

# Executive Branch Personnel

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

### Filer's Information

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**Behnam, Rostin**

Commissioner, Commodity Futures Trading Commission

Report Year: 2018

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Other Federal Government Positions Held During the Preceding 12 Months:

Senior Counsel, U.S. Senate Committee on Agriculture, Nutrition, and Forestry (5/2011 - 9/2017)

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

**/s/ Behnam, Rostin [electronically signed on 05/08/2018 by Behnam, Rostin in Integrity.gov]**

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

**/s/ Dolan, John, Certifying Official [electronically signed on 06/13/2018 by Dolan, John in Integrity.gov]**

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Other review conducted by

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U.S. Office of Government Ethics Certification

**/s/ Skalla, Daniel L, Certifying Official [electronically signed on 07/05/2018 by Skalla, Daniel L in Integrity.gov]**

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Data Revised 06/22/2018

Data Revised 06/21/2018

Data Revised 06/12/2018

Data Revised 05/31/2018

Data Revised 05/29/2018

Data Revised 05/10/2018

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Comments of Reviewing Officials (public annotations):

<b>PART</b>	<b>#</b>	<b>REFERENCE</b>	<b>COMMENT</b>
N/A	N/A	General	(06/21/2018, Rosado, Alicia N): Dolan, John Public Annotation: May 31st 2018, 3:49:21 pm EST Due to a miscommunication to the filer about the reporting requirements, the filer listed several assets on his nominee report that had previously been sold. These assets are not reported on this financial disclosure report. At the time of the nominee filing, the assets had no value - Crown Castle Intl Corp, Johnson Controls International, Wal-Mart Stores, Walgreens Boots RG, International Business Machines, Celgene Corporation, Costco Wholesale Corp, Marriott Intl Inc., SAP SE Spon ADR, Union Pacific Corp, Workday Inc., Cognizant Tech Solutions, Dick's Sporting Goods Inc., Toll Brothers, Costco Wholesale Corp., and Weatherford International plc.

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

None

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	SPDR S&P 500 ETF Trust (SPY)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	Powershares QQQ Trust, Series 1 ETF (QQQ)	Yes	\$1,001 - \$15,000		None (or less than \$201)

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## 3. Filer's Employment Agreements and Arrangements

None

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

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

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## 5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	PJPA, LLC (Restaurant Franchise Management Company)	N/A		Salary	

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#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Amgen Inc. - Common Stock (AMGN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Chubb Corp (Insurance Company) (CB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	Coca-Cola Bottling Co. Consolidated - Common Stock (COKE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Danaher Corp (DHR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6	Diageo plc (ADR) (DEO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	Facebook, Inc. - Class A Common Stock (FB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	Lockheed Martin (LMT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	NIKE Inc B (NKE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	Thermo Fisher Scientific (TMO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
11	Walt Disney Co (DIS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
12	Yum! Brands Inc (YUM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
13	Doubeline Opportunistic Credit Fund Common Stock (DBL)	Yes	\$1,001 - \$15,000		None (or less than \$201)
14	Adobe Systems Incorporated - Common Stock (ADBE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
15	Jazz Pharmaceuticals plc - Ordinary Shares (Jazz)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16	Rockwell Collins, Inc. (COL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
17	United Parcel Service Inc B (UPS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
18	Twilio Inc. (TWLO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
19	Western Asset High Income Opportunity Fund Inc. (HIO)	Yes	\$1,001 - \$15,000		None (or less than \$201)
20	Alphabet Inc. (GOOG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
21	American Tower Corp A (AMT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
22	Apple Inc. (AAPL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
23	Becton Dickinson & Co (BDX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
24	Guidewire Software, Inc. (GWRE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
25	Intel Corporation (INTC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
26	Merck & Co Inc (MRK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
27	Raytheon Company (RTN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
28	PPG Industries Inc (PPG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
29	Western Asset High Income Fund II Inc. (HIX)	N/A	\$1,001 - \$15,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Chevron Corp (CVX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
2	Fortune Brands Home & Security Inc (FBHS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Abbot Laboratories (ABT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	Abbvie Inc (ABBV)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
5	International Flavors & Fragrances Inc (IFF)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6	Johnson & Johnson (JNJ)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
7	Eli Lilly and Co (LLY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	Lockheed Martin (LMT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	Microsoft Corp (MSFT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	PepsiCo Inc (PEP)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
11	Procter & Gamble (PG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
12	3M Co (MMM)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
13	Guidewire Solutions, Inc. (GWRE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
14	U.S. bank account #1 (cash)	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15	U.S. bank account #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
16	Baltimore, MD Residential Rental Property	N/A	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000
17	iShares MSCI ACWI Index (ACWI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
18	SPDR EURO STOXX 50 (FEZ)	Yes	\$15,001 - \$50,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Cisco Systems, Inc. - Common Stock	Sale	08/23/17	\$1,001 - \$15,000
2	iShares MSCI ACWI Index	Purchase	09/08/2017	\$1,001 - \$15,000
3	Exxon Mobil Corp	Sale	9/8/2017	\$1,001 - \$15,000
4	Charter Communications, Inc. - Class A Common Stock	Sale	09/12/2017	\$1,001 - \$15,000
5	Atlassian Corporation Plc - TEAM	Sale	09/07/2017	\$1,001 - \$15,000
6	Chevron Corp	Sale	09/08/2017	\$15,001 - \$50,000
7	Western Digital Corporation - Common Stock	Sale	09/13/2017	\$1,001 - \$15,000
8	SPDR EURO STOXX 50 - FEZ	Purchase	09/08/2017	\$15,001 - \$50,000

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Conduent Education Services	Student Loan	\$15,001 - \$50,000	2005	2.875	No Term. Fixed monthly payments
2	PNC Bank	Mortgage (investment/rental property)	\$100,001 - \$250,000	2014	4.5	30 Years
3	First Home Mortgage	Mortgage on Personal Residence	\$250,001 - \$500,000	2016	3.50	30 Years

## 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).

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