New Entrant Report | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (Updated July 2020)

## **Executive Branch Personnel**

# Public Financial Disclosure Report (OGE Form 278e)

## Filer's Information

Karlan, Pamela

Principal Deputy Assistant Attorney General, Department of Justice

Date of Appointment: 02/08/2021

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/ Karlan, Pamela [electronically signed on 04/11/2021 by Karlan, Pamela 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/ Gupta, Vanita, Certifying Official [electronically signed on 11/18/2021 by Gupta, Vanita in Integrity.gov]

Other review conducted by

/s/ Buchko, John, Ethics Official [electronically signed on 05/24/2021 by Buchko, John in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 11/17/2021

Data Revised 11/08/2021

Data Revised 06/14/2021

Data Revised 05/11/2021

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

#	ORGANIZATION NAME	_	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	ТО
1	Stanford University	See Endnote	Stanford, California	University/Colleg e	Professor of Law	7/1998	Present
2	Oversight Board	See Endnote	Wilmington, Delaware	Trust	Member, Oversight Board	4/2020	1/2021
3	American Constitution Society	See Endnote	Washington, District of Columbia	Non-Profit	Chairman and board member	12/2017	2/2021
4	Campaign Legal Center	See Endnote	Washington, District of Columbia	Non-Profit	Member, board of trustees	6/2016	2/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Stanford University	N/A		Salary	\$1,191,239
2	Oversight Board	N/A		I was an independent contractor with the Trust	\$86,000
3	University of Virginia	No			
3.1	TIAA traditional	N/A	\$250,001 - \$500,000		None (or less than \$201)
3.2	CREF Stock R3	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	CREF Money Market	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.4	TIAA Annuity	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	Stanford University	No			
4.1	CREF Stock R3	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.2	CREF Growth R3	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.3	CREF Equity Index	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.4	CREF Global Equities	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.5	TIAA Annuity Contract	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
4.6	TIAA Traditional	N/A	\$50,001 - \$100,000		None (or less than \$201)
4.7	CREF Stock R3	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.8	CREF Stock R3	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.9	CREF Social Choice	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.10	CREF Growth	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.11	CREF Equity Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.12	CREF Global Equities R3	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.13	Fidelity SCRP	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.14	Health Equity Health Care Savings Account	N/A	\$15,001 - \$50,000		None (or less than \$201)
5	Rice University lecture - Feb. 20, 2020	N/A	None (or less than \$1,001)	honorarium	\$2,500
6	Harvard Safra Lecture - Feb. 13-14, 2020	N/A		honorarium	\$4,001
7	Oxford University Press royalties	N/A		Rent or Royalties	\$1,001 - \$2,500
8	Wolters Kluwer casebook royalties	No		Rent or Royalties	\$5,001 - \$15,000
9	West Academic casebook royalties	N/A		Rent or Royalties	\$2,501 - \$5,000
10	NY Rev Books publication fees	N/A		publication fees	\$7,000
11	Themis Bar Review lectures	N/A		taped bar review lectures	\$16,500
12	Inherited IRA	No			
12.1	Money Market Account	N/A	\$1,001 - \$15,000		None (or less than \$201)
12.2	Cohen & Steers Real Estate Securities Fund, Inc Class I Shares (CSDIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.3	Delaware Corporate Bond Fund Institutional Class Shares (DGCIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.4	First Trust Dow Jones Internet Index Fund (FDN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.5	Health Care Select Sector SPDR Fund (XLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.6	iShares MSCI USA ESG Select ETF (SUSA)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12.7	iShares iBoxx \$ High Yield Corporate Bond ETF (HYG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.8	iShares Core S&P 500 ETF (IVV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.9	SPDR S&P Semiconductor ETF (XSD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.10	Vanguard Total Stk Mkt	Yes	\$15,001 - \$50,000		None (or less than \$201)
13	Regular IRA	No			
13.1	Money Market Fund	N/A	\$1,001 - \$15,000		None (or less than \$201)
13.2	BlackRock Health Sciences Opportunities Portfolio Institutional Shares (SHSSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.3	BlackRock Technology Opportunities Fund Institutional Shares (BGSIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.4	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.5	BlackRock Equity Dividend Fund Institutional Shares (MADVX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.6	Fidelity Advisor New Insights Fund Class I Shares (FINSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.7	Fidelity Advisor Growth Opportunities Fund Class I Shares (FAGCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.8	Franklin Utilities Fund Advisor Class (FRUAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.9	Global X Robotics & Artificial Intelligence ETF (BOTZ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.10	Invesco S&P 500 Equal Weight ETF (RSP)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
13.11	iShares iBoxx \$ Investment Grade Corporate Bond ETF (LQD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.12	First Trust NASDAQ Clean Edge Green Energy Index Fund (QCLN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13.13	Consumer Staples Select Sector SPDR Fund (XLP)	Yes			None (or less than \$201)
13.14	SPDR S&P Semiconductor ETF (XSD)	Yes	\$1,001 - \$15,000		None (or less than \$201)

