

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

## Filer's Information

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Koulogeorge, Sarah

Senior Advisor, Small Business Administration

Date of Appointment: 01/16/2024

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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/ Sarah Koulogeorge \[electronically signed by Sarah Koulogeorge on 2024-07-08 09:51:20 in FDOonline\]](#)

Filed with Extension. Extended for 90 days

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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)

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Other review conducted by:

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U.S. Office of Government Ethics Certification

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

| # | NAME     | CITY, STATE           | ORG TYPE     | POSITION   | FROM    | TO      |
|---|----------|-----------------------|--------------|------------|---------|---------|
| 1 | Scale AI | San Francisco, CA, US | Tech Company | Consultant | 09/2023 | 11/2023 |

## 2. Filer's Employment Assets and Income

| #   | Description                               | EIF | Value                       | Income Type | Income Amount             |
|-----|---|-----|-----------------------------|-------------|---------------------------|
| 1   | (IRA) Charles Schwab                      | N/A |                             |             |                           |
| 1.1 | (Stock) AMZN-Amazon.com Inc               | No  | \$1,001 - \$15,000          |             | None (or less than \$201) |
| 1.2 | (Stock) XCUR-Exicure Inc                  | No  | None (or less than \$1,001) |             | None (or less than \$201) |
| 1.3 | (ETF) SPY-S&P 500 SPDR                    | Yes | \$15,001 - \$50,000         |             | None (or less than \$201) |
| 1.4 | (ETF) VEA-FTSE Developed Markets Vanguard | Yes | \$1,001 - \$15,000          |             | None (or less than \$201) |
| 2   | Mars & Co. (401k) Charles Schwab          | N/A |                             |             |                           |
| 2.1 | (ETF) VEA-FTSE Developed Markets Vanguard | Yes | \$1,001 - \$15,000          |             | None (or less than \$201) |

## 3. Filer's Employment Agreements and Arrangements

| # | EMPLOYER OR OTHER PARTY TO AGREEMENT/ARRANGEMENT | CITY, STATE       | STATUS AND TERMS   | DATE     |
|---|--|-------------------|--|----------|
| 1 | Mars & Co.                                       | Greenwich, CT, US | 401K- standard 401K plan- I continue to participate in this 401k plan, the employer does not make contributions to the plan on my behalf | 11 /2016 |

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

None

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## 5. Spouse's Employment Assets and Income

None

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## 6. Other Assets and Income

| #  | DESCRIPTION  | EIF | VALUE                | INCOME TYPE | INCOME AMOUNT             |
|----|--|-----|----------------------|-------------|---------------------------|
| 1  | (ETF) SPY S&P 500 SPDR   | Yes | \$50,001 - \$100,000 |             | None (or less than \$201) |
| 2  | (Cash Deposit/Savings) Schwab Value Advantage Money Investor Shares Northbrook, IL, US | N/A | \$50,001 - \$100,000 | Dividends   | \$5,001 - \$15,000        |
| 3  | (Stock) FHN First Horizon Corp   | N/A | \$15,001 - \$50,000  | Dividends   | \$201 - \$1,000           |
| 4  | (Stock) GS Goldman Sachs Group   | N/A | \$15,001 - \$50,000  | Dividends   | \$1,001 - \$2,500         |
| 5  | (Stock) HD Home Depot  | N/A | \$15,001 - \$50,000  | Dividends   | \$201 - \$1,000           |
| 6  | (Stock) JPM JP Morgan Chase & Company  | N/A | \$15,001 - \$50,000  |             | \$201 - \$1,000           |
| 7  | (Stock) MS Morgan Stanley  | N/A | \$15,001 - \$50,000  | Dividends   | \$1,001 - \$2,500         |
| 8  | (Stock) PYPL Paypal Holdings   | N/A | \$15,001 - \$50,000  |             | None (or less than \$201) |
| 9  | (Stock) SNOW Snowflake Inc Cl A  | N/A | \$15,001 - \$50,000  |             | None (or less than \$201) |
| 10 | (Stock) SBUX Starbucks Corp  | N/A | \$15,001 - \$50,000  |             | None (or less than \$201) |
| 11 | (Stock) UTMD Utah Medical Prod   | N/A | \$15,001 - \$50,000  | Dividends   | \$201 - \$1,000           |
|    |  |     |                      |             | None (or less than        |

|   |     |                     |               |                     |
|---|-----|---------------------|---------------|---------------------|
| 12 (Stock) DIS Walt Disney Company      | N/A | \$1,001 - \$15,000  |               | \$201)              |
| 13 (Stock) WBA Walgreens Boots Alliance | N/A | \$15,001 - \$50,000 | Capital Gains | \$15,001 - \$50,000 |

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## 7. Transactions

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

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## 8. Liabilities

None

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## 9. Gifts and Reimbursements

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

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## Endnotes

| PART | # | ENDNOTE                        |
|------|---|--------------------------------|
| 6    | 2 | This is a money market account |

## Summary of Contents

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

Part 1 discloses the following: Positions held by the filer at any time during the reporting period (excluding positions with the United States Government). Reportable positions include those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any for-profit or non-profit organization (whether compensated or uncompensated).

### 2. Filer's Employment Assets and Income

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 if the value of the asset at the end of the reporting period exceeded \$1,000 or if 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, anticipated payments such as severance payments, 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 the following: Agreements or arrangements that the filer had during the reporting period for the following:

- Continuing participation in an employee welfare or benefit plan maintained by a former employer
- Leave of absence
- Future employment
- Continuation of payments by a former employer (e.g., severance payments)

### 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 and Income

Part 5 discloses the following:

- Source of earned income (excluding honoraria) for the filer's spouse over \$1,000 during the reporting period.
- Sources of honoraria for the filer's spouse over \$200 during the reporting period.

- Assets related to the 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, 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

Part 9 discloses the following:

- Gifts totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 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 \$192 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. § 13101 et seq., as amended by the Representative Louise McIntosh Slaughter 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 13989 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;
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.

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# **Reviewer Comments and Submission History**

## **for Sarah Koulogeorge**

**sarah.koulogeorge@sba.gov - Sarah Koulogeorge**

05/16/2024 11:04:53

Filing Submitted

**sarah.koulogeorge@sba.gov - Sarah Koulogeorge**

05/14/2024 16:42:04

Filing Submitted

**lashion.pratt@sba.gov - Lashion Pratt**

04/05/2024 13:55:21

Filing Extension Granted to 05/15/2024