

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

Filer's Information

DelBene, Kurt D

Assistant Secretary for Information and Technology, Department of Veterans Affairs

Report Year: 2023

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/ DelBene, Kurt D [electronically signed on 06/15/2023 by DelBene, Kurt D in Integrity.gov] - Filer received a 45 day filing extension.

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/ Hogan, Michael R, Certifying Official [electronically signed on 07/18/2023 by Hogan, Michael R in Integrity.gov]

Other review conducted by

/s/ Britt, Christopher, Ethics Official [electronically signed on 07/18/2023 by Britt, Christopher in Integrity.gov]

U.S. Office of Government Ethics Certification

1. Filer's Positions Held Outside United States Government

None

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Microsoft Corporation, deferred compensation		No			
1.1	Vanguard FTSE All-World ex-US Index Fund Institutional Shares	See Endnote	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
1.2	Vanguard Mid-Cap Index Fund Admiral Shares	See Endnote	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
1.3	Fid GR Co Pool CL3		Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
1.4	PIMCO Unconstrained Bond-Ins		Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
1.5	Vanguard 1-5 Year US Bond Index	See Endnote	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
1.6	Vanguard Small-Cap Index Fund Admiral Shares	See Endnote	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
1.7	Vanguard Institutional Index Fund Institutional Plus Shares (VIIIX)		Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
2	IRA		No			
2.1	SPDR S&P 500 ETF Trust (SPY)		Yes	\$100,001 - \$250,000		None (or less than \$201)
2.2	Fidelity Gov't Sweep Money Fund		Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	AT&T, defined benefit plan (value not readily ascertainable) \$336.05 per month beginning on 7/24/2025	N/A			None (or less than \$201)
4	Forward Contract (MSFT)		\$1,000,001 - \$5,000,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Microsoft Corporation	Redmond, Washington	Pursuant to the company's executive compensation plan, my unvested restricted stock units will begin to vest every six months beginning in August 2021, with the remaining units vesting every February and August until the final units vest in August 2024. Upon vesting, the restricted stock units are converted to common stock and sold pursuant to the forward contract dated February 9, 2022.	4/2015
2	Microsoft Corporation	Redmond, Washington	I will continue to participate in this deferred compensation plan. Assets will begin to vest over a number of years, starting upon my retirement from the company. The plan sponsor will not make further contributions after my separation.	4/2015
3	AT&T	Dallas, Texas	I will continue to participate in this defined benefit plan.	6/1982