# 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Stanford University	Stanford, California	I continue to live in a house on the University campus. I own the house but pay ground rent to the University. I hold a non-amortizing, 0% university mortgage. I receive health insurance benefits for myself and my registered domestic partner and life insurance benefits for myself.  The University continues to make contributions to my retirement accounts.	7/1998
2	Stanford University	Stanford, California	I remain in my position. I am on detail to the Department of Justice for the duration of my government service (which ends in September 2022). I am being paid my normal salary, minus my summer stipend. My employer will continue to make its normal contributions to my retirement account.	1/2021
3	Stanford University	Stanford, California	I will continue to participate in this defined contribution plan, and the plan sponsor will continue to make contributions.	7/1998
4	University of Virginia	Charlottesville, Virginia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	8/1988

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Stanford University	Stanford, California	Professor of Law
2	Oversight Board	Wilmington, Delaware	Member of board
3	Themis Bar Review	LaGrange Park, Illinois	I tape bar review lectures for Themis, which it then uses for a multi-year period.
4	New York Review of Books	New York, New York	I wrote two articles for the Review, for which I was paid the Review's standard fee.

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

None

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Stanford Federal Credit Union Accounts	-	\$250,001 - \$500,000	Interest	\$201 - \$1,000
2	VTI Vanguard Total Stock Market Index Fund Investor Class Shares (VTSMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	SPDR S&P Software & Services ETF (XSW)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	SPDR S&P Health Care Equipment ETF (XHE)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	SPDR S&P Semiconductor ETF (XSD)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	Consumer Staples Select Sector SPDR Fund (XLP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	NASDQ Clean Edge Green Energy Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
8	IShares US Medical Devices ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	IShares S&P Midcap 400	Yes	\$15,001 - \$50,000		None (or less than \$201)
10	iShares National Muni Bond ETF (MUB)	Yes	\$1,001 - \$15,000		None (or less than \$201)
11	iShares MSCI USA ESG Select ETF (SUSA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12	iShares iBoxx \$ High Yield Corporate Bond ETF (HYG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
13	iShares iBoxx \$ Investment Grade Corporate Bond ETF (LQD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
14	iShares Core S&P 500 ETF (IVV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
15	Invesco S&P 500 Equal Weight ETF (RSP)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
16	Health Care Select Sector SPDR Fund (XLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
17	Global X Funds Global X Fintech ETF (FINX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
18	Global X Funds Global X & Artificial Intellgnce (BOTZ)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	First Trust Dow Jones Internet Index Fund (FDN)	Yes	\$50,001 - \$100,000		None (or less than \$201)
20	First Trust NASDAQ Cybersecurity ETF (CIBR)	Yes	\$15,001 - \$50,000		None (or less than \$201)
21	Wells Fargo Intermediate Tax/AMT-Free Fund Class A Shares (WFTAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
22	PIMCO California Intermediate Municipal Bond Fund Class A Shares (PCMBX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
23	Nuveen Santa Barbara Dividend Growth Fund Class A Shares (NSBAX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
24	Nuveen California Municipal Bond Fund Class A Shares (NCAAX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
25	Mirova Global Sustainable Equity Fund Class C Shares (ESGCX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
26	Lord Abbett Fundamental Equity Fund Class A Shares (LDFVX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
27	Lord Abbett California Tax Free Fund Class A Shares (LCFIX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
28	Invesco Oppenheimer Rochester California Muni Fd Class A Shs (OPCAX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
29	Franklin Utilities Fund Advisor Class (FRUAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
30	Franklin Utilities Fund Advisor Class (FRUAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
31	Franklin California Intermediate-Term Tax- Free Income Fund Class A1 Shs (FKCIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
32	Franklin California Intermediate-Term Tax- Free Income Fund Class A Shar (FCCQX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
33	First EagleGlobal Fund Class A Shares (SGENX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
34	Fidelity AdvisorEmerging Markets Fund Class C Shares (FMCKX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
35	Fidelity Advisor Short-Term Bond Fund Class A Shares (FBNAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
36	Fidelity Advisor New Insights Fund Class I Shares (FINSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
37	Fidelity Advisor Biotechnology Fund Class A Shares (FBTAX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
38	Fidelity Advisor Growth Opportunities Fund Class A Shares (FAGAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
39	Fidelity Advisor Growth Opportunities Fund Class I Shares (FAGCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
40	Fidelity Advisor Growth Opportunities Fund Class C Shares (FACGX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
41	Fidelity Advisor Consumer Discretionary Fund Class A Shares (FCNAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
42	Delaware Tax-Free USA Fund Class A Shares (DMTFX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
43	Delaware Limited-Term Diversified Income Fund Class A Shares (DTRIX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
44	Delaware Corporate Bond Fund Institutional Class Shares (DGCIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
45	Cohen & Steers Real Estate Securities Fund, Inc Class C Shares (CSCIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
46	Cohen & Steers Real Estate Securities Fund, Inc Class I Shares (CSDIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME AMOUNT		
47	Cohen & SteersGlobal Infrastructure Fund, Inc Class A Shares (CSUAX)	Yes	\$1,001 - \$15,000	\$1,001 - \$15,000		
48	BlackRock Technology Opportunities Fund Institutional Shares (BGSIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)	
49	BlackRock Mid-Cap Growth Equity Portfolio Investor C Shares (BMGCX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
50	BlackRock Health Sciences Opportunities Portfolio Institutional Shares (SHSSX)	Yes	\$1,001 - \$15,000	\$1,001 - \$15,000		
51	BlackRock Health Sciences Opportunities Portfolio Investor A Shares (SHSAX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500	
52	BlackRock High Yield Bond Portfolio Institutional Shares (BHYIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)	
53	BlackRock Equity Dividend Fund Investor A Shares (MDDVX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000	
54	BlackRock Equity Dividend Fund Investor C Shares (MCDVX)	N/A	\$15,001 - \$50,000		\$2,501 - \$5,000	
55	BlackRock Equity Dividend Fund Institutional Shares (MADVX)	Yes	\$1,001 - \$15,000		None (or less than \$201)	
56	lackRock California Municipal Opportunities  Yes \$100,001 - \$250,000		\$2,501 - \$5,000			
57	Sierra (CA) Community College District Muni Bond	No	\$15,001 - \$50,000		\$201 - \$1,000	
58	San Francisco (CA) Community College District Muni Bond	No	\$15,001 - \$50,000		None (or less than \$201)	
59	Los Angeles (CA) Unified School Dist. Muni . Bond	No	\$15,001 - \$50,000		\$201 - \$1,000	
60	California Various Purpose Bond	No	\$15,001 - \$50,000		\$201 - \$1,000	

