

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

Filer's Information

Dickson, Stephen

Administrator, Federal Aviation Administration, Department of Transportation

Report Year: 2020

Other Federal Government Positions Held During the Preceding 12 Months:

None

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/ Dickson, Stephen [electronically signed on 05/06/2020 by Dickson, Stephen 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/ Kaleta, Judith, Certifying Official [electronically signed on 06/02/2020 by Kaleta, Judith in Integrity.gov]

Other review conducted by

/s/ Carlson, Terence W, Ethics Official [electronically signed on 06/02/2020 by Carlson, Terence W in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 06/05/2020 by Granahan, Megan in Integrity.gov]

Data Revised 06/05/2020

Data Revised 05/30/2020

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	USAFA Endowment, Inc.	Colorado Springs, Colorado	Non-Profit	Director	12/2016	7/2019

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Delta Air Lines, stock options (long-term incentive program award) accelerated payout of 2018 nonqualified stock option awards	See Endnote	N/A		\$15,001 - \$50,000
2	Delta Air Lines, deferred compensation (2018 management incentive plan award): variable cash award based on corporate performance	See Endnote	N/A		\$297,087
3	Delta Air Lines stock	See Endnote	N/A	Dividends Capital Gains Interest	\$100,001 - \$1,000,000
4	Fidelity IRA	No			
4.1	BlackRock Strategic Income Instl (BSIIX)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.2	Evermore Global Value Fund (EVGIX)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
4.3	Blackstone Alternative Multi Strategy Fund (BXMIX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
5	Schwab IRA				

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.1	DFA US Large Cap Value (DFLVX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
5.2	BlackRock Strategic Income Instl (BSIIX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
5.3	Schwab Money Market (SchwabCash)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.4	Vanguard Equity International (VTRIX)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
5.5	PIONEER ILS INTERVAL FD INST (XILSX)	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
5.6	iShares MSCI MinValue USA ETF (USMV)	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
5.7	iShare MSCI USA Value Factor (VLUE)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.8	iShares Russell 1000 Growth Index (IWF)	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
5.9	UBS ETRACS Alerian MLP Infrastructure Index (MLPI)	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
5.10	Vanguard Dividend Appreciation ETF (VIG)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
5.11	Vanguard Total International Stock ETF (VXUS)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
6	Schwab Roth IRA	No			
6.1	Schwab Money Market (SchwabCash)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.2	EVERMORE GLOBAL VALUE INST CLASS (EVGIX)	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000
6.3	FEG DIRECTIONAL ACCS TEILIMITED LIABILITY CO DELAWARE	No		Capital Gains	\$15,001 - \$50,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.3.1	Darsana Fund LP (underlying holdings and income are not readily ascertainable)		No	\$50,001 - \$100,000		
6.3.2	Pennant Windward Fund, L.P. (underlying holdings and income are not readily ascertainable)		No	\$1,001 - \$15,000		
6.4	JP Morgan Ultra-Short Income ETF (JPST)		Yes	None (or less than \$1,001)		\$5,001 - \$15,000
6.5	Vanguard Dividend Appreciation ETF (VIG)		Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
6.6	Vanguard Total Bond Market Index Admiral Shares (VBTLX)		Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
7	Pension Benefit Guaranty Corporation, Delta Pilots Retirement Plan, Defined Benefit Plan (value not readily ascertainable) \$4,020.92 / month payable 10/1/2022		N/A			None (or less than \$201)
8	Delta Air Lines, deferred compensation (2016 long-term incentive program award): variable cash award based on corporate performance	See Endnote	N/A	None (or less than \$1,001)		\$681,524
9	Delta Air Lines, deferred compensation (2017 long-term incentive program award): variable cash award based on corporate performance	See Endnote	No	None (or less than \$1,001)		\$471,638
10	Delta Air Lines, deferred compensation (2018 long-term incentive program award): variable cash award based on corporate performance	See Endnote	N/A	None (or less than \$1,001)		\$230,420
11	Delta Air Lines, stock options (long-term incentive program award) accelerated payout of 2017 nonqualified stock option awards	See Endnote	N/A	None (or less than \$1,001)		\$15,001 - \$50,000
12	Delta 401(k)		No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12.1	BlackRock Strategic Income Instl (BSIIX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
12.2	DFA US Large Cap Value (DFLVX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
12.3	JP Morgan Ultra Short Income (JPST)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
12.4	UBS ETRACS Alerian MLP Infrastructure Index ETN (MLPI)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
12.5	iShares MSCI Min Vol USA ETF (USMV)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Delta Air Lines	Atlanta, Georgia	Pursuant to the company's 2018 management incentive plan, I received a cash bonus based on corporate performance in 2/2019. My bonus was pro rated based on my separation date."	2/2018
2	Delta Air Lines	Atlanta, Georgia	I will not participate in this defined contribution plan after my separation.	2/1991
3	Delta Air Lines	Atlanta, Georgia	Pursuant to my employment contract with Delta Air Lines, I am entitled to receive pension payments under the Delta Pilots Retirement Plan . The Plan is held in trust by the Pension Benefit Guarantee Corporation and PBGC will issue monthly pension payments on behalf of the Plan beginning on 10/1/2022.	2/1991

