Annual Report 2023 for Calendar Year 2022 | 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

Dalton, Melissa G

Assistant Secretary of Defense for Homeland Defense and Hemispheric Affairs, DoD - Department of Defense

Report Year: 2023

Other Federal Government Positions Held During the Preceding 12 Months:

Principal Deputy Assistant Secretary of Defense for Strategy, Plans, and Capabilities, Department of Defense (1/2021 - 3/2022)

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/ Dalton, Melissa G [electronically signed on 05/03/2023 by Dalton, Melissa 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 05/18/2023 by Thompson, Scott F in Integrity.gov]

Other review conducted by

/s/ Green, Jeffrey, Ethics Official [electronically signed on 05/09/2023 by Green, Jeffrey in Integrity.gov]

/s/ Green, Jeffrey, Screener [electronically signed on 05/09/2023 by Green, Jeffrey in Integrity.gov]

U.S. Office of Government Ethics Certification	
/s/ Granahan, Megan, Certifying Official [electronically signed on 06/14/2023 by Granahan, I	Megan in Integrity.gov]

Data Revised 05/12/2023

Data Revised 05/08/2023

Data Revised 05/06/2023

Data Revised 05/05/2023

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Girl Scouts of the United States of America	Vienna, Virginia	Non-Profit	Volunteer Leader, Troop 50124 (unpaid)	9/2019	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA	No	-		
1.1	U.S. Money Market Account (Cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.2	Neuberger Berman Guardian Fund Institutional Class Shares (NGDLX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.3	Global X Copper Miners ETF (COPX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.4	Global X Genomics & Biotechnology ETF (GNOM)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.5	Avantis International Small Cap Value ETF (AVDV)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.6	iShares Latin America 40 ETF (ILF)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.7	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.8	PGIM Short Duration High Yield Income Fund Class Z Shares (HYSZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.9	SPDR S&P Oil & Gas Exploration & Production ETF (XOP)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.10	Amazon.com, Inc. (AMZN)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.11	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.12	Invesco Core Plus Bond Fund Class Y Shares (CPBYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.13	Dimensional U.S. Small Cap ETF Dimensional U.S. Small Cap ETF (DFAS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.14	Freeport-McMoRan, Inc. (FCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

# 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	Daybreak LLC	N/A		salary	\$180,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Azimuth1, Inc (Information Technology) (common stock)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
3	IRA	No			
3.1	Neuberger Berman Guardian Fund Institutional Class Shares (NGDLX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.2	Global X Copper Miners ETF (COPX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.3	Global X Genomics & Biotechnology ETF (GNOM)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.4	Avantis International Small Cap Value ETF (AVDV)	Yes	\$15,001 - \$50,000		
3.5	iShares Latin America 40 ETF (ILF)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.6	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.7	PGIM Short Duration High Yield Income Fund Class Z Shares (HYSZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.8	SPDR S&P Oil & Gas Exploration & Production ETF (XOP)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.9	Amazon.com, Inc. (AMZN)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.10	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.11	Invesco Core Plus Bond Fund Class Y Shares (CPBYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.12	Dimensional U.S. Small Cap ETF Dimensional U.S. Small Cap ETF (DFAS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.13	U.S. Money Market Account (Cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)

# 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Brokerage Account #1	No			
1.1	Apple, Inc. (AAPL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.2	U.S. Money Market Account (Cash)	N/A	None (or less than \$1,001)		None (or less than \$201)
1.3	JPMorgan Large Cap Growth Fund Class I Shares (SEEGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	Neuberger Berman Guardian Fund Institutional Class Shares (NGDLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	Vanguard Total Stock Market Index Fund Admiral Class Shares (VTSAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	PGIM Short Duration High Yield Income Fund Class Z Shares (HYSZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.8	Vanguard Small-Cap Growth Index Fund Admiral Class Shares (VSGAX)	Yes	\$1,001 - \$15,000	\$1,001 - \$15,000	
1.9	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Yes	\$1,001 - \$15,000	\$1,001 - \$15,000	
1.10	VanguardEmerging Markets Stock Index Fund Admiral Class Shares (VEMAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.11	Dodge & Cox International Stock Fund (DODFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
1.12	Delaware Small Cap Core Fund Institutional Class Shares (DCCIX)	Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.13	Invesco Core Plus Bond Fund Class Y Shares (CPBYX)		Yes	None (or less than \$1,001)		None (or less than \$201)
1.14	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)		Yes	None (or less than \$1,001)		None (or less than \$201)
2	Brokerage Account #2		No			
2.1	MapBox Inc	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.2	Varo Bank	See Endnote	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.3	YieldStreet	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.4	Brennan Investment Group	See Endnote	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.5	Locked Brands	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	US bank - cash		N/A	\$15,001 - \$50,000		None (or less than \$201)
4	VA (Child 1 PrePaid529)		No			
4.1	1 Semester Tier I		Yes	\$1,001 - \$15,000		None (or less than \$201)
5	VA (Child 2 PrePaid529)		No			
5.1	1 Semester Tier 1		Yes	\$1,001 - \$15,000		None (or less than \$201)
6	VA (Merrill Lynch 529 Plan)		No			
6.1	Blackrock 8-11 Years Direct		Yes	\$1,001 - \$15,000		None (or less than \$201)
7	Northwestern Mutual Whole Life Policy		N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	Northwestern Mutual Whole Life Policy	N/A	\$50,001 - \$100,000		None (or less than \$201)

