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

Sherwood-Randall, Elizabeth

Assistant to the President for Homeland Security, White House - Biden-Harris Administration

Date of Appointment: 01/20/2021

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/ Sherwood-Randall, Elizabeth [electronically signed on 02/10/2021 by Sherwood-Randall, Elizabeth 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/ Olorunnipa, Funmi, Certifying Official [electronically signed on 08/06/2021 by Olorunnipa, Funmi in Integrity.gov]

Other review conducted by

/s/ Olorunnipa, Funmi, Ethics Official [electronically signed on 08/06/2021 by Olorunnipa, Funmi in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 12/09/2021 Data Revised 12/08/2021 Data Revised 11/19/2021 Data Revised 11/17/2021 Data Revised 11/16/2021 Data Revised 10/25/2021 Data Revised 10/20/2021 Data Revised 10/05/2021 Data Revised 09/27/2021 Data Revised - Workflow re-designation - 08/06/2021 Data Revised 03/19/2021

Data Revised 03/11/2021

Data Revised 03/10/2021

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	то
1	Georgia Institute of Technology	Atlanta, Georgia	University/Colleg e	Distinguished Professor of the Practice; Senior Fellow	8/2018	1/2021
2	Lawrence Livermore National Laboratory	Livermore, California	LLC	Strategic Advisor	2/2018	1/2021
3	Sandia National Laboratories	Livermore, California	LLC	Strategic Advisor	11/2017	1/2021
4	Georgia Tech Research Institute	Atlanta, Georgia	Non-Profit	Member, External Advisory Council	9/2019	1/2021
5	Energy Impact Partners	New York, New York	Limited Partnership	Member, Senior Advisory Board	10/2017	1/2021
6	Resilience (fka Arceo Analytics)	San Francisco, California	Corporation	Member, Advisory Board	8/2018	1/2021
7	Dragos Inc	Hanover, Maryland	Corporation	Member, Advisory Board	6/2018	1/2021
8	University of Pennsylvania	Philadelphia, Pennsylvania	University/Colleg e	Perry World House Distinguished Visiting Fellow	1/2019	4/2019
9	Irrevocable Family Trust 03	Los Angeles, California	Trust	Trustee	11/2018	Present
10	Irrevocable Family Trust 04	Los Angeles, California	Trust	Trustee	11/2018	Present
11	Revocable Family Trust 02	Piedmont, California	Trust	Trustee	12/2006	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	ТО
12	Electric Power Research Institute	Palo Alto, California	Non-Profit	Consultant	10/2018	3/2019

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

#	DESCRIPTION	EIF	VALUE IN	ICOME TYPE	INCOME AMOUNT
1	SEP IRA	No	-		
1.1	U.S. brokerage account (cash) (IRA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.2	EFA - iShares EAFE ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	JPST - JP Morgan Ultra-Short Income ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.4	SCHA Schwab US Small Cap ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	SCHE - Schwab Emerging Markets Equity ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	SCHF - Schwab International Equity ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.7	SCHM - Schwab US Mid-Cap ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.8	SCHZ - Schwab US Aggregate Bond ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.9	SFLNX - Schwab Fdmtl US Lg Co Idx	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.10	Morgan Stanley D W Disc Srmtns 05/17/2023 3.371%	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Georgia Institute of Technology	N/A		Salary	\$100,000
3	Lawrence Livermore National Laboratory	N/A		Consulting Fees	\$2,000
4	Sandia National Laboratories	N/A		Consulting Fees	\$1,183
5	Georgia Tech Research Institute - 2/5/2020; 2/6/2020	N/A		Honorarium	\$1,500
6	Energy Impact Partners, vested Stock Options; Energy Impact Partners (sustainable energy)	N/A	\$15,001 - \$50,000		None (or less than \$201)
7	Resilience (fka Arceo Analytics), vested Stock Options; Resilience (cybersecurity)	N/A	\$1,001 - \$15,00	0	None (or less than \$201)
8	Dragos Inc, vested Stock Options; Dragos Inc (value not readily ascertainable) (cybersecurity); 17618 vested shares, strike \$4.39; exp. 4/19/2021	N/A			None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	-	CITY, STATE	STATUS AND TERMS	DATE
1	Energy Impact Partners	See Endnote	New York City, New York	I have forfeited my unvested stock options upon separation. I will divest my vested stock options.	10/2017
2	Resilience (fka Arceo Analytics)	See Endnote	San Francisco, California	I will divest my vested stock options. I had no unvested stock options.	8/2018
3	Dragos Inc	See Endnote	Hanover, Maryland	I have forfeited my unvested stock options upon separation. I will divest my vested stock options.	6/2018

