

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

Filer's Information

Hadjiyane, Paul

General Counsel, Department of Defense Office of Inspector General

Report Year: 2020

Other Federal Government Positions Held During the Preceding 12 Months:

Acting General Counsel (5/2019 - 7/2019)

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/ Hadjiyane, Paul [electronically signed on 05/10/2020 by Hadjiyane, Paul 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/ Kraus, William, Certifying Official [electronically signed on 06/22/2020 by Kraus, William in Integrity.gov]

Other review conducted by

/s/ Williams, Keith, Ethics Official [electronically signed on 06/22/2020 by Williams, Keith in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 06/05/2020

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1. Filer's Positions Held Outside United States Government

None

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

None

3. Filer's Employment Agreements and Arrangements

None

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	Inova Health Systems	N/A		salary, bonus	
2	Private counseling services (self-employed)	N/A		Hourly fees for mental health counseling services	
3	Inova Health Systems 401(k) Plan	No			

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1	American Fund Washington Mutual Investors Fund Class R-6 (RWMGX)		Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.2	Fidelity International Index Fund (FSPSX)	See Endnote	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.3	Fidelity 500 Index Fund (FXAIX)		Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
3.4	Fiam Core Plus Commingled Pool Class K		Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
3.5	Janus Henderson Enterprise Fund Class I (JMGRX)		Yes	\$50,001 - \$100,000		\$201 - \$1,000
3.6	American Fund Europac Growth R6	See Endnote	Yes	\$50,001 - \$100,000		\$201 - \$1,000
3.7	American Century Mid Cap Value (ACMVX)	See Endnote	Yes	\$50,001 - \$100,000		\$201 - \$1,000
3.8	Fidelity Growth Commingled Pool	See Endnote	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.9	Fidelity US Bond Index (FBIDX)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.10	Fidelity Managed Income Portfolio II		Yes	\$15,001 - \$50,000		\$201 - \$1,000

6. Other Assets and Income

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Consumer Discretionary Select Sector SPDR Fund (XLY)		Yes	\$1,001 - \$15,000		None (or less than \$201)
2	Invesco QQQ Trust, Series 1 (QQQ)		Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
3	Ishares Core US Aggregate (AGG)	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
4	Ishares Edge MSCI US Momentum (MTUM)	Yes	\$1,001 - \$15,000		\$201 - \$1,000	
5	Ishares Dow US Aerospace & Defense ETF (ITA)	Yes	\$1,001 - \$15,000		None (or less than \$201)	
6	Vanguard Information Technology ETF (VGT)	Yes	\$1,001 - \$15,000		None (or less than \$201)	
7	Vanguard Mega Capital Index Fund (MGC)	Yes	\$1,001 - \$15,000		None (or less than \$201)	
8	Comm Serve Sector Select SPDR (XLC)	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
9	First Trust Cloud Computing (SKYY)	Yes	\$15,001 - \$50,000		None (or less than \$201)	
10	Invesco QQQ Trust, Series 1 (QQQ)	Yes	\$50,001 - \$100,000		\$201 - \$1,000	
11	Ishares Core U.S. Aggregate (AGG)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500	
12	IShares Edge MSCI US Momentum (MTUM)	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
13	Vanguard Consumer DSC EFT (VCR)	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
14	Vanguard Information Technology ETF (VGT)	Yes	\$15,001 - \$50,000		\$201 - \$1,000	
15	Vanguard TTL STK MKT ETF (VTI)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500	
16	ConocoPhillips (COP)	No	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)	
17	Exxon Mobil Corp (XOM)	See Endnote	No	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
18	Intel Corp (INTC)	See Endnote	No	\$15,001 - \$50,000	Dividends Capital Gains	\$1,001 - \$2,500
19	Johnson & Johnson (JNJ)	See Endnote	No	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
20	Phillips 66 (PSX)	See Endnote	No	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)
21	Rental Property, Richmond, VA		No	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000
22	JP Morgan Equity Income C (OINCX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
23	US Bank Account #5 (cash)		No	None (or less than \$1,001)	Interest	None (or less than \$201)
24	Vanguard TTL STK MKT EFT (VTI)		Yes	\$1,001 - \$15,000		\$201 - \$1,000
25	US Bank Account #4 (cash)		No	None (or less than \$1,001)	Interest	None (or less than \$201)
26	US Bank Account #6 (cash)		No	\$1,001 - \$15,000	Interest	None (or less than \$201)
27	American Investment Company of America F2 (ICAFX)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
28	US Bank Account #1 (cash)		No	\$1,001 - \$15,000	Interest	None (or less than \$201)
29	US Bank Account #2 (cash)		No	\$1,001 - \$15,000	Interest	None (or less than \$201)
30	US Bank Account #3 (cash)		No	\$1,001 - \$15,000	Interest	None (or less than \$201)
31	Cisco Systems, Inc. - Common Stock (CSCO)	See Endnote	No	\$1,001 - \$15,000	Dividends	None (or less than \$201)
32	Starbucks Corporation - Common Stock (SBUX)	See Endnote	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
33	Garmin Ltd. - Common Stock (GRMN) See Endnote	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
34	TD Ameritrade - Deposit Account		\$1,001 - \$15,000	Interest	None (or less than \$201)

