

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

Filer's Information

DONNELLY, SALLY

Senior Advisor to Secretary of Defense, OSD, Office of the Secretary of Defense

Date of Appointment: 01/21/2017

Other Federal Government Positions Held During the Preceding 12 Months:

Advisor, Defense Business Board, 1/2015 - 1/2016

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

eSigned in FDM by:

SALLY DONNELLY

User ID: 760E3EC284BE6251

05/17/2017

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).

eSigned in FDM by:

KURT T. GERLACH

User ID: A362E5D13AC976AA

08/30/2017

Other review conducted by

Supervisor:

eSigned in FDM by:

KEVIN M. SWEENEY

User ID: 4C72DC3B5E257D4D

07/27/2017

U.S. Office of Government Ethics Certification

Comments of Reviewing Officials (public annotations):

PART #	REFERENCE	COMMENT
2.	2	SBD Advisors LLC
		(08/30/17, GERLACH, KURT T.): Confirmed that this asset actually has \$ 0 value to filer as she no longer has any stake in the company. ADAEO Clarification: Filer confirmed this was total sale of filer's partial interest.

2. 13 Personal Salary / Distributions (SBD Advisors)

(08/30/17, GERLACH, KURT T.): Filer earned an additional \$20,833 for work in CY 2017.

ADAE0 Clarification: Filer confirmed that income received in 2017 was for work performed in 2016.

1. Filer's Positions Held Outside United States Government

#	NAME	CITY, STATE	OG E TYPE	POSITION	FROM	TO
1	American Friends of the Black Stork	New York, NY, USA	Non-Profit Organiza tion	Director	01/2013	06/2015
2	Donnelly Seaview LLC	Columbia, SC, USA	Business Enterprise	co-owner	11/2012	Present
3	Imperatis	Arlington , VA, USA	Business Enterprise	Director	06/2014	12/2016
4	SBD Advisors	Washington, DC, USA	Business Enterprise	Officer	02/2012	01/2017

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Time Warner Employee Savings Plan(401K)	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.1	Time Warner Inc. Common Stock	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
1.2	Time Warner Large Cap Value Fund	No	\$1,001 - \$15,000		None (or less than \$201)
1.3	Time Warner Growth Fund	No	\$15,001 - \$50,000		None (or less than \$201)
1.4	Capital Preservation Fund	No	\$1,001 - \$15,000		None (or less than \$201)
2	SBD Advisors LLC	N/A	\$1,000,001 - \$5,000,000	Partial sale/SBD	\$390,000
3	Donnelly Seaview LLC - Columbia, SC (Residential Real Estate)	N/A	\$500,001 - \$1,000,000	Rent and Royalties	\$5,001 - \$15,000
4	Calvert Balanced Portfolio Fund - A	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$201 - \$1,000
5	"TEGNA Common Stock (Sole Ownership)"	Yes	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
6	TEGNA Common Stock (Joint Ownership)	Yes	\$100,001 - \$250,000	Dividends	\$201 - \$1,000
7	T. Rowe Price Diversified Mutual Funds (Joint Account with Spouse)	N/A	\$250,001 - \$500,000	Dividends, Capital Gains	\$1,001 - \$2,500
7.1	T. Rowe Price Capital Opportunity (PRCOX) (Joint Account with Spouse)	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$201 - \$1,000
7.2	T. Rowe Price New Era Fund (PRNEX) (Joint Account with Spouse)	Yes	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
7.3	T. Rowe Price Science & Technology Fund (PRSCX) (Joint Account with Spouse)	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$201 - \$1,000
7.4	T. Rowe Price TRP Capital Appreciation (Joint Account with Anna Rumer)	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$201 - \$1,000
7.5	T. Rowe Price TRP New Era (Joint Account with Anna Rumer)	Yes	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
8	Gannett Investments Common Stock (Joint Account with DC)	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
9	Gannett Investments Common Stock (Individual Account)	No	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
10	Gannett Investments Common Stock (Joint Account with Spouse)	No	\$15,001 - \$50,000	Dividends, Capital Gains	\$201 - \$1,000
11	Wells Fargo Checking Account (Joint with Spouse)	N/A	\$250,001 - \$500,000	Interest	\$1,001 - \$2,500
12	Wells Fargo Savings Account (Joint with Spouse)	N/A	\$500,001 - \$1,000,000	Interest	\$1,001 - \$2,500
13	Personal Salary / Distributions (SBD Advisors)	N/A		Salary	\$250000

