American Funds New World 529C	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7.5	American Funds SMALLCAP World 529C	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
8	Family Trust #4	No			
8.1	Pan American Silver Corp. - Common Stock (PAAS)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
8.1.1	Pan American Silver Corp. (PAAS), closed position for written call option	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.2	Dow Dupont	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
8.3	Ford Motor Co. (F)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
8.4	Citigroup Inc	N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000
8.5	JP Morgan Chase & Co	N/A	None (or less than \$1,001)	Dividends	\$201 - \$1,000
8.6	Endeavour Silver Corp (EXK)	N/A	\$100,001 - \$250,000		None (or less than \$201)
8.7	US Bank Account (cash)	N/A	\$250,001 - \$500,000		\$1,001 - \$2,500
9	Citigroup Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
10	Pan American Silver Corp. - Common Stock (PAAS)	N/A	\$15,001 - \$50,000		None (or less than \$201)
11	Wells Fargo and Company	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
12	Dow Dupont	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
13	Family Trust #5	No			
13.1	Vanguard Morgan Growth Fund Admiral Shares	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
14	Family Trust #6	No			
14.1	Dodge & Cox Global Stock Fund	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
15	US Bank Account Child #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
16	US Bank Account Child #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
17	Alphabet Inc Class A	N/A	None (or less than \$1,001)	Capital Gains	\$50,001 - \$100,000
18	Caterpillar Inc	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$100,001 - \$1,000,000
19	Amazon.com, Inc. - Common Stock (AMZN)	N/A	None (or less than \$1,001)	Capital Gains	\$100,001 - \$1,000,000
20	Chevron Corp (CVX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
21	Bank of America Corp (BAC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
22	Air Prods & Chem Inc	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
23	AT&T Inc (T)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
24	Exxon Mobil Corp (XOM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
25	Eaton Corp plc (ETN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
26	Hershey Foods Corp (HSY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
27	PPG Industries Inc (PPG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
28	Intel Corp (INTC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$100,001 - \$1,000,000
29	Microsoft Corp (MSFT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
30	Johnson & Johnson (JNJ)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$100,001 - \$1,000,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
31	PepsiCo Inc (PEP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
32	Exelon Corp (EXC)	N/A	None (or less than \$1,001)		None (or less than \$201)
33	Verizon Communications Inc (VZ)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
34	Corning Inc (GLW)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
35	United Technologies Corp (UTX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
36	Pfizer Inc (PFE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
37	International Business Machine Corp	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
38	Tata Motors	N/A	None (or less than \$1,001)		None (or less than \$201)
39	Exxon Mobil Corp (XOM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
40	3M Co (MMM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
41	Illinois Tool Works Inc (ITW)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
42	General Electric Co (GE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
43	Walt Disney Co (DIS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
44	Intel Corp (INTC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
45	Royal Dutch Schell PLC	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
46	RPM	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
47	Sysco Corp (SYY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
48	Xylem Inc (XYL)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
