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

Romanowski, Alina L

Ambassador to the State of Kuwait, Department of State

Report Year: 2022

Other Federal Government Positions Held During the Preceding 12 Months:

U.S. Ambassador to Kuwait (1/2020 - Present)

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/ Romanowski, Alina L [electronically signed on 03/27/2022 by Romanowski, Alina L 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/ Chabora, Paige E, Certifying Official [electronically signed on 05/03/2022 by Chabora, Paige E in Integrity.gov]

Other review conducted by

/s/ Chabora, Paige E, Ethics Official [electronically signed on 04/28/2022 by Chabora, Paige E in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying	g Official [electronically signed on	05/16/2022 by Granahan, N	Megan in Integrity.gov]		
Data Revised 04/28/2022					
Data Revised 04/25/2022					
Data Revised 04/05/2022					
Data Revised 03/28/2022					

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	ТО
1	Filer's Revocable Estate Trust	See Endnote	Washington DC, District of Columbia	Trust	Trustee	12/2012	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA # 1	No			
1.1	Blackrock Capital Appreciation FD, INC A (IRA)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
1.2	Blackrock Advantage LRGE Cap Growth FD CL A (IRA)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
1.3	PIMCO ALL Asset Fund Class C (IRA)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2	IRA #2	No			
2.1	Vanguard STAR Investor CL Fund (IRA)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
2.2	Vanguard Wellington Admiral CL (renamed from Wellington Fund Inv) (IRA)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
3	IRA #3	No		Cash payments	\$7,421
3.1	CREF Bond Market R3 (Inherited IRA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	TIAA Traditional (Inherited IRA)	N/A	\$50,001 - \$100,000		\$1,001 - \$2,500