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	JH Enterprise Fund Class I (JMGRX)	Sale	08/15/2019	\$1,001 - \$15,000
2	Fidelity US Bond Index (FBIDX)	Purchase	08/15/2019	\$1,001 - \$15,000
3	Fidelity International Index Fund (FSPSX)	Purchase	08/15/2019	\$15,001 - \$50,000
4	Fidelity Growth Commingled Pool	Sale	08/15/2019	\$1,001 - \$15,000
5	Fidelity Extended Market Index (FSMAX)	Purchase	08/15/2019	\$15,001 - \$50,000
6	Fidelity 500 Index (FXAIX)	Purchase	08/15/2019	\$15,001 - \$50,000
7	FIAM Core Plus Class K	Sale	08/15/2019	\$1,001 - \$15,000
8	American Century Mid Cap Value (ACMVX)	Sale	08/15/2019	\$15,001 - \$50,000
9	American Funds Europacific Growth R6 (RERGX)	Sale	08/15/2019	\$15,001 - \$50,000
10	American Funds Washington Mutual R6 (RWMGX)	Purchase	12/02/2019	\$50,001 - \$100,000
11	American Funds EuroPacific Gr R6 (RERGX)	Sale	12/02/2019	\$1,001 - \$15,000
12	JH Enterprise Fund Class I (JMGRX)	Sale	12/02/2019	\$1,001 - \$15,000
13	Fidelity US Bond Index (FBIDX)	Sale	12/02/2019	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
14	Fidelity International Index (FSPSX)	Purchase	12/02/2019	\$1,001 - \$15,000
15	Fidelity Growth Commingled Pool	Purchase	12/02/2019	\$1,001 - \$15,000
16	Fidelity 500 Index (FXAIX)	Sale	12/02/2019	\$15,001 - \$50,000
17	FIAM Core Plus Class K	Sale	12/02/2019	\$1,001 - \$15,000
18	American Century Mid Cap Value (ACMVX)	Sale	12/02/2019	\$15,001 - \$50,000
19	PIMCO Enhanced Short Maturity Active (MINT)	Sale	07/17/2019	\$50,001 - \$100,000
20	iShares Core U.S. Aggregate Bond (AGG)	Purchase	07/17/2019	\$50,001 - \$100,000
21	Pimco Enhanced Short Maturity Active (MINT)	Sale	07/12/2019	\$15,001 - \$50,000
22	Invesco QQQ Trust, Series 1	Purchase	07/12/2019	\$1,001 - \$15,000
23	Ishares Core U.S. Aggregate Bond (AGG)	Purchase	07/12/2019	\$15,001 - \$50,000
24	Vanguard Consumer DSC	Sale	07/12/2019	\$1,001 - \$15,000

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	USAA Federal Savings Bank	Mortgage (investment/rental property)	\$100,001 - \$250,000	2012	3.875	30 yr fixed

