Annual Report 2022 for Calendar Year 2021 | 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

Rosenblum, Deborah G

Assistant Secretary of Defense for Nuclear, Chemical and Biological Defense, DoD - Department of Defense

Report Year: 2022

Other Federal Government Positions Held During the Preceding 12 Months:

None

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/ Rosenblum, Deborah G [electronically signed on 05/01/2022 by Rosenblum, Deborah G 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/ Thompson, Scott F, Certifying Official [electronically signed on 08/03/2022 by Thompson, Scott F in Integrity.gov]

Other review conducted by

/s/ Raab, Dean, Ethics Official [electronically signed on 08/02/2022 by Raab, Dean in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 09/09/2022 by Granahan, Megan in Integrity.gov]			
Data Revised 08/02/2022			
Data Revised 06/24/2022			
Data Revised 05/11/2022			
Data Revised 05/02/2022			

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	ТО
1	The Nuclear Threat Initiative	Washington, District of Columbia	Non-Profit	Executive Vice President	8/2009	8/2021
2	The Herbert Scoville Peace Fellowship	Washington, District of Columbia	Non-Profit	Board Chair	5/2019	8/2021
3	Family Trust	Washington, District of Columbia	Trust	Trustee	9/2017	Present
4	Biden/Harris Transition Team, PT Fund, Inc.	Washington, District of Columbia	Non-Profit	Member	10/2020	1/2021

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

#	DESCRIPTION	EIF	VALUE IN	ICOME TYPE	INCOME AMOUNT
1	Rollover IRA	No	-		
1.1	U.S. brokerage money market account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.2	Baird Short Term Bond Instl CL	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.3	Baird Ultra Short Bond Fund Institutional Class Shares (BUBIX)	Yes	\$100,001 - \$250,000		
1.4	Edgewood Growth Fund Institutional Class Shares (EGFIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.5	MFS INTL Intrinsic Value CL 1	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.6	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.7	FMI Large Cap Fund Institutional Class Share (FMIQX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.8	Parnassus Mid Cap Fund Investor Class Shares (PARMX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.9	Delaware Small Cap Core Fund Institutional Class Shares (DCCIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.10	Artisan Global Value Instl CL	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.11	First EagleGlobal Fund Class I Shares (SGIIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.12	Washington Mutual Investors Fund Class F3 Shares (FWMIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.13	FPA Crescent Fund (FPACX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	The Nuclear Threat Initiative 457 B	No			
2.1	1290 VT GAMCO Small Cap Value (TNVIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3	The Nuclear Threat Initiative	N/A		salary	\$172,000

# 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	The Nuclear Threat Initiative	Washington, District of Columbia	I will continue to participate in the 457(b) defined contribution plan. The plan sponsor will not make further contributions after my separation.	8/2009

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Consulting (sole proprietorship)	N/A			
1.1	National Democratic Institute	N/A		Consulting fees	
1.2	International Republican Institute	N/A		Consulting fees	
1.3	Kearney	N/A		Consulting fees	
1.4	Alleghany Science and Technologies	N/A		Consulting fees	
1.5	Third Way	N/A		Consulting fees	
2	Rollover IRA Account	No			
2.1	U.S. brokerage money market account (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.2	Artisan Global Value Instl CL	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	Delaware Small cap core cl 1	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	Vanguard Total Stock Market ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.5	Washington Mutual Investors CL F3	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.6	FPA Crescent	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.7	First Eagle Global CL 1	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.8	Thornburg Investment Income Builder CL 1	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.9	Baird Short Term Bond Instl CL	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.10	Dodge & Cox Income	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.11	FMI Large Cap Fund Institutional Class Share (FMIQX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.12	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.13	Baird Ultra Short Bond Fund Institutional Class Shares (BUBIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.14	Baird Chautauqua global growth instl CL	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.15	Edgewood Growth Fund Institutional Class Shares (EGFIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.16	Parnassus Mid Cap Fund Investor Class Shares (PARMX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

