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

Filer's Information

Workman, Thomas Eldon

Member, Financial Stability Oversight Council, Department of the Treasury

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/ Workman, Thomas Eldon [electronically signed on 05/08/2020 by Workman, Thomas Eldon 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/ Sonfield, Brian, Certifying Official [electronically signed on 07/28/2020 by Sonfield, Brian in Integrity.gov]

Other review conducted by
/s/ Plesser, Brian, Ethics Official [electronically signed on 07/27/2020 by Plesser, Brian in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 08/10/2020 by Granahan, Megan in Integrity.gov]

Data Revised 07/20/2020

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Revocable Trust #1	Columbus, Ohio	Trust	Trustee	7/2004	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Life Insurance Council of New York, Inc. 457B Plan:	No		Cash Distributions	$60,888
1.1	Mutual of America Interest Accumulation Account	N/A	$250,001 - $500,000		None (or less than $201)
2	SEP-IRA:	No			
2.1	U.S. bank account (cash)	N/A	$1,001 - $15,000	Interest	None (or less than $201)
2.2	Vanguard Dividend Appreciation (VIG)	Yes	$50,001 - $100,000		None (or less than $201)
2.3	AQR Diversified Arbitrage Instl (ADAIX)	Yes	$15,001 - $50,000		None (or less than $201)
2.4	DFA U.S. Large Cap Value Instl (DFLVX)	Yes	$50,001 - $100,000		None (or less than $201)
3	Roth IRA:	No			
3.1	BlackRock Strategic Income Opps Institutional (BSIIX)	Yes	$100,001 - $250,000		None (or less than $201)
3.2	DFA US Large Cap Value Institutional (DFLVX)	Yes	$50,001 - $100,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	Dodge & Cox stock fund (DODGX)	Yes	$1,001 - $15,000		None (or less than $201)
3.4	Harbor Capital Appreciation Institutional (HACAX)	Yes	$100,001 - $250,000		None (or less than $201)
3.5	IVA International Institutional (IVIQX)	Yes	$250,001 - $500,000		None (or less than $201)
3.6	Matthews Pacific Tiger Institutional (MIPTX)	Yes	$100,001 - $250,000		None (or less than $201)
3.7	Meridian Growth Fund Legacy Class (MERDX)	Yes	$100,001 - $250,000		None (or less than $201)
3.8	PIMCO Commodity Real Return Institutional (PCRIX)	Yes	$15,001 - $50,000		None (or less than $201)
3.9	PIMCO Corp Opportunity Fund II	Yes	$100,001 - $250,000		None (or less than $201)
3.10	Weitz Partners III Opportunity (WPOPX)	Yes	$100,001 - $250,000		None (or less than $201)
3.11	U.S. bank account #1 (cash)	N/A	$1,001 - $15,000	Interest	$201 - $1,000
3.12	DFA Emerging Markets Value Instl (DFEVX)	Yes	$100,001 - $250,000		None (or less than $201)
3.13	Schwab Fundamental Intl Lg Co ETF (FNDF)	Yes	$15,001 - $50,000		None (or less than $201)
3.14	U.S. bank account #2 (cash)	N/A	$1,001 - $15,000		None (or less than $201)
4	IRA:	No		Cash Distributions	$103,300
4.1	AQR Diversified Arbitrage Institutional (ADAIX)	Yes	$100,001 - $250,000		None (or less than $201)
4.2	AQR Long-Short Equity I (QLEIX)	Yes	$100,001 - $250,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.3	BlackRock Strategic Income Opps Institutional (BSIIX)	Yes	$250,001 - $500,000		None (or less than $201)