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
4	Delta Air Lines	Atlanta, Georgia	Pursuant to the company's 2016, 2017, and 2018 long-term incentive programs, I received a cash award and stock options based on corporate performance in 2/2019 , and I would have received a cash award and stock options based on corporate performance in 2/2020 and 2/2021. These awards were pro rated based on my separation date. Pursuant to an agreement with Delta Air Lines, in lieu of the cash awards and stock options that I would have received in 2020 and 2021, I received a lump sum cash payment before I entered government service.	2/2016
5	Delta Air Lines	Atlanta, Georgia	Pursuant to company policy, upon separation I am entitled to receive retired officer travel benefits, including a capped annual tax gross up	10/2018
6	Delta Air Lines	Atlanta, Georgia	Pursuant to company policy, upon separation the company will continue paying premiums for a term life insurance policy	10/2018

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Schwab IRA	No			
1.1	Vanguard Dividend Appreciation (VIG)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
1.2	BlackRock Strategic Income Instl (BSIIX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.3	Schwab Money Market (SchwabCash)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	Vanguard Dividend Growth (VDIGX)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
1.5	Vanguard Total World (VT)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
2	Schwab Roth IRA	No			
2.1	DELTA AIR LINES INC	N/A	None (or less than \$1,001)		\$201 - \$1,000
2.2	BlackRock Strategic Income Opportunities Inv A (BASIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.3	DFA US Large Cap Value (DFLVX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
2.4	Schwab Money Market (SchwabCash)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	iShares MSCI USA Value (VLUE)	Yes	\$15,001 - \$50,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US Bank account (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
2	US Bank Money Market Account (cash)	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
3	Schwab Brokerage	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1	BlackRock Strategic Income Instl (BSIIX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
3.2	iShares MSCI Min Vol USA ETF (USMV)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
3.3	JP Morgan Ultra Short income ETF (JPST)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
3.4	Schwab Money Market (SchwabCash)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.5	Semper MBS Total Return Instl (SEMMX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
3.6	Vanguard Dividend Appreciation (VIG)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
3.7	Vanguard Total International Stock Index (VXUS)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
4	Schwab Brokerage	No			
4.1	BlackRock Strategic Income Instl (BSIIX)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
4.2	JP Morgan Ultra Short Income (JPST)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
4.3	iShares MSCI Min Vole USA ETF (USMV)	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
4.4	iShares Russell 1000 Growth (IWF)	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
4.5	Schwab Money Market (SchwabCash)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
4.6	Vanguard Interm-Term Tax-Exempt Admiral (VWIUX)	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
4.7	VANGUARD DIV GROWTH FD INVESTOR SHRS (VDIGX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.8	PRIMECAP ODYSSEY GROWTH (POGRX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
4.9	REMS INTL REAL ESTATE VALUE OPPTY FOUNDERS (REIFX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
4.10	UBS ETRACS Alerian MLP Infrastructure Index (MLPI)	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
4.11	Vanguard FTSE Emerging Markets (VWO)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
4.12	Vanguard Total International Stock ETF (VXUS)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
4.13	Vanguard Total World ETF (VT)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
5	Schwab Brokerage	No			
5.1	Accenture Ltd Cl A (ACN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.2	Ageas Spons ADR (AGESY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.3	AIA Group Ltd (AAGIY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.4	Air Liquide ADR (AIQUY) (Basic Materials)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.5	Alexandria Real Estate Equities Inc (ARE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.6	Allianz AG (AZSEY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.7	American Express Co (AXP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.8	Ameriprise Financial Inc (AMP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.9	Amgen Inc (AMGN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.10	Amphenol Corp (APH)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.11	Apple Inc (AAPL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
5.12	Applied Materials Inc (AMAT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.13	Astrazeneca PLC ADR F (AZN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.14	AT&T Inc (T)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.15	Atos Origin SA (AEXAY) (Technology)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.16	AXA SA (AXAHY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.17	Banco Do Brasil SA Sponsored ADR (BDORY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.18	Bank of America Corp (BAC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.19	Bank of New York Mellon Corp (BK)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.20	BHP Billiton Ltd (BHP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.21	Boeing Co (BA)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