3. Filer's Employment Agreements and Arrangements

None

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	WWM Solutions LLC (aerospace and defense consultant)		N/A	\$50,001 - \$100,000	LLC income	
2	BAE Deferred Compensation Plan	See Endnote	No	\$50,001 - \$100,000		None (or less than \$201)
2.1	Fidelity Freedom Income		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	Vanguard VIF Total Bond Market Index		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	DFA VIT Inflation-Protected Securities Instl Class		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	Vanguard VIF Balanced		Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	Vanguard VIF Small Company Growth		Yes	None (or less than \$1,001)		None (or less than \$201)
2.6	DFA VA US Large Value (BAE Deferred Comp)		Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.7	BNY Mellon IP Small Cap Stock Index (BAE Deferred Comp)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.8	DFA VA Targeted Value (BAE Deferred Comp)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	BAE 401K	No			
3.1	Vanguard Institutional Total Bond Mkt (BAE 401K)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.2	Dodge & Cox Stock (BAE 401K)	N/A	\$15,001 - \$50,000		
3.3	Vanguard Institutional 500 Index Trust (BAE 401K)	Yes	\$100,001 - \$250,000		
3.4	Dodge & Cox Income (BAE 401K)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.5	Vanguard Target Retirement Trust (BAE 401K)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.6	Vanguard Target Retirement 2025 Trust (BAE 401K)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.7	Vanguard Institutional Extended Market Index Trust (BAE 401K)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.8	Touchstone Sands Cap Emerging (BAE 401K)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.9	Fidelity Contrafund Commingled (BAE 401K)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.10	Vanguard Developed Markets Index (BAE 401K)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	Raytheon 401k	No			
4.1	Raytheon Fixed Income Fund (Raytheon 401K)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.2	Northern Trust S&P 500 Index (NOSIX) (Raytheon 401K)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.3	T. Rowe Price Inst SM CAP STK (Raytheon 401K)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.4	PIMCO Total RT INST (Raytheon 401K)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.5	Income Allocation Index (Raytheon 401K)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	Vanguard Real Estate Index 1st Shares (Raytheon 401k subasset)	Yes	\$50,001 - \$100,000		
4.7	Vanguard Inst Total Stock Mkt Index (Raytheon 401K subasset)	Yes	\$100,001 - \$250,000		
4.8	American Funds New Perspective Fund (Raytheon 401k subassset)	Yes	\$100,001 - \$250,000		
5	IRA #1	No			
5.1	Ford Motor Co. (IRA)	N/A	\$1,001 - \$15,000		\$201 - \$1,000
5.2	Freeport-McMoran Inc. (IRA)	N/A	\$15,001 - \$50,000		\$201 - \$1,000
5.3	Johnson and Johnson Company (IRA)	N/A	\$50,001 - \$100,000		\$1,001 - \$2,500
5.4	Marathon Petroleum Corporation (IRA)	N/A	\$15,001 - \$50,000	\$15,001 -	
5.5	Medtronic PLC Shares (IRA)	N/A	\$1,001 - \$15,000		\$201 - \$1,000
5.6	General Electric (IRA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.7	Vanguard Growth Index Fund ETF Class Shares (VUG) (IRA)	Yes	\$50,001 - \$100,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.8	Virtus Allianzgi Income and Growth Fund CL A [converted from CL C] (IRA)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.9	Hancock John Disciplined Value Mid Cap CL A [converted from CL C] (IRA)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.10	Vanguard Value ETF [VTV] (IRA)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Coca-Cola Co (ML Acct)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$201 - \$1,000
2	Virtus Allianzgi NFJ Dividend Value Fund CL A (converted from CL C) (ML Acct)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
3	BlackRock National Municipal FD A (ML Acct)	Yes	\$1,001 - \$15,000	\$1,001 - \$15,000	
4	Columbia AMT Free Interm Muni Bond Fund CL A (ML Acct)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
5	Fidelity Advisor New Insights FD CL A (converted from CL C) (ML Acct)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6	First Eagle Global Incom Builder Fund CL A (ML Acct)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7	Delaware IVY Municipal Bond FD C (ML Acct)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
8	John Hancock Disciplined Value Mid Cap CL A (ML Acct)	Yes	\$100,001 - \$250,000		None (or less than \$201)
9	INVESCO (renamed Oppnhmr Rochester) SRT Dur Hi Yld Muni FD CL C (ML Acct)	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10	INVESCO (renamed Oppnhmr Rochester)SRT Dur Hi Yld Muni FD CL A	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
11	Templeton Growth Fund Inc CL C (ML Acct)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
12	Western Asset Managed Municipals FD C	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
13	Vanguard Growth and Income Inv	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
14	Vanguard Windsor Fund Admiral	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
15	T. Rowe Price GNMA	Yes	\$15,001 - \$50,000		\$201 - \$1,000
16	T. Rowe Price New Income	Yes	\$15,001 - \$50,000		\$201 - \$1,000
17	T. Rowe Price Tax-Free Short Intermediate	Yes	\$15,001 - \$50,000		\$201 - \$1,000
18	U.S. credit union #1 (cash)	N/A	\$15,001 - \$50,000	Interest Dividends	None (or less than \$201)
19	U.S. bank #1 (cash)	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
20	Southern Company	N/A	\$250,001 - \$500,000	Dividends Capital Gains	\$5,001 - \$15,000
21	Apple Inc. (AAPL) Common Stock (eTrade Acct)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	None (or less than \$201)
22	Renewable Energy Group (REGI) (eTrade Acct)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)
23	IShares MSCI Chile (Schwab Acct)	Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
24	Arcelormittal NY Registry (Schwab Acct)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)
25	USAA Precious Metals and Minerals Retail (Schwab Acct)	Yes	None (or less than \$1,001)		None (or less than \$201)
26	Eli Lilly & Co (ML Acct)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
27	Nat Fuel Gas Co (ML Acct)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
28	Blackrock Muniyield Qual (ML Acct)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
29	Blackrock Muniassets FND (ML Acct)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
30	Templeton Growth Fund (ML Acct)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
31	U.S. brokerage money market account (cash)	N/A	\$50,001 - \$100,000	Dividends Interest	None (or less than \$201)
32	Altria Group Inc	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
33	Mondelez International	N/A	\$1,001 - \$15,000		None (or less than \$201)
34	U.S. bank #2 (cash)	N/A	\$15,001 - \$50,000	Interest Dividends	None (or less than \$201)
35	U.S. credit union #2 (cash)	N/A	\$1,001 - \$15,000	Interest Dividends	None (or less than \$201)
36	Kinross Gold Corp KGC	N/A	None (or less than \$1,001)	Capital Gains Dividends	None (or less than \$201)
37	Cisco Systems In CSCO	N/A	\$1,001 - \$15,000	Capital Gains Dividends	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
38	Ameresco, Inc (AMRC)	N/A	\$1,001 - \$15,000	Capital Gains	None (or less than \$201)
39	Invesco Solar ETF (TAN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
40	First Cobalt Corp (FTSSP) [renamed to Electra Battery Materials Corp]	N/A	\$1,001 - \$15,000	Capital Gains Dividends	None (or less than \$201)
41	First National Energy Corp (FNEC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	None (or less than \$201)
42	Tesla, Inc (TSLA)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
43	Invesco Winderhill Clean Energy ETF (PBW) (Schwab)	Yes	\$1,001 - \$15,000		None (or less than \$201)
44	NextEra Energy, Inc (NEE) (Schwab)	N/A	\$1,001 - \$15,000	Capital Gains Dividends	None (or less than \$201)
45	Cleanspark Inc CLSK	N/A	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)
46	National Bank of Kuwait (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
47	U.S. Brokerage account (cash)	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)
48	Ocean Power Technologies, Inc. (OPTT)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)
49	Scotts Miracle Grow Company	No	\$1,001 - \$15,000	Capital Gains Dividends	None (or less than \$201)
50	Goldman Sachs Future Planet Equity ETF	No	\$1,001 - \$15,000	Capital Gains Dividends	None (or less than \$201)
51	JOBY Aviaton INC	No	\$1,001 - \$15,000	Capital Gains	\$201 - \$1,000

