

# Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

## Filer's Information

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Sullivan, Jacob

Assistant to the President and National Security Advisor, White House - Biden-Harris Administration

Date of Appointment: 01/20/2021

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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/ Sullivan, Jacob [electronically signed on 02/18/2021 by Sullivan, Jacob 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/ Olorunnipa, Funmi, Certifying Official [electronically signed on 03/19/2021 by Olorunnipa, Funmi in Integrity.gov]

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Other review conducted by

/s/ Olorunnipa, Funmi, Ethics Official [electronically signed on 03/18/2021 by Olorunnipa, Funmi in Integrity.gov]

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U.S. Office of Government Ethics Certification

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Data Revised 03/18/2021

Data Revised - Workflow re-designation - 03/18/2021

Data Revised 03/17/2021

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO	
1	Biden for President	Philadelphia, Pennsylvania	Political Campaign	Senior Policy Advisor	6/2020	11/2020	
2	Yale University	New Haven, Connecticut	University/College	Lecturer in Law / Distinguished Practitioner	1/2017	Present	
3	Carnegie Endowment for International Peace	Washington, District of Columbia	Think Tank	Senior Fellow	3/2017	Present	
4	Dartmouth College	Hanover, New Hampshire	University/College	Fellow	1/2019	6/2020	
5	University System of New Hampshire	Durham, New Hampshire	University/College	Member of Carsey School of Public Policy faculty	1/2018	5/2020	
6	Macro Advisory Partners	London, Outside U.S.	Corporation	Senior Adviser and Partner	3/2017	6/2020	
7	Microsoft Corporation	Washington, District of Columbia	Corporation	Member, Microsoft Advisory Council	5/2017	5/2020	
8	International Crisis Group	Washington, District of Columbia	Non-Profit	Member, Board of Trustees	7/2018	6/2020	
9	National Security Action	Washington, District of Columbia	Non-Profit	Co-Chair, Advisory Board; Member, Governing Board	2/2017	5/2020	
10	Truman National Security Project	See Endnote	Washington, District of Columbia	Non-Profit	Member, Board of Directors	5/2018	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
11	Belfer Center for Science and International Affairs	Cambridge, Massachusetts	University/College	Senior Fellow, Future of Diplomacy Project	3/2017	Present
12	Yale Paul Tsai China Center	New Haven, Connecticut	University/College	Senior Fellow	1/2018	12/2019
13	PT Fund, Inc.	Wilmington, Delaware	Non-Profit	Advisor	11/2020	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Biden for President	N/A		Salary	\$72,412
2	Yale University	N/A		Salary	\$80,000
3	Dartmouth College	N/A		Salary	\$80,000
4	Macro Advisory Partners	N/A		Advisory Fees	\$138,000
5	University System of New Hampshire	N/A		Salary	\$12,000
6	Microsoft Corporation	N/A		Advisory Council Fees	\$45,000
7	Center for US Global Leadership	N/A		Consulting Fee	\$10,000
8	The New York Times - 9/2020	N/A		Article Fee	\$250
9	J Street Education Fund - 12/14/19	See Endnote		Speaking Fee	\$5,000
10	Faegre Baker Daniels Retirement Plan (401k)	No			
10.1	Vanguard Total Stock Market Index Fund Investor Class Shares (VTSMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.2	Baron Small Cap Fund Retail Shares (BSCFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
11	Fidelity IRA	No			
11.1	Fidelity Core	Yes	\$1,001 - \$15,000		None (or less than \$201)
11.2	iShares Silver Trust (SLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12	Yale University Retirement Savings Account	No			
12.1	TIAA Traditional	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.2	Vanguard Total Stock Market Index Fund Investor Class Shares (VTSMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
12.3	Vanguard Developed Markets Index Fund Institutional Shares (VTMNX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
12.4	Vanguard Real Estate Index Fund Institutional Class Shares (VGSNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.5	Vanguard Emerging Markets Stock Index Fund Instl Class Shares (VEMIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12.6	Fixed Income Index		\$15,001 - \$50,000		None (or less than \$201)
13	PT Fund, Inc.	N/A		Salary	\$24,432
14	Carnegie Endowment for International Peace	N/A		Stipend	\$16,664