#	DESCRIPTION EIF VALUE INCOME TYPE		INCOME AMOUNT		
61	California Various Purpose (2050)	No	\$15,001 - \$50,000		\$201 - \$1,000
62	Cabrillo (CA) Unified School Dist. Muni Bond	No	\$15,001 - \$50,000		None (or less than \$201)
63	San Francisco (CA) Mun. Tr. Agency Muni Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
64	San Francisco (CA) City-County Airport	N/A	\$15,001 - \$50,000		\$201 - \$1,000
65	San Diego Muni Bond	No	\$50,001 - \$100,000		None (or less than \$201)
66	Sacramento (CA) SAN DT Muni Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
67	Riverside (CA) Elect. Rev. Muni Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
68	Los Angeles (CA) Water & Power Mun. Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
69	Los Angeles (CA) Airports Mun. Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
70	Gainesville (FL) Utility System Muni Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
71	Dutchess County (NY) LCL Dev Corp Mun. Bond	No	\$15,001 - \$50,000		\$1,001 - \$2,500
72	Chi-O Hare Mun. Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
73	Cal. State Univ. Rev. Bond	No	\$15,001 - \$50,000		\$201 - \$1,000
74	Cal. Hith FCS Bond	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
75	Cal. EDL Facs. Auth. Bond	No	\$15,001 - \$50,000		None (or less than \$201)
76	Cal. Edl. Facs Pepperdine Bond	No	\$50,001 - \$100,000		None (or less than \$201)

## 7. Transactions

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

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

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

## **Endnotes**

PART	#	ENDNOTE
1.	1	I am on detail to the Department of Justice pursuant to an Intergovernmental Personnel Agreement between Stanford and the Department.
1.	2	"Oversight Board Trust" is the formal name for what is commonly referred to as the "Facebook Oversight Board"

PART	#	ENDNOTE
1.	3	I was chairman of the board from Dec. 2017 to Dec. 2019, but remained on the board until I resigned in February 2021.
1.	4	I believe I joined the board of trustees in 2016, but I am not 100% certain of that.

## **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).