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Georgia Institute of Technology	Atlanta, Georgia	Teaching; researching and mentoring of students
2	Electric Power Research Institute	Palo Alto, California	Advising on improving cyber security of the power grid
3	University of Pennsylvania	Philadelphia, Pennsylvania	Guest lecturing, researching and mentoring students
4	Institute for European Integration	Vienna, Outside U.S.	University speech on energy, climate and national security

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Pacific Brain & Spine (1/3rd Ownership in medical practice; accounts receivable)	N/A	\$50,001 - \$100,000	salary, bonus, partnership share	
2	Sutter West Bay Medical Group (Medical Practice)	N/A		salary, bonus	
3	PBSMG Holdings, LLC (1/3rd Interest In LLC that holds commercial real estate)	No			
3.1	commercial real estate, Danville, CA	N/A	\$15,001 - \$50,000	Rent or Royalties	\$5,001 - \$15,000
4	IRA 01	No			
4.1	SCHM - Schwab US Mid-Cap ETF™	Yes	\$1,001 - \$15,00	00	None (or less than \$201)
5	Def Contr Plan 01	No			
5.1	U.S. brokerage account (cash) Def. Ctb. Plan	N/A	\$15,001 - \$50,000		None (or less than \$201)
5.2	JPST - JPMorgan Ultra-Short Income ETF	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.3	SCHA - Schwab US Small-Cap ETF	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.4	SCHE - Schwab Emerging Markets Equity ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.5	SCHF - Schwab International Equity ETF	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.6	SCHM - Schwab US Mid-Cap ETF	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.7	SCHZ - Schwab US Aggregate Bond ETF	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.8	SFLNX - Schwab Fdmtl US Lg Co Idx	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.9	Cranbrook Realty Investment Fund, LP	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	Def Contr Plan 02	No			
6.1	American Funds Fundamental Investors Class R6 Shares (RFNGX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
6.2	American Funds 2010 Target Date Retirement Fund Class R6 Shs (RFTTX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
6.3	American Funds 2035 Target Date Retirement Fund Class R6 Shs (RFFTX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
6.4	American Funds Euro Pacific Growth R6	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.5	Franklin Small Cap Value Fund Class R6 Shares (FRCSX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.6	PIMCO Total Return Fund Institutional Class Shares (PTTRX)	Yes	\$250,001 - \$500,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Irrevocable Family Trust 01	No			
1.1	ADBE - Adobe Systems Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.2	AMZN - Amazon.com Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.3	U.S. brokerage account #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.4	CVX - Chevron Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.5	EFA - iShares MSCI EAFE	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	FBKWX - Fidelity Advisor Total Bond Z	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.7	FCAMX - Franklin CA High Yield Municipal A1	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.8	FKGRX - Franklin Growth A	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.9	FLOT - iShares Floating Rate Bond	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.10	FMC - FMC Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.11	GSIE - Goldman Sachs ActiveBeta Intl Eq ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.12	GSLC - Goldman Sachs ActiveBeta US LgCp Eq ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE INCOME TY	PE INCOME AMOUNT
1.13	JNJ - Johnson & Johnson	N/A	\$1,001 - \$15,000	None (or less than \$201)