# 7. Transactions

#	DESCRIPTION	_	TYPE	DATE	AMOUNT
1	Amazon.com, Inc. (AMZN)	See Endnote	Purchase	05/25/2022	\$15,001 - \$50,000
2	Freeport-McMoRan, Inc. (FCX)	See Endnote	Purchase	08/19/2022	\$1,001 - \$15,000
3	Amazon.com, Inc. (AMZN)	See Endnote	Purchase	05/25/2022	\$15,001 - \$50,000
4	Apple, Inc. (AAPL)		Sale	12/02/2022	\$15,001 - \$50,000
5	Delaware Small Cap Core Fund Institutional Class Shares (DCCIX)		Purchase	12/05/2022	\$1,001 - \$15,000
6	Dodge & Cox International Stock Fund (DODFX)		Purchase	12/05/2022	\$1,001 - \$15,000
7	Hartford Core Equity Fund Class I Shares (HGIIX)		Purchase	12/05/2022	\$1,001 - \$15,000
8	PGIM Short Duration High Yield Income Fund Class Z Shares (HYSZX)		Purchase	12/15/2022	\$1,001 - \$15,000
9	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)		Sale	12/15/2022	\$1,001 - \$15,000
10	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)		Purchase	12/05/2022	\$1,001 - \$15,000
11	Northern Funds Mid Cap Index Fund (NOMIX)		Sale	09/24/2022	\$1,001 - \$15,000
12	PGIM Total Return Bond Fund Class Z Shares (PDBZX)		Sale	12/01/2022	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
13	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Purchase	12/05/2022	\$1,001 - \$15,000
14	Parnassus Endeavor Fund Institutional Class Shares (PFPWX)	Sale	02/02/2022	\$1,001 - \$15,000
15	JPMorgan Large Cap Growth Fund Class I Shares (SEEGX)	Purchase	12/05/2022	\$1,001 - \$15,000
16	VanguardEmerging Markets Stock Index Fund Admiral Class Shares (VEMAX)	Purchase	12/05/2022	\$1,001 - \$15,000
17	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	Purchase	12/05/2022	\$1,001 - \$15,000
18	Vanguard Small-Cap Growth Index Fund Admiral Class Shares (VSGAX)	Purchase	12/05/2022	\$1,001 - \$15,000
19	Vanguard Total Stock Market Index Fund Admiral Class Shares (VTSAX)	Purchase	12/05/2022	\$1,001 - \$15,000
20	Avantis International Small Cap Value ETF (AVDV)	Sale	07/07/2022	\$1,001 - \$15,000
21	Avantis International Small Cap Value ETF (AVDV)	Purchase	01/19/2022	\$1,001 - \$15,000
22	Avantis International Small Cap Value ETF (AVDV)	Purchase	01/12/2022	\$15,001 - \$50,000
23	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Sale	09/02/2022	\$15,001 - \$50,000
24	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Sale	02/22/2022	\$1,001 - \$15,000
25	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Purchase	01/19/2022	\$15,001 - \$50,000
26	Global X Copper Miners ETF (COPX)	Purchase	09/26/2022	\$50,001 - \$100,000
27	Global X Copper Miners ETF (COPX)	Sale	08/09/2022	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
28	Global X Copper Miners ETF (COPX)	Purchase	01/19/2022	\$1,001 - \$15,000
29	BNY Mellon Core Plus Fund Class I Shares (DCPIX)	Sale	01/29/2022	\$15,001 - \$50,000
