



DEPARTMENT OF DEFENSE  
OFFICE OF THE GENERAL COUNSEL

1600 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1600

The Honorable Emory A. Rounds  
Director  
U.S. Office of Government Ethics  
Washington, D.C. 20005-3917

JUN 14 2021

Dear Mr. Rounds:

I am enclosing a supplement to Caroline Krass' nominee public financial disclosure report, signed on April 17, 2021. I have reviewed the additional information. Based on my review of this supplemental disclosure, I continue to believe that Ms. Caroline Krass is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Thompson", is written over a horizontal line.

Scott F. Thompson  
Alternate Designated Agency Ethics Official

Enclosures  
As stated



June 14, 2021

Mr. Scott F. Thompson  
Alternate Designated Agency Ethics Official  
Office of the General Counsel  
Department of Defense  
Washington, DC 20301

**Re: Supplement to Financial Disclosure Report of Caroline Krass**

Dear Mr. Thompson:

The purpose of this letter is to supplement the financial disclosure report that I signed on April 17, 2021. I am adding the names of three federal positions that I held during the 12 months prior to the date of my filing.

The item(s) identified below are supplemented, as follows:

Cover Page: Other Federal Government Positions Held During the Preceding 12 Months

Member, Secret Service Cyber Investigations Advisory Board, 9/2020-present  
Member, CIA General Counsel's External Advisory Board, 1/2017-present  
Member, National Security Agency Compliance Advisory Board, 2/2017-12/2020

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,



Caroline Krass

# Executive Branch Personnel

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

### Filer's Information

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Krass, Caroline

General Counsel, Department of Defense

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Names of Congressional Committees Considering Nomination:

- Committee on Armed Services
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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/ Krass, Caroline [electronically signed on 04/17/2021 by Krass, Caroline 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/ Thompson, Scott F, Certifying Official [electronically signed on 05/20/2021 by Thompson, Scott F in Integrity.gov]

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Other review conducted by

/s/ Thompson, Scott F, Ethics Official [electronically signed on 05/20/2021 by Thompson, Scott F in Integrity.gov]

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U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 05/21/2021 by Apol, David in Integrity.gov]

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	American International Group, Inc.	See Endnote	New York, New York	Corporation	Senior Vice President and Deputy General Counsel, AIG & General Counsel, General Insurance	4/2018	Present
2	Global Loss Prevention, Inc.			Corporation	Executive Vice President	7/2019	Present
3	American Home Assurance Company			Corporation	Executive Vice President, General Counsel	5/2018	Present
4	AIG Claims, Inc.			Corporation	Executive Vice President, General Counsel	7/2019	Present
5	AIU Insurance Company			Corporation	Executive Vice President, General Counsel	5/2018	Present
6	AIG Specialty Insurance Company			Corporation	Executive Vice President, General Counsel	5/2018	Present
7	AIG Property Casualty Company			Corporation	Executive Vice President, General Counsel	5/2018	Present
8	Commerce and Industry Insurance Company			Corporation	Executive Vice President, General Counsel	5/2018	Present
9	The Insurance Company of the State of Pennsylvania			Corporation	Executive Vice President, General Counsel	5/2018	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
10	Lexington Insurance Company		Corporation	Executive Vice President, General Counsel	5/2018	Present
11	National Union Fire Insurance Company of Pittsburgh, Pa.		Corporation	Executive Vice President, General Counsel	5/2018	Present
12	New Hampshire Insurance Company		Corporation	Executive Vice President, General Counsel	5/2018	Present
13	Illinois National Insurance Co.		Corporation	Executive Vice President, General Counsel	5/2018	Present
14	Granite State Insurance Company		Corporation	Executive Vice President, General Counsel	5/2018	Present
15	AIG Assurance Company		Corporation	Executive Vice President, General Counsel	5/2018	Present
16	AIG Property Casualty U.S., Inc.		Corporation	Executive Vice President, General Counsel	5/2018	Present
17	Eaglestone Reinsurance Company		Corporation	Executive Vice President, General Counsel	5/2018	Present
18	Health Direct, Inc.		Corporation	Executive Vice President, General Counsel	7/2019	Present
19	AIG Property Casualty International, LLC		Corporation	Executive Vice President, General Counsel	5/2018	Present
20	AIG PC Global Services, Inc.		Corporation	Senior Vice President	5/2019	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
21	AIG Property Casualty Inc.		Corporation	General Counsel	5/2018	Present
22	DSA P&C Solutions, Inc.		Corporation	Executive Vice President, General Counsel	7/2020	Present
23	AIG Property Casualty Inc.		Corporation	Executive Vice President	8/2018	Present
24	PT Fund, Inc. (Presidential Transition Team)	Washington, District of Columbia	Transition Team	Volunteer Member	10/2020	11/2020
25	Historical Society of the DC Circuit Board	Washington, District of Columbia	Non-Profit	Board of Directors	4/2017	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Vanguard IRA	No			
1.1	Vanguard Inflation-Protected Securities Fund Investor Shares VIPSX	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	AIG Company Sponsored Stock Plan (UBS Account)	No			
2.1	American International Group, Inc. (AIG)	N/A	\$250,001 - \$500,000	Dividends	\$1,001 - \$2,500
2.2	AIG Vested Stock Options Value not readily ascertainable. Comprises 14,666 options with a strike price of \$55.55 that expire on 6/18/2028	N/A			None (or less than \$201)
2.3	AIG Unvested Restricted Stock Units	See Endnote	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.4	AIG Unvested Performance Stock Units	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)
2.5	AIG Unvested Stock Options (value not readily ascertainable)	See Endnote	N/A			None (or less than \$201)
3	AIG Leadership Continuity Award	See Endnote	N/A	\$250,001 - \$500,000		None (or less than \$201)
4	AIG Incentive Savings 401K Plan		No			
4.1	Vanguard Target Ret 2035 Trust Plus		Yes	\$250,001 - \$500,000		None (or less than \$201)
5	AIG Salary and Bonus		N/A		Salary and Bonus	\$2,972,722
6	AIG, HSA (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)
7	AIG anticipated bonus		N/A	\$500,001 - \$1,000,000		None (or less than \$201)