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	IRA	No			
1.1	Columbia Pacific Income Fund II	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
1.2	SPDR S&P 500 (SPY)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.3	Fidelity Gov't Sweep Money Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.4	Fid Contra Pool CL3	No	\$50,001 - \$100,000		None (or less than \$201)
2	SEP IRA	No			
2.1	SPDR S&P 500 (SPY)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	Fidelity Gov't Sweep Money Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	PIMCO Total Return	No	\$15,001 - \$50,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Alkeon Growth Partners LP	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
2	BalFour Place Investors, LLC	See Endnote	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Columbia Pacific Income Fund II	See Endnote	Yes	\$5,000,001 - \$25,000,000		\$100,001 - \$1,000,000
4	EJF Specialty Finance Solutions Fund	See Endnote	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
5	Fidelity Gov't Sweep Money Fund		Yes	\$5,000,001 - \$25,000,000		\$15,001 - \$50,000
6	Global Partnerships SIF 5.0 (5.0% 3/25/23)		Yes	\$100,001 - \$250,000		None (or less than \$201)
7	Global Partnerships SIF 6.0 (2.75% September 2025)		Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
8	Gryphon Mezzanine Partners		Yes	\$100,001 - \$250,000		\$100,001 - \$1,000,000
9	Gryphon Mezzanine Partners II		Yes	\$250,001 - \$500,000		\$50,001 - \$100,000
10	Gryphon Capital Partners Fund V	See Endnote	Yes	None (or less than \$1,001)		\$50,001 - \$100,000
11	Gryphon Capital Partners Fund VI	See Endnote	Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000
12	Gryphon Capital Partners Fund IV	See Endnote	Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000
13	Harbor International		Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
14	Huntington Capital Fund III	See Endnote	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
15	Kimpact Evergreen Real Estate Fund		Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
16	Manning & Napier - Rainier Intl Disc	See Endnote	Yes	None (or less than \$1,001)		\$15,001 - \$50,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
17	Matthews Asia Dividend Fund Institutional Class Shares (MIPIX)		Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
18	ML Bank Deposit Program	See Endnote	No	\$5,000,001 - \$25,000,000	Interest	None (or less than \$201)
19	Montauk TriGuard Fund VIII		Yes	None (or less than \$1,001)		\$50,001 - \$100,000
20	Pacific Co B1 Bond - Garden Grove		N/A	\$100,001 - \$250,000	Interest	\$15,001 - \$50,000
21	Pacific Co B1 Bond - Gilroy/Glen Loma		N/A	\$500,001 - \$1,000,000	Interest	\$50,001 - \$100,000
22	Pacific Co B1 Bond - Oakland MacArthur		N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
23	Pacific Co B1 Bond - Santa Ana First Point I	See Endnote	N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
24	Pacific Co B1 Bond - Santa Ana First Point II	See Endnote	N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
25	Pacific Co B1 Bond - Santa Ana ME	See Endnote	N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
26	Pacific West Real Estate Income LLC	See Endnote	Yes	\$1,000,001 - \$5,000,000		\$100,001 - \$1,000,000
27	Redwood Kairos Real Estate Fund IV	See Endnote	Yes	\$250,001 - \$500,000		\$100,001 - \$1,000,000
28	Redwood Kairos Real Estate Fund VI		Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
29	Security Properties Augusta Fund, LLC		Yes	\$250,001 - \$500,000		None (or less than \$201)
30	Security Properties FountainGlen Venture Fund, LLC		Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
31	Security Properties Multi-Family Fund II, LLC	See Endnote	Yes	None (or less than \$1,001)		\$50,001 - \$100,000
32	Security Properties Nashville Fund, LLC	See Endnote	Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000
33	Structure Duomo GP, LLC	See Endnote	Yes	None (or less than \$1,001)		None (or less than \$201)
34	TCG Private Select Partners I	See Endnote	Yes	None (or less than \$1,001)		None (or less than \$201)
35	TCG Private Select Partners II		Yes	None (or less than \$1,001)		None (or less than \$201)
36	TCG Private Select Partners III		Yes	None (or less than \$1,001)		None (or less than \$201)
37	TriLinc Global Impact Fund		Yes	\$1,000,001 - \$5,000,000		\$100,001 - \$1,000,000
38	Redwood Kairos Real Estate Fund VIII		Yes	\$1,000,001 - \$5,000,000		\$5,001 - \$15,000
39	Security Properties TriRock		Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
40	Crosslink Capital IX		Yes	None (or less than \$1,001)		None (or less than \$201)
41	Goodwater Capital IV		Yes	\$100,001 - \$250,000		None (or less than \$201)
42	Institutional Venture Partners XVII, LP		Yes	None (or less than \$1,001)		None (or less than \$201)
43	Madrona Investment Partners V, LP	See Endnote	Yes	None (or less than \$1,001)		None (or less than \$201)
44	Reach III	See Endnote	Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
45	Invesco Limited Term Fund (Separately Managed Account)	No				
45.1	Arizona Indl Dev Auth Rev BDS Lincoln 5.00% Due 5/1/26	N/A	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000	
45.2	Colorado Health Fac 5% Hosp HLTH Due 08/01/49	N/A	\$500,001 - \$1,000,000	Capital Gains Interest	\$15,001 - \$50,000	
45.3	CT ST HSG Fa HSG 2.75% ²⁶ 2.75 % Due May 15, 2026	N/A	None (or less than \$1,001)	Interest	\$5,001 - \$15,000	
45.4	District Columbia Go BDS Ser. 2017D 5.00 % Due Jun 1, 2027	N/A	None (or less than \$1,001)	Capital Gains Interest	\$15,001 - \$50,000	
45.5	Fidelity Treasury Money Fund	Yes	\$1,000,001 - \$5,000,000		\$2,501 - \$5,000	
45.6	Florida HSG Fin Corp Homeowner MTG Rev 2.15% Due 07/01/2029	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000	
45.7	ID St Bldg Auth 5.00% Due 9/01/23	See Endnote	N/A	None (or less than \$1,001)	Interest	\$5,001 - \$15,000
45.8	Illinois HSG Dev Auth Rev BDS Ser. 1.7% Due 04/01/31	N/A	None (or less than \$1,001)	Interest	\$5,001 - \$15,000	
45.9	Maricopa CNTY Ariz Uni Sch Dist No 69 5.00% Due 07/01/27	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000	
45.10	Maryland ST Dept TR 5.00% Due 10/01/26	N/A	None (or less than \$1,001)	Interest	None (or less than \$201)	
45.11	Maryland ST Go ST Local Facs BDS 5.00% Due 03/15/27	N/A	None (or less than \$1,001)	Capital Gains Interest	\$5,001 - \$15,000	
45.12	Michigan ST HSG Dev Auth Single Family 1.25% Due 6/1/2027	N/A	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000	
45.13	New Jersey ST HSG & MTG Fin Agy 0.75% Due 5/1/2023	N/A	None (or less than \$1,001)	Capital Gains Interest	\$2,501 - \$5,000	

