

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

### Filer's Information

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Campbell, Kurt

Senior Coordinator for Indo Pacific Affairs, Deputy Asst. to the President, National Security Council - 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/ Campbell, Kurt [electronically signed on 01/22/2021 by Campbell, Kurt 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 08/09/2021 by Olorunnipa, Funmi in Integrity.gov]

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Other review conducted by

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

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U.S. Office of Government Ethics Certification

Data Revised - Workflow re-designation - 12/21/2021

Data Revised 12/17/2021

Data Revised 12/15/2021

Data Revised 11/20/2021

Data Revised 11/18/2021

Data Revised 11/14/2021

Data Revised 11/10/2021

Data Revised 10/28/2021

Data Revised 10/24/2021

Data Revised 08/18/2021

Data Revised 08/10/2021

Data Revised - Workflow re-designation - 08/06/2021

Data Revised 03/16/2021

Data Revised 03/05/2021

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	The Asia Group LLC	Washington, District of Columbia	LLC	Partner	1/2013	1/2021
2	The Asia Group Capital Advisory Partners LLC	Washington, District of Columbia	LLC	Partner	7/2014	1/2021
3	Lixil Corporation	Tokyo, Outside U.S.	Corporation	Board of Director	7/2019	6/2020
4	Center for New American Security	Washington, District of Columbia	Non-Profit	Consultant	1/2013	1/2021
5	Intelligence Square U.S. Foundation	New York, New York	Non-Profit	Consultant	1/2020	12/2020
6	The Aspen Institute	Washington, District of Columbia	Non-Profit	Consultant	1/2019	12/2020

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA #1	No			
1.1	iShares US Preferred Income Securities ETF (PFF)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	Vanguard Intermediate-Term Corporate Bond Index Fund ETF Shares (VCIT)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.3	Lord Abbett Short Duration Income Fund Class I (LLDYX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.4	Vanguard Short-Term Bond Index Fund ETF Shares (BSV)	Yes	\$250,001 - \$500,000		None (or less than \$201)
1.5	Vanguard Real Estate Index Fund ETF Shares (VNQ)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.6	JPMorgan Ultra-Short Income ETF (JPST)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.7	Vanguard Intermediate-Term Bond Index Fund ETF Shares (BIV)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.8	U.S. Brokerage #1 Bank Deposit Account	N/A	\$100,001 - \$250,000		None (or less than \$201)
1.9	Vanguard Short-Term Bond Index Fund ETF Class Shares (VCSH)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.10	iShares iBonds Dec 2021 Term Corporate ETF (IBDM)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.11	iShares iBonds Dec 2022 Term Corporate ETF (IBDN)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.12	Lord Abbett Ultra Short Bond Class I (LUBYX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.13	Akre Focus Fund Institutional Class Shares (AKRIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.14	First Eagle Overseas Fund Class I (SGOIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.15	AMG Yacktman Fund Class I (YACKX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.16	Goldman Sachs International Small Cap Insights Fund Institutional Class (GICIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.17	JOHCM International Select Fund Institutional Shares (JOHIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.18	JPMorgan Mid Cap Value Fund Class L (FLMVX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.19	Invesco Developing Markets Fund Class Y (ODVYX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.20	Tweedy, Brown International Value Fund (TBGVX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.21	Undiscovered Managers Behavioral Value Fund Class L (UBVLX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.22	T. Rowe Price International Discovery Fund I Class (TIDDX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.23	iShares iBonds Dec 2023 Term Corporate ETF (IBDO)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.24	iShares iBonds Dec 2024 Term Corporate ETF (IBDP)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2	Center for a New American Security 403(b)	No			
2.1	Large Cap U.S. Stock - American Funds Washington Mutual R6 (30)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.2	Mid Cap U.S. Stock - Wells Fargo Special Mid Cap Value R6 (30)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.3	International Stock - MFS International Diversification R6 (40)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	Center for Strategic International Studies and Harvard University, 403(b) Plan	No			
3.1	TIAA Traditional Annuity	N/A	\$100,001 - \$250,000		None (or less than \$201)
3.2	CREF Stock	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	TIAA Real Estate	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.4	CREF Bond Market	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.5	CREF Money Market Account	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	The Asia Group LLC, outstanding distribution of membership interest	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
5	The Asia Group LLC (advisory services)	N/A		Earned Income	\$1,619,707
6	The Asia Group LLC, 401(k) Plan	No			
6.1	T. Rowe Price Retirement 2020 Fund Class R	Yes	\$250,001 - \$500,000		None (or less than \$201)
7	Blackstone Group - 9/24/2020	N/A		Honorarium	\$25,000
8	Blackstone Group - 10/04/2020	N/A		Honorarium	\$25,000
9	CSIS Nikkei Symposium - 10/29/2020	N/A		Honorarium	\$2,000
10	The Prospect Foundation - 12/03/2020	N/A		Honorarium	\$25,000
11	Lixil Corporation	N/A		Director Fees	\$74,600
12	Center for New American Security	N/A		Consulting Fees	\$8,500
13	Intelligence Squared U.S. Foundation	N/A		Consulting Fees	\$1,000
14	The Aspen Institute	N/A		Consulting Fees	\$1,000
15	The Asia Group Capital Advisory Partners LLC, capital account	N/A	\$15,001 - \$50,000		None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	The Asia Group LLC	Washington, District of Columbia	I will continue to participate in The Asia Group's defined contributions plan. The plan sponsor will not make further contributions after my separation.	3/2013
2	The Asia Group LLC	Washington, District of Columbia	I withdrew from this company prior to the start of my federal service, and I will receive a lump-sum payment for the redemption of my membership interest. The lump sum payment is \$506,250.00 which represents 9 months of my gross monthly pay as stipulated in The Asia Group LLC's operating agreement for the full return of my ownership equity in the company. It will be paid out in equal installments over 6 months on the 24th of each month, beginning in Jan 2021.	11/2017
3	Harvard University	Cambridge, Massachusetts	I continue to participate in this defined contribution plan. The plan sponsor ceased making contributions on my separation.	8/1989
4	Center for a New American Security	Washington, District of Columbia	I continue to participate in this defined contribution plan. The plan sponsor ceased making contributions on my separation.	1/2007