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Yale University	New Haven, Connecticut	I will continue to participate in the voluntary retirement savings plan. Neither the sponsor nor I will make further contributions following my separation.	9/2017
2	Faegre Baker Daniels	Minneapolis, Minnesota	I will continue to participate in the defined contribution retirement plan. Neither the sponsor nor I make further contributions to this plan.	9/2013

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Biden for President	Philadelphia, Pennsylvania	Senior policy advisor for campaign
2	Yale University	New Haven, Connecticut	Academic Position
3	Dartmouth College	Hanover, New Hampshire	Academic position
4	University System of New Hampshire	Durham, New Hampshire	Academic position
5	Carnegie Endowment of International Peace	Washington, District of Columbia	Senior fellow at foreign policy think tank
6	Microsoft Corporation	Washington, District of Columbia	Serve on a policy advisory council advising the president of Microsoft on key policy developments
7	Center for US Global Leadership	Washington, District of Columbia	Consulting Fee
8	National Association of Life and Health Guaranty Associations	Herndon, Virginia	Speaking fee for speech at annual conference
9	Geneva Group International	Zurich, Outside U.S.	Speaking fee for speech at US-based client conference

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
10	Atlantic Monthly	Washington, District of Columbia	Fee for article published in Atlantic print edition
11	Yale Paul Tsai China Center	New Haven, Connecticut	Honorarium for fellowship
12	Macro Advisory Partners (MAP)	London, UK, Outside U.S.	Strategic advisory services on major global trends and policy developments
13	Uber	San Francisco, California	Advisory services for MAP
14	LEGO	Billund, Denmark, Outside U.S.	Advisory services for MAP
15	Mastercard	Purchase, New York	Advisory services for MAP
16	Standard Chartered Bank	London, UK, Outside U.S.	Advisory services for MAP
17	Aviva PLC	London, UK, Outside U.S.	Advisory services for MAP
18	Standard Life Aberdeen PLC	Edinburgh, UK, Outside U.S.	Advisory services for MAP
19	BofA Securities, Inc.	New York, New York	Advisory services for MAP
20	PT Fund, Inc.	Wilmington, Delaware	Advisor

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	University of New Hampshire Law School	N/A		Salary	

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Skadden Arps Slate Meagher and Flom	N/A		Salary	
3	Co-Equal	N/A		Consulting Fees	
4	Open Democracy	N/A		Consulting fees	
5	Ford Foundation	N/A		Consulting fees	
6	US Credit Union Account #1 (cash)	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Trust #1	See Endnote	\$1,000,001 - \$5,000,000		\$50,001 - \$100,000
1.1	United State bank (cash account)	N/A			
1.2	Residential real estate in Londonberry, NH	N/A			
1.3	Residential property in Amherst, NH	N/A			
1.4	4 Townsend West LLC	No			
1.4.1	United States bank (cash account)	N/A	None (or less than \$1,001)		
1.4.2	Residential real estate in Nashua, NH	N/A	\$1,000,001 - \$5,000,000		
1.5	Hampton Hills LP (real estate in Citrus Hills, FL)	No	\$250,001 - \$500,000		
1.5.1	United States bank (cash account)	N/A			
1.5.2	Citrus Hills Holdings LLC	See Endnote			



