

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

Filer's Information

SKELTON, KAREN

Senior Advisor to the Secretary, Department of Energy

Date of Appointment: 02/22/2021

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/ SKELTON, KAREN [electronically signed on 02/22/2021 by SKELTON, KAREN 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/ Comfort, Melinda, Certifying Official [electronically signed on 04/05/2021 by Comfort, Melinda in Integrity.gov]

Other review conducted by

/s/ Comfort, Melinda, Ethics Official [electronically signed on 04/05/2021 by Comfort, Melinda in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 04/05/2021

Data Revised 03/04/2021

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(04/05/2021, Comfort, Melinda): 208: Oracle, AT&T, Cisco, Disney, Wells Fargo, Alphabet, Apple, Berkshire Hathaway, Ford, Goldman Sachs, Bloom Energy, Oak Tree Strategies. 502: Skelton Strategies and/or its clients;; Public Policy Institute of California; She Shares; Institute for Democracy & Justice; Open California; Lawyers for Sustainable Economy; National Parks Foundation Council.

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Skelton Strategies	Sacramento, California	Sole Proprietorship	Founder and CEO	1/2011	2/2021
2	Public Policy Institute of California	San Francisco, California	Non-Profit	Board of Directors	1/2019	1/2021
3	Women's Alzheimer's Movement	Los Angeles, California	Non-Profit	Board of Directors	1/2014	1/2021
4	She Shares	Sacramento, California	Non-Profit	Board of Directors	1/2011	1/2021
5	Institute for Democracy and Justice	Sacramento, California	Non-Profit	Board of Directors	1/2017	1/2021
6	Open California	Sacramento, California	Non-Profit	Board of Directors	1/2019	1/2021
7	Lawyers for Sustainable Economy	Palo Alto, California	Non-Profit	Advisor	1/2017	1/2021
8	National Parks Foundation Council	Washington, District of Columbia	Non-Profit	Board of Directors	1/2017	1/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Skelton Strategies	N/A	\$500,001 - \$1,000,000	Income from Skelton Strategies	\$531,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Oak Tree Strategies See Endnote	N/A	\$250,001 - \$500,000	Income per fixed amount set for sale of business	\$100,000
3	US bank cash account	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	AMERICAN BALANCED F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	AMERICAN GLOBAL BALANCED F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	AMERICAN INFL LNKD BD F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	AMERICAN MUTUAL F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
8	E V BALANCED I	Yes	\$1,001 - \$15,000		None (or less than \$201)
9	FIDELITY ADV BALANCED I	Yes	\$1,001 - \$15,000		None (or less than \$201)
10	AMERICAN FUNDAMENTAL INV F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
11	Permanent Portfolio Family of Funds: PERMANENT PORTFOLIO	Yes	\$1,001 - \$15,000		None (or less than \$201)
12	AMERICAN WA MUTUAL F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
13	JOHN DEERE CAPITAL CORP Coupon 1.20% Mature 04/06/2023(FQT30)	N/A	\$1,001 - \$15,000		None (or less than \$201)
14	EBAY INCC Coupon 3.45% Mature 08/01/2024(EQ73W)	N/A	\$1,001 - \$15,000		None (or less than \$201)
15	LOWE'S COS INCC Coupon 3.75% Mature 04/15/2021(BL4H8)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16	ORACLE CORP Coupon 1.90% Mature 09/15/2021(B2M5S)	N/A	\$1,001 - \$15,000		None (or less than \$201)
17	J M SMUCKER CO/THE Coupon 3.50% Mature 03/15/2025(B83NV)	N/A	\$1,001 - \$15,000		None (or less than \$201)
18	STRYKER CORP Coupon 2.63% Mature 03/15/2021(D8L25)	N/A	\$1,001 - \$15,000		None (or less than \$201)
19	WESTERN UNION CO/THE Coupon 3.60% Mature 03/15/2022(C59T6)	N/A	\$1,001 - \$15,000		None (or less than \$201)
20	US bank cash account	N/A	\$1,001 - \$15,000		None (or less than \$201)
21	AMGEN INC	N/A	\$1,001 - \$15,000		None (or less than \$201)
22	AT&T INC	N/A	\$1,001 - \$15,000	Dividends Interest Capital Gains	\$201 - \$1,000
23	CISCO SYS INC	N/A	\$1,001 - \$15,000		None (or less than \$201)
24	WALT DISNEY CO HLDG CO	N/A	\$1,001 - \$15,000		None (or less than \$201)
25	UNILEVER PLC (NEW) ADS	N/A	\$1,001 - \$15,000		None (or less than \$201)
26	FIRST TR VALU.LN DIV IDX	Yes	\$1,001 - \$15,000		\$201 - \$1,000
27	FRANKLIN LIBERTYQ US EQUI ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