14	SBD Advisors	N/A	Bonus Income	\$25000
15	Time Warner Pension	N/A	Retirement Plan or Account	\$9745

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR OTHER PARTY TO AGREEMENT/ARRANGEMENT	CITY/STATE	STATUS AND TERMS	DATE
1	Time Warner Defined Benefit Pension	New York, NY, USA	Continuing participation in Employee Benefit Plan: receive pension payments from my former employer. This information is also included under income.	I 04/2007
2	Time Warner Savings Plan (401K)	New York, NY, USA	Continuing participation in Employee Benefit Plan: either I nor my former employer continue to make contributions to this plan.	N 10/1985

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Amazon Web Services	Seattle, WA	Consulting
2	Association of the US Army	Arlington, VA	Consulting
3	Bloomberg, LP	New York, NY	Consulting
4	C. Ham	Washington, DC	Consulting
5	C5	New York, NY	Consulting
6	ETO Group, LLC	Tampa, FL	Consulting
7	Foreign Policy	Washington, DC	Consulting
8	General Motors LLC	Detroit, MI	Consulting
9	GeoPoll	Washington, DC	Consulting
10	Human Rights First	Washington, DC	Consulting
11	KnuEdge, Inc.	San Diego, CA	Consulting
12	M. Flynn	Washington, DC	Consulting
13	Medecins Sans Frontiers USA, Inc	New York, NY	Consulting
14	MGM Consulting	Annapolis, MD	Consulting
15	Palantir Technologies	Palo Alto, CA	Consulting
16	RCF Management LLC	Escondido, CA	Consulting
17	Sasakawa Peace Foundation USA	Washington, DC	Consulting
18	SBD Advisors	Washington, DC	Officer
19	Skadden, Arps, Slate, Meagher & Flom LLP	Washington, DC	Consulting
20	The Palm Center	San Francisco, CA	Consulting
21	Uber	San Francisco, CA	Consulting
22	World Wildlife Fund	Washington, DC	Consulting

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Spouse Individual Retirement Account (IRA)	N/A	\$250,001 - \$500,000	Dividends, Capital Gains	\$1,001 - \$2,500
1.1	Avenue Credit Strategies Investor	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	Baron Emerging Markets Fund Retail	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.3	Columbia Dividend Opportunity Class A	Yes	\$1,001 - \$15,000		None (or less than \$201)

1.4	Columbia Select LRG Cap Growth Class A	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	Delaware Value FD CL A	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.6	Doubleline Low DURTN EMERG MKTS FX INC	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.7	Dreyfus Bond Market Index INVS	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.8	Driehaus Micro CAP Growth Fund	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.9	Driehaus Event Driven Fund	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$1,001 - \$2,500
1.10	Driehaus Active Income Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.11	Fidelity 500 Index Premium Class	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.12	Fidelity Government Cash Reserves	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$1,001 - \$2,500
1.13	JP Morgan Strategic Income Opportunity A	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.14	LM BW Absolute RTRN Opportunities CL A	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.15	MFS International Value Fund CL A	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.16	T Rowe Price Growth Stock Advisor CL	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$2,501 - \$5,000
1.17	Ridgeworth Ceredex Mid-Cap VAL EQ I	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$5,001 - \$15,000
1.18	Rivernorth Core Opportunities FD CL R	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.19	Riverpark Short Term Hi Yield	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.20	Riverpark Strategic Income	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.21	Double Line Total Return Bond Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.22	Victory Global Natural Resources Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.23	Touchstone Small Cap Value Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.24	Touchstone Focused Fund	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$1,001 - \$2,500
1.25	Wasatch Frontier Emerging Small Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.26	Wasatch International Opportunities Fund	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$1,001 - \$2,500
1.27	T Rowe Price International Stock	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$1,001 - \$2,500
1.28	TCW Relative Value Dividend Fund	Yes	\$15,001 - \$50,000	Dividends, Capital Gains	\$5,001 - \$15,000
2	Carnegie Endowment for International Peace	N/A		Salary	
3	College of Charleston	N/A		Income from personal services	

4	Cowen Services Company LLC	N/A	Income from personal services
5	Dartmouth College	N/A	Income from personal services
6	Gerson Lehrman Group, 60 East 42d Street, NY	N/A	Income from personal services
7	Massachusetts Institute of Technology	N/A	Royalties
8	SAIC, 151 Lafayette Dr., Oak Ridge, TN	N/A	Income from personal services

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Time Warner Cable stock (IRA)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2	AOL stock (IRA)	N/A	\$50,001 - \$100,000		None (or less than \$201)

7. Transactions

This report has no reported Transactions

8. Liabilities

#	CREDITOR NAME	TYPE OF LIABILITY	AMOUNT	YEAR INCURRED	INTEREST RATE	TERM
1	Wells Fargo Bank	Mortgage, Washington, DC, USA	\$250,001 - \$500,000	2016	3.0%	15 years

9. Gifts and Travel Reimbursements

This report has no reported Gifts and Reimbursements

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.

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).