# 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Bank Account #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2	Kimberly-Clark Corp. (KMB)	N/A	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Truist Financial Corp	Sale	08/16/2021	\$1,001 - \$15,000
2	Danaher Corp. (DHR)	Sale	08/17/2021	\$1,001 - \$15,000
3	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	Purchase	08/17/2021	\$15,001 - \$50,000
4	The Walt Disney Co. (DIS)	Sale	08/17/2021	\$1,001 - \$15,000
5	Constellation Brands, Inc. (STZ)	Sale	08/13/2021	\$1,001 - \$15,000
6	Domino's Pizza, Inc. (DPZ)	Sale	08/17/2021	\$1,001 - \$15,000
7	Facebook, Inc. (FB)	Sale	08/17/2021	\$1,001 - \$15,000
8	Edwards Lifesciences Corp. (EW)	Sale	08/17/2021	\$1,001 - \$15,000
9	Ecolab, Inc. (ECL)	Sale	08/17/2021	\$1,001 - \$15,000
10	FMI Large Cap Fund Institutional Class Share (FMIQX)	Purchase	08/17/2021	\$15,001 - \$50,000
_11	DR Horton Inc	Sale	08/17/2021	\$1,001 - \$15,000
12	DuPont de Nemours, Inc. (DD)	Sale	08/17/2021	\$1,001 - \$15,000
13	Costco Wholesale Corp. (COST)	Sale	08/17/2021	\$1,001 - \$15,000
14	BlackRock, Inc. (BLK)	Sale	08/17/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
15	Chubb Ltd. (CB)	Sale	08/17/2021	\$1,001 - \$15,000
16	Caterpillar, Inc. (CAT)	Sale	08/17/2021	\$1,001 - \$15,000
17	Generac Holdings, Inc. (GNRC)	Sale	08/17/2021	\$1,001 - \$15,000
18	Bank of America Corp. (BAC)	Sale	08/17/2021	\$1,001 - \$15,000
19	Apple, Inc. (AAPL)	Sale	08/17/2021	\$1,001 - \$15,000
20	Amazon.com, Inc. (AMZN)	Sale	08/17/2021	\$1,001 - \$15,000
21	Alphabet, Inc. (GOOG)	Sale	08/17/2021	\$1,001 - \$15,000
22	Morgan Stanley	Purchase	08/16/2021	\$1,001 - \$15,000
23	Adobe, Inc. (ADBE)	Sale	08/17/2021	\$1,001 - \$15,000
24	Abbott Laboratories (ABT)	Sale	08/17/2021	\$1,001 - \$15,000
25	Constellation Brands, Inc. (STZ)	Sale	08/17/2021	\$1,001 - \$15,000
26	HCA Healthcare, Inc. (HCA)	Sale	08/17/2021	\$1,001 - \$15,000
27	Edgewood Growth Fund Institutional Class Shares (EGFIX)	Purchase	08/17/2021	\$15,001 - \$50,000
28	IQVIA Holdings, Inc. (IQV)	Sale	08/17/2021	\$1,001 - \$15,000
29	Zoetis, Inc. (ZTS)	Sale	08/17/2021	\$1,001 - \$15,000
30	The Home Depot, Inc. (HD)	Sale	08/17/2021	\$1,001 - \$15,000
31	Vanguard Extended Market Index Fund ETF Shares (VXF)	Sale	08/17/2021	\$15,001 - \$50,000
32	Union Pacific Corp. (UNP)	Sale	08/17/2021	\$1,001 - \$15,000
33	Thornburg Investment Income Builder Fund Class I Shares (TIBIX)	Sale	08/17/2021	\$1,001 - \$15,000
34	Starbucks Corp. (SBUX)	Sale	08/17/2021	\$1,001 - \$15,000
35	salesforce.com, inc. (CRM)	Sale	08/17/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
36	Rockwell Automation, Inc. (ROK)	Sale	08/17/2021	\$1,001 - \$15,000
37	Principal Global Diversified Income Instl CL	Sale	08/17/2021	\$1,001 - \$15,000
38	Pioneer Natural Resources Co. (PXD)	Sale	08/17/2021	\$1,001 - \$15,000
39	Thermo Fisher Scientific, Inc. (TMO)	Sale	08/17/2021	\$1,001 - \$15,000
40	Parnassus Mid Cap Fund Investor Class Shares (PARMX)	Purchase	08/17/2021	\$50,001 - \$100,000
41	S&P Global, Inc. (SPGI)	Sale	08/17/2021	\$1,001 - \$15,000
42	NIKE, Inc. (NKE)	Sale	08/17/2021	\$1,001 - \$15,000
43	NextEra Energy, Inc. (NEE)	Sale	08/17/2021	\$1,001 - \$15,000
44	NVIDIA Corp. (NVDA)	Sale	08/17/2021	\$1,001 - \$15,000
45	Microsoft Corp. (MSFT)	Sale	08/17/2021	\$1,001 - \$15,000
46	MasTec, Inc. (MTZ)	Sale	08/17/2021	\$1,001 - \$15,000
47	Mastercard, Inc. (MA)	Sale	08/17/2021	\$1,001 - \$15,000
48	Keysight Technologies, Inc. (KEYS)	Sale	08/17/2021	\$1,001 - \$15,000
49	JP Morgan Chase	Sale	08/17/2021	\$1,001 - \$15,000
50	PayPal Holdings, Inc. (PYPL)	Sale	08/17/2021	\$1,001 - \$15,000
51	Morgan Stanley	Sale	08/17/2021	\$1,001 - \$15,000
52	MFS intl Intrinsic Value CL 1	Purchase	08/19/2021	\$1,001 - \$15,000
53	Delaware Small Cap Core Fund Institutional Class Shares (DCCIX)	Purchase	11/01/2021	\$50,001 - \$100,000
54	Baird Ultra Short Bond Fund Institutional Class Shares (BUBIX)	Purchase	11/01/2021	\$100,001 - \$250,000
55	Baird Short-Term Bond Fund Institutional Class Shares (BSBIX)	Purchase	11/01/2021	\$100,001 - \$250,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
56	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	Purchase	11/01/2021	\$100,001 - \$250,000
57	Edgewood Growth Fund Institutional Class Shares (EGFIX)	Purchase	11/01/2021	\$100,001 - \$250,000
58	artisan global value instl cl	Purchase	11/01/2021	\$15,001 - \$50,000
59	FMI Large Cap Fund Institutional Class Share (FMIQX)	Purchase	11/01/2021	\$100,001 - \$250,000
60	First EagleGlobal Fund Class I Shares (SGIIX)	Purchase	11/01/2021	\$50,001 - \$100,000
61	FPA Crescent Fund (FPACX)	Purchase	11/01/2021	\$15,001 - \$50,000
62	MFS Intl intrinsic value CL 1	Purchase	11/01/2021	\$50,001 - \$100,000
63	Parnassus Mid Cap Fund Investor Class Shares (PARMX)	Purchase	11/01/2021	\$100,001 - \$250,000
64	Constellation Brands, Inc. (STZ)	Sale	08/13/2021	\$1,001 - \$15,000
65	truist financial corp	Sale	08/16/2021	\$1,001 - \$15,000
66	Morgan Stanley	Purchase	08/16/2021	\$1,001 - \$15,000
67	First EagleGlobal Fund Class I Shares (SGIIX)	Sale	08/24/2021	\$15,001 - \$50,000
68	Facebook, Inc. (FB)	Sale	08/24/2021	\$1,001 - \$15,000
69	FMI Large Cap Fund Institutional Class Share (FMIQX)	Purchase	08/24/2021	\$100,001 - \$250,000
70	Ecolab, Inc. (ECL)	Sale	08/24/2021	\$1,001 - \$15,000
71	Edwards Lifesciences Corp. (EW)	Sale	08/24/2021	\$1,001 - \$15,000
72	Washington Mutual Investors Fund Class F3 Shares (FWMIX)	Purchase	11/01/2021	\$50,001 - \$100,000