4.4	Hatteras Core Alternatives TEI Institutional Fund LP	Yes	$100,001 - $250,000		None (or less than $201)
4.5	IVA International Institutional (IVIQX)	Yes	$100,001 - $250,000		None (or less than $201)
4.6	PIMCO Commodity Real Return Institutional (PCRIX)	Yes	$50,001 - $100,000		None (or less than $201)
4.7	PIMCO Income Institutional (PIMIX)	Yes	$500,001 - $1,000,000		None (or less than $201)
4.8	Vanguard Market Neutral Inv (VMNFX)	Yes	$100,001 - $250,000		None (or less than $201)
4.9	Vanguard Short-Term Bond Index Fund Adm (VBIRX)	Yes	$50,001 - $100,000		None (or less than $201)
4.10	TIAA Traditional	N/A	$100,001 - $250,000		None (or less than $201)
4.11	U.S. bank account (cash)	N/A	None (or less than $1,001)		None (or less than $201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Life Insurance Council of New York, Inc.	New York, New York	The fixed balance of the Life Insurance Council of New York, Inc. 457(b) plan will be paid out in equal installments over the remaining two, of the original five, payout years with the final payout in 2021.	9/1999

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	Spouse’s artistic works (value of unsold artwork not readily ascertainable)	N/A		Art Sales	

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Revocable Trust #1:				
1.1	Goldman Sachs MLP Energy Infrastructure Institutional (GMLPX)	Yes	$100,001 - $250,000		$5,001 - $15,000
1.2	Longleaf Partners Small-cap (LLSCX)	Yes	$100,001 - $250,000		$15,001 - $50,000
1.3	U.S. bank account #1 (cash)	N/A	$15,001 - $50,000		None (or less than $201)
1.4	Separately Managed Account (Brokerage Account):	No			
1.4.1	3M Company (MMM)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.2	Altria Group (MO)	N/A	$1,001 - $15,000	Dividends	$201 - $1,000
1.4.3	AstraZeneca Plc ADR F (AZN)	N/A	$1,001 - $15,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.4.4	Boeing Co (BA)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.5	Chevron Texaco Corp (CVX)	N/A	$1,001 - $15,000	Dividends	$201 - $1,000
1.4.6	Diageo Plc New F 1 ADR Reps 4 Ord (DEO)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.7	Dow Inc. (DOW)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.8	Genuine Parts Co (GPC)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.9	Intel Corp (INTC)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.10	Johnson & Johnson (JNJ)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.11	CISCO Systems Inc (CSCO)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.12	Kimberly-Clark (KMB)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.13	Lilly Eli & Co (LLY)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.14	Merck & Co Inc (MRK)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.15	Microsoft Corp (MSFT)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.16	NextEra Energy Inc (NEE)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.17	Novartis A G Spons ADR F (NVS)	N/A	$1,001 - $15,000		None (or less than $201)
1.4.18	Pfizer Inc (PFE)	N/A	$1,001 - $15,000	Dividends	$201 - $1,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.4.19	Philip Morris International (PM)		N/A	$1,001 - $15,000		None (or less than $201)