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
45.14	New York NY Go BDS Ser. Fiscal 2008J 5.00% Due 08/01/26		N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
45.15	New York ST Dorm Auth Sales Tax Rev 5.00% Due 03/15/2025		N/A	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
45.16	New York ST Dorm Auth ST Pers Income 5.00% Due 03/15/27		N/A	None (or less than \$1,001)	Capital Gains Interest	\$15,001 - \$50,000
45.17	Philadelphia PA SCH Dist Go BDS 5.00% Due 09/01/2027		N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
45.18	Round Rock Tex Indpt Sch Dist 5.00% Due 8/1/2025		N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
45.19	Sales Tax Securitization Corp 5.00% Due 01/01/27		N/A	None (or less than \$1,001)	Interest	\$5,001 - \$15,000
45.20	Sales Tax Securitization Corp 5.00% Due 01/01/31		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
45.21	Tennessee HSG Dev Agy Residential Fin 2.80% Due Jan 1, 2026		N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
45.22	Texas ST Tax Rev Antic NTS 4.00% Due 08/26/21	See Endnote	N/A	None (or less than \$1,001)		None (or less than \$201)
45.23	University Minn GO Ref BDS Regents Ser. 5.00% Due 10/01/25		N/A	None (or less than \$1,001)	Capital Gains Interest	\$5,001 - \$15,000
45.24	Connecticut ST Go BDS 2018 5.00% Due 06/15/2030		N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
45.25	Berkeley Heights TWP NJ BD NTS 2.00% Due 07/08/22		N/A	None (or less than \$1,001)		None (or less than \$201)
45.26	Los Angeles CNTY Calif Tax and Rev 4.00% Due 06/30/22		N/A	None (or less than \$1,001)		None (or less than \$201)
45.27	Illinois State Sales Tax Rev JR Oblig 4.00% Due Jun 15 2030		N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
45.28	King Cnty Wash LTD Tax Go Ref BDS Ser. 5.00% Due Jul 1,2024	N/A	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
45.29	Maryland ST Go BDS Ser. 2017 B 5.00 % Due Aug 1, 2026	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
45.30	New York N Y City Transitional Fin 5.00% Due Feb 1, 2032	N/A	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
45.31	New York N Y Go BDS Ser. Fiscal 2015F 5.00 % Due Jun 1, 2044	N/A	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
45.32	New York NY GO BDS Ser 5.00% Due 08/01/2030	N/A	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
45.33	New York NY Go BDS Ser. C 5.00% Due 08/01/2031	N/A	None (or less than \$1,001)	Interest	None (or less than \$201)
45.34	North Dakota ST HSG Fin Agy Home MTG 1.85 % Due Jan 1, 2032	N/A	\$250,001 - \$500,000	Interest	None (or less than \$201)
45.35	Prince Georges CNTY MD Go Consolidated 5.00% Due 07/15/2031	N/A	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
45.36	Seattle WA MN LT PW 2.68% PWR Util Due 05/01/2045	N/A	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000
45.37	United States Treas Bills Zero CPN 0.00 % Due Feb 21, 2023	N/A	\$250,001 - \$500,000		None (or less than \$201)
45.38	United States Treas Bills Zero CPN 0.00 % Due May 11, 2023	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
45.39	US Treasury Bill23 U S T Bill Due 09/07/23	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
45.40	WA ST HLTH Care Fa 5.00% Hosp HLTH Due 08/01/2049	N/A	None (or less than \$1,001)		None (or less than \$201)
45.41	Wolcott CT 1.25%22 Go Utx Due 08/23/22	N/A	None (or less than \$1,001)	Interest	\$5,001 - \$15,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
46	Arizona Indl Dev Auth Rev BDS Lincoln 5.00% Due Nov. 1, 2029		No	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
47	Goodwater Infinity II, LP		Yes	\$250,001 - \$500,000		None (or less than \$201)
48	Honolulu HI City & 4%32 GO Utx Due 10/01/32		N/A	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000
49	Pacific Co B1 Bond - Fremont Osgood		N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
50	Pacific Co B1 Bond - Osgood South		N/A	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
51	Security Properties Multi-Family Fund III	See Endnote	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
52	Security Properties Multi-Family Fund VI	See Endnote	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
53	Vertical Ventures Co-Investment Fund II		Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
54	Vision Ridge Sustainable Asset Fund III		Yes	\$500,001 - \$1,000,000		None (or less than \$201)
55	BGH 24, LLC	See Endnote	No	\$250,001 - \$500,000	Interest	\$1,001 - \$2,500
56	BGH 24, LLC	See Endnote	No	\$100,001 - \$250,000	Interest	\$201 - \$1,000
57	BGH 24, LLC	See Endnote	No	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000
58	GRRTS LTD	See Endnote	No	None (or less than \$1,001)	Capital Gains	\$50,001 - \$100,000
59	GRRTS LTD	See Endnote	No	\$5,000,001 - \$25,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
60	GRRTS LTD See Endnote	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
61	New York New Y CI 2.6% Mult HSG Due 05/01/26	No	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
62	New York NY City Transitional Fin 5.00% Due 11/01/2027	No	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000
63	Vanguard Small-Cap Index Fund ETF Shares (VB)	No	\$250,001 - \$500,000	Dividends	\$5,001 - \$15,000
64	Vanguard 500 Index Fund ETF Shares (VOO)	No	\$1,000,001 - \$5,000,000	Dividends	\$5,001 - \$15,000
65	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	No	\$250,001 - \$500,000	Dividends	\$5,001 - \$15,000
66	iShares Core S&P US Growth ETF (IUSG)	No	\$500,001 - \$1,000,000	Dividends	\$2,501 - \$5,000
67	iShares Core S&P US Value ETF (IUSV)	No	\$500,001 - \$1,000,000	Dividends	\$5,001 - \$15,000
68	Vanguard Emerging Markets Stock Index Fund ETF Shares (VWO) See Endnote	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
69	Fidelity Gov't Sweep Money Fund	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
70	U.S. Cash Account	No	\$50,001 - \$100,000		None (or less than \$201)
71	GRRTS LTD See Endnote	No	\$500,001 - \$1,000,000		None (or less than \$201)