30	Global X Genomics & Biotechnology ETF (GNOM)	Purchase	07/07/2022	\$1,001 - \$15,000
31	Global X Genomics & Biotechnology ETF (GNOM)	Purchase	05/12/2022	\$15,001 - \$50,000
32	Hartford Core Equity Fund Class I Shares (HGIIX)	Purchase	08/09/2022	\$15,001 - \$50,000
33	Hartford Core Equity Fund Class I Shares (HGIIX)	Purchase	07/22/2022	\$15,001 - \$50,000
34	Hartford Core Equity Fund Class I Shares (HGIIX)	Sale	03/03/2022	\$50,001 - \$100,000
35	Hartford Core Equity Fund Class I Shares (HGIIX)	Sale	01/19/2022	\$15,001 - \$50,000
36	Hartford Core Equity Fund Class I Shares (HGIIX)	Sale	01/19/2022	\$15,001 - \$50,000
37	PGIM Short Duration High Yield Income Fund Class Z Shares (HYSZX)	Purchase	12/15/2022	\$15,001 - \$50,000
38	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Sale	12/15/2022	\$15,001 - \$50,000
39	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Purchase	09/02/2022	\$15,001 - \$50,000
40	Lord Abbett Ultra Short Bond Fund Class I Shares (LUBYX)	Purchase	12/15/2022	\$15,001 - \$50,000
41	Neuberger Berman Large Cap Value Fund Institutional Class (NBPIX)	Sale	09/23/2022	\$15,001 - \$50,000
42	Neuberger Berman Large Cap Value Fund Institutional Class (NBPIX)	Purchase	01/19/2022	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
43	Northern Funds Mid Cap Index Fund (NOMIX)	Sale	01/19/2022	\$50,001 - \$100,000
44	PIMCO International Bond Fund (U.S. Dollar-Hedged) I-2 (PFBPX)	Sale	01/19/2022	\$1,001 - \$15,000
45	Principal Finisterre UnconstrainedEmerging Markets Bond Fund Institutional Class Shares (PFUMX)	Sale	01/19/2022	\$1,001 - \$15,000
46	Principal Finisterre UnconstrainedEmerging Markets Bond Fund Institutional Class Shares (PFUMX)	Purchase	08/18/2022	\$1,001 - \$15,000
47	PGIM Short-Term Corporate Bond Fund Class Z Shares (PIFZX)	Sale	04/18/2022	\$15,001 - \$50,000
48	PGIM Short-Term Corporate Bond Fund Class Z Shares (PIFZX)	Purchase	01/19/2022	\$1,001 - \$15,000
49	PGIM Short-Term Corporate Bond Fund Class Z Shares (PIFZX)	Purchase	08/18/2022	\$1,001 - \$15,000
50	PIMCO Income Fund Class I-2 Shares (PONPX)	Sale	04/19/2022	\$15,001 - \$50,000
51	PIMCO Income Fund Class I-2 Shares (PONPX)	Purchase	01/19/2022	\$1,001 - \$15,000
52	PGIM JennisonGlobal Opportunities Fund Class Z Shares (PRJZX)	Sale	01/12/2022	\$15,001 - \$50,000
53	Royce International Premier Fund Investment Class Shares (RIPNX)	Sale	08/19/2022	\$1,001 - \$15,000
54	Royce International Premier Fund Investment Class Shares (RIPNX)	Sale	04/07/2022	\$1,001 - \$15,000
55	Royce International Premier Fund Investment Class Shares (RIPNX)	Purchase	01/19/2022	\$1,001 - \$15,000
56	Avantis International Small Cap Value ETF (AVDV)	Sale	07/07/2022	\$1,001 - \$15,000
	(AVDV)	:		