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	PIMCO Total RT INST (Raytheon 401K)	Sale	02/24/2021	\$100,001 - \$250,000
2	Vanguard Inst Total Stock Mkt (Raytheon 401K)	Sale	09/20/2021	\$100,001 - \$250,000
3	T. Rowe Price Inst SM CAP STK (Raytheon 401K)	Purchase	02/24/2021	\$15,001 - \$50,000
4	T. Rowe Price Inst SM CAP STK (Raytheon 401K)	Purchase	11/17/2020	\$15,001 - \$50,000
5	Vanguard Inst Total Stock Mkt (Raytheon 401K)	Purchase	11/13/2020	\$100,001 - \$250,000
6	Vanguard Real Estate Index (Raytheon 401K)	Purchase	02/24/2021	\$100,001 - \$250,000
7	Raytheon Fixed Income (Raytheon 401K)	Purchase	09/20/2021	\$15,001 - \$50,000
8	American Funds New Perspective (Raytheon 401K)	Purchase	09/20/2021	\$15,001 - \$50,000
9	Income Allocation Index (Raytheon 401K)	Purchase	09/20/2021	\$1,001 - \$15,000
10	Vanguard Real Estate Index (Raytheon 401K)	Sale	09/29/2021	\$50,001 - \$100,000
11	Raytheon Fixed Income (Raytheon 401K)	Purchase	09/29/2021	\$50,001 - \$100,000
12	Dodge & Cox Stock (BAE 401K)	Sale	09/20/2021	\$15,001 - \$50,000
13	Dodge & Cox Income (BAE 401K)	Purchase	09/20/2021	\$15,001 - \$50,000
14	Vanguard Institutional 500 Index (BAE 401K)	Sale	09/24/2021	\$1,001 - \$15,000

#	DESCRIPTION		DATE	AMOUNT	
15	Dodge & Cox Income (BAE 401K)	Purchase	09/24/2021	\$1,001 - \$15,000	
16	Vanguard Developed Market Index (BAE 401K)	Sale	10/05/2021	\$15,001 - \$50,000	
17	Dodge & Cox Income (BAE 401K)	Purchase	10/05/2021	\$15,001 - \$50,000	
18	Apple Inc	Purchase	08/31/2021	\$1,001 - \$15,000	
19	Scotts Miracle Grow SMG	Purchase	09/28/2021	\$1,001 - \$15,000	
20	Goldman Sachs Future Planet Equity ETF GSFP	Purchase	09/30/2021	\$1,001 - \$15,000	
21	Ocean Power Technologies, Inc. (OPTT)	Purchase	07/15/2021	\$1,001 - \$15,000	
22	Vanguard Institutional Extended Market (BAE 401K)	Sale	06/18/2021	\$15,001 - \$50,000	
23	Dodge & Cox Stock (BAE 401K)	Sale	06/18/2021	\$15,001 - \$50,000	
24	Vanguard Institutional 500 Index (BAE 401K)	Purchase	06/28/2021	\$1,001 - \$15,000	
25	Vanguard Developed Markets (BAE 401K)	Purchase	06/18/2021	\$15,001 - \$50,000	
26	Touchtone Sands Cap Emerging (BAE 401K)	Purchase	06/18/2021	\$15,001 - \$50,000	
27	Dodge & Cox Stock (BAE 401K)	Sale	06/28/2021	\$15,001 - \$50,000	
28	Vanguard Developed Markets Index (BAE 401K)	Purchase	06/28/2021	\$1,001 - \$15,000	
29	Touchstone Sands CAP Emerging (BAE 401K)	Sale	07/07/2021	\$1,001 - \$15,000	
30	Vanguard Institutional Extended Market Index Trust (BAE 401K)	Sale	07/07/2021	\$1,001 - \$15,000	