7. Transactions

#	DESCRIPTION		TYPE	DATE	AMOUNT
1	Florida HSG Fin Corp Homeowner MTG Rev 2.15% Due 07/01/29		Sale	01/03/2022	\$15,001 - \$50,000
2	Los Angeles CNTY Calif Tax And Rev S 4.00% Due 06/30/22		Sale	01/11/2022	\$500,001 - \$1,000,000
3	Maryland ST Dept TR 5.00% Comb Tax Due 10/01/26		Purchase	01/14/2022	\$15,001 - \$50,000
4	Maryland ST Dept TR 5.00% Comb Tax Due 10/01/26		Purchase	01/07/2022	\$15,001 - \$50,000
5	Maryland ST Dept TR 5.00% Comb Tax Due 10/01/26		Purchase	01/10/2022	\$15,001 - \$50,000
6	Prince Georges CNTY MD Go Consolidated 5.00% Due 07/15/31		Purchase	01/10/2022	\$500,001 - \$1,000,000
7	Round Rock Tex Indpt SCH Dist Unltd Tax 5.00% Due 08/01/25		Purchase	01/07/2022	\$15,001 - \$50,000
8	New York ST Dorm Auth Sales Tax Rev 5.00% Due 03/15/25		Purchase	01/18/2022	\$15,001 - \$50,000
9	Illinois HSG Dev Auth Rev BDS Ser. 1.70% Due 04/01/2031		Purchase	02/08/2022	\$15,001 - \$50,000
10	New York ST Dorm Auth Sales Tax Rev 5.00% Due 03/15/2025		Purchase	02/08/2022	\$15,001 - \$50,000
11	New York ST Dorm Auth ST Pers Income 5.00% Due 03/15/2027		Purchase	02/15/2022	\$1,001 - \$15,000
12	New York ST Dorm Auth ST Pers Income 5.00% Due 03/15/2027		Purchase	02/04/2022	\$15,001 - \$50,000
13	Forward Contract (MSFT)	See Endnote	Purchase	02/09/2022	\$5,000,001 - \$25,000,000
14	MSFT Common Stock	See Endnote	Sale	02/28/2022	\$500,001 - \$1,000,000
15	Colorado Health Fac 5.00% Hosp HLTH Due 08/01/2049		Sale	03/15/2022	\$500,001 - \$1,000,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
16	Prince Georges CNTY MD Go Consolidated 5.00% Due 07/15/2031		Purchase	03/02/2022	\$1,001 - \$15,000
17	WA ST HLTH Care Fa 5.00% Hosp HLTH Due 08/01/2049		Purchase	03/15/2022	\$500,001 - \$1,000,000
18	District Columbia GO BDS Ser 2017 5.00% Due 06/01/27		Purchase	03/21/2022	\$1,001 - \$15,000
19	Florida HSG Fin Corp Homeowner MTG 2.15% Due 07/01/29	See Endnote	Sale	04/01/2022	\$1,001 - \$15,000
20	Maryland ST Go ST Local Facs LN BDS 5.005 Due 03/15/2027		Purchase	04/11/2022	\$1,001 - \$15,000
21	New York ST Dorm Auth ST Pers 5% due 3/15/2027		Purchase	04/26/2022	\$15,001 - \$50,000
22	Sales Tax Securitization Corp 5.00% Due 1/1/2027		Sale	05/04/2022	\$250,001 - \$500,000
23	CT ST HSG Fa HSG 2.75% Due 05/15/2026	See Endnote	Sale	05/16/2022	\$250,001 - \$500,000
24	New York NY Go BDS Ser Fiscal 2008J 5.00% Due 08/01/2026		Purchase	05/10/2022	\$1,001 - \$15,000
25	New York NY City Transitional Fin 5.00% Due 11/01/2027		Purchase	05/06/2022	\$500,001 - \$1,000,000
26	District Columbia Go BDS Ser 2017D 5.00% Due 06/01/2027		Sale	05/06/2022	\$500,001 - \$1,000,000
27	Illinois ST Sales Tax Rev JR Oblig 4.00% Due 06/15/2030		Purchase	05/03/2022	\$250,001 - \$500,000
28	Honolulu HI City & 4.00% GO Utx Due 10/01/32		Purchase	05/18/2022	\$500,001 - \$1,000,000
29	New Jersey ST HSG & MTG Fin Agy 0.75% Due 05/01/23		Sale	05/19/2022	\$250,001 - \$500,000
30	Connecticut ST Go BDS 2018 C 5.00%	See Endnote	Purchase	06/14/2022	\$15,001 - \$50,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
31	Honolulu HI City 4.00% Go Utx Due 10/01/32		Purchase	06/13/2022	\$15,001 - \$50,000
32	New York ST Dorm Auth ST Pers Income 5.00% Due 03/15/27		Purchase	06/09/2022	\$1,001 - \$15,000
33	Prince Georges CNTY MD Go Consolidated 5.00% Due 07/15/31		Purchase	06/07/2022	\$100,001 - \$250,000
34	Berkeley Heights TWP N J BD NTS 2.00% Due 07/08/2022		Sale	06/30/2022	\$15,001 - \$50,000
35	Colorado Health Fac 5.00% Due 08/01/2049		Purchase	06/28/2022	\$500,001 - \$1,000,000
36	Connecticut ST Go BDS 2018 5.0% Due 06/15/2030		Purchase	06/24/2022	\$1,001 - \$15,000
37	Florida HSG Fin Corp Homeowner MTG Rev 2.15% Due 07/01/2029	See Endnote	Sale	07/01/2022	\$15,001 - \$50,000
