Annual Report 2018 | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (January 2018)

## **Executive Branch Personnel**

## Public Financial Disclosure Report (OGE Form 278e)

## Filer's Information

Sonfield, Brian

Assistant General Counsel for General Law, Ethics & Regulation, Department of the Treasury

Report Year: 2018

Other Federal Government Positions Held During the Preceding 12 Months:

Deputy Assistant General Counsel (General Law & Regulation) (11/2010 - 10/2017)

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/ Sonfield, Brian [electronically signed on 04/23/2018 by Sonfield, Brian 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/ Horton, Elizabeth A, Certifying Official [electronically signed on 06/04/2018 by Horton, Elizabeth A in Integrity.gov]

Other review conducted by

/s/ Furey, Christian, Ethics Official [electronically signed on 05/25/2018 by Furey, Christian in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Christopher, Dale, Certifying Official [electronically signed on 06/15/2018 by Christopher, Dale in Integrity.go	/s/ Ch	hristopher, Dale,	, Certifying Official	[electronically signed on 06	6/15/2018 by Christopher, Dale i	n Integrity.gov
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Data Revised 06/15/2018

Data Revised 05/25/2018

Data Revised 05/23/2018

1. Filer's Positions Held Outside United States Government

None

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

None

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	Vanguard Target Retirement 2040 Fund	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Vanguard Dividend Growth Fund	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
2	Vanguard Growth Index Fund Adm	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
3	Vanguard Total Stock Mkt Indx Adm	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
4	Vanguard 500 Index Fund Adm	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
5	Morgan Stanley Private Bank NA cash account	N/A	\$15,001 - \$50,000		None (or less than \$201)
6	Novartis AG ADR	No	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
7	Abderdeen Asia-Pac Pr Inc Fd	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8	Guggenheim S&P 500 Equ Weight	Yes	\$50,001 - \$100,000		\$201 - \$1,000
9	ishares Morningstar Mid CP ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
10	iShares MSCI EAFE Index	Yes	\$15,001 - \$50,000		\$201 - \$1,000
11	iShares S&P SmallCap 600 Index	Yes	\$15,001 - \$50,000		\$201 - \$1,000
12	Powersh DWA Tech Lead PTF ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
13	Powershares QQQ Tr	Yes	\$15,001 - \$50,000		None (or less than \$201)
14	Vanguard Dividend Appreciation Index	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15	Vanguard FTSE Emerging Markets	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16	Puerto Rico Comwlth Genl Oblig Pub Impt Ser-A	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
17	Maryland St Hlth Hghr Edl Facs Au Pkg Rv- John Hpkin	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
18	Puerto Rico Comwlth Pub Impt Ref	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
19	Maryland St Genl Oblig Second Ser B	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
20	ML/Bank of America, N.A. Bank Deposit Program	N/A	\$100,001 - \$250,000		None (or less than \$201)
21	Blackrock Eqty Dividend Fund Instl	Yes	\$15,001 - \$50,000		\$201 - \$1,000
22	iShares Russell 1000 Growth	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
23	iShares Russell 1000 Value Index	Yes	\$15,001 - \$50,000		\$201 - \$1,000
24	iShares Core US Treasury Bond ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
25	John Hancock Disciplined Value Fund Cl l	Yes	None (or less than \$1,001)		\$201 - \$1,000
26	Mainstay Large Cap Growth Fund Cl I	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
27	Oppenheimer Rising Dividends Fund Cl Y	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
28	TCW Total Return Bond Fd Cl I	Yes	\$1,001 - \$15,000		\$201 - \$1,000
29	The Oakmark Intl Fund	Yes	None (or less than \$1,001)		\$201 - \$1,000
