

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

### Filer's Information

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**Ketcham, Lori W**

DAEO, Associate General Counsel Ethics, National Labor Relations Board

Report Year: 2018

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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

**/s/ Ketcham, Lori W [electronically signed on 05/09/2018 by Ketcham, Lori W 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/ Burow, Kathryn, Certifying Official [electronically signed on 06/05/2018 by Burow, Kathryn in Integrity.gov]**

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Other review conducted by

**/s/ Burow, Kathryn, Ethics Official [electronically signed on 06/05/2018 by Burow, Kathryn in Integrity.gov]**

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U.S. Office of Government Ethics Certification

/s/ Christopher, Dale, Certifying Official [electronically signed on 06/20/2018 by Christopher, Dale in Integrity.gov]

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Data Revised 06/11/2018

Data Revised 06/06/2018

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

None

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

None

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## 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	National Student Clearinghouse		N/A		Salary	
2	National Student Clearinghouse 401(k) Retirement 2030 Fund(T Rowe Price)	See Endnote	Yes	\$100,001 - \$250,000		None (or less than \$201)
3	Marconi USA Retirement Plan, defined benefit plan (value not readily ascertainable)		N/A			None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Suntrust Checking account	N/A	\$50,001 - \$100,000		None (or less than \$201)
2	Suntrust Money Market	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Schwab Investment Account - Joint Tenant				
3.1	Berkshire Hathaway Class B	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.2	Harbor Bond Fund Inst CL	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	Templeton Global Bond Adv	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.4	Vanguard Inflation-Protected Securities	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.5	Vanguard Short-Term Bond Index Admiral Shares	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.6	Wells Fargo Advantage High Yld Bond Adm	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.7	American FD Europacific Growth Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.8	Eagle MLP Strategy Fund I	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.9	Ivy Science & Technology Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.10	Tweedy, Browne Global Value	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.11	Voya Real Estate Fund I	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
3.12	Vanguard Energy ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.13	Vanguard FTSE Emerging Markets	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.14	Vanguard Mid-Cap Growth	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.15	Vanguard Small-Cap	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.16	Vanguard Total Stock Market Index Admiral Shares	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4	Schwab Roth IRA Lori				
4.1	iShares Core US	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	iShares MSCI ACWI ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	Schwab Roth Contributory IRA				
5.1	Schwab US Large Cap Growth	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	iShares Core MSCI EAFE	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	iShares US Treasury Bond	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	Vanguard Growth ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	Vanguard Value ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.6	XTrackers MSCI EAFE HDGD	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Schwab Rollover IRA				
6.1	iShares Core MSCI Emerging Markets ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
6.2	iShares Core S&P 500	Yes	\$15,001 - \$50,000		None (or less than \$201)	
6.3	iShares MSCI EAFE Small Cap Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000	
6.4	iShares S&P Small Cap 600 Value	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
6.5	iShares S&P Small Cap 600 Growth	Yes	\$15,001 - \$50,000		None (or less than \$201)	
6.6	Schwab US Broad Market	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500	
6.7	iShares Core 10 Year USD	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
6.8	Deutsche X-trackers MSCI EAFE Hedged Eq	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
6.9	iShares Core MSCI EAFE	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500	
6.10	iShares Intermediate Credit Bond	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500	
6.11	iShares MBS	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
6.12	iShares US Treasury Bond	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500	
6.13	Schwab US TIPS ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000	
6.14	Schwab US Large CAP ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)	
6.15	Vanguard Value ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)	
7	Allianz 360 SM Annuity	See Endnote	Yes	\$100,001 - \$250,000	Interest	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	Schwab Joint Brokerage 2017				
8.1	Vanguard Total International Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.2	iShares Intermediate Credit Bond	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.3	Deutsche X-trackers MSCI EAFE Hedged Eq	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.4	iShares US Treasury Bond	Yes	\$15,001 - \$50,000		\$201 - \$1,000
8.5	iShares Core MSCI EAFE	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8.6	iShares Core MSCI Emerging Markets ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.7	iShares S&P Small-Cap 600 Value ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.8	iShares S&P Small-Cap 600 Growth ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.9	iShares MBS	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.10	Schwab US TIPS ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.11	Schwab US Large-Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.12	iShares MSCI EAFE Small-Cap	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.13	Vanguard Value ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8.14	Vanguard Growth ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
9	Mike's Schwab IRA 2017				

