

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

Filer's Information

Kessler, Jeffrey Ian

Assistant Secretary for Enforcement & Compliance, Department of Commerce

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- **Committee on Finance**
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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/ Kessler, Jeffrey Ian [electronically signed on 07/25/2017 by Kessler, Jeffrey Ian 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/ Maggi, David, Certifying Official [electronically signed on 11/03/2017 by Maggi, David in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 11/08/2017 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	WilmerHale	Washington, District of Columbia	Law Firm	Attorney	1/2011	Present
2	Yale College Class of 2005	New Haven, Connecticut	Non-Profit	Treasurer	7/2010	6/2015

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	WilmerHale (law firm)	N/A		Salary/Bonus	\$681,519
2	BlackRock Equity Index Non-Lendable Fund (INDXMNL)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3	Oppenheimer Global Fund (OGLYX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	Roth IRA	No			
4.1	American Funds Fundamental Investors (ANCFX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4.2	American Funds New Perspective Fund (ANWPX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	WilmerHale	Washington, District of Columbia	I will continue to participate in the defined contribution plan. The plan sponsor will not make contributions after my separation	3/2011

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	WilmerHale LLP	Washington, District of Columbia	Attorney
2	Abbott Laboratories	Lake Bluff, Illinois	Legal services as a WilmerHale attorney
3	AlMansoori Specialized Engineering	Abu Dhabi, Outside U.S.	Legal services as a WilmerHale attorney
4	Business Roundtable	Washington, District of Columbia	Legal services as a WilmerHale attorney
5	The Boeing Company	Chicago, Illinois	Legal services as a WilmerHale attorney
6	Concert Pharmaceuticals	Lexington, Massachusetts	Legal services as a WilmerHale attorney
7	Cisco Systems, Inc.	San Jose, California	Legal services as a WilmerHale attorney
8	DuPont Teijin Films	Hopewell, Virginia	Legal services as a WilmerHale attorney
9	Facebook, Inc.	Menlo Park, California	Legal services as a WilmerHale attorney
10	GlaxoSmithKline plc	Brentford, Middlesex, UK, Outside U.S.	Legal services as a WilmerHale attorney
11	Google Inc.	Mountain View, California	Legal services as a WilmerHale attorney
12	Intel Corporation	Santa Clara, California	Legal services as a WilmerHale attorney
13	Economics Ministry of Japan	Tokyo, Japan, Outside U.S.	Legal services as a WilmerHale attorney
14	Mitsubishi Polyester Film, Inc.	Greer, South Carolina	Legal services as a WilmerHale attorney

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
15	Monsanto Company	Saint Louis, Missouri	Legal services as a WilmerHale attorney
16	Oracle Corporation	Redwood Shores, California	Legal services as a WilmerHale attorney
17	Panasonic Corporation of North America	Newark, New Jersey	Legal services as a WilmerHale attorney
18	PepsiCo, Inc.	Purchase, New York	Legal services as a WilmerHale attorney
19	PhRMA	Washington, District of Columbia	Legal services as a WilmerHale attorney
20	Semiconductor Industry Association	Washington, District of Columbia	Legal services as a WilmerHale attorney
21	SKC, Inc.	Covington, Georgia	Legal services as a WilmerHale attorney
22	ValueAct Capital Management, L.P.	San Francisco, California	Legal services as a WilmerHale attorney
23	Visa Inc.	San Francisco, California	Legal services as a WilmerHale attorney
24	Western Union Company	Englewood, Colorado	Legal services as a WilmerHale attorney
25	Europeans for Fair Competition	Washington, District of Columbia	Legal services as a WilmerHale attorney
26	MoneyGram International, Inc.	Dallas, Texas	Legal services as a WilmerHale attorney
27	Alliance for Clean Technology Innovation	Fairfield, Connecticut	Legal services as a WilmerHale attorney
28	Apple Inc.	Cupertino, California	Legal services as a WilmerHale attorney
29	Kuraray America, Inc.	Houston, Texas	Legal services as a WilmerHale attorney
30	Sekisui Specialty Chemicals America, LLC	Dallas, Texas	Legal services as a WilmerHale attorney

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Contrafund Fund (FCNKX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
2	Fidelity International Discovery Fund (FIDKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Roth IRA	No	\$15,001 - \$50,000		\$201 - \$1,000
3.1	Vanguard Total World Stock (VT)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Total Market Index Fund (FSTVX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2	Bristol-Myers Squibb Co (BMY)	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
3	Columbia Seligman Communications and Information Fund (SLMCX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
4	Ford Motor Company (F)	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
5	American Funds Growth Fund of America (AGTHX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
6	JPMorgan Chase & Co. (JPM)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
7	Microsoft Corporation (MSFT)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	Walt Disney Co (DIS)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
9	American Funds Washington Mutual Investors Fund (AWSHX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
10	Zimmer Biomet (ZBH)	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
11	American Funds Capital World Growth and Income Fund (CWGIX)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
12	American Funds EuroPacific Growth Fund (AEPGX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
13	American Funds SMALLCAP World Fund (SMCWX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
14	Dodge & Cox Stock Fund (DODGX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
15	Dodge & Cox International Stock Fund (DODFX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
16	U.S. Bank Account #2 (cash)	N/A	\$250,001 - \$500,000	Interest	\$1,001 - \$2,500
17	U.S. Bank Account #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
18	Vanguard Federal Money Market Fund (cash)	Yes	\$15,001 - \$50,000		None (or less than \$201)
19	Vanguard Total International Stock Index Fund (VGT SX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
20	U.S. Bank Account #3 (cash)	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)
21	Loudoun County VA Bonds	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
22	Virginia College Building Authority Bonds	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
23	Pyramid Company L.L.P. (Richmond, Virginia) (residential real estate rentals)	No	\$100,001 - \$250,000	Interest Rent or Royalties	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
23.1	Williamsburg Park Apartments (Henrico, Virginia)	N/A			
23.2	U.S. bank account #4 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
24	American Funds New Perspective Fund (ANWPX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
25	American Funds Fundamental Investors (ANCFX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
26	Virginia 529 College Savings Plan (VCSP)	No			
26.1	American Funds EuroPacific Growth Fund (AEPGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
26.2	American Funds Growth Fund of America (AGTHX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
27	U.S. savings bond	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000

7. Transactions

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

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	U.S. Bank	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2011	4.50%	30 years
2	PNC Bank	Home equity loan	\$100,001 - \$250,000	2017	4.34%	15 years

9. Gifts and Travel Reimbursements

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

Endnotes

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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