1.4.20	Raytheon Co (RTN)		N/A	$1,001 - $15,000		None (or less than $201)
1.4.21	U.S. bank account (cash)		N/A	$15,001 - $50,000		None (or less than $201)
1.4.22	Unilever N V New F (UN)		N/A	$1,001 - $15,000		None (or less than $201)
1.4.23	Davis Select US Equity ETF (DUSA)		Yes	$15,001 - $50,000		$201 - $1,000
1.4.24	E.I. DuPont de Nemours (DD)		N/A	$1,001 - $15,000		None (or less than $201)
1.4.25	Corteva Inc. (CTVA)	See Endnote	N/A	None (or less than $1,001)		None (or less than $201)
1.5	Apple Computer, Inc. (AAPL)		N/A	$15,001 - $50,000	Dividends	$201 - $1,000
1.6	U.S. bank account (cash)		N/A	$100,001 - $250,000	Interest	$1,001 - $2,500
1.7	Davis Select US Equity ETF (DUSA)		Yes	$250,001 - $500,000		$5,001 - $15,000
1.8	EV Tax-Mgd Emerging Markets Fund Instl (EITEX)		Yes	$50,001 - $100,000		$1,001 - $2,500
1.9	Vanguard Interm-Term Tax-Exempt Fund Adm (VWIUX)		Yes	$100,001 - $250,000		$201 - $1,000
1.10	Welltower, Inc. (WELL)		N/A	$1,001 - $15,000		$201 - $1,000
2	Revocable Trust #2:					
2.1	U.S. bank account (cash)		N/A	$15,001 - $50,000	Interest	$5,001 - $15,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.2	Morse & Hamilton Limited Partnership	See Endnote	N/A	Over $1,000,000	Capital Gains Rent or Royalties	$15,001 - $50,000
2.3	Schwab Fundamental Intl Lg Co ETF (FNDF)		Yes	$250,001 - $500,000		None (or less than $201)
2.4	Vanguard Interm-Term Tax-Exempt Fund Adm (VWIUX)		Yes	$250,001 - $500,000		$201 - $1,000
2.5	Vanguard Alternative Strategies Fund Investor Shs (VASFX)		Yes	$100,001 - $250,000		None (or less than $201)
3	Irrevocable Trust #1:					
3.1	BlackRock Strategic Income Opportunity Institutional (BSIIX)		Yes	$50,001 - $100,000		$1,001 - $2,500
3.2	DFA Emerging Markets Value Institutional (DFEVX)		Yes	$1,001 - $15,000		$201 - $1,000
3.3	DFA US Large Cap Value Institutional (DFLVX)		Yes	$1,001 - $15,000		$201 - $1,000
3.4	DFA US Small Cap Value Institutional (DFSVX)		Yes	$1,001 - $15,000		$201 - $1,000
3.5	Elements Rogers International Commodity ETN (RJI)		N/A	$1,001 - $15,000		None (or less than $201)
3.6	Goldman Sachs MLP Energy Infrastructure Institutional (GMLPX)		Yes	$1,001 - $15,000		$201 - $1,000
3.7	Harbor Capital Appreciation Institutional (HACAX)		Yes	$1,001 - $15,000		$1,001 - $2,500
3.8	IVA International Institutional (IVIQX)		Yes	$15,001 - $50,000		$1,001 - $2,500
3.9	Matthews Pacific Tiger Inv (MAPTX)		Yes	$1,001 - $15,000		$201 - $1,000
3.10	Meridian Growth Fund Legacy Class (MERDX)		Yes	$1,001 - $15,000		$1,001 - $2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.11	PIMCO Income Institutional (PIMIX)	Yes	$50,001 - $100,000		$2,501 - $5,000
3.12	U.S. bank account (Cash)	N/A	$1,001 - $15,000		None (or less than $201)
3.13	Schwab US Large Cap ETF (SCHX)	Yes	$15,001 - $50,000		$201 - $1,000
3.14	Vanguard Intermediate-Term Tax-Exempt (VWITX)	Yes	$15,001 - $50,000		$1,001 - $2,500
3.15	Weitz Partners III Opportunity (WPOPX)	Yes	$1,001 - $15,000		$201 - $1,000
3.16	Davis Select US Equity ETF (DUSA)	Yes	$15,001 - $50,000		$201 - $1,000
3.17	AQR Diversified Arbitrage Instl (ADAIX)	Yes	$15,001 - $50,000		None (or less than $201)