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	The Asia Group LLC	Washington, District of Columbia	LLC Member
2	Aflac	Columbus, Georgia	Consulting services (client of The Asia Group, LLC)
3	Lockheed Martin	Bethesda, Maryland	Consulting services (client of The Asia Group, LLC)
4	McKinsey & Company Singapore Pte. Ltd	New York, New York	Consulting services (client of The Asia Group, LLC)
5	Northrop Grumman	Falls Church, Virginia	Consulting services (client of The Asia Group, LLC)

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	Omnispace, LLC	Washington, District of Columbia	Consulting services (client of The Asia Group, LLC)
7	Paul, Weiss	New York, New York	Consulting services (client of The Asia Group, LLC)
8	Raytheon Company	Waltham, Massachusetts	Consulting services (client of The Asia Group, LLC)
9	Warner Bros. Entertainment Inc.	Washington, District of Columbia	Consulting services (client of The Asia Group, LLC)
10	Wynn Resorts, Limited	Las Vegas, Nevada	Consulting services (client of The Asia Group, LLC)
11	General Electric Company	Boston, Massachusetts	Consulting services (client of The Asia Group, LLC)
12	Itochu Aviation Inc.	El Segundo, California	Consulting services (client of The Asia Group, LLC)
13	L3 Technologies	New York, New York	Consulting services (client of The Asia Group, LLC)
14	Levi Strauss & Co.	San Francisco, California	Consulting services (client of The Asia Group, LLC)
15	Blackstone Group	New York, New York	Honorarium
16	CSIS Nikkei Symposium	Nikkei, Outside U.S.	Honorarium
17	The Prospect Foundation	Taiwan, Outside U.S.	Honorarium
18	Lixil Corporation	Tokyo, Outside U.S.	Director Fees
19	Center for New American Security	Washington, District of Columbia	Consulting Services