5.22	BP PLC (BP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.23	Broadcom Inc (AVGO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.24	Canadian National Railway Co (CNI)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.25	Capital One Financial Corp (COF)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.26	Carlsburg As Sponsored ADR (CABGY) (Consumer Defensive: Beverages - Brewers)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.27	Caterpillar Inc (CAT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.28	Chevron Corp (CVX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.29	Chunghwa Telecom Co Ltd (CHT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.30	Cisco Systems Inc (CSCO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.31	Citigroup Inc (C)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.32	Clorox Co (CLX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.33	Coca Cola Company (KO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.34	Comcast Corp A (CMCSA)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.35	Compania Cervecerias Unidas SA Spon ADR (CCU)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.36	ConocoPhillips (COP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.37	Constellation Brands Inc (STZ)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.38	Costco Wholesale Corp (COST)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.39	Danaher Corp (DHR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.40	Diageo PLC ADR F (DEO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.41	DR Reddys Labs Ltd (RDY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.42	Eaton Corp PLC (ETN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.43	Emerson Electric Co (EMR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.44	Enbridge Inc (ENB)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.45	Equinix Inc (EQIX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.46	Essex Property Trust Inc (ESS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.47	Essilor Intl ADR (ESLOY) (Healthcare)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.48	Essity AKT (ESSYY) (Consumer Defensive: Household & Personal Products)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.49	Experian Group Ltd (EXPGY) (Industrials: Business Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.50	Genpact Ltd (G)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.51	GlaxoSmith Kline Sponsored ADR (GSK)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.52	Goldman Sachs Group Inc (GS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.53	Heineken NV Spons Ads (HEINY) (Consumer Defensive: Beverages - Brewers)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.54	Hitachi Ltd (HTHIY) (Technology)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.55	Home Depot Inc (HD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.56	Honeywell International (HON)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.57	Iberdrola SA Spons ADR (IBDRY) (Utilities)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.58	Illinois Tool Works Inc (ITW)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.59	Infosys Technologies Ltd (INFY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.60	Intel Corp (INTC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.61	Intercontinental Hotels Group PLC (IHG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.62	Itau Unibanco Banco Multiplo SA (ITUB)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.63	Johnson & Johnson (JNJ)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.64	JP Morgan Chase & Co (JPM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.65	Koninklijke Philips NV (PHG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.66	Kroger Company (KR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.67	Lilly Eli & Company (LLY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.68	L'Oreal Co ADR (LRLCY) (Consumer Defensive: Household & Personal Products)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.69	Lowe's Companies Inc (LOW)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.70	Manulife Financial Corp (MFC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.71	Marine Harvest ASA ADR (MHGVY) (Consumer Defensive: Farm Products)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.72	McDonalds Corp (MCD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.73	Medtronic PLC (MDT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.74	Merck & Co Inc (MRK)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.75	Morgan Stanley (MS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.76	Naspers Ltd (NPSNY) (Technology)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.77	Nestle SA Reg B ADR (NSRGY) (Consumer Defensive: Packaged Foods)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.78	Nike Inc Class B (NKE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.79	Nintendo Ltd Spons ADR (NTDOY) (Technology)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.80	Nippon Telegraph & Telephone Corp Spons ADR (NTTYY) (Communication Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.81	Northern Trust Corp (NTRS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.82	Novartis AG Spons ADR (NVS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.83	Novo Nordisk ADR (NVO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.84	Oneok Inc (OKE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.85	