38	New York NY Go BDS Ser. C 5.00% Due 08/01/2031		Purchase	06/14/2022	\$15,001 - \$50,000
39	WA ST HLTH Care Fa 5.00% Due 08/01/2049		Sale	06/28/2022	\$500,001 - \$1,000,000
40	Berkeley Heights TWP N J BD Antic NTS 2.00% Due 07/08/2022	See Endnote	Sale	07/08/2022	\$500,001 - \$1,000,000
41	New York NY City Transitional Fin 5.00% Due 02/01/2032		Purchase	08/02/2022	\$500,001 - \$1,000,000
42	New York NY Go BDS Ser.C 5.00% Due 08/01/2030		Purchase	08/02/2022	\$250,001 - \$500,000
43	New York NY Go BDS Ser.C 5.00% Due 08/01/2031		Sale	08/02/2022	\$250,001 - \$500,000
44	New York NY GO BDS Ser 5.00% Due 08/01/2030		Purchase	08/09/2022	\$1,001 - \$15,000
45	New York ST Dorm Auth ST Pers Income 5.00% Due 03/15/2027		Sale	08/02/2022	\$500,001 - \$1,000,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
46	Philadelphia PA SCH Dist Go BDS Ser. 5.00% Due 09/01/2027		Purchase	08/18/2022	\$15,001 - \$50,000
47	Prince Georges CNTY MD Go Consolidated 5.00% Due 07/15/31		Purchase	08/04/2022	\$15,001 - \$50,000
48	Round Rock Tex Indpt Sch Dist 5.00% Due 08/01/2025		Purchase	08/18/2022	\$100,001 - \$250,000
49	University Minn GO Ref BDS Regents Ser. 5.00% Due 10/01/25		Sale	08/18/2022	\$250,001 - \$500,000
50	ID ST BLDG Auth 5.00% Due 09/01/2023	See Endnote	Sale	09/01/2022	\$50,001 - \$100,000
51	Wolcott CT 1.25% Go Utx Due 08/23/2022		Sale	08/23/2022	\$500,001 - \$1,000,000
52	Illinois ST Sales Tax Rev JR Oblig 4.00 % Due Jun 15, 2030 [GS]		Purchase	09/22/2022	\$1,001 - \$15,000
53	King CNTY Wash LTD Tax Go Ref BDS Ser. 5.00 % Due Jul 1, 2024 [GS]		Purchase	09/26/2022	\$500,001 - \$1,000,000
54	New York ST Dorm Auth Sales Tax Rev 5.00 % Due Mar 15, 2025 [GS]		Purchase	09/22/2022	\$15,001 - \$50,000
55	US Treasury Bill23 U S T Bill Due 09/07/23 [GS]		Purchase	09/28/2022	\$1,000,001 - \$5,000,000
56	Connecticut ST Go BDS 2018 C 5.0000% Due 06/15/30		Purchase	10/13/2022	\$1,001 - \$15,000
57	Illinois ST Sales Tax Rev JR Oblig 4.00 % Due 06/15/30		Purchase	10/12/2022	\$15,001 - \$50,000
58	Maryland ST Go BDS Ser. 2017 B 5.00 % Due 08/01/26		Purchase	10/13/2022	\$500,001 - \$1,000,000
59	Maryland ST Go ST Local Facs LN BDS 5.00 % Due 03/15/27		Sale	10/13/2022	\$500,001 - \$1,000,000
60	New York N Y City Transitional Fin 5.00 % Due 11/01/27		Purchase	10/07/2022	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
61	Round Rock Tex Indpt SCH Dist Unltd Tax 5.00 % Due 08/01/25	Purchase	10/17/2022	\$15,001 - \$50,000
62	Seattle WA MN LT PW 2.68% PWR Util Due 05/01/45	Purchase	10/17/2022	\$15,001 - \$50,000
63	Seattle WA MN LT PW 2.68% PWR Util Due 05/01/45	Purchase	10/13/2022	\$1,001 - \$15,000
64	Maryland ST Go BDS Ser. 2017 B 5.00% Due Aug 1, 2026	Purchase	10/19/2022	\$1,001 - \$15,000
65	Maryland ST Go BDS Ser. 2017 B 5.00% Due Aug 1, 2026	Purchase	10/20/2022	\$50,001 - \$100,000
66	New York N Y Go BDS Ser. Fiscal 2008J 5.00% Due Aug 1, 2026	Sale	10/24/2022	\$500,001 - \$1,000,000
67	New York N Y Go BDS Ser. Fiscal 2015F 5.00% Due Jun 1, 2044	Purchase	10/24/2022	\$500,001 - \$1,000,000
68	New York N Y Go BDS Ser.C 5.00 % Due Aug 1, 2030	Purchase	12/01/2022	\$15,001 - \$50,000
69	Seattle WA MN LT PW 2.68% due 5/1/2045	Purchase	04/18/2022	\$1,001 - \$15,000
70	New York New Y CI 2.6% Mult HSG Due 05/01/26	Purchase	07/22/2022	\$500,001 - \$1,000,000
71	Maryland ST Dept TR 5%26 Comb Tax Due 10/01/26	Sale	12/16/2022	\$500,001 - \$1,000,000
72	Round Rock Tex Indpt SCH Dist Unltd Tax 5.00 % Due Aug 1, 2025	Sale	12/19/2022	\$500,001 - \$1,000,000
73	New York N Y City Transitional Fin 5.00 % Due Nov 1, 2027	Purchase	11/04/2022	\$15,001 - \$50,000
74	United States Treas Bills Zero CPN 0.00 % Due Feb 21, 2023	Purchase	11/09/2022	\$250,001 - \$500,000