28	ISHARES SELECT DIVIDEND ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
29	ISHARES CORE S&P 500 ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
30	ISHARES GLOBAL TECH ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
31	ISHARES REAL ESTATE 50 ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
32	ISHARES MSCI KLD 400 SCL ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
33	ISHARES US AEROSPACE & DEF ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
34	ISHARES INDIA 50 ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
35	ISHARES CORE GROWTH ALLOCATI	Yes	\$1,001 - \$15,000		None (or less than \$201)
36	ISHARES AAA-A RATED COR BD ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
37	ISHARES EDGE MSCI MIN VOL USA	Yes	\$1,001 - \$15,000		None (or less than \$201)
38	ISHARES IBONDS DEC 2022 CORP	Yes	\$1,001 - \$15,000		None (or less than \$201)
39	ISHARES IBONDS DEC 21 TRM CORP	Yes	\$1,001 - \$15,000		None (or less than \$201)
40	PROSHARES TR S&P 500 DV ARIST	Yes	\$1,001 - \$15,000		\$201 - \$1,000
41	SPDR GOLD TR GOLD SHS	Yes	\$1,001 - \$15,000		None (or less than \$201)
42	SPDR DJIA TRUST	Yes	\$1,001 - \$15,000		None (or less than \$201)
43	AMERICAN BALANCED F2	Yes	\$15,001 - \$50,000		\$201 - \$1,000
44	AMERICAN BALANCED F2	Yes	\$1,001 - \$15,000		None (or less than \$201)
45	E V BALANCED I	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
46	FIDELITY ADV BALANCED I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
47	PIONEER BOND Y	Yes	\$15,001 - \$50,000		\$201 - \$1,000
48	PGIM TOTAL RETURN BOND Z	Yes	\$15,001 - \$50,000		\$201 - \$1,000
49	AMERICAN WA MUTUAL F2	Yes	\$15,001 - \$50,000		\$201 - \$1,000
50	ALLY BK MIDVALE U MIDVALE UT CDCoupon 1.85% Mature 01/17/2023(EM55E)	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
51	AMERICAN EXPRESS FED SVGS BK CDCoupon 2.40% Mature 05/17/2022(C572K)	N/A	\$1,001 - \$15,000		None (or less than \$201)
52	WELLS FARGO BK NA SIOUX FALLS SD CDCoupon 1.75% Mature 07/19/2021(CR2D5)	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
53	MORGAN STANLEY BANK N.A.	N/A	\$50,001 - \$100,000		None (or less than \$201)
54	AT&T INC	N/A	\$15,001 - \$50,000	Dividends Interest Capital Gains	\$1,001 - \$2,500
55	ALPHABET INC CL A	N/A	\$50,001 - \$100,000		None (or less than \$201)
56	AMGEN INC	N/A	\$15,001 - \$50,000	Dividends Interest Capital Gains	\$201 - \$1,000
57	APPLE INC	N/A	\$50,001 - \$100,000	Dividends Capital Gains Interest	\$201 - \$1,000
58	BERKSHIRE HATHAWAY CL-B NEW	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
59	WALT DISNEY CO HLDG CO	N/A	\$50,001 - \$100,000	Dividends Capital Gains Interest	\$15,001 - \$50,000
60	FORD MOTOR CO NEW	N/A	\$1,001 - \$15,000		None (or less than \$201)
61	PALO ALTO NETWORKS INC	N/A	\$50,001 - \$100,000		None (or less than \$201)
62	PEPSICO INC NC	N/A	\$15,001 - \$50,000	Dividends Interest Capital Gains	\$201 - \$1,000
63	THE J.M. SMUCKER COMPANY	N/A	\$15,001 - \$50,000	Dividends Interest Capital Gains	\$201 - \$1,000
64	UNILEVER PLC (NEW) ADS	N/A	\$15,001 - \$50,000		\$201 - \$1,000
65	INVESCO S&P 500 EQUAL WEIGHT E	Yes	\$15,001 - \$50,000		\$201 - \$1,000
66	INVESCO EQUAL WGHTD S&P 500 Y	Yes	\$15,001 - \$50,000		\$201 - \$1,000
67	AMERICAN INFL LNKD BD F2	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
68	AMERICAN MUTUAL F2	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
69	AMERICAN BD FD OF AMERICA F2	Yes	\$15,001 - \$50,000		\$201 - \$1,000
70	E V BALANCED I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
71	FIDELITY ADV BALANCED I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
72	FIDELITY ADV NEW INSIGHTS I	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
73	FRANKLIN RISING DIVIDENDS ADV	Yes	\$15,001 - \$50,000		\$201 - \$1,000
74	AMERICAN FUNDAMENTAL INV F2	Yes	\$50,001 - \$100,000		\$201 - \$1,000
75	LAZARD EMERGING MKTS EQ I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
76	Permanent Portfolio Family of Funds: PERMANENT PORTFOLIO	Yes	\$15,001 - \$50,000		\$201 - \$1,000
77	PIONEER BOND Y	Yes	\$15,001 - \$50,000		\$201 - \$1,000
78	PGIM TOTAL RETURN BOND Z	Yes	\$15,001 - \$50,000		\$201 - \$1,000
79	PGIM SHORT-TERM CORP BOND Z	Yes	\$15,001 - \$50,000		\$201 - \$1,000
80	WESTERN UNION CO/THECoupon 3.60% Mature 03/15/2022(C59T6)	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
81	Goldman Sachs NEW YORK NY CDCoupon 3.05% Mature 10/29/2024(D538B)	N/A	\$15,001 - \$50,000	Interest	\$5,001 - \$15,000