30	Vanguard Intermediate-Term Corporate Bond ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
31	Victory Sycamore Small Company Oppor Fd Cl Y	Yes	None (or less than \$1,001)		\$201 - \$1,000
32	BlackRock Equity Dividend Instl	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
33	Lord Abbett Short Duration Income Fd Cl F	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
34	Powershares S&P 500	Yes	\$15,001 - \$50,000		\$201 - \$1,000
35	Puerto Rico Comwlth Pub Impt-Ambac Rf OID Ambac Jan 98	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
36	Baltimore Cnty Md Met Dist RF Jun 15	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
37	Maryland St CDA Dept HSG Cmty Loc Ser A OID AMBAC May 05	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
38	Maryland St EDC Student Hsg Rv Univ Rf OID Syngi Mar06	No	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
39	Maryland St St & Loc Facs-First Ser A Mar 13	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
40	Virgin Islands Wtr & Pwr Auth Elec Sys Ambac June03	No	None (or less than \$1,001)	Interest	\$5,001 - \$15,000
41	Scotiabank Capped Leveraged Index Return Note (linked to S&P 500) due 12/22/17 (MLTSZ)	No	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
42	Guggenheim S&P 500 Equal Weight ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
43	iShares Core S&P Mid-Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
44	iShares Tr Russell 2000	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
45	Powershares ETF Divid Achivers Portf (PFM)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
46	Maryland College Investment Plan (Portfolio 2027)	Yes	\$15,001 - \$50,000		None (or less than \$201)
47	Maryland College Investment Plan (Portfolio 2024)	Yes	\$15,001 - \$50,000		None (or less than \$201)
48	Clearbridge Small Cap Growth Fund	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
49	Bank of America (cash account)	N/A	\$15,001 - \$50,000		None (or less than \$201)
50	iShares Inc Core MSCI Emerging Mkts	Yes	\$1,001 - \$15,000		\$201 - \$1,000
51	Oppenheimer Int' Growth Fd Cl Y	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
52	Pioneer Fundamental Growth Fund Cl Y	Yes	\$1,001 - \$15,000		\$201 - \$1,000
53	Maryland St St & Loc FACS Ln-Second Ser A OID Aug15	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
54	Maryland St St & Loc FACS LN Ser1 Jun 16	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
55	Maryland St Hlth-Higher EFA RV Johns A RF GTD May15	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
56	ClearBridge Large Cap Growth Fund CL I	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
57	Delaware Emerging Markets Fund Instl Cl	Yes	\$1,001 - \$15,000		\$201 - \$1,000
58	Edgewood Growth Fund Cl Inst	Yes	\$1,001 - \$15,000		None (or less than \$201)
59	Glenmede Small Cap Equity Fund Instl	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
60	iShares Tr Core MSCI EAF	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
61	MFS Value Fd Cl I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
62	SPDR Blmbrg Brcly High Yield Bond ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
63	T Rowe Price Emerging Markets Stock Fd Retail	Yes	\$1,001 - \$15,000		None (or less than \$201)
64	Vanguard Dividend Appreciation Index	Yes	\$15,001 - \$50,000		\$201 - \$1,000
65	Vanguard High Dvd Yield Index	Yes	\$15,001 - \$50,000		\$201 - \$1,000
66	Montgomery Cnty MD Cons Pub Impt Issued 11/19/2014	No	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
67	Prince Georges Cnty Md Jun13	No	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
68	Maryland CDA Lcl Gvt Infrastructure Ser A-2 Aug15	No	\$15,001 - \$50,000	Interest	None (or less than \$201)
69	Anne Arundel Cnty MD Cons Wtr & Swr Issued 6/14/12	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
70	Washington Subn San Dist MD (6/1/2029)	No	\$15,001 - \$50,000	Interest	\$201 - \$1,000
71	SP500 Capped Leveraged Index Return Note (CLIRN) Issuer Barclays due 12/23/19	No	\$15,001 - \$50,000		None (or less than \$201)
72	Lazard Emerging Mkts Equity Ptfl Instl Class	Yes	None (or less than \$1,001)		\$1,001 - \$2,500