1.14	LOW - Lowe s Companies Inc	N/A	\$1,001 - \$15,000	None (or less than \$201)
1.15	LQD - iShares iBoxx \$ Invst Grade Crp Bond	Yes	\$15,001 - \$50,000	None (or less than \$201)
1.16	MBB - iShares MBS	Yes	\$15,001 - \$50,000	None (or less than \$201)
1.17	MINT - PIMCO Enhanced Short Maturity ETF	Yes	\$15,001 - \$50,000	None (or less than \$201)
1.18	MITTX - MFS Massachusetts Investors Tr A	Yes	\$15,001 - \$50,000	\$1,001 - \$2,500
1.19	MSFT - Microsoft Corp	N/A	\$1,001 - \$15,000	None (or less than \$201)
1.20	PG - Procter & Gamble Co	N/A	\$15,001 - Dividends \$50,000	\$201 - \$1,000
1.21	PYPL - Paypal Hldgs Inc	N/A	\$1,001 - \$15,000	None (or less than \$201)
1.22	TAFTX - American Funds Tax-Exempt Fund of CA A	Yes	\$1,001 - \$15,000	None (or less than \$201)
1.23	VIAC - Viacomcbs CI B Ord	N/A	\$1,001 - \$15,000	None (or less than \$201)
1.24	VKLIX - Invesco Intermediate Term Muni Inc Y	Yes	\$15,001 - \$50,000	None (or less than \$201)
1.25	XLF - Financial Select Sector SPDR ETF	Yes	\$1,001 - \$15,000	None (or less than \$201)
1.26	Cranbrook Realty Investment Fund, LP	Yes	\$50,001 - \$100,000	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE INCOME TYP	PE INCOME AMOUNT
1.27	ZAF Energy Systems, Preferred A Stock	N/A	\$1,001 - \$15,000	None (or less than \$201)
1.28	Residential Real Estate - Walnut Creek, CA	N/A	\$250,001 - \$500,000	None (or less than \$201)
2	Revocable Family Trust 02	No		
2.1	California St 4.000 02/01/20 02/01/2020 4.000%	N/A	None (or less Interest than \$1,001)	\$1,001 - \$2,500
2.2	U.S. brokerage account (cash)	N/A	\$250,001 - \$500,000	None (or less than \$201)
2.3	FNDX - Schwab Fundamental US Large Company ETF	Yes	\$50,001 - \$100,000	\$1,001 - \$2,500
2.4	GSIE - Goldman Sachs ActiveBeta Intl Eq ETF	Yes	\$100,001 - \$250,000	\$1,001 - \$2,500
2.5	GSLC - Goldman Sachs ActiveBeta US LgCp Eq ETF	Yes	\$100,001 - \$250,000	\$1,001 - \$2,500
2.6	IWB - iShares Russell 1000	Yes	\$100,001 - \$250,000	\$1,001 - \$2,500
2.7	IWM - iShares Russell 2000	Yes	\$15,001 - \$50,000	None (or less than \$201)
2.8	IWR - iShares Russell Mid-Cap	Yes	\$50,001 - \$100,000	None (or less than \$201)
2.9	JPST - JPMorgan Ultra-Short Income ETF	Yes	\$1,001 - \$15,000	None (or less than \$201)
2.10	RSP - Invesco S&P 500 Equal Weight ETF	Yes	\$15,001 - \$50,000	None (or less than \$201)
2.11	SCHA - Schwab US Small-Cap ETF	Yes	\$1,001 - \$15,000	None (or less than \$201)
2.12	SCHB - Schwab US Broad Market ETF	Yes	\$1,001 - \$15,000	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.13	SCHE - Schwab Emerging Markets Equity ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.14	SCHF - Schwab International Equity ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
2.15	SCHM - Schwab US Mid-Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.16	SCHZ - Schwab US Aggregate Bond ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.17	SFLNX - Schwab Fdmtl US Lg Co Idx	Yes	\$1,001 - \$15,000		\$201 - \$1,000
2.18	SNVXX - Schwab Government Money Inv	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
2.19	US Treasury 1.250 01/31/20 01/31/2020 1.250%	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
2.20	US Treasury 2.000 01/31/20 01/31/2020 2.000%	N/A	None (or less than \$1,001)		None (or less than \$201)
2.21	US Treasury Bill 01/02/20 01/02/2020	N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
2.22	VEA - Vanguard FTSE Developed Markets ETF	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
2.23	VWO - Vanguard FTSE Emerging Markets ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.24	VYM - Vanguard High Dividend Yield ETF	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
2.25	California St 10/1/2021 5 10/01/2021 5.000%	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
2.26	California St 4.000 10/01/22 10/01/2022 4.000%	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