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	AIG Incentive Savings 401K Plan	New York, New York	I will continue to participate in this defined contribution plan. The plan sponsor will make no further contributions after my separation.	4/2018
2	AIG, HSA	New York, New York	I will continue to participate in the HSA, but will make no further contributions after my separation.	5/2018
3	AIG	New York, New York	I will retain my vested and unvested stock options. The unvested options will continue to vest on the normal vesting schedule.	5/2021
4	AIG	New York, New York	I will retain my unvested restricted stock which will continue to vest on the normal vesting schedule.	5/2021



#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
5	AIG	New York, New York	I will retain my unvested performance stock units which will continue to vest on the normal vesting schedule.	5/2021
6	AIG	New York, New York	I will receive a prorated bonus for calendar year 2021 before I assume the duties of the position.	5/2021
7	AIG	New York, New York	AIG leadership continuity award. I am eligible for one payment on 5/1/2021. AIG will accelerate the payment of a second award for which I am eligible on 5/1/22 and I will receive it before I assume the duties of the position.	5/2021

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	American International Group, Inc. See Endnote	New York, New York	As AIG Deputy General Counsel & General Counsel, General Insurance, I supervise and lead the legal team for AIG's principal business unit.

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity IRA	No			
1.1	Fidelity Four-in-One Index Fund (FFNOX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2	Insperity 401K	No			
2.1	State Street S&P 500 Index	Yes	Over \$1,000,000		None (or less than \$201)
3	McKinsey & Co. Profit Sharing Retirement Plan	No			
3.1	State Street Target Retirement 2035 Fund	Yes	Over \$1,000,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	Redbrick LMD LLC		N/A		Salary and business income	
5	Redbrick LMD LLC (small business, real estate)	See Endnote	No	None (or less than \$1,001)	LLC Income	
5.1	Carried Interest from 1100 Alabama Ave SE LLC (value not readily ascertainable): 30% to 1100 Alabama Holdings LLC after 8% preferred return and catchup		N/A			None (or less than \$201)
5.2	Capital gains earned from asset on line 5		N/A		Capital Gains	\$100,001 - \$1,000,000
6	RMC Manager LLC (small business, real estate)	See Endnote	No	\$1,001 - \$15,000	LLC Income	
6.1	Capital gains earned from asset on line 6		N/A		Capital Gains	\$201 - \$1,000
7	Redbrick Management Holdings LLC (small business, real estate)	See Endnote	No	Over \$1,000,000	LLC Income	
7.1	Capital gains earned from asset on line 7		N/A		Capital Gains	\$100,001 - \$1,000,000
8	RB CQ Metro QOF LLC (Commercial real estate at Anacostia metro station SE Washington DC)		N/A	\$15,001 - \$50,000		None (or less than \$201)
9	Redbrick Opportunity Fund II LLC (commercial real estate St Elizabeths East Campus and Howard Road SE Washington DC)		N/A	\$1,001 - \$15,000		None (or less than \$201)
10	RB Management QOF LLC (value represents real estate at lines 10.3 and 10.4.1)		No	\$1,001 - \$15,000		None (or less than \$201)
10.1	Carried Interest from RB OZ Manager LLC (value not readily ascertainable): 20% to RB Management QOF LLC after 7% preferred return and catchup		N/A			