75	United States Treas Bills Zero CPN 0.00 % Due May 11, 2023	Purchase	11/10/2022	\$1,000,001 - \$5,000,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
76	Michigan ST HSG Dev Auth Single Family 1.25 % Due Jun 1, 2027		Purchase	11/10/2022	\$15,001 - \$50,000
77	North Dakota ST HSG Fin Agy Home MTG 1.85 % Due Jan 1, 2032		Purchase	11/17/2022	\$250,001 - \$500,000
78	Illinois HSG Dev Auth Rev BDS Ser. 1.70 % Due Apr 1, 2031		Sale	11/17/2022	\$250,001 - \$500,000
79	ID ST BLDG Auth 5%23 5.00 % Due Sep 1, 2023		Sale	11/17/2022	\$50,001 - \$100,000
80	Philadelphia PA SCH Dist Go BDS Ser. F 5.00 % Due Sep 1, 2027		Purchase	12/15/2022	\$50,001 - \$100,000
81	Arizona Indl Dev Auth Rev BDS Lincoln 5.00 % Due Nov 1, 2029		Purchase	12/16/2022	\$500,001 - \$1,000,000
82	Connecticut ST Go BDS 2018 C 5.0000% Due 06/15/2030	See Endnote	Sale	12/16/2022	\$500,001 - \$1,000,000
83	Pacific Co B1 Bond - Fremont Osgood		Purchase	01/26/2022	\$250,001 - \$500,000
84	Pacific Co B1 Bond - Oakland MacArthur		Purchase	05/26/2022	\$250,001 - \$500,000
85	Pacific Co B1 Bond - Osgood South		Purchase	12/12/2022	\$500,001 - \$1,000,000
86	Columbia Pacific Income Fund II	See Endnote	Purchase	03/21/2022	\$1,000,001 - \$5,000,000
87	Columbia Pacific Income Fund II		Purchase	11/08/2022	\$500,001 - \$1,000,000
88	Redwood Kairos RE Fund VIII	See Endnote	Purchase	10/14/2022	\$100,001 - \$250,000
89	Redwood Kairos RE Fund VIII	See Endnote	Purchase	09/09/2022	\$100,001 - \$250,000
90	Security Properties Multi-Family Fund VI	See Endnote	Purchase	05/12/2022	\$250,001 - \$500,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
91	Security Properties Multi-Family Fund VI	See Endnote	Purchase	07/15/2022	\$100,001 - \$250,000
92	Security Properties Multi-Family Fund VI	See Endnote	Purchase	10/03/2022	\$250,001 - \$500,000
93	Vertical Ventures Co-Investment Fund II		Purchase	05/10/2022	\$1,000,001 - \$5,000,000
94	Vision Ridge Sustainable Asset Fund III	See Endnote	Purchase	06/17/2022	\$250,001 - \$500,000
95	Vision Ridge Sustainable Asset Fund III	See Endnote	Purchase	10/13/2022	\$250,001 - \$500,000
96	Goodwater Capital IV	See Endnote	Purchase	03/31/2022	\$1,001 - \$15,000
97	Goodwater Capital IV	See Endnote	Purchase	06/16/2022	\$15,001 - \$50,000
98	Goodwater Capital IV	See Endnote	Purchase	09/23/2022	\$15,001 - \$50,000
99	Goodwater Infinity II	See Endnote	Purchase	03/25/2022	\$15,001 - \$50,000
100	Goodwater Infinity II	See Endnote	Purchase	05/27/2022	\$15,001 - \$50,000
101	Goodwater Infinity II	See Endnote	Purchase	08/30/2022	\$15,001 - \$50,000
102	Goodwater Infinity II	See Endnote	Purchase	10/20/2022	\$15,001 - \$50,000
103	Goodwater Infinity II	See Endnote	Purchase	12/15/2022	\$1,001 - \$15,000
104	Gryphon Mezzanine Partners	See Endnote	Purchase	05/02/2022	\$15,001 - \$50,000
105	Gryphon Mezzanine Partners II	See Endnote	Purchase	04/27/2022	\$15,001 - \$50,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
106	Gryphon Mezzanine Partners II	See Endnote	Purchase	08/21/2022	\$15,001 - \$50,000
107	TCG Private Select Partners II		Sale	01/01/2022	\$1,000,001 - \$5,000,000
108	TCG Private Select Partners III		Sale	01/01/2022	\$1,000,001 - \$5,000,000
109	Institutional Venture Partners XVII, LP	See Endnote	Purchase	01/03/2022	\$1,001 - \$15,000
110	Gryphon Capital Partners Fund IV		Sale	01/01/2022	\$250,001 - \$500,000
111	Institutional Venture Partners XVII, LP		Sale	01/11/2022	\$250,001 - \$500,000
112	Montauk TriGuard Fund VIII		Sale	01/01/2022	\$250,001 - \$500,000
113	Crosslink Capital IX		Sale	01/04/2022	\$250,001 - \$500,000
114	MSFT Common Stock	See Endnote	Sale	08/30/2022	\$1,000,001 - \$5,000,000
115	GRRTS LTD	See Endnote	Sale	11/07/2022	\$500,001 - \$1,000,000