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
5.	3.2	This fund shows a decrease in value, which corrects an overvaluation stated on my New Entrant report filed in July 2019. This change is not based on a reportable sales transaction during the reporting period.
5.	3.6	This fund was purchased within my spouse's 401k plan prior to my appointment as a senior executive. I was unaware of its presence when I filed to my New Entrant report in July 2019. I am now including it on this Annual report as a correction. This entry is not based on a reportable purchase transaction during the reporting period.
5.	3.7	This fund was purchased within my spouse's 401k plan prior to my appointment as a senior executive. I was unaware of its presence when I filed to my New Entrant report in July 2019. I am now including it on this Annual report as a correction. This entry is not based on a reportable purchase transaction during the reporting period.
5.	3.8	This fund was purchased within my spouse's 401k plan prior to my appointment as a senior executive. I was unaware of its presence when I filed to my New Entrant report in July 2019. I am now including it on this Annual report as a correction. This entry is not based on a reportable purchase transaction during the reporting period; however, there are other purchase and sale transactions during the reporting period shown in Part 7.
6.	17	This financial interest is in a DoD Contractor (prohibited source). I do not have any current official duties relevant to this company/corporation, nor do I anticipate any such duties in the future. I understand that I am ultimately responsible for ensuring that I do not participate personally and substantially in any particular matter that will have a direct and predictable effect on my financial interests, or on the financial interests of a person whose interests are imputed to me.
6.	18	This financial interest is in a DoD Contractor (prohibited source). I do not have any current official duties relevant to this company/corporation, nor do I anticipate any such duties in the future. I understand that I am ultimately responsible for ensuring that I do not participate personally and substantially in any particular matter that will have a direct and predictable effect on my financial interests, or on the financial interests of a person whose interests are imputed to me.

PART	#	ENDNOTE
6.	19	This financial interest is in a DoD Contractor (prohibited source). I do not have any current official duties relevant to this company/corporation, nor do I anticipate any such duties in the future. I understand that I am ultimately responsible for ensuring that I do not participate personally and substantially in any particular matter that will have a direct and predictable effect on my financial interests, or on the financial interests of a person whose interests are imputed to me.
6.	20	This financial interest is in a DoD Contractor (prohibited source). I do not have any current official duties relevant to this company/corporation, nor do I anticipate any such duties in the future. I understand that I am ultimately responsible for ensuring that I do not participate personally and substantially in any particular matter that will have a direct and predictable effect on my financial interests, or on the financial interests of a person whose interests are imputed to me.
6.	31	1) This financial interest is in a DoD Contractor (prohibited source). I do not have any current official duties relevant to this company/corporation, nor do I anticipate any such duties in the future. I understand that I am ultimately responsible for ensuring that I do not participate personally and substantially in any particular matter that will have a direct and predictable effect on my financial interests, or on the financial interests of a person whose interests are imputed to me. 2) This stock was purchased prior to my appointment as a senior executive. It is one of three that were purchased years ago (at least 5), and is held by TD Ameritrade Clearing, Inc., in an account that is not actively managed. I had forgotten about it and am now including it, along with the other two stocks, on this Annual report as a correction to my New Entrant report filed in July 2019.
6.	32	This stock was purchased prior to my appointment as a senior executive. It is one of three that were purchased years ago (at least 5), and is held by TD Ameritrade Clearing, Inc., in an account that is not actively managed. I had forgotten about it and am now including it, along with the other two stocks, on this Annual report as a correction to my New Entrant report filed in July 2019.
6.	33	1) This financial interest is in a DoD Contractor (prohibited source). I do not have any current official duties relevant to this company/corporation, nor do I anticipate any such duties in the future. I understand that I am ultimately responsible for ensuring that I do not participate personally and substantially in any particular matter that will have a direct and predictable effect on my financial interests, or on the financial interests of a person whose interests are imputed to me. 2) This stock was purchased prior to my appointment as a senior executive. It is one of three that were purchased years ago (at least 5), and is held by TD Ameritrade Clearing, Inc., in an account that is not actively managed. I had forgotten about it and am now including it, along with the other two stocks, on this Annual report as a correction to my New Entrant report filed in July 2019.

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).