3.18	Schwab Fundamental Intl Lg Co ETF (FNDF)	Yes	$15,001 - $50,000		$201 - $1,000
3.19	Vanguard Interm-Term Tax-Exempt Fund Adm (VWIUX)	Yes	$1,001 - $15,000		None (or less than $201)
3.20	Vanguard Market Neutral Inv (VMNFX)	Yes	$15,001 - $50,000		None (or less than $201)
3.21	Vanguard Equity Income Fund Adm (VEIRX)	Yes	$1,001 - $15,000		$201 - $1,000
4	Irrevocable Trust #2:				
4.1	AQR Diversified Arbitrage Institutional (ADAIX)	Yes	$50,001 - $100,000		$2,501 - $5,000
4.2	BlackRock Strategic Income Opportunity Institutional (BSIIX)	Yes	$100,001 - $250,000		$5,001 - $15,000
4.3	Cullen High Dividend Institutional (CHDVX)	Yes	$15,001 - $50,000		$1,001 - $2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.4	DFA US Large Cap Value Institutional (DFLVX)	Yes	$15,001 - $50,000		$1,001 - $2,500
4.5	DFA US Small Cap Value Institutional (DFSVX)	Yes	$15,001 - $50,000		$1,001 - $2,500
4.6	Elements Rogers International Commodity ETN (RJI)	N/A	$15,001 - $50,000		None (or less than $201)
4.7	Goldman Sachs MLP Energy Infrastructure Institutional (GMLPX)	Yes	$15,001 - $50,000		$1,001 - $2,500
4.8	Harbor Capital Appreciation Institutional (HACAX)	Yes	$15,001 - $50,000		$2,501 - $5,000
4.9	IVA International Institutional (IVIQX)	Yes	$100,001 - $250,000		$5,001 - $15,000
4.10	Matthews Pacific Tiger Institutional (MIPTX)	Yes	$15,001 - $50,000		$1,001 - $2,500
4.11	Meridian Growth Fund Legacy Class (MERDX)	Yes	$15,001 - $50,000		$1,001 - $2,500
4.12	Parametric Emerging Markets Institutional (EIEMX)	Yes	$15,001 - $50,000		$201 - $1,000
4.13	PIMCO Income Institutional (PIMIX)	Yes	$100,001 - $250,000		$5,001 - $15,000
4.14	U.S. bank account #1 (cash)	N/A	$15,001 - $50,000	Interest	$201 - $1,000
4.15	Schwab Fundamental International Lg Co ETF (FNDF)	Yes	$50,001 - $100,000		$2,501 - $5,000
4.16	Schwab US Large Cap ETF (SCHX)	Yes	$50,001 - $100,000		$201 - $1,000
4.17	Vanguard Intermediate-Term Tax-Exempt (VWITX)	Yes	$100,001 - $250,000		$2,501 - $5,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.18	Vanguard Short-Term Bond Index Admiral Shares (VBIRX)		Yes	$15,001 - $50,000		$201 - $1,000
4.19	Weitz Partners III Opportunity (WPOPX)		Yes	$15,001 - $50,000		$1,001 - $2,500
4.20	Morse & Hamilton Limited Partnership	See Endnote	N/A	Over $1,000,000	Rent or Royalties Capital Gains	$15,001 - $50,000
4.21	Davis Select US Equity ETF (DUSA)		Yes	$50,001 - $100,000		$1,001 - $2,500
4.22	DFA Emerging Markets Value Instl (DFEVX)		Yes	$15,001 - $50,000		$201 - $1,000
4.23	Vanguard Interm-Term Tax-Exempt Fund Adm (VWIUX)		Yes	$15,001 - $50,000		None (or less than $201)
4.24	AQR Equity Market Neutral I (QMNIX)		Yes	$50,001 - $100,000		$1,001 - $2,500
4.25	Vanguard Alternative Strategies Fund Investor Shs (VASFX)		Yes	$50,001 - $100,000		$1,001 - $2,500
5	Irrevocable Trust #3:					
5.1	U.S. bank account (cash)		N/A	$15,001 - $50,000	Interest	$1,001 - $2,500
5.2	AQR Long Short Equity I (QLEIX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.3	BlackRock Strategic Income Opportunity Institutional (BSIIX)		Yes	$100,001 - $250,000		$2,501 - $5,000
5.4	DFA Emerging Markets Vlaue Institutional (DFEVX)		Yes	$15,001 - $50,000		$201 - $1,000