#	DESCRIPTION	TYPE	DATE	AMOUNT
57	Avantis International Small Cap Value ETF (AVDV)	Purchase	01/19/2022	\$1,001 - \$15,000
58	Avantis International Small Cap Value ETF (AVDV)	Purchase	01/12/2022	\$15,001 - \$50,000
59	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Sale	09/02/2022	\$15,001 - \$50,000
60	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Sale	02/22/2022	\$1,001 - \$15,000
61	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Purchase	01/19/2022	\$15,001 - \$50,000
62	Global X Copper Miners ETF (COPX)	Purchase	09/26/2022	\$50,001 - \$100,000
63	Global X Copper Miners ETF (COPX)	Sale	08/09/2022	\$15,001 - \$50,000
64	Global X Copper Miners ETF (COPX)	Purchase	01/19/2022	\$1,001 - \$15,000
65	BNY Mellon Core Plus Fund Class I Shares (DCPIX)	Sale	01/19/2022	\$15,001 - \$50,000
66	Dimensional U.S. Small Cap ETF Dimensional U.S. Small Cap ETF (DFAS)	Sale	12/29/2022	\$1,001 - \$15,000
67	Dimensional U.S. Small Cap ETF Dimensional U.S. Small Cap ETF (DFAS)	Purchase	05/12/2022	\$1,001 - \$15,000
68	Freeport-McMoRan, Inc. (FCX)	Purchase	08/19/2022	\$1,001 - \$15,000
69	Federated Total Return Bond Fund Institutional Shares (FTRBX)	Sale	01/19/2022	\$15,001 - \$50,000
70	Global X Genomics & Biotechnology ETF (GNOM)	Purchase	07/07/2022	\$1,001 - \$15,000
71	Global X Genomics & Biotechnology ETF (GNOM)	Purchase	05/12/2022	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
72	Hartford Core Equity Fund Class I Shares (HGIIX)	Purchase	08/19/2022	
73	Hartford Core Equity Fund Class I Shares (HGIIX)	Purchase	08/09/2022	\$15,001 - \$50,000
74	Hartford Core Equity Fund Class I Shares (HGIIX)	Purchase	08/01/2022	\$1,001 - \$15,000
75	Hartford Core Equity Fund Class I Shares (HGIIX)	Purchase	07/22/2022	\$15,001 - \$50,000
76	Hartford Core Equity Fund Class I Shares (HGIIX)	Sale	03/03/2022	\$50,001 - \$100,000
77	Hartford Core Equity Fund Class I Shares (HGIIX)	Sale	01/19/2022	\$15,001 - \$50,000
78	PGIM Short Duration High Yield Income Fund Class Z Shares (HYSZX)	Purchase	12/15/2022	\$15,001 - \$50,000
79	iShares Latin America 40 ETF (ILF)	Purchase	01/19/2022	\$1,001 - \$15,000
80	iShares Latin America 40 ETF (ILF)	Purchase	12/22/2022	\$1,001 - \$15,000
81	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Sale	12/15/2022	\$15,001 - \$50,000
82	Lord Abbett Core Fixed Income Fund Class I Shares (LCRYX)	Purchase	09/02/2022	\$15,001 - \$50,000
83	Neuberger Berman Large Cap Value Fund Institutional Class (NBPIX)	Sale	09/23/2022	\$15,001 - \$50,000
84	Neuberger Berman Large Cap Value Fund Institutional Class (NBPIX)	Sale	07/22/2022	\$15,001 - \$50,000
85	Neuberger Berman Large Cap Value Fund Institutional Class (NBPIX)	Purchase	01/19/2022	\$1,001 - \$15,000
86	Northern Funds Mid Cap Index Fund (NOMIX)	Sale	01/19/2022	\$50,001 - \$100,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
87	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Sale	12/15/2022	\$15,001 - \$50,000
88	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Purchase	09/02/2022	\$1,001 - \$15,000
89	PGIM Total Return Bond Fund Class Z Shares (PDBZX)	Purchase	08/25/2022	\$15,001 - \$50,000
90	PGIM JennisonEmerging Markets Equity Opportunities Fund Class Z Shares (PDEZX)	Sale	12/22/2022	\$15,001 - \$50,000
91	PIMCO International Bond Fund (U.S. Dollar- Hedged) I-2 (PFBPX)	Sale	01/29/2022	\$1,001 - \$15,000
92	Principal Finisterre UnconstrainedEmerging Markets Bond Fund Institutional Class Shares (PFUMX)	Sale	01/19/2022	\$1,001 - \$15,000
93	PGIM Short-Term Corporate Bond Fund Class Z Shares (PIFZX)	Sale	08/18/2022	\$15,001 - \$50,000
94	PGIM Short-Term Corporate Bond Fund Class Z Shares (PIFZX)	Purchase	01/19/2022	\$1,001 - \$15,000
95	PIMCO Income Fund Class I-2 Shares (PONPX)	Sale	04/19/2022	\$15,001 - \$50,000
96	PIMCO Income Fund Class I-2 Shares (PONPX)	Purchase	01/19/2022	\$1,001 - \$15,000
97	Royce International Premier Fund Investment Class Shares (RIPNX)	Sale	08/19/2022	\$1,001 - \$15,000
98	Royce International Premier Fund Investment Class Shares (RIPNX)	Purchase	01/19/2022	\$1,001 - \$15,000
99	SPDR S&P Oil & Gas Exploration & Production ETF (XOP)	Purchase	01/19/2022	\$1,001 - \$15,000
100	SPDR S&P Oil & Gas Exploration & Production ETF (XOP)	Purchase	09/30/2022	\$1,001 - \$15,000

# 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Mr. Cooper	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2021	3.5%	30 years

## 9. Gifts and Travel Reimbursements

None

# **Endnotes**

PART	#	ENDNOTE
6.	2.1	Mapbox is an American provider of custom online maps for websites and applications.
6.	2.2	Varo is an American mobile only neobank based in San Francisco, California. The company provides financial services through its mobile app and currently has 1 million customers.
6.	2.3	Yieldstreet allows investors to participate in crowdfunding for a wide array of alternative investments, including real estate, commercial, and art investments.
6.	2.4	Brennan Investment Group is a real estate investment company. They purchased land to develop and lease to a long term storage facility company. Filer advises this is a note and not a reportable security for 278T purposes.
6.	2.5	Locked Brands is the inventor and supplier of MedSure Systems secure medication dispenser for in home use.
		Filer advises this is a note and not a reportable security for 278T purposes.
7.	1	Spouse IRA

PART	#	ENDNOTE
7.	2	Filer IRA
7.	3	Filer's IRA

## **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).