#	DESCRIPTION	TYPE	DATE	AMOUNT	
31	Vanguard Total Bond Market Index Trust (BAE 401K)	Purchase	07/07/2021	\$1,001 - \$15,000	
32	Vanguard Institutional 500 Index Trust (BAE 401K)	Purchase	07/07/2021	\$1,001 - \$15,000	
33	Fidelity Contrafund Commingled (BAE 401K)	Purchase	07/07/2021	\$1,001 - \$15,000	
34	Renewable Energy Group, Inc. (REGI)	Purchase	06/02/2021	\$1,001 - \$15,000	
35	Ameresco, Inc. (AMRC)	Sale	06/30/2021	\$1,001 - \$15,000	
36	Cleanspark Inc (CLSK)	Purchase	07/08/2021	\$1,001 - \$15,000	
37	Apple, Inc. (AAPL)	Sale	02/19/2021	\$15,001 - \$50,000	
38	First National Energy Corp FNEC	Purchase	05/07/2021	\$1,001 - \$15,000	
39	Ameresco, Inc. (AMRC)	Purchase	02/19/2021 \$1,001 - \$15		
40	First Cobalt Corp (FTSSF)	Purchase	02/19/2021	\$1,001 - \$15,000	
41	Invesco Solar ETF (TAN)	Purchase	02/19/2021	\$1,001 - \$15,000	
42	First National Energy Corp FNEC	Purchase	02/19/2021	\$1,001 - \$15,000	
43	Invesco Solar ETF (TAN)	Purchase	05/07/2021	\$1,001 - \$15,000	
44	Tesla, Inc. (TSLA)	Purchase	05/07/2021	\$1,001 - \$15,000	
45	Vanguard Retirement Income Trust (BAE 401K)	Sale	04/22/2021	\$15,001 - \$50,000	
46	Vanguard Total Bond Market Index Fund Institutional Shares (VBTIX) [BAE 401K]	Sale	04/22/2021	\$1,001 - \$15,000	
47	Dodge & Cox Stock [BAE 401K]	Purchase	05/24/2021	\$15,001 - \$50,000	
48	BNY Mellon IP Small Cap Stock Index (BAE Deferred Comp)	Purchase	01/11/2021	\$1,001 - \$15,000	

#	DESCRIPTION	TYPE	DATE	AMOUNT
49	Vanguard Institutional Extended Market Index Trust[BAE 401K]	Purchase	04/22/2021	\$15,001 - \$50,000
50	DFA VA Targeted Value (BAE Deferred Comp)	Purchase	03/30/2021	\$15,001 - \$50,000
51	DFA VA US Large Value (BAE Deferred Comp)	Purchase	03/30/2021	\$15,001 - \$50,000
52	BNY Mellon IP Small Cap Stock Index (BAE Deferred Comp)	Purchase	03/30/2021	\$1,001 - \$15,000
53	Vanguard VIF Total Bond Market Index (BAE Deferred Comp)	Sale	03/30/2021	\$1,001 - \$15,000
54	Vanguard VIF Balanced (BAE Deferred Comp)	Sale	03/30/2021	\$1,001 - \$15,000
55	Fidelity VIP Freedom Income (BAE Deferred Comp)	Sale	03/30/2021	\$1,001 - \$15,000
56	NextEra Energy, Inc. (NEE) (Schwab)	Purchase	03/02/2021	\$1,001 - \$15,000
57	Invesco Winderhill Clean Energy ETF (PBW) (Schwab acct)	Purchase	03/02/2021	\$1,001 - \$15,000
58	IShares MSCI Chile (Schwab Acct)	Sale	12/31/2021	\$1,001 - \$15,000
59	USAA Precious Metals & Minerals Retail (Schwab acct)	Sale	12/31/2021	\$1,001 - \$15,000
60	Kinross Gold Corp KGC	Sale	12/22/2021	\$1,001 - \$15,000
61	Fidelity VIP Freedom Income (BAE Deferred Comp)	Purchase	02/01/2021	\$1,001 - \$15,000
62	Invesco Solar ETF (TAN)	Sale	11/02/2021	\$1,001 - \$15,000
63	JOBY Aviation INC	Purchase	10/26/2021	\$1,001 - \$15,000
64	JOBY Aviation INC	Purchase	10/28/2021	\$1,001 - \$15,000
65	JOBY Aviaton INC	Sale	11/03/2021	\$1,001 - \$15,000
66	JOBY Aviation INC	Sale	11/23/2021	\$1,001 - \$15,000

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Navy Federal Credit Union	Mortgage on Personal Residence	\$50,001 - \$100,000	2011	2.0%	15 years

9. Gifts and Travel Reimbursements

None

Endnotes

PART	_ #	ENDNOTE
1.	1	This trust currently has no assets. This uncompensated position was inadvertently omitted from prior financial disclosure reports.
5.	2	This deferred compensation plan is linked to the child assets listed below.

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).