116	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)		Purchase	04/28/2022	\$15,001 - \$50,000
117	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)		Purchase	06/01/2022	\$15,001 - \$50,000
118	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)		Purchase	07/06/2022	\$50,001 - \$100,000
119	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)		Purchase	08/10/2022	\$15,001 - \$50,000
120	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)		Purchase	09/02/2022	\$50,001 - \$100,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
121	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	Purchase	10/04/2022	\$50,001 - \$100,000
122	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	Purchase	11/02/2022	\$15,001 - \$50,000
123	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	Purchase	12/02/2022	\$15,001 - \$50,000
124	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	04/28/2022	\$100,001 - \$250,000
125	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	06/01/2022	\$100,001 - \$250,000
126	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	07/06/2022	\$100,001 - \$250,000
127	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	08/10/2022	\$100,001 - \$250,000
128	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	09/02/2022	\$100,001 - \$250,000
129	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	10/04/2022	\$100,001 - \$250,000
130	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	11/02/2022	\$100,001 - \$250,000
131	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	12/02/2022	\$100,001 - \$250,000
132	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	04/28/2022	\$15,001 - \$50,000
133	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	06/01/2022	\$15,001 - \$50,000
134	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	07/06/2022	\$50,001 - \$100,000
135	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	08/10/2022	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
136	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	09/02/2022	\$50,001 - \$100,000
137	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	10/04/2022	\$15,001 - \$50,000
138	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	11/02/2022	\$15,001 - \$50,000
139	Vanguard Small-Cap Index Fund ETF Shares (VB)	Purchase	12/02/2022	\$50,001 - \$100,000
140	iShares Core S&P US Growth ETF (IUSG)	Purchase	04/28/2022	\$100,001 - \$250,000
141	iShares Core S&P US Growth ETF (IUSG)	Purchase	06/01/2022	\$100,001 - \$250,000
142	iShares Core S&P US Growth ETF (IUSG)	Purchase	07/06/2022	\$100,001 - \$250,000
143	iShares Core S&P US Growth ETF (IUSG)	Purchase	08/10/2022	\$100,001 - \$250,000
144	iShares Core S&P US Growth ETF (IUSG)	Purchase	09/02/2022	\$100,001 - \$250,000
145	iShares Core S&P US Growth ETF (IUSG)	Purchase	10/04/2022	\$100,001 - \$250,000
146	iShares Core S&P US Growth ETF (IUSG)	Purchase	11/02/2022	\$100,001 - \$250,000
147	iShares Core S&P US Growth ETF (IUSG)	Purchase	12/02/2022	\$100,001 - \$250,000
148	iShares Core S&P US Value ETF (IUSV)	Purchase	04/28/2022	\$100,001 - \$250,000
149	iShares Core S&P US Value ETF (IUSV)	Purchase	06/01/2022	\$100,001 - \$250,000
150	iShares Core S&P US Value ETF (IUSV)	Purchase	07/06/2022	\$100,001 - \$250,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
151	iShares Core S&P US Value ETF (IUSV)	Purchase	08/10/2022	\$100,001 - \$250,000
152	iShares Core S&P US Value ETF (IUSV)	Purchase	09/02/2022	\$100,001 - \$250,000
153	iShares Core S&P US Value ETF (IUSV)	Purchase	10/04/2022	\$100,001 - \$250,000
154	iShares Core S&P US Value ETF (IUSV)	Purchase	11/02/2022	\$50,001 - \$100,000
155	iShares Core S&P US Value ETF (IUSV)	Purchase	12/02/2022	\$100,001 - \$250,000