Open Text Corp (OTEX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.86	Oracle Corporation (ORCL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.87	Paccar Inc (PCAR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.88	Parker-Hannifin Corp (PH)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.89	Pepsico Incorporated (PEP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.90	Pernod-Ricard SA ADR (PDRDY) (Consumer Defensive: Beverages - Wineries & Distilleries)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.91	Pfizer Inc (PFE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.92	Phillips 66 (PSX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.93	Ping An Ins Co Of China (PNGAY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.94	PNC Financial Service Corp (PNC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.95	PPG Industries Inc (PPG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.96	Procter & Gamble Co (PG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.97	PT BK Mandiri PE ADR (PPERY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.98	Qualcomm Inc (QCOM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.99	Rio Tinto PLC Spons ADR (RIO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.100	Roche Hldgs Ltd Spons ADR (RHHBY) (Healthcare)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.101	Rockwell Automation Inc (ROK)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.102	Royal Bank of Canada Montreal Quebec (RY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.103	Royal Dutch Shell PLC A Spons ADR (RDSA) (Energy)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.104	Safran Sa Unspn/ ADR (SAFRY) (Industrials: Aerospace & Defense)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.105	Sanofi (SNY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.106	Schneider Electric SE (SBGSY) (Industrials: Diversified Industrials)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.107	Smith & Nephew PLC (SNN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.108	Softbank Group Corporation (SFTBY) (Communication Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.109	Sonic Healthcare Ltd Sponsored ADR (SKHHY) (Healthcare)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.110	Sony Corp (SNE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.111	Store Cap Corp Com (STOR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.112	Sun Life Financial Inc (SLF)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.113	T Rowe Price Group Inc (TROW)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.114	Taiwan Semiconductor ADRF (TSM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.115	TE Connectivity Ltd (TEL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.116	Tencent Hldgs ADR (TCEHY) (Technology)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.117	Texas Instruments Inc (TXN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.118	TFS Financial Corp (TFSL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.119	Tokio Marine Holdings Inc ADR (TKOMY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.120	Toronto-Dominion Bank (TD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.121	Total S A Sponsored ADR (TOT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.122	Toyota Motor ADR (TM)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.123	Unilever NV (UN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.124	Union Pacific Corp (UNP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.125	United Microelectronics Grp (UMC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.126	United Parcel Service Inc (UPS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.127	United Technologies Corp (UTX)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.128	UnitedHealth Group Inc (UNH)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.129	Vectren Corp (VVC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.130	Verizon Communications (VZ)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.131	Volkswagen AG (VLKAY) (Automobile)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.132	Wal-Mart Inc (WMT)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.133	Walt Disney Co (DIS)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.134	Yum China Holdings Inc (YUMC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.135	Zurich Insurance Group Ltd (ZURVY) (Financial Services)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.136	AIRBUS GROUP FSPONSORED ADR (EADSY) (Industrials: Aerospace & Defense)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.137	ALIBABA GROUP HOLDING FSPONSORED ADR (BABA)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.138	ALPHABET INC. CLASS A (GOOGL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
5.139	AMAZON.COM INC (AMZN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
5.140	BERKSHIRE HATHAWAY CLASS B (BRKB)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.141	BOOKING HOLDINGS INC (BKNG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.142	CELGENE CORP (CELG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.143	CENTENE COPR (CNC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.144	CHARTER COMMUNICATN (CHTR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.145	COCA-COLA EURO PTNRS (CCEP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.146	FACEBOOK INC (FB)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