3. Filer's Employment Agreements and Arrangements

None

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Bloom Energy	Sacramento, California	Consulting Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
2	Alzheimer's Association of America	Sacramento, California	Consulting Services
3	Democratic National Convention	Sacramento, California	Consulting Services
4	Glover Park Group	Washington DC	Consulting Services
5	Google	Sunnyside, California	Consulting Services
6	Consulate of Japan, Northern California	San Francisco, California	Consulting Services
7	Lyft	San Francisco, California	Consulting Services
8	T-Mobile	Sacramento, California	Consulting Services
9	Verisign	Sacramento, California	Consulting Services
10	College Futures	Sacramento, California	Consulting Services
11	NextEra	Sacramento, California	Consulting Services
12	Amazon	Sacramento, California	Consulting Services
13	Natural Resources Defense Council	Sacramento, California	Consulting Services
14	Skelton Strategies	Sacramento, California	provided consulting services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Sacramento Public Defender Office	N/A		Salary	
2	AMERICAN BALANCED A	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	AMERICAN CAP WRLD GR & INC A	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4	AMERICAN WA MUTUAL A	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
5	VANGUARD TARGET 2025	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	FIDELITY CONTRAFUND K6	Yes	\$50,001 - \$100,000		None (or less than \$201)
7	PARNASSUS CORE EQUITY INST	Yes	\$50,001 - \$100,000		None (or less than \$201)
8	VANGUARD TARGET 2025	Yes	\$100,001 - \$250,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US bank cash account	N/A	\$100,001 - \$250,000		None (or less than \$201)
2	AT&T INC	N/A	\$1,001 - \$15,000	Dividends Capital Gains Interest	\$201 - \$1,000
3	BLOOM ENERGY CORP COM CL A	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	CISCO SYS INC	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	WALT DISNEY CO HLDG CO	N/A	\$15,001 - \$50,000		None (or less than \$201)
6	MERCK & CO INC NEW COM	N/A	\$1,001 - \$15,000	Dividends Interest Capital Gains	\$201 - \$1,000
7	UNILEVER PLC (NEW) ADS	N/A	\$15,001 - \$50,000	Dividends Capital Gains Interest	\$201 - \$1,000
8	INVESCO S&P 500 EQUAL WEIGHT E	Yes	\$15,001 - \$50,000		\$201 - \$1,000
9	ISHARES CORE S&P 500 ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
10	ISHARES MSCI EMERGING MKTS ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
11	ISHARES S&P 500 VAL ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
12	ISHARES S&P MIDCAP 400 INDEX	Yes	\$15,001 - \$50,000		\$201 - \$1,000
13	ISHARES US REAL ESTATE ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
14	ISHARES US AEROSPACE & DEF ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
15	ISHARES CORE GROWTH ALLOCATI	Yes	\$1,001 - \$15,000		None (or less than \$201)
16	PROSHARES TR S&P 500 DV ARIST	Yes	\$1,001 - \$15,000		None (or less than \$201)
17	AMERICAN BALANCED F2	Yes	\$50,001 - \$100,000		\$201 - \$1,000
18	AMERICAN TAX EXEMPT CA F2	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	FRANKLIN CA TX FR INC ADV	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
20	"ABBVIE INCCoupon 0.69% Mature 11/19/2021(H3PR7) LIBOR LINKED"	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
21	ALAMEDA CALIF UNI SCH DIST ALAMEDA CNTY SER A OY 5.13Coupon .00% Mature 08/01/2023 (H5362) Insurance Co: AGMC FORMERLY FSA	N/A	\$50,001 - \$100,000		None (or less than \$201)
22	BASS LAKE CALIF JT UN ELEM SCHDISTCoupon .00% Mature 08/01/2031 (CU2K6) Insurance Co: NATIONAL PUBLIC FINANCE GUARANTEE CORP	N/A	\$1,001 - \$15,000		None (or less than \$201)
23	EAST SIDE UN HIGH SCH DIST CALIF SANTA CLARA CNTY-G OY 4.93Coupon .00% Mature 08/01/2029 (CL6X1) Insurance Co: AGMC FORMERLY FSA	N/A	\$15,001 - \$50,000		None (or less than \$201)
24	HERMOSA BEACH CALIF CITY SCH DIST OY 4.97Coupon .00% Mature 08/01/2030 (NPD32) Insurance Co: AMBAC	Yes	\$15,001 - \$50,000		None (or less than \$201)