5.5	DFA US Large Cap Value Institutional (DFLVX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.6	Elements Rogers International Commodity ETN (RJI)		N/A	$15,001 - $50,000		None (or less than $201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.7	Goldman Sachs MLP Energy Infrastructure Institutional (GMLPX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.8	Harbor Capital Appreciation Institutional (HACAX)		Yes	$15,001 - $50,000		$2,501 - $5,000
5.9	IVA International Fund (IVIQX)		Yes	$50,001 - $100,000		$5,001 - $15,000
5.10	Longleaf Partners Small Cap (LLSCX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.11	Matthews Pacific Tiger Institutional (MIPTX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.12	Meridian Growth Fund Legacy Class (MERDX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.13	PIMCO Income Instl (PIMIX)		Yes	$100,001 - $250,000		$5,001 - $15,000
5.14	U.S. bank account #1 (cash)		N/A	$1,001 - $15,000		None (or less than $201)
5.15	Vanguard Dividend Appreciation ETF (VIG)		Yes	$15,001 - $50,000		$201 - $1,000
5.16	Vanguard Intermediate-Term Tax-Exempt (VWITX)		Yes	$50,001 - $100,000		$2,501 - $5,000
5.17	Weitz Partners III Opportunity (WPOPX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.18	The Vista Plaza, L.P.	See Endnote	N/A	$15,001 - $50,000		None (or less than $201)
5.19	The Vista at Rocky Fork, L.P.	See Endnote	N/A	Over $1,000,000	Capital Gains Rent or Royalties	$5,001 - $15,000
5.20	Davis Select US Equity ETF (DUSA)		Yes	$15,001 - $50,000		$1,001 - $2,500

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.21	AQR Diversified Arbitrage Instl (ADAIX)		Yes	$50,001 - $100,000		$201 - $1,000
5.22	Schwab Fundamental Intl Lg Co ETF (FNDF)		Yes	$50,001 - $100,000		$1,001 - $2,500
5.23	Vanguard Interm-Term Tax-Exempt Fund Adm (VWIUX)		Yes	$15,001 - $50,000		None (or less than $201)
5.24	Vanguard Alternative Stratehies Fund Investor Shs (VASFX)		Yes	$15,001 - $50,000		$1,001 - $2,500
5.25	Schwab Fundamental Int'l Lg Co ETF (FNDF)		Yes	$15,001 - $50,000		$1,001 - $2,500
6	TIAA-CREF Personal Annuity Select	See Endnote	N/A	$100,001 - $250,000	Interest	$5,001 - $15,000
7	TIAA-CREF Personal Annuity Select	See Endnote	N/A	$100,001 - $250,000	Interest	$5,001 - $15,000
8	Mutual of America Flexible Premium Annuity	See Endnote	N/A	$250,001 - $500,000	Interest	$2,501 - $5,000
9	Israel State Bond 5/1/2020		N/A	$1,001 - $15,000	Interest	$201 - $1,000
10	Personal Loan to friend	See Endnote	N/A	$15,001 - $50,000		None (or less than $201)
11	U.S. bank account #1 (cash)		N/A	$50,001 - $100,000		None (or less than $201)
12	U.S. bank account #2 (cash)		N/A	$1,001 - $15,000		None (or less than $201)
13	U.S. bank account #3 (cash)		N/A	$1,001 - $15,000		None (or less than $201)
14	NY College Savings 529 Plan #1:		No			
14.1	Vanguard Total International Stock Index Fund (VTPSX)		Yes	$15,001 - $50,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.2	Vanguard Developed Markets Index Fund (VDIPX)	Yes	$100,001 - $250,000		None (or less than $201)
14.3	Vanguard Growth Index Fund (VIGIX)	Yes	$15,001 - $50,000		None (or less than $201)
