## UNITED STATES OFFICE OF GOVERNMENT ETHICS

### **CERTIFICATE OF DIVESTITURE**

**CERTIFICATE NO:** OGE-2021-146

DATE OF ISSUANCE: July 21, 2021

ELIGIBLE PERSON: John C. Inglis, Office of National Cyber Director

[The divestiture property is identified in the attachment to this Certificate.]

[Please note: Upon the sale of this property, only the capital gain realized under Federal tax law is eligible for deferral under section 1043. This Certificate of Divestiture does not apply to ordinary compensation income.]

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code and 5 C.F.R. § 2634.1002 with respect to the specific property described in the attachment. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Section 1043 of the Internal Revenue Code and the rules of 5 C.F.R. part 2634, subpart J provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service. Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should also be consulted as to these matters. Eligible persons must follow Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824).

A Certificate of Divestiture may only be used if the person identified above is an "eligible person" at the time of divestiture. The rules of 5 C.F.R. part 2634, subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003.

> DAVID **APOL**

David J. Apol

Digitally signed by DAVID APOL Date: 2021.07.21 15:14:46 -04'00'

General Counsel

Attachment

	Quantity or Percentage Owned (quantity
Description	may be represented by the
of the Property	number of shares of stock, units
(include the name of the property	owned, or percentage of the
being divested (e.g. name of stock)	partnership owned)
AT&T Inc. (T)	2056.3555 shares
Duke Energy (DUK)	94.9537 shares
Enbridge (ENB)	146.9331 shares
Phillips Morris (PM)	70.9702 shares
Under Armour Class A Shares (UAA)	160 shares
Under Armour Class C Shares (UA)	161.1357 shares
Verizon Communications (VZ)	742.4641 shares
Walmart (WMT)	134 shares
FedEx (FDX)	13100 shares
FedEx (FDX) Shares Vequrity, Inc. (dba Range Force)	5296 shares
options	20,000 options
Blackpoint Cyber options	144,168 options
Securonix shares	100,000 shares
Securonix	125,000 shares
HawkEye 360	1562 shares
	100% of all financial interest in
Paladin Cyber Investors LP	Paladin Cyber Investors LP that you hold as of the date of this
	Certificate of Divestiture.  100% of all financial interest In
Paladin Cyber Investors II LP	Paladin Cyber Investors II LP that you hold as of the date of this Certificate of Divestiture.
Paladin Cyber Investors II LP, carried interest	100% of all financial interest in Paladin Cyber Investors II LP, carried interest that you hold as of the date of this Certificate of Divestiture.
Paladin Investors III LP, carried interest	100% of all financial interest in Paladin Investors III LP, carried interest that you hold as of the date of this Certificate of Divestiture.

## UNITED STATES OFFICE OF GOVERNMENT ETHICS

### **CERTIFICATE OF DIVESTITURE**

**CERTIFICATE NO:** OGE-2021-147

DATE OF ISSUANCE: July 21, 2021

**ELIGIBLE PERSON:** John C. Inglis and Anna Maria Stanowski Inglis [spouse of John C.

Inglis], Office of National Cyber Director

[The divestiture property is identified in the attachment to this Certificate.]

[Please note: Upon the sale of this property, only the capital gain realized under Federal tax law is eligible for deferral under section 1043. This Certificate of Divestiture does not apply to ordinary compensation income.]

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code and 5 C.F.R. § 2634.1002 with respect to the specific property described in the attachment. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Section 1043 of the Internal Revenue Code and the rules of 5 C.F.R. part 2634, subpart J provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service. Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should also be consulted as to these matters. Eligible persons must follow Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824).

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> DAVID **APOL**

David J. Apol General Counsel Digitally signed by DAVID APOL Date: 2021.07.21 15:15:40 -04'00'

Attachment

#### **ATTACHMENT**

**CERTIFICATE NO.: OGE-2021-147** 

# Description of the Property

(include the name of the property being divested (e.g. name of stock)

USAA Precious Metals and Minerals

Fund

Vanguard Energy Fund (VGENX)

Walmart (WMT)

Apple (AAPL) FedEx (FDX) Shares Quantity

or Percentage Owned (quantity may be represented by the number of shares of stock, units owned, or percentage of the partnership owned)

> 994.69 shares 70.7060 176.502 shares 432.3991 shares 600 shares