25	HILLSBOROUGH CALIF SCH DIST REF OY 2.640Coupon .00% Mature 09/01/2031 (E59FR)	N/A	\$15,001 - \$50,000		None (or less than \$201)
26	IMPERIAL CA CMNTY COLLEGE DISTSER-B OY 4.30Coupon .00% Mature 08/01/2022 (J1718) Insurance Co: AGC REINSURES SYNCORA GUAR INC (FORM XLCA)	N/A	\$15,001 - \$50,000		None (or less than \$201)
27	MODESTO CALIF HIGH SCH DIST STANISLAUS CNTY SER-ACoupon .00% Mature 08/01/2025 (NL712) Insurance Co: NATIONAL PUBLIC FINANCE GUARANTEE CORP	N/A	\$15,001 - \$50,000		None (or less than \$201)
28	MONTEREY PENINSULA CALIF CMNTYCOLLEGE DCoupon .00% Mature 08/01/2032 (DBJ32)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
29	MT DIABLO CALIF UNI SCH DIST-AOY 4.70Coupon .00% Mature 08/01/2022 (AE60T) Insurance Co: ASSURED GUARANTY MUNICIPAL CORP	N/A	\$15,001 - \$50,000		None (or less than \$201)	
30	ROSS VALLEY CALIF PUB FING AUTH REVCoupon 3.00% Mature 01/01/2028 (C4X92) Insurance Co: BUILD AMERICA MUTUAL	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000	
31	SAN MARCOS CALIF UNI SCH DIST-A OY 5.35Coupon .00% Mature 08/01/2023 (AUQ46)	N/A	\$15,001 - \$50,000		None (or less than \$201)	
32	SAN MATEO CO CA CMNTY CLGE DIST ELECTION OF 2001-A OY 5.60Coupon .00% Mature 09/01/2021 (BF251) Insurance Co: NATIONAL PUBLIC FINANCE GUARANTEE CORP	N/A	\$15,001 - \$50,000		None (or less than \$201)	
33	SEBASTOPOL CALIF UN SCH DIST SER- BCoupon .00% Mature 08/01/2031 (HQY52)	N/A	\$1,001 - \$15,000		None (or less than \$201)	
34	SOUTH PASADENA CALIF UNI SCH DIST SER-C OY 5.650Coupon .00% Mature 11/01/2021 (C08EK) Insurance Co: NATIONAL PUBLIC FINANCE GUARANTEE CORP	N/A	\$15,001 - \$50,000		None (or less than \$201)	
35	VICTOR CALIF ELEM SCH DIST REF-B OY 4.83Coupon .00% Mature 08/01/2022 (SK708) Insurance Co: NATIONAL PUBLIC FINANCE GUARANTEE CORP	N/A	\$1,001 - \$15,000		None (or less than \$201)	
36	discover GREENWOOD DE CDCoupon 2.40% Mature 07/26/2024(C2WM8)	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000	
37	FIRST PREMIER BK SIOUX FALLS SD CDCoupon 2.45% Mature 08/01/2025(DH2J7)	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000	
38	US brokerage cash accounts	See Endnote	N/A		\$500,001 - \$1,000,000	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	SBA PPP	See Endnote	SBA PPP	\$15,001 - \$50,000	2020	NA	NA

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
2.	2	Regards the sale of Skelton Strategies
6.	38	cash accounts: Checking and Money market accounts.
8.	1	Subject to any applicable forgiveness eligibility.

Summary of Contents

1. Filer's Positions Held Outside United States Government

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

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

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

Part 2 discloses the following:

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

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

3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

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

Part 5 discloses the following:

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

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

6. Other Assets and Income

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

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

7. Transactions

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

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

8. Liabilities

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

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

9. Gifts and Travel Reimbursements

This section discloses:

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

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

Privacy Act Statement

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

Public Burden Information

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

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