14.4	Vanguard Value Index Fund (VIVIX)	Yes	$15,001 - $50,000		None (or less than $201)
14.5	Vanguard Small-Cap Index Fund (VSCPX)	Yes	$15,001 - $50,000		None (or less than $201)
14.6	Vanguard Total Stock Market Index Fund (VTSMX)	Yes	$15,001 - $50,000		None (or less than $201)
15	NY College Savings 529 Plan #2:	No			
15.1	Vanguard Total International Stock Index Fund (VTPSX)	Yes	$15,001 - $50,000		None (or less than $201)
15.2	Vanguard Growth Index Fund (VIGIX)	Yes	$15,001 - $50,000		None (or less than $201)
15.3	Vanguard Value Index Fund (VIVIX)	Yes	$15,001 - $50,000		None (or less than $201)
15.4	Vanguard Developed Markets Index Fund (VDIPX)	Yes	$100,001 - $250,000		None (or less than $201)
15.5	Vanguard Small-Cap Index Fund (VSCPX)	Yes	$15,001 - $50,000		None (or less than $201)
15.6	Vanguard Total Stock Market Index Fund (VTSMX)	Yes	$15,001 - $50,000		None (or less than $201)
16	NY College Savings 529 Plan #3:	No			
16.1	Vanguard Total International Stock Index Fund (VTPSX)	Yes	$15,001 - $50,000		None (or less than $201)
16.2	Vanguard Growth Index Fund (VIGIX)	Yes	$15,001 - $50,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16.3	Vanguard Value Index Fund (VIVIX)	Yes	$15,001 - $50,000		None (or less than $201)
16.4	Vanguard Developed Markets Index Fund (VDIPX)	Yes	$100,001 - $250,000		None (or less than $201)
16.5	Vanguard Small-Cap Index Fund (VSCPX)	Yes	$15,001 - $50,000		None (or less than $201)
16.6	Vanguard Total Stock Market Index Fund (VTSMX)	Yes	$15,001 - $50,000		None (or less than $201)
17	NY College Savings 529 Plan #4:	No			
17.1	Vanguard Total International Stock Index Fund (VTPSX)	Yes	$15,001 - $50,000		None (or less than $201)
17.2	Vanguard Growth Index Fund (VIGIX)	Yes	$15,001 - $50,000		None (or less than $201)
17.3	Vanguard Value Index Fund (VIVIX)	Yes	$15,001 - $50,000		None (or less than $201)
17.4	Vanguard Developed Markets Index Fund (VDIPX)	Yes	$100,001 - $250,000		None (or less than $201)
17.5	Vanguard Small-Cap Index Fund (VSCPX)	Yes	$15,001 - $50,000		None (or less than $201)
17.6	Vanguard Total Stock Market Index Fund (VTSMX)	Yes	$15,001 - $50,000		None (or less than $201)
18	NY College Savings 529 Plan #5:	No			
18.1	Vanguard Total International Stock Index Fund (VTPSX)	Yes	$15,001 - $50,000		None (or less than $201)
18.2	Vanguard Growth Index Fund (VIGIX)	Yes	$15,001 - $50,000		None (or less than $201)
18.3	Vanguard Value Index Fund (VIVIX)	Yes	$15,001 - $50,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
18.4	Vanguard Developed Markets Index Fund (VDIPX)	Yes	$100,001 - $250,000		None (or less than $201)
18.5	Vanguard Small-Cap Index Fund (VSCPX)	Yes	$15,001 - $50,000		None (or less than $201)
18.6	Vanguard Total Stock Market Index Fund (VTSMX)	Yes	$15,001 - $50,000		None (or less than $201)
19	Northwestern Mutual, Whole Life #1	N/A	$15,001 - $50,000	Dividends	$1,001 - $2,500
20	Northwestern Mutual, Whole Life #2	N/A	$15,001 - $50,000	Dividends	$1,001 - $2,500
21	Northwestern Mutual, Whole Life #3	N/A	$50,001 - $100,000	Dividends	$1,001 - $2,500
22	Northwestern Mutual, Whole Life #4	N/A	$50,001 - $100,000	Dividends	$1,001 - $2,500