5.147	GIVAUDAN SA (GVDNY) (Basic Materials)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.148	IHS MARKIT LTD (INFO)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.149	JD COMMON INC (JD) FSPONSORED ADR	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.150	KAO CORP (KAOOY) (Consumer Defensive: Household & Personal Products) FUNSPONSORED ADR	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.151	KINROSS GOLD CORP (KGC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.152	LENOVO GROUP LIMITED (LNVGY) (Technology)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.153	METTLER TOLEDO INTL (MTD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.154	O REILLY AUTOMOTIVE (ORLY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.155	PAYPAL HOLDINGS (PYPL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.156	PPL CORP (PPL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.157	PREMIER INC (PINC)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.158	PUBLIC JOINT STOCK (LUKOY) (Energy)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.159	SAP SE (SAP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.160	VARIAN MEDICAL SYSTM (VAR)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.161	HUDSON PACIFIC (HPP)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.162	Linde PLC (LIN)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.163	COMPAGNIE FINANCIERE R FSPONSORED ADR (CFRUY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.164	NEW ORIENTAL EDUCATION FSPONSORED ADR (EDU)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.165	SHIRE PLC (SHPG)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
5.166	TERNA RETE ELETTRICA N FSPONSORED ADR (TEZNY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5.167	UTD OVERSEAS BK FSPONSORED ADR (UOVEY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
6	Ovation Alternative Income Fund, LP	Yes	\$500,001 - \$1,000,000		\$50,001 - \$100,000
7	Ardent Financial Fund II, LP	No	\$100,001 - \$250,000	Dividends Capital Gains Interest	\$15,001 - \$50,000
7.1	AFF II Wilmington, LLC (commercial real estate loans)	N/A			
7.2	AFF II Portland, LLC (commercial real estate loans)	N/A			
7.3	AFF II Knoxville, LLC (commercial real estate loans)	N/A			
7.4	AFF II Charity, LLC (commercial real estate loans)	N/A			
7.5	AFF II Downtown, LLC (commercial real estate loans)	N/A			
7.6	AFF II Wall Street, LLC (commercial real estate loans)	N/A			
7.7	AFF II Hank, LLC (commercial real estate loans)	N/A			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.8	AFF II Clemson House, LLC (commercial real estate loans)	N/A			
7.9	AFF II Port Royal, LLC (commercial real estate loans)	N/A			
7.10	AFF II Beaumont, LLC (commercial real estate loans)	N/A			
7.11	AFF II Lark, LLC (commercial real estate loans)	N/A			
7.12	AFF II South Village, LLC (commercial real estate loans)	N/A			
7.13	AFF II Cane Bay, LLC (commercial real estate loans)	N/A			
8	Flock Financial Fund, LLC Promissory Note 12%	No	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
9	Porter House Investors, LLC	No			
9.1	Commercial real estate, Jacksonville, FL	N/A	\$50,001 - \$100,000		None (or less than \$201)
10	Monteagle - East Fork Fund, LLC	No			
10.1	Undeveloped land, Dekalb County, AL	N/A	\$50,001 - \$100,000		None (or less than \$201)
11	Residential real estate, Key West, FL	N/A	\$500,001 - \$1,000,000	Rent or Royalties	None (or less than \$201)
12	Big Hill Partners LLC	No			
12.1	Undeveloped land, Chatham County, NC	N/A	\$50,001 - \$100,000		None (or less than \$201)
13	Tennessee Branch Partners LLC	No			
13.1	Undeveloped land, Liberty County, GA	N/A	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	Diversified HP 2016 Investors (QP) LLC	No	\$100,001 - \$250,000		None (or less than \$201)
14.1	1104 Prospect Redevelopment LLC	No			
14.1.1	Commercial real estate, Cleveland, OH	N/A			
14.2	West Duval Towers LLC	No			
14.2.1	Commercial real estate, Jacksonville, FL	N/A			
14.3	Financial Planning Center LP	No			
14.3.1	Commercial real estate, New Orleans, LA	N/A			
14.4	Olympia Newco LLC	No			
14.4.1	Commercial and residential real estate, New Haven, CT	N/A			
14.5	384 Peachtree LLC	No			
14.5.1	Commercial real estate, Atlanta, GA	N/A			
14.6	Midtown Associates LLC	No			
14.6.1	Commercial real estate, Asheville, NC	N/A			
15	HP15 Opportunity Fund LLC	No	\$100,001 - \$250,000	Rent or Royalties	\$1,001 - \$2,500
15.1	Downunder Columbia LLC	No			
15.1.1	Commercial real estate, Columbia, SC	N/A			
15.2	Municipal Light Plant LLC	No			
15.2.1	Commercial real estate, Columbus, OH	N/A			
15.3	Asheville Foundry Inn LLC	No			
15.3.1	Commercial real estate, Asheville, NC	N/A			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.4	Blue Venterra LP	No			
15.4.1	Commercial real estate, Louisville, KY	N/A			
15.5	Mast Asheville RE LLC	No			
15.5.1	Commercial real estate, Asheville, NC	N/A			
15.6	Sumter LLC	No			
15.6.1	Commercial real estate, Columbia, SC	N/A			
15.7	CLM Properties LLC	No			
15.7.1	Commercial real estate, Columbia, SC	N/A			
15.8	2101 Superior Avenue LLC	No			
15.8.1	Commercial real estate, Cleveland, OH	N/A			
15.9	2125 Superior Holding LLC	No			
15.9.1	Commercial real estate, Cleveland, OH	N/A			
15.10	2130 Superior Avenue LLC	No			
15.10.1	Commercial real estate, Cleveland, OH	N/A			
15.11	40 N French Broad LLC	No			
15.11.1	Commercial real estate, Asheville, NC	N/A			
16	15th Street Partners LLC	No			
16.1	Undeveloped land, Liberty County, GA	N/A	\$100,001 - \$250,000		None (or less than \$201)
17	Lookout Creek Mining Company LLC	No			
17.1	Undeveloped land, Dekalb County, AL	N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
18	Kissinger Acquisitions, LLC	No			
18.1	Undeveloped land, Pike County, Missouri	N/A	\$50,001 - \$100,000		None (or less than \$201)
19	Greer Building, LLC	No			
20	Commercial Real Estate, Buncombe County, NC		\$50,001 - \$100,000		None (or less than \$201)