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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Massachusetts Institute of Technology, 401(k) P	No			
1.1	Vanguard Russell 3000 Index Fund Institutional Shares (VRTTX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2	IRA #1	No			
2.1	Fidelity Capital & Income Fund (FAGIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	Fidelity Asset Manager 50% (FASMX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	Fidelity Puritan Fund (FPURX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	National Bureau of Economic Research, 401(a)	No			
3.1	Vanguard 500 Index Fund Investor Shares (VFINX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.2	Vanguard International Value Fund Investor Shares (VTRIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	The Brookings Institution TIAA	No			
4.1	TIAA Traditional	N/A	\$15,001 - \$50,000		None (or less than \$201)
4.2	CREF Stock	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.3	CREF Bond Market	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.4	TIAA Real Estate	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.5	CREF Growth	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.6	CREF Equity Index	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.7	CREF Global Equities	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.8	CREF Money Market Account	N/A	\$100,001 - \$250,000		None (or less than \$201)
5	IRA #2	No			
5.1	Franklin Templeton Mutual Beacon Fund - Class Z	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	IRA #3	No			
6.1	Vanguard Dividend Growth Investor Shares (VDIGX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.2	Akre Focus Fund Institutional Class (AKRIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.3	First Eagle Overseas Fund Class I (SGOIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.4	Goldman Sachs U.S. Equity Dividend & Premium Fund Institutional Class (GSPKX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.5	iShares Core S&P Small-Cap ETF (IJR)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.6	iShares iBonds Dec 2021 Term Corporate ETF (IBDM)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.7	iShares Preferred and Income Securities (PFF)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.8	JPMorgan Ultra-Short Income ETF (JPST)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.9	JOHCM International Select Fund Institutional Shares (JOHIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.10	JPMorgan Mid Cap Value Fund Class L (FLMVX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.11	Lord Abbett Ultrashort Duration Income Fund Class I (LLDYX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.12	Lord Abbett Ultra Short Bond Fund Class I (LUBYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.13	Invesco Developing Markets Fund Class Y (ODVYX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.14	Tweedy, Browne International Value Fund (TBGVX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.15	Undiscoverable Managers Behavioral Value Fund Class L (UBVLX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.16	Vanguard Short-Term Bond Index Fund ETF Shares (BSV)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.17	Vanguard Short-Term Corporate Bond Index Fund ETF Shares (VCSH)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.18	Vanguard Intermediate-Term Corporate Bond Index Fund ETF Shares (VCIT)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.19	Vanguard Real Estate Index Fund ETF Shares (VNQ)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.20	Vanguard Intermediate-Term Bond Index Fund ETF Shares (BIV)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.21	AMG Yacktman Fund Class I (YACKX)	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.22	U.S. Brokerage #1 Cash Deposit Accounts	N/A	\$15,001 - \$50,000		None (or less than \$201)
7	Massachusetts Institute of Technology, defined benefit plan (value not readily ascertainable)	N/A			None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank #1 Cash account	N/A	\$100,001 - \$250,000	Interest	None (or less than \$201)
2	U.S. bank #2 Cash account	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
3	DC College Savings Plan - In-College Portfolio	N/A	\$50,001 - \$100,000	Cash Payments	\$108,884
4	DC College Savings Plan - In-college Portfolio	N/A	\$250,001 - \$500,000		None (or less than \$201)
5	DC College Savings Plan - 2025 Portfolio	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	Vanguard Short-Term Tax-Exempt Fund Class Admiral (VWSUX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
7	Fidelity Intermediate Municipal Income Fund (FLTMX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
8	iShares Core High Dividend ETF (HDV)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
9	iShares Core S&P Small Cap ETF (IJR)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10	iShares Core Dividend Growth ETF (DGRO)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
11	iShares MSCI USA Min Vol Factor ETF (USMV)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
12	Vanguard Mid-Cap Index Fund ETF Shares (VO)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
13	Thornburg Limited Term Municipal Fund Class I (LTMIX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
14	SPDR S&P 500 ETF Trust (SPY)	Yes	Over \$1,000,000		\$15,001 - \$50,000
15	SPDR S&P Dividend ETF (SDY)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
16	Goldman Sachs International Small Cap Insights Fund Institutional Class (GICIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
17	Vanguard Consumer Staples Index ETF Shares (VDC)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
18	Vanguard Real Estate Index Fund ETF Shares (VNQ)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
19	Goldman Sachs Emerging Markets Equity Fund Institutional Class (GEMIX)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
20	Vanguard Consumer Discretionary Index Fund ETF Shares (VCR)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
21	Vanguard Mid-Cap Value Index Fund ETF Shares (VOE)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
22	Akre Focus Fund Institutional Class (AKRIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
23	First Eagle Overseas Fund Class I (SGOIX)	Yes	\$100,001 - \$250,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
24	Goldman Sachs U.S. Equity Dividend and Premium Fund Institutional Class (GSPKX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
25	iShares Preferred and Income Securities ETF (PFF)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
26	JPMorgan Ultra-Short Income ETF (JPST)	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
27	JOHCM International Select Fund Institutional Shares (JOHIX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
28	Lord Abbett Ultrashort Fund Class I (LUBYX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
29	Tweedy Brown Global Value Fund (TBGVX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
30	Vanguard Short-Term Bond Index Fund ETF Shares (BSV)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
31	Vanguard Short-Term Corporate Bond Index Fund ETF Shares (VCSH)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
32	Vanguard Intermediate-Term Corporate Bond Index Fund ETF Shares (VCIT)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
33	AMG Yacktman Fund Class I (YACKX)	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
34	U.S. Brokerage #1 cash deposit accounts	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
35	U.S. bank Certificate of Deposit #1	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
36	U.S. bank Certificate of Deposit #2	N/A	None (or less than \$1,001)	Interest	\$2,501 - \$5,000

**7. Transactions**

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

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**8. Liabilities**

None

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**9. Gifts and Travel Reimbursements**

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

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**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 (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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