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Redwood Kairos Real Estate Fund VIII	Unfunded Commitment	\$250,001 - \$500,000	2020	0	On Demand
2	Security Properties Multi-Family Fund VI, LLC	Unfunded Commitment	\$1,000,001 - \$5,000,000	2021	0	On Demand
3	Goodwater Infinity II, LP	Unfunded Commitment	\$100,001 - \$250,000	2021	0	On Demand
4	Gryphon Mezzanine Partners II	Unfunded Commitment	\$50,001 - \$100,000	2019	0	On Demand
5	Goodwater Capital IV	Unfunded Commitment	\$250,001 - \$500,000	2021	0	On Demand
6	Vision Ridge SAF III	Unfunded Commitment	\$500,001 - \$1,000,000	2021	0	On Demand

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
2.	1.1	Ticker: VFWSX
2.	1.2	Ticker: VIMAX
2.	1.5	Ticker: VFISX
2.	1.6	VSMAX
6.	2	Co-investment in multi-family housing building located in Seattle, Washington.
6.	3	Commercial real estate lending fund
6.	4	European focused specialty finance fund. Fund fully liquidated.
6.	10	Transfer to separate trust not for the benefit of the filer or spouse Formerly listed as Gryphon Partners Fund V
6.	11	Transfer to separate trust not for the benefit of the filer or spouse. Formerly listed as Gryphon Partners Fund VI.
6.	12	Formerly listed as Gryphon Partners IV
6.	14	Transfer to separate trust not for the benefit of the filer or spouse
6.	16	Fund donated to separate fund not for the benefit of filer or spouse
6.	18	This account holds the underlying ETFs that are separately listed on lines 63, 64, 65, 66 and 67.
6.	23	Fund fully redeemed. No reportable sale.
6.	24	Fund fully redeemed. No reportable sale.

PART	#	ENDNOTE
6.	25	Fund fully redeemed. No reportable sale.
6.	26	Opportunistic real-estate strategy with income focus
6.	27	Real estate fund
6.	31	Fund in process of being fully liquidated
6.	32	Fund was fully redeemed with no reportable transaction.
6.	33	Transfer to separate trust not for the benefit of the filer or spouse
6.	34	Transfer to separate trust not for the benefit of the filer or spouse
6.	43	Fund fully redeemed
6.	44	Transfer to separate trust not for the benefit of the filer or spouse
6.	45.7	Redemption
6.	45.22	Asset was sold in 2021; value should have been listed as zero in Part 6 of the Nominee 278 report
6.	51	Fund had final liquidation in 2018 but distributed remaining capital in 2022
6.	52	Formerly listed as SP Multi-Family Fund VI.
6.	55	Loan to daughter and son-in-law for house remodel
6.	56	Promissory note to daughter and son-in-law's house
6.	57	Promissory note to son's house
6.	58	Condominium - Issaquah Wa (for Mother's use). Sold
6.	59	Personal residence in Medina, WA
6.	60	Personal Residence in Washington D.C.
6.	68	Shares transferred as charitable contribution
6.	71	Partial ownership of daughter and son in law's house
7.	13	Forward Contract provides for the sale of Microsoft Common stock to a separate trust, not for the benefit of the filer or spouse, for a set amount, following the vesting of RSUs every six months through 2024

PART	#	ENDNOTE
7.	14	Vested shares sold to separate trust not for the benefit of the filer or spouse pursuant to forward contract dated 2/09/22
7.	19	Partial redemption
7.	23	Redemption
7.	30	Asset listed as Connecticut ST Go BDS 2018 5.00% Due 06/15/2030
7.	37	Redemption
7.	40	Full maturity of bond.
7.	50	Redemption
7.	82	Asset listed as Connecticut ST Go BDS 2018 5.00% Due 06/15/2030
7.	86	Additional commitment
7.	88	Capital call
7.	89	Additional commitment
7.	90	Formerly listed as SP Multi-Family Fund VI. Capital call.
7.	91	Formerly listed as SP Multi-Family Fund VI. Capital call.
7.	92	Formerly listed as SP Multi-Family Fund VI. Capital call
7.	94	Capital call
7.	95	Capital call
7.	96	Capital call
7.	97	Capital call
7.	98	Capital call
7.	99	Capital call
7.	100	Capital call
7.	101	Capital call

PART	#	ENDNOTE
7.	102	Capital call
7.	103	Capital call
7.	104	Capital call
7.	105	Capital call
7.	106	Capital call
7.	109	Capital call
7.	114	Vested shares sold to separate trust not for the benefit of filer or spouse pursuant to forward contract dated 2/9/2022.
7.	115	Condominium - Issaquah Wa (for Mother's use). Sale of property

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).