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.2	Carried Interest from RB OZ Manager II LLC (value not readily ascertainable): 20% to RB Management QOF LLC after 6% preferred return and catchup		N/A			
10.3	Redbrick Oz Manager LLC (holds commercial real estate at St. Elizabeths East Campus, Washington DC)		N/A			
10.4	Redbrick Oz Manager II LLC		No			
10.4.1	Redbrick Opportunity Fund II LLC (holds commercial real estate at St. Elizabeths East Campus and Howard Road SE, Washington, DC)		N/A			
11	1100 Alabama Holdings LLC (real estate)		No	\$500,001 - \$1,000,000		None (or less than \$201)
11.1	1100 Alabama Ave. SE LLC (Commercial Real Estate joint venture investment at St Elizabeths East Campus, Washington, DC.)		N/A			
12	1000 Sycamore Street SE LLC (real estate)	See Endnote	No	\$100,001 - \$250,000		None (or less than \$201)
13	RB NOVA MF LLC (real estate) (value represents real estate on line 13.2)		No	\$15,001 - \$50,000		None (or less than \$201)
13.1	Carried Interest in RB Nova MF Management LLC (value not readily ascertainable): 50% allocation to promote member after 16% preferred return		N/A			
13.2	RB Nova MF Management LLC (Commercial Real Estate joint venture investment in Annandale and Merrifield, VA.)		N/A			
14	RB Poplar Point LLC (real estate)	See Endnote	No	\$500,001 - \$1,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15	Poplar Point GP LLC (real estate) (value represents real estate on lines 15.2; 15.3.1; 15.4.1)	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1	Carried Interest in RB Poplar Point LLC, (value not readily ascertainable): 25% to Poplar Point GP LLC after 10% preferred return and catchup	N/A			
15.2	RB Poplar Point LLC (Commercial real estate joint venture investment at Howard Road SE, Washington, DC.)	N/A			
15.3	Poplar Point Investors LLC	No			
15.3.1	RB Poplar Point LLC (commercial real estate Howard Road, Washington, DC)	N/A			
15.4	Popular Point Investors III LLC	No			
15.4.1	RB Poplar Point LLC (commercial real estate at Howard Road, Washington, DC)	N/A			
15.5	Carried interest in Poplar Point Investors LLC (value not readily ascertainable) 25% to Poplar Point GP LLC after 10% preferred return and catchup	N/A			
15.6	Carried interest in Poplar Point Investors III LLC (value not readily ascertainable) 25% to Poplar Point GP LLC after 10% preferred return and catchup	N/A			
16	Poplar Point Investor LLC (real estate)	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
16.1	RB Poplar Point LLC (Commercial real estate joint venture investment at Howard Road SE, Washington, DC.)	N/A			
17	Poplar Point Investor III LLC (real estate)	No	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
17.1	RB Poplar Point LLC (Commercial real estate joint venture investment at Howard Road SE, Washington, DC.)	N/A			
18	Redbrick CG Manager LLC	See Endnote	No	\$1,001 - \$15,000	None (or less than \$201)
19	RDGH Member LLC	See Endnote	No	\$500,001 - \$1,000,000	None (or less than \$201)
20	Redbrick Partners LLC	See Endnote	N/A	\$50,001 - \$100,000	None (or less than \$201)
21	Standard Life Aberdeen Pension plan	No			
21.1	Heritage With-Profits Fund	Yes		\$15,001 - \$50,000	None (or less than \$201)
21.2	Standard Life Aberdeen	N/A		\$1,001 - \$15,000	None (or less than \$201)
22	Insperity 401K Plan	No			
22.1	State Street S&P 500 Index Fund Class N Shares (SVSPX)	Yes		Over \$1,000,000	None (or less than \$201)
23	RB Nova MF Management LLC	See Endnote	No	\$50,001 - \$100,000	LLC Income