#	DESCRIPTION	DN TYPE		AMOUNT
73	DuPont de Nemours, Inc. (DD)	Sale	08/24/2021	\$1,001 - \$15,000
74	Domino's Pizza, Inc. (DPZ)	Sale	08/24/2021 \$1,001 - \$1	
75	The Walt Disney Co. (DIS)	Sale	08/24/2021	\$1,001 - \$15,000
76	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	Purchase	08/24/2021	\$100,001 - \$250,000
77	Danaher Corp. (DHR)	Sale	08/24/2021	\$1,001 - \$15,000
78	Costco Wholesale Corp. (COST)	Sale	08/24/2021	\$1,001 - \$15,000
79	Constellation Brands, Inc. (STZ)	Sale	08/24/2021	\$1,001 - \$15,000
80	Apple, Inc. (AAPL)	Sale	08/24/2021	\$15,001 - \$50,000
81	Caterpillar, Inc. (CAT)	Sale	08/24/2021	\$1,001 - \$15,000
82	BlackRock, Inc. (BLK)	Sale	08/24/2021	\$15,001 - \$50,000
83	Bank of America Corp. (BAC)	Sale	08/24/2021	\$15,001 - \$50,000
84	Baird Ultra Short Bond Fund Institutional Class Shares (BUBIX)	Purchase	08/24/2021	\$50,001 - \$100,000
85	Generac Holdings, Inc. (GNRC)	Sale	08/24/2021	\$15,001 - \$50,000
86	Amazon.com, Inc. (AMZN)	Sale	08/24/2021	\$15,001 - \$50,000
87	Alphabet, Inc. (GOOGL)	Sale	08/24/2021	\$15,001 - \$50,000
88	Edgewood Growth Fund Institutional Class Shares (EGFIX)	Purchase	08/24/2021	\$100,001 - \$250,000
89	Adobe, Inc. (ADBE)	Sale	08/24/2021	\$1,001 - \$15,000
90	Abbott Laboratories (ABT)	Sale	08/24/2021	\$1,001 - \$15,000
			-	