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.5.2.1	Chip Realty LLC (real estate sales in Citrus Hills, FL)	No			
1.5.2.1.1	United States bank (cash account)	N/A			
1.5.2.2	Citrus Hills Internet & Cable LLC	N/A			
1.5.2.2.1	United States bank (cash account)	N/A			
1.5.2.3	Citrus Hills Golf & Country Club LLC (golf course and country club in Citrus Hills, FL)	No			
1.5.2.3.1	United States bank (cash account)	N/A			
1.5.2.4	Canterbury Lakes LLC (real estate in Citrus Hills, FL)	No			
1.5.2.4.1	United States bank (cash account)	N/A			
1.5.2.4.2	Land held for development as commercial real estate in FL	N/A			
1.5.2.4.3	Land held for development as commercial real estate in FL	N/A			
1.5.2.5	Citrus Hills Investment Properties LLC (real estate in Citrus Hills, FL)	No			
1.5.2.5.1	United States bank (cash account)	N/A			
1.5.2.5.2	Land held for development as residential real estate in FL	N/A			
1.5.2.5.3	Land held for development as residential real estate in FL	N/A			
1.5.2.5.4	Undeveloped land designated as commercial real estate in FL	N/A			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.5.2.6	Hampton Hills LLC (real estate in Citrus Hills, FL)	No			
1.5.2.6.1	United States bank (cash account)	N/A			
1.5.2.6.2	Land under development as commercial real estate in FL	N/A			
1.5.2.6.3	Land held for development as commercial real estate in FL	N/A			
1.5.2.6.4	Residential real estate for sale in FL	N/A			
1.5.2.6.5	Ownership interest in a commercial building leased to retail tenant in FL				
1.5.2.6.6	Golf course and country club in FL	N/A			
1.5.2.7	Brentwood Farms Limited Partnership LLC	N/A			
1.5.2.7.1	United States bank (cash account)	N/A			
1.5.2.7.2	Land held for development as residential real estate in FL	N/A			
1.5.2.7.3	Land held for sale as residential real estate in FL	N/A			
1.5.2.7.4	Undeveloped land designated as commercial real estate in FL	N/A			
1.5.2.7.5	Undeveloped land designated for use as school or church real estate in FL	N/A			
1.5.2.7.6	Strip mall in Citrus Hills, FL	N/A			
1.5.2.8	486 Properties LLC (real estate in Hernando, FL)	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.5.2.8.1	United States bank (cash account)	N/A			
1.5.2.8.2	Developed residential real estate for sale in FL	N/A			
1.5.2.8.3	Undeveloped land designated as commercial real estate in FL	N/A			
1.5.2.8.4	Brentwood Farms Limited Partnership LLC	See Endnote		No	
1.5.2.9	Manatee Title Company (real estate services in Hernando, FL)	No			
1.5.2.9.1	United States bank (cash account)	N/A			
1.5.2.10	Terra Vista Realty Group LLC (real estate company in FL)	No			
1.5.2.10.1	United States bank (cash account)	N/A			
1.5.2.11	Florida Showcase Properties LLC (real estate services in FL)	N/A			
1.5.2.11.1	United States bank (cash account)	N/A			
1.5.2.12	Citrus Hills Construction LLC (residential construction in Hernando, FL)	No			
1.5.2.12.1	United States bank (cash account)	N/A			
1.5.2.12.2	Land under development as residential real estate for sale in FL	N/A			
1.5.2.12.3	Developed commercial real estate for sale in FL	N/A			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.6	SAT SR. Limited Partnership	No	\$100,001 - \$250,000		
1.6.1	United States bank (cash account)				
1.6.2	CSNH Development LLC (post-disaster reconstruction services in NH, MA, and ME))	N/A			
1.6.3	Betz Farm Water/Sewer Impact Fee (developer fee)	N/A			
1.6.4	North Bridge Business Center (commercial real estate in North Bridge NH)	N/A			
1.6.5	Office Building in Nashua NH	N/A			
1.6.6	Bow Industrial Park	No			
1.6.6.1	United States bank (cash account)	N/A			
1.6.6.2	Land and office building in Bow, NH	N/A			
1.6.7	Tamposi-Watson	No			
1.6.7.1	United States bank (cash account)	N/A			
1.6.7.2	Land and office building in Milford NH	N/A			
1.6.8	Ten Columbia Drive Associates	No			
1.6.8.1	United States bank (cash account)				
1.6.8.2	Land and office building in Amherst, NH	N/A			
1.6.9	Watson-Tamposi-Nash	No			
1.6.9.1	United States bank (cash account)	N/A			
1.6.9.2	Commercial real estate in Merrimack NH	N/A			
2	BT Realty LP	See Endnote	No	\$50,001 - \$100,000	Rent or Royalties \$1,001 - \$2,500