49	Total SA	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
50	Proctor & Gamble	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
51	3D Systems Corps	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
52	Alphabet Class C	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
53	AT&T	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
54	Proctor & Gamble	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
55	Johnson & Johnson (JNJ)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
56	US Bank Account #3 (Cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Alphabet Inc Class A	Sale	12/03/2018	\$100,001 - \$250,000
2	Caterpillar Inc	Sale	12/03/2018	\$100,001 - \$250,000
3	Amazon.com Inc	Sale	12/03/2018	\$250,001 - \$500,000
4	Chevron Corp	Sale	12/03/2018	\$100,001 - \$250,000
5	Bank of America Corp	Sale	12/03/2018	\$50,001 - \$100,000
6	Air Prods & Chems Inc	Sale	12/03/2018	\$100,001 - \$250,000
7	AT&T Inc	Sale	12/03/2018	\$15,001 - \$50,000
8	Exxon Mobil Corp	Sale	12/03/2018	\$100,001 - \$250,000
9	Eaton Corp plc	Sale	12/03/2018	\$100,001 - \$250,000
10	Hershey	Sale	12/03/2018	\$100,001 - \$250,000
11	PPG Industries Inc	Sale	12/03/2018	\$50,001 - \$100,000
12	Intel Corp	Sale	12/03/2018	\$100,001 - \$250,000
13	Microsoft Corporation - Common Stock	Sale	12/03/2018	\$100,001 - \$250,000
14	Johnson & Johnson	Sale	12/03/2018	\$100,001 - \$250,000
15	PepsiCo Inc	Sale	12/03/2018	\$100,001 - \$250,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
16	Exelon Corp	Sale	12/03/2018	\$15,001 - \$50,000
17	Verizon Communications Inc	Sale	12/03/2018	\$100,001 - \$250,000
18	Corning Inc	Sale	11/29/2018	\$15,001 - \$50,000
19	United Technologies Corp	Sale	12/03/2018	\$100,001 - \$250,000
20	Pfizer Inc	Sale	12/03/2018	\$50,001 - \$100,000
21	Intl Business Machines Corp	Sale	11/29/2018	\$1,001 - \$15,000
22	Tata Motors	Sale	06/18/2018	\$15,001 - \$50,000
23	Exxon Mobil Corp	Sale	11/29/2018	\$100,001 - \$250,000
24	3M Co	Sale	11/29/2018	\$15,001 - \$50,000
25	Illinois Tool Works Inc	Sale	11/29/2018	\$15,001 - \$50,000
26	General Electric Co	Sale	11/29/2018	\$1,001 - \$15,000
27	Walt Disney Co	Sale	12/03/2018	\$250,001 - \$500,000
28	Intel Corp	Sale	11/29/2018	\$15,001 - \$50,000
29	Royal Dutch Schell PLC	Sale	11/29/18	\$50,001 - \$100,000
30	RPM International	Sale	11/29/18	\$15,001 - \$50,000
31	Sysco Corp	Sale	11/29/18	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
32	Xylem Inc	Sale	11/29/18	\$1,001 - \$15,000
33	Total SA	Sale	11/29/18	\$15,001 - \$50,000
34	Protor & Gamble	Sale	11/28/18	\$1,001 - \$15,000
35	Ford Motor Co	Purchase	12/24/18	\$100,001 - \$250,000
36	Citigroup	Purchase	12/24/18	\$100,001 - \$250,000
37	Endeavour Silver Corp	Purchase	12/24/18	\$100,001 - \$250,000
38	iShares Core MSCI EAFE ETF	Purchase	12/26/18	\$100,001 - \$250,000
39	iShares Core MSCI Emerging Markets ETF	Purchase	12/26/18	\$100,001 - \$250,000
40	iShares Core S&P Mid-Cap ETF	Purchase	12/26/18	\$100,001 - \$250,000
41	iShares Core S&P Small-Cap ETF	Purchase	12/26/18	\$100,001 - \$250,000
42	iShares Core S&P 500 ETF	Purchase	12/26/18	\$100,001 - \$250,000
43	3D Systems Corps	Sale	11/29/18	\$1,001 - \$15,000
44	Alphabet Class C	Sale	11/29/18	\$1,001 - \$15,000
45	Citigroup	Purchase	12/28/18	\$15,001 - \$50,000
46	AT&T	Sale	11/29/18	\$15,001 - \$50,000
47	Johnson & Johnson	Sale	11/29/18	\$1,001 - \$15,000



## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Wells Fargo Bank	Exercised Line of Credit	\$100,001 - \$250,000	2008	3.75%	20 years

## 9. Gifts and Travel Reimbursements

None

## Endnotes

PART	#	ENDNOTE
6.	2	Peer-to-peer lending. No individual loan in excess of \$50.

# 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 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 \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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. 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 another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. 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 three 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, NW., 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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