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Montgomery Cnty MD Cons Pub Impt Issued 11/19/2014	Purchase	02/03/17	\$15,001 - \$50,000
2	Washington Subn San Dist MD (6/1/2029)	Purchase	02/02/17	\$15,001 - \$50,000
3	Virgin Islands Wtr & Pwr Auth Elec Sys Rev Issued 6/15/2003	Sale	09/29/17	\$100,001 - \$250,000
4	Anne Arundel Cnty MD Cons Wtr & Swr Issued 6/14/2012	Purchase	10/02/17	\$1,001 - \$15,000
5	Maryland CDA Local Govt Infrastructure Ser A-2 Aug15	Purchase	10/02/17	\$1,001 - \$15,000
6	Prince Georges Cnty MD Jun13	Purchase	10/03/17	\$15,001 - \$50,000
7	Vanguard High Dividend Yield Index	Purchase	12/14/17	\$15,001 - \$50,000
8	Vanguard Dividend Appreciation Index	Purchase	12/14/17	\$15,001 - \$50,000
9	BlackRock Equity Dividend Instl	Sale	12/14/17	\$50,001 - \$100,000
10	iShares Russell 1000 Value Index	Sale	1/27/17	\$1,001 - \$15,000
11	iShares Inc Core MSCI Emerging Mkts ETF	Sale	01/26/17	\$1,001 - \$15,000
12	John Hancock Disciplined Value Fund Cl I	Sale	01/26/17	\$1,001 - \$15,000
13	Pioneer Fundamental Growth Fund Cl Y	Sale	01/26/17	\$1,001 - \$15,000
14	Clearbridge Small Cap Growth Fund Cl I	Sale	01/26/17	\$1,001 - \$15,000
15	Mainstay Large Cap Growth Fund Cl I	Sale	01/26/17	\$15,001 - \$50,000
16	Transamerica Emerging Markets Debt Fd Cl I	Sale	01/26/17	\$1,001 - \$15,000
17	Victory Sycamore Small Company Oppor Fd Cl Y	Sale	01/26/17	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
18	Blackrock Equity Dividend Fund Instl	Sale	01/26//17	\$1,001 - \$15,000
19	iShares Russell 1000 Growth	Purchase	01/26/17	\$1,001 - \$15,000
20	SPDR Blmbrg Brcly High Yield Bond ETF	Purchase	01/26/17	\$1,001 - \$15,000
21	Vanguard Intermediate-Term Corporate Bond ETF	Purchase	01/26/17	\$1,001 - \$15,000
22	Oakmark Intl Fund	Purchase	01/26/17	\$1,001 - \$15,000
23	TCW total Return Bond Fd Cl I	Purchase	1/26/17	\$1,001 - \$15,000
24	Delaware Emerging Markets Fund Instl Cl	Purchase	01/26/17	\$1,001 - \$15,000
25	MFS Value Fd Cl I	Purchase	01/26/17	\$15,001 - \$50,000
26	Delaware Small Cap Core Fund Instl Cl	Purchase	01/26/17	\$1,001 - \$15,000
27	Oppenheimer Int'l Growth Fd Cl Y	Purchase	01/26/17	\$1,001 - \$15,000
28	Lazard Emerging Mkts Equity Ptfl Instl Class	Purchase	01/26/17	\$1,001 - \$15,000
29	Clearbridge Large Cap Growth Fund Cl I	Purchase	01/26/17	\$1,001 - \$15,000
30	Glenmede Small Cap Equity Fund Instl Cl	Purchase	04/04/17	\$1,001 - \$15,000
31	Delaware Small Cap Core Fund Instl Cl	Sale	04/04/17	\$1,001 - \$15,000
32	iShares Russell 1000 Value Index	Purchase	05/19/17	\$1,001 - \$15,000
33	Glenmede Small Cap Equity Fund Instl Cl	Sale	05/19/17	\$1,001 - \$15,000
34	Edgewood Growth Fund Cl Inst	Purchase	06/23/17	\$1,001 - \$15,000
35	Clearbridge Large Cap Growth Fund Cl I	Purchase	06/23/17	\$1,001 - \$15,000
36	iShares Russell 1000 Growth	Sale	06/23/17	\$1,001 - \$15,000
37	Mainstay Large Cap Growth Fund Cl I	Sale	06/23/17	\$1,001 - \$15,000
38	Oakmark Intl Fund Inv Cl	Sale	09/27/17	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
39	MFS Value Fd Cl I	Sale	09/27/17	\$1,001 - \$15,000
40	Oppenheimer Int'l Growth Fund Cl Y	Sale	9/27/17	\$1,001 - \$15,000
41	Lazard Emerging Mkts Equity Ptfl Instl Class	Sale	09/27/17	\$1,001 - \$15,000
42	Clearbridge Large Cap Growth Fund Cl I	Sale	09/27/17	\$1,001 - \$15,000
43	Blackrock Eqty Dividend Fund Instl	Sale	09/27/17	\$1,001 - \$15,000
44	iShares Russell 1000 Growth Index	Purchase	09/27/17	\$1,001 - \$15,000
45	iShares Russell 1000 Value Index	Purchase	09/27/17	\$1,001 - \$15,000
46	iShares Tr Core MSCI EAF ETF	Purchase	09/27/17	\$15,001 - \$50,000
47	T. Rowe Price Emerging Markets Stock Fd Retail	Purchase	09/27/17	\$1,001 - \$15,000
48	BlackRock Equity Dividend Instl	Sale	12/14/17	\$50,001 - \$100,000
49	Vanguard Dividend Appreciation Index	Purchase	12/14/17	\$15,001 - \$50,000
50	Vanguard High Dividend Yield Index	Purchase	12/14/17	\$15,001 - \$50,000
51	Scotiabank Capped Leveraged Index Return Note (linked to S&P 500) due 12/22/17 (MLTSZ)	Sale	12/21/17	\$15,001 - \$50,000
52	SP500 Capped Leveraged Index Return Note (CLIRN) Issuer Barclays due 12/23/19	Purchase	12/21/17	\$15,001 - \$50,000

# 8. Liabilities

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9. Gifts and Travel Reimbursements

None

## Endnotes

## 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

#### 6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

### 7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

### 8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

### 9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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. 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 another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another: (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. 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 three 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, NW., 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).