23	Northwestern Mutual, Whole Life #5	N/A	$100,001 - $250,000	Dividends	$2,501 - $5,000
24	Irrevocable Life Insurance Trust				
24.1	Northwestern Mutual, Whole Life #6	N/A	$15,001 - $50,000	Dividends	$2,501 - $5,000
24.2	Northwestern Mutual, Whole Life #7	N/A	$50,001 - $100,000	Dividends	$5,001 - $15,000
24.3	Northwestern Mutual, Whole Life #8	N/A	$50,001 - $100,000	Dividends	$5,001 - $15,000
25	Joint Account (Brokerage account):	No			
25.1	Vanguard Inflation-Protected Securities Fund Inv (VIPSX)	Yes	$15,001 - $50,000		$201 - $1,000
25.2	Vanguard Long-Term Investment Grade Fund Inv (VWESX)	Yes	$15,001 - $50,000		$1,001 - $2,500

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
25.3	Vanguard Total Stock Market Index Fund (VTSAX)		Yes	$50,001 - $100,000		$201 - $1,000
26	Pan American Life, Whole Life		N/A	$1,001 - $15,000		None (or less than $201)
27	NY College Savings 529 Plan #6		No			
27.1	Vanguard Total International Stock Index Fund (VTPSX)		Yes	$15,001 - $50,000		None (or less than $201)
27.2	Vanguard Developed Markets Index Fund (VDIPX)		Yes	$100,001 - $250,000		None (or less than $201)
27.3	Vanguard Growth Index Fund (VIGIX)		Yes	$50,001 - $100,000		None (or less than $201)
27.4	Vanguard Value Index Fund (VIVIX)		Yes	$15,001 - $50,000		None (or less than $201)
27.5	Vanguard Small-Cap Index Fund (VSCPX)		Yes	$15,001 - $50,000		None (or less than $201)
27.6	Vanguard Total Stock Market Index Fund (VTSMX)		Yes	$15,001 - $50,000		None (or less than $201)
28	Standard Life, Whole Life		N/A	$1,001 - $15,000		None (or less than $201)
29	Installment Note Receivable	See Endnote	N/A	None (or less than $1,001)		$50,001 - $100,000

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Vanguard Alternative Strategies Fund Inv (VASFX)	Purchase	12/31/2019	$100,001 - $250,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
2	Vanguard Market Neutral Inv (VMNFX)	Sale	12/30/2019	$100,001 - $250,000
3	Vanguard Equity Income Fund Adm (VEIRX)	Purchase	12/24/2019	$1,001 - $15,000
4	DFA Emerging Markets Value Instl (DFEVX)	Purchase	06/24/2019	$1,001 - $15,000
5	Schwab Fundamental Intl Lg Co (FNDF)	Purchase	06/24/2019	$1,001 - $15,000
6	Vanguard Market Neutral Inv (VMNFX)	Purchase	06/24/2019	$1,001 - $15,000
7	Cullen High Dividend Instl (CHDVX)	Sale	12/23/2019	$1,001 - $15,000
8	Harbor Capital Appreciation Instl (HACAX)	Sale	06/24/2019	$1,001 - $15,000
9	Weitz Partners III Opportunity (WPOPX)	Sale	06/24/2019	$1,001 - $15,000
10	Vanguard Alternative Strategies Fund Inv (VASFX)	Purchase	12/31/2019	$50,001 - $100,000
11	AQR Equity Market Neutral (QMNIX)	Purchase	12/24/2019	$50,001 - $100,000
12	BlackRock Strategic Income Opps Instl (BSIIX)	Purchase	06/24/2019	$1,001 - $15,000
13	Cullen High Dividend Instl (CHDVX)	Purchase	06/24/2019	$1,001 - $15,000
14	Matthews Pacific Tiger Inst (MIPTX)	Purchase	06/24/2019	$1,001 - $15,000
15	PIMCO Income Instl (PIMIX)	Purchase	06/24/2019	$1,001 - $15,000
16	Schwab Fundamental Intl Lg Co (FNDF)	Purchase	06/24/2019	$1,001 - $15,000
17	Vanguard Market Neutral Inv (VMNFX)	Purchase	06/24/2019	$1,001 - $15,000
18	Weitz Partners III Opportunity (WPOPX)	Purchase	06/24/2019	$1,001 - $15,000