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Second Generation Properties LP	See Endnote	N/A	\$50,001 - \$100,000	Rent or Royalties	\$5,001 - \$15,000
4	Trust #2	See Endnote	No	\$50,001 - \$100,000		None (or less than \$201)
5	Tamposi Company Inc. (real estate management company)	See Endnote	N/A	\$1,000,001 - \$5,000,000		
6	Trust #3		No			
6.1	Abbott Laboratories (ABT)		N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
6.2	AptarGroup, Inc. (ATR)		N/A	\$15,001 - \$50,000		None (or less than \$201)
6.3	American Express Co. (AXP)		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.4	Donaldson Co., Inc. (DCI)		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.5	Danaher Corp. (DHR)		N/A	\$15,001 - \$50,000		None (or less than \$201)
6.6	Emerson Electric Co. (EMR)		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.7	Facebook, Inc. (FB)		N/A	\$15,001 - \$50,000		None (or less than \$201)
6.8	FedEx Corp. (FDX)		N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
6.9	Fiserv, Inc. (FISV)		N/A	\$100,001 - \$250,000		None (or less than \$201)
6.10	Fortive Corp. (FTV)		N/A	\$15,001 - \$50,000		None (or less than \$201)
6.11	Alphabet, Inc. (GOOGL)		N/A	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.12	Intel Corp. (INTC)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.13	Merck & Co., Inc. (MRK)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.14	Microsoft Corp. (MSFT)	N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
6.15	Procter & Gamble Co. (PG)	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
6.16	Visa, Inc. (V)	N/A	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
6.17	Vontier Corp. Ordinary Shares (VNT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.18	Verizon Communications, Inc. (VZ)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6.19	Zoetis, Inc. (ZTS)	N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
6.20	SPDR S&P Dividend ETF (SDY)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
6.21	SPDR S&P 500 ETF Trust (SPY)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
6.22	SPDR Portfolio S&P 500 Growth ETF (SPYG)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
6.23	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
6.24	Federated Government Obligation Fund #636	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
6.25	Cash Account	N/A	None (or less than \$1,001)		None (or less than \$201)
7	Checking Account, US bank (cash)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	Savings Account, US bank (cash)		N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
9	Checking Account #2, US bank (cash)		N/A	\$50,001 - \$100,000	Interest	\$201 - \$1,000
10	Brentwood Farms Limited Partnership LLC	See Endnote	No			
11	Trust # 4	See Endnote	No	\$1,000,001 - \$5,000,000		\$100,001 - \$1,000,000
11.1	Amherst Street/11 Delta Drive		No			
11.1.1	United States bank (cash account)		N/A			
11.1.2	Office building in Nashua NH		N/A			
11.1.3	Office building in Londonberry NH		N/A			
11.2	Two Executive Drive		No			
11.2.1	United States bank (cash account)		N/A			
11.2.2	Undeveloped land in Hudson NH		N/A			
11.2.3	Land leased to Irving Oil in Hudson NH		N/A			
11.3	Hampton Falls		No			
11.3.1	United States bank (cash account)		N/A			
11.3.2	Land leased for cell phone tower easement in NH		N/A			
11.4	1987 Tamposi LP		No			
11.4.1	United States bank (cash account)		N/A			
11.4.2	United States bank (cash account)		N/A			
11.4.3	Boston Billiards (HVAC company in NH)		N/A			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
11.4.4	Martin Garabadian Jr. (personal loan for roof replacement)	N/A			
11.4.5	Co-owner of parking lot w Penske Truck Rentals in NH	N/A			
11.4.6	Cash bonds for 57 Northeastern Boulevard	N/A			
11.4.7	Land and commercial buildings in Nashua and Hudson NH and Citrus Hills, FL	N/A			
11.4.8	Undeveloped land in Nashua, Hudson, and Londonberry NH NH	N/A			
11.5	TNK Associates LLC	No			
11.5.1	United States bank (cash account)	N/A			
11.5.2	Land and office building in NH	N/A			
11.6	TANA Properties LP	No			
11.6.1	United States bank (cash account)	N/A			
11.6.2	Commercial real estate in Manchester NH	N/A			
11.6.3	Residential real estate in Amherst NH	N/A			
11.6.4	Industrial real estate in Amherst NH	N/A			
11.6.5	Undeveloped land in Manchester, Rochester, and Londonberry NH	N/A			
11.7	SAT SR. LP	See Endnote			
12	Citrus Hills Holdings, LLC	See Endnote			
13	BT Realty Limited Partnership (real estate in NH)	No	\$250,001 - \$500,000		None (or less than \$201)
13.1	United States bank (cash account)	No			