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.1	Stone Ridge Tr II Rns Rsk Pr Int	Yes	\$15,001 - \$50,000		None (or less than \$201)
9.2	Stone Ridge Tr V Alt Lendg Prem	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Vanguard Total International Bond ETF	Purchase	06/08/2017	\$1,001 - \$15,000
2	iShares Intermediate Credit Bond	Purchase	06/08/2017	\$1,001 - \$15,000
3	Deutsche X-Trackers MSCI EAFE Hedged Eq	Purchase	06/08/2017	\$1,001 - \$15,000
4	iShares US Treasury Bond	Purchase	06/08/2017	\$15,001 - \$50,000
5	iShares Core MSCI EAFE	Purchase	06/08/2017	\$1,001 - \$15,000
6	iShares Core MSCI Emerging Markets ETF	Purchase	06/08/2017	\$1,001 - \$15,000
7	iShares S&P Small-Cap 600 Value ETF	Purchase	06/08/2017	\$1,001 - \$15,000
8	iSharesS&P Small-Cap 600 Growth ETF	Purchase	06/08/2017	\$1,001 - \$15,000
9	iShares MBS	Purchase	06/08/2017	\$1,001 - \$15,000
10	Schwab US TIPS ETF	Purchase	06/08/2017	\$1,001 - \$15,000
11	Schwab US Large-Cap ETF	Purchase	06/08/2017	\$1,001 - \$15,000
12	iShares MSCI EAFE Small-Cap	Purchase	06/08/2017	\$1,001 - \$15,000
13	Vanguard Value ETF	Purchase	06/08/2017	\$1,001 - \$15,000
14	Vanguard Growth ETF	Purchase	06/08/2017	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
15	Stone Ridge TR II Rns Rsk Pr Int	Purchase	5/16/2017	\$15,001 - \$50,000
16	Stone Ridge Tr V Alt Lendg Prem	Purchase	6/1/2017	\$15,001 - \$50,000
17	iShares US Treasury Bond	Purchase	1/17/2017	\$1,001 - \$15,000
18	iShares Core S&P 500	Sale	4/19/2017	\$1,001 - \$15,000
19	iShares Intermediate Credit Bond	Purchase	4/19/2017	\$1,001 - \$15,000
20	iShares US Treasury Bond	Purchase	4/19/2017	\$1,001 - \$15,000
21	iShares MBS	Purchase	4/19/2017	\$1,001 - \$15,000
22	iShares Intermediate Credit Bond	Purchase	6/7/2017	\$1,001 - \$15,000
23	iShares US Treasury Bond	Purchase	6/7/2017	\$1,001 - \$15,000
24	iShares MBS	Purchase	6/7/2017	\$1,001 - \$15,000
25	Schwab US TIPS ETF	Purchase	6/7/2017	\$1,001 - \$15,000
26	Schwab US Large-Cap ETF	Purchase	6/7/2017	\$1,001 - \$15,000
27	Vanguard Value ETF	Purchase	7/20/2017	\$1,001 - \$15,000
28	iShares Core MSCI Emerging Markets ETF	Purchase	10/20/2017	\$1,001 - \$15,000
29	iShares US Treasury Bond	Purchase	10/20/2017	\$1,001 - \$15,000
30	Promontory Financial Group 401(k) T. Rowe Price Psnl Strt Bal Fund	See Endnote	Sale	

## 8. Liabilities

None

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## 9. Gifts and Travel Reimbursements

None

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### Endnotes

<b>PART</b>	<b>#</b>	<b>ENDNOTE</b>
5.	2	Retirement Plan managed by Mass Mutual. Asset allocation is in a Lifestyle/Lifecycle Fund.
6.	7	Fixed Index Annuity.
7.	30	This account was liquidated and its assets created two new accounts: Schwab Joint Brokerage (2017) and Mike's Schwab IRA (2017). The purchases for the Schwab Joint Brokerage (2017) were made on 6/8/2017. The purchases for Mike's Schwab IRA (2017) were made on May 16, 2017 and June 1, 2017.

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# 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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