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Vanguard Dividend Appreciation (VIG)	Purchase	08/28/2019	\$1,001 - \$15,000
2	iShares MSCI Min Vol USA (USMV)	Purchase	08/28/2019	\$1,001 - \$15,000
3	Vanguard Total International Stock (VXUS)	Purchase	09/19/2019	\$50,001 - \$100,000
4	Vanguard Dividend Appreciation (VIG)	Purchase	09/19/2019	\$100,001 - \$250,000
5	Blackrock Strategic Income (BSIIX)	Purchase	09/19/2019	\$100,001 - \$250,000
6	Pioneer ILS Interval Fund (XLSX)	Sale	08/26/2019	\$15,001 - \$50,000
7	Maingate MLP (IMLPX)	Purchase	10/22/2019	\$1,001 - \$15,000
8	Blackrock Strategic Income (BSIIX)	Purchase	11/15/2019	\$15,001 - \$50,000
9	UBS Alerian MLP (MLPI)	Sale	12/04/2019	\$15,001 - \$50,000
10	Ishares MSCI USA Value (VLUE)	Purchase	12/04/2019	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
11	Maingate MLP (IMLPX)	Sale	12/04/2019	\$100,001 - \$250,000
12	Vanguard Dividend Appreciation (VIG)	Purchase	12/04/2019	\$100,001 - \$250,000
13	UBS Alerian MLP (MLPI)	Sale	12/04/2019	\$100,001 - \$250,000
14	iShares MSCI USA Value (VLUE)	Purchase	12/04/2019	\$50,001 - \$100,000

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
2.	1	As described in my ethics agreement, after my confirmation, the performance awards and stock to be paid out under the Delta Long-Term Incentive Program between 2020 and 2021 were instead paid as a fixed amount before I entered government service
2.	2	I received this payment in 2/2019.
2.	3	Remaining Delta stock sold prior to my confirmation
2.	8	I received this payment in 2/2019.

PART	#	ENDNOTE
2.	9	As described in my ethics agreement, after my confirmation, the performance awards and stock to be paid out under the Delta Long-Term Incentive Program between 2020 and 2021 were instead paid as a fixed amount before I entered government service
2.	10	As described in my ethics agreement, after my confirmation, the performance awards and stock to be paid out under the Delta Long-Term Incentive Program between 2020 and 2021 were instead paid as a fixed amount before I entered government service
2.	11	As described in my ethics agreement, after my confirmation, the performance awards and stock to be paid out under the Delta Long-Term Incentive Program between 2020 and 2021 were instead paid as a fixed amount before I entered government service

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 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 \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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).