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
13.2	Land and office buildings in Nashua and Manchester NH	N/A			
14	Second Generation Properties	No	\$250,001 - \$500,000		None (or less than \$201)
14.1	United States bank (cash account)	N/A			
14.2	Jeffrey Enterprises (film production company in FL)	N/A			
14.3	Lexington Greens of Citrus Hills	No			
14.3.1	Undeveloped commercial real estate in NH	N/A			
14.3.2	Cell tower on commercial lot in NH	N/A			
14.4	BT Realty Limited Partnership	See Endnote	No		
14.5	Undeveloped land in Nashua NH	N/A			
14.6	Residential real estate in Nashua NH	N/A			
14.7	Land and office buildings in Nashua and Manchester NH	N/A			
15	18 Celina Avenue Associates	No	\$250,001 - \$500,000		None (or less than \$201)
15.1	United States bank (cash account)	N/A			
15.2	Land and office building in Nashua NH	N/A			

## 7. Transactions

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

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Nelnet	Student Loan	\$15,001 - \$50,000	2003	1.75	20 years
2	First Republic Bank	1/3 of mortgage on family member's home	\$500,001 - \$1,000,000	2017	3.2	30 years

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	10	On leave
2.	9	Compensation received in April 2020.
6.	1	The value listed represents only my spouse's share of the trust assets. The value is based on current value for all assets, except for the SAT SR. Limited Partnership, which was most recently valued as of 6/30/2020. The income range listed is distribution received for 2020.
6.	1.5.2	The value of my spouse's interest in Citrus Hill Holdings, LLC is reflected in Hampton Hills, LP at entry 1.5.
6.	1.5.2.8.4	For the underlying holdings of Brentwood Farms, LLC, see Part 6, Line 1.5.2.7.
6.	2	Interest in realty limited partnership with real estate in Nashua and Manchester, NH.
6.	3	Interest in realty limited partnership with real estate in Nashua, NH.
6.	4	Holds reimbursement value of spouse's interest in residential property in NH.

PART	#	ENDNOTE
6.	5	Interest on a liquidation basis.
6.	10	For the underlying holdings of Brentwood Farms, LLC, see Part 6, Line 1.5.2.7.
6.	11	The value listed represents only my spouse's share of the trust assets. The value is based on current value for all assets, except for the SAT SR. Limited Partnership, which was most recently valued as of 6/30/2020. The income range listed is distribution received for 2020.
6.	11.7	See Part 6, Line 1.6 for underlying holdings of this asset.
6.	12	See Part 6, Line 1.5.2 for holdings of this asset.
6.	14.4	See Part 6, Line 13 for underlying holdings of this asset.

# 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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