#	DESCRIPTION	PTION TYPE		AMOUNT
91	Chubb Ltd. (CB)	Sale	08/24/2021	\$1,001 - \$15,000
92	HCA Healthcare, Inc. (HCA)	Sale	08/24/2021	\$1,001 - \$15,000
93	D R Horton INC	Sale	08/24/2021	\$1,001 - \$15,000
94	IQVIA Holdings, Inc. (IQV)	Sale	08/24/2021	\$1,001 - \$15,000
95	The Home Depot, Inc. (HD)	Sale	08/24/2021	\$1,001 - \$15,000
96	Baird Chautauqua global growth inst cl	Purchase	08/24/2021	\$50,001 - \$100,000
97	Zoetis, Inc. (ZTS)	Sale	08/24/2021	\$1,001 - \$15,000
98	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Sale	08/24/2021	\$15,001 - \$50,000
99	Thornburg Investment Income Builder Fund Class I Shares (TIBIX)	Sale	08/24/2021	\$15,001 - \$50,000
100	Union Pacific Corp. (UNP)	Sale	08/24/2021	\$1,001 - \$15,000
101	Thermo Fisher Scientific, Inc. (TMO)	Sale	08/24/2021	\$1,001 - \$15,000
102	Starbucks Corp. (SBUX)	Sale	08/24/2021	\$1,001 - \$15,000
103	S&P Global, Inc. (SPGI)	Sale	08/24/2021	\$1,001 - \$15,000
104	salesforce.com, inc. (CRM)	Sale	08/24/2021	\$1,001 - \$15,000
105	Rockwell Automation, Inc. (ROK)	Sale	08/24/2021	\$1,001 - \$15,000
106	PayPal Holdings, Inc. (PYPL)	Sale	08/24/2021	\$1,001 - \$15,000
107	Parnassus Mid Cap Fund Investor Class Shares (PARMX)	Purchase	08/24/2021	\$100,001 - \$250,000
108	NextEra Energy, Inc. (NEE)	Sale	08/24/2021	\$1,001 - \$15,000
109	Pioneer Natural Resources Co. (PXD)	Sale	08/24/2021	\$1,001 - \$15,000
110	Oshkosh Corp. (OSK)	Sale	08/24/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE		DATE	AMOUNT
111	JP Morgan Chase &Co			08/24/2021	\$15,001 - \$50,000
112	iShares Core Dividend Growth ETF (DGRO)		Sale	08/24/2021	\$15,001 - \$50,000
113	NIKE, Inc. (NKE)		Sale	08/24/2021	\$1,001 - \$15,000
114	iShares Edge MSCI Min Vol EAFE ETF (EFAV)		Sale	08/24/2021	\$15,001 - \$50,000
115	MasTec, Inc. (MTZ)		Sale	08/24/2021	\$1,001 - \$15,000
116	Mastercard, Inc. (MA)		Sale	08/24/2021	\$1,001 - \$15,000
117	Keysight Technologies, Inc. (KEYS)		Sale	08/24/2021	\$1,001 - \$15,000
118	Morgan Stanley	\$		08/24/2021	\$1,001 - \$15,000
119	NVIDIA Corp. (NVDA)			08/24/2021	\$15,001 - \$50,000
120	Apple, Inc. (AAPL)		Sale	08/27/2021	\$1,001 - \$15,000
121	Microsoft Corp. (MSFT)		Sale	08/24/2021	\$15,001 - \$50,000
122	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)		Sale	08/27/2021	\$1,001 - \$15,000
123	Microsoft Corp. (MSFT)		Sale	08/17/2021	\$1,001 - \$15,000
124	Microsoft Corp. (MSFT)		Sale	08/17/2021	\$1,001 - \$15,000
125	Oshkosh Corp. (OSK)		Sale	08/17/2021	\$1,001 - \$15,000
126	Oshkosh Corp. (OSK)		Sale	08/17/2021	\$1,001 - \$15,000
127	Enphase Energy, Inc. (ENPH)	See Endnote	Sale	07/16/2021	\$1,001 - \$15,000
128	Enphase Energy, Inc. (ENPH)	See Endnote	Sale	07/16/2021	\$1,001 - \$15,000
129	Fiserv, Inc. (FISV)	See Endnote	Sale	06/29/2021	\$1,001 - \$15,000

#	DESCRIPTION	_	TYPE	DATE	AMOUNT
130	Fiserv, Inc. (FISV)	See Endnote	Sale	06/29/2021	\$1,001 - \$15,000

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Sun Trust Bank/Truist	Mortgage on Personal Residence	\$15,001 - \$50,000	2019	3.49%	15 year fixed

## 9. Gifts and Travel Reimbursements

None

## Endnotes

PART	#	ENDNOTE
7.	127	Asset sold prior to appointment, so no OGE 278-T filed.
7.	128	Asset sold prior to appointment, so no OGE 278-T filed.
7.	129	Asset sold prior to appointment, so no OGE 278-T filed.
7.	130	Asset sold prior to appointment, so no OGE 278-T filed.

## **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).