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	DC College Savings Plan	No		cash payments	\$36,427
1.1	DC College Savings 2022 Portfolio	Yes		\$100,001 - \$250,000	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.2	DC College Savings in College Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
2	American Express National Bank, Savings Account	N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
3	U.S. bank #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	Fidelity	No			
4.1	Fidelity Government Money Market Fund (SPAXX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.2	Apple, Inc. (AAPL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4.3	SPDR S&P 500 ETF Trust (SPY)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5	Vanguard 529 Plan Nevada	No			
5.1	Vanguard Inflation-Protected Securities Fund Investor Shares (VIPSX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	Iowa College Savings Plan	No			
6.1	Aggressive Growth Age-Based Track: Income Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
7	Vanguard	No			
7.1	Vanguard Growth & Income Fund (VGIAX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
7.2	Vanguard Federal Money Market Fund Investor Shares (VMFXX)	Yes	\$500,001 - \$1,000,000		\$201 - \$1,000
7.3	Vanguard Municipal Money Market Fund VMSXX	Yes	\$250,001 - \$500,000		\$201 - \$1,000
8	U.S. bank #2 (cash)	N/A	\$500,001 - \$1,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9	U.S. bank #3 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	The Walt Disney Co. (DIS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
11	General Motors Co. (GM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
12	Bitcoin (BTC)	See Endnote	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

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

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Chase Bank	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2012	3.25%	30 years

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	1	All the other positions shown in this section are at 100% owned domestic subsidiaries of American International Group, Inc.
2.	2.3	Comprises 8,049 restricted stock units vesting 1/1/22, 16,302 units vesting 1/1/23, and 11,524 units vesting 1/1/24.
2.	2.4	Comprises 3,763 performance stock units that will deliver in March 2022. The actual amount of stock units delivered can vary from zero to 7,526 based on a formula based on company performance leading up to March 2022.
2.	2.5	19,963 options with a strike price of \$44.28 that vest on 1/1/22 and expire on 3/18/29, 19,005 options with a strike price of \$32.43 that vest on 1/1/23 and expire on 3/11/30, and 13,888 options with a strike price of \$44.10 that vest on 1/1/24 and expire on 2/22/31.
2.	3	Comprises two payments of \$250,000 payable conditioned on continued employment on 5/1/2021 and 5/1/2022 respectively
4.	1	Paid by AIG for duties with Global Loss Prevention, Inc.; American Home Assurance Company; AIG Claims, Inc.; AIU Insurance Company; AIG Specialty Insurance Company; AIG Property Casualty Company; Commerce and Industry Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; Illinois National Insurance Co.; Granite State Insurance Company; AIG Assurance Company; AIG Property Casualty U.S., Inc.; Eaglestone Reinsurance Company; Health Direct, Inc.; AIG Property Casualty International, LLC; AIG PC Global Services, Inc.; AIG Property Casualty Inc.; DSA P&C Solutions, Inc.; AIG Property Casualty Inc.
5.	5	Commercial real estate at St Elizabeths Campus, Merrifield and Annandale, VA, and Howard Road SE, Washington, DC. Passthrough entity. The value of Redbrick LMD LLC's underlying investments as of 4/2021 are already shown in the RMC Manager LLC (line 6) and Redbrick Management Holdings LLC (line7).
5.	6	Commercial real estate at St Elizabeths Campus, Merrifield and Annandale, VA, and Howard Road SE, Washington, DC.
5.	7	Commercial real estate at St Elizabeths Campus, Merrifield and Annandale, VA, and Howard Road SE, Washington, DC.
5.	12	Commercial real estate joint venture investment at St. Elizabeth's East Campus, Washington, DC.
5.	14	Commercial real estate joint venture investment at Howard Road SE, Washington, DC.



PART	#	ENDNOTE
5.	18	Commercial real estate investment at Buzzard Point, Washington, DC.
5.	19	Commercial Real Estate Investment at Richmond Highway, Alexandria, VA.
5.	20	Commercial Real Estate Back-office Services
5.	23	Commercial Real Estate joint venture investment in Annandale and Merrifield, VA.
6.	12	Held by Robinhood.

# 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).

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