2.27	San Francisco Calif Bay Area R 4.000 08/01/22	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.28	US Treasury 1.250 01/31/20		N/A	None (or less than \$1,001)	Interest	\$2,501 - \$5,000
2.29	US Treasury 2.000 01/31/20		N/A	None (or less than \$1,001)	Interest	\$2,501 - \$5,000
2.30	EH-LA Associates LLC (hotel in Hollywood, CA)		No	None (or less than \$1,001)	distribution	\$29,965
2.31	Cranbrook Realty Investment Fund, LP		Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
2.32	ECCC Property LLC	See Endnote	No			
2.32.1	EPICare Cyberknife (radiation therapy center)		N/A	\$15,001 - \$50,000	distribution	\$3,400
2.33	Holly Mortgage Trust - Series '04 Prfds		N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
3	Irrevocable Family Trust 03		No			
3.1	U.S. brokerage account (cash) #3		N/A	\$5,000,001 - \$25,000,000	Interest	\$201 - \$1,000
4	01 Brokerage Account		No			
4.1	AGG - iShares Core US Aggregate Bond		Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.2	DSI - iShares MSCI KLD 400 Social ETF		Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.3	EFA - iShares MSCI EAFE		Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	JPST - JPMorgan Ultra-Short Income ETF		Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.5	SCHA - Schwab US Small-Cap ETF		Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.6	SCHE - Schwab Emerging Markets Equity ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.7	SCHF - Schwab International Equity ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.8	SCHM - Schwab US Mid-Cap ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.9	SCHZ - Schwab US Aggregate Bond ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.10	FN - Fabrinet	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	02 Brokerage Account	No			
5.1	AGG - iShares Core US Aggregate Bond	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.2	JPST - JPMorgan Ultra-Short Income ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.3	SCHA - Schwab US Small-Cap ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.4	SCHE - Schwab Emerging Markets Equity ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	SCHF - Schwab International Equity ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.6	SCHM - Schwab US Mid-Cap ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.7	SCHZ - Schwab US Aggregate Bond ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.8	SFLNX - Schwab Fdmtl US Lg Co Idx	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
5.9	FN - Fabrinet	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	Irrevocable Family Trust 04	No			
6.1	FDRXX - Fidelity Government Cash Reserves	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
6.2	First Commonwealth Mortgage Trust REIT	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
7	AR iShares 529 Plan 01	No			
7.1	iShares College Portfolio Class F	Yes	\$15,001 - \$50,000		None (or less than \$201)
8	AR iShares 529 Plan 02	No			
8.1	iShares College Portfolio Class F	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	Northwestern Mutual - Whole Life Policy	N/A	\$250,001 - \$500,000		None (or less than \$201)
10	U.S. bank (cash) #1	N/A	\$100,001 - \$250,000		None (or less than \$201)

7. Transactions

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

8. Liabilities

None

9. Gifts and Travel Reimbursements

Endnotes

PART	#	ENDNOTE
3.	1	The filer will be divesting of these stock options.
3.	2	The filer will be divesting of these stock options.
3.	3	The filer will be divesting of these stock options.
6.	2.32	LLC holding investment in Radiation Therapy Center located in California. Spouse does not practice medicine there.

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 OGÉ 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).