19	Vanguard Market Neutral Inv (VMNFX)	Sale	12/30/2019	$50,001 - $100,000
20	AQR Long-Short Equity I (QLEIX)	Sale	12/23/2019	$50,001 - $100,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
21	Weitz Partners III Opportunity (WPOPX)	Sale	09/12/2019	$1,001 - $15,000
22	BlackRock Strategic Income Opps Instl (BSIIX)	Sale	05/03/2019	$1,001 - $15,000
23	DFA U.S. Small-Cap Value Instl (DFSVX)	Sale	04/26/2019	$1,001 - $15,000
24	Harbor Capital Appreciation Instl (HACAX)	Sale	04/26/2019	$1,001 - $15,000
25	IVA International Instl (IVIQX)	Sale	04/26/2019	$1,001 - $15,000
26	Meridian Growth Fund Legacy Class (MERDX)	Sale	04/26/2019	$1,001 - $15,000
27	PIMCO Income Instl (PIMIX)	Sale	04/26/2019	$1,001 - $15,000
28	Weitz Partners III Opportunity (WPOPX)	Sale	04/26/2019	$1,001 - $15,000
29	Vanguard Alternative Strategies Fund Inv (VASFX)	Purchase	12/31/2019	$15,001 - $50,000
30	AQR Diversified Arbitrage Instl (ADAIX)	Purchase	06/24/2019	$15,001 - $50,000
31	AQR Long-Short Equity I (QLEIX)	Purchase	06/24/2019	$1,001 - $15,000
32	Vanguard Interm-Term Tax-Exempt Fund (VWIUX)	Purchase	06/24/2019	$1,001 - $15,000
33	Vanguard Market Neutral Inv (VMNFX)	Purchase	06/24/2019	$1,001 - $15,000
34	Vanguard Market Neutral Inv (VMNFX)	Sale	12/30/2019	$15,001 - $50,000
35	AQR Diversified Arbitrage Instl (ADAIX)	Sale	11/05/2019	$15,001 - $50,000
36	AQR Long-Short Equity I (QLEIX)	Sale	11/05/2019	$15,001 - $50,000
37	BlackRock Strategic Income Opps Instl (BSIIX)	Sale	11/05/2019	$50,001 - $100,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
38	Cullen High Dividend Instl (CHDVX)	Sale	11/05/2019	$15,001 - $50,000
39	Davis Select US Equity (DUSA)	Sale	11/05/2019	$1,001 - $15,000
40	DFA U.S. Small-Cap Value Instl (DFSVX)	Sale	11/05/2019	$1,001 - $15,000
41	Elements Rogers Intl Commodity ETN (RJI)	Sale	11/05/2019	$15,001 - $50,000
42	Goldman Sachs MLP Energy Infras Instl (GMLPX)	Sale	11/05/2019	$1,001 - $15,000
43	Harbor Capital Appreciation Instl (HACAX)	Sale	11/05/2019	$15,001 - $50,000
44	IVA International Instl (IVIQX)	Sale	11/05/2019	$15,001 - $50,000
45	Matthews Pacific Tiger Inst (MIPTX)	Sale	11/05/2019	$1,001 - $15,000
46	Meridian Growth Fund Legacy Class (MERDX)	Sale	11/05/2019	$1,001 - $15,000
47	Parametric Emerging Markets Instl (EIEMX)	Sale	11/05/2019	$15,001 - $50,000
48	PIMCO Income Instl (PIMIX)	Sale	11/05/2019	$50,001 - $100,000
49	Schwab Fundamental Intl Lg Co (FNDF)	Sale	11/05/2019	$15,001 - $50,000
50	Vanguard Dividend Appreciation ETF (VIG)	Sale	11/05/2019	$15,001 - $50,000
51	Vanguard Interm-Term Tax-Exempt Fund (VWITX)	Sale	11/05/2019	$50,001 - $100,000
52	Vanguard Market Neutral Inv (VMNFX)	Sale	11/05/2019	$15,001 - $50,000
53	DFA U.S. Large Cap Value Instl (DFLVX)	Purchase	08/12/2019	$15,001 - $50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
54	Schwab Fundamental Intl Lg Co (FNDF)	Purchase	08/12/2019	$15,001 - $50,000
55	Schwab Fundamental Intl Lg Co ETF (FNDF)	Sale	12/05/2019	$1,001 - $15,000
56	BlackRock Strategic Income Opps Instl (BSIIX)	Sale	04/16/2019	$1,001 - $15,000
57	Weitz Partners III Opportunity (WPOPX)	Sale	03/18/2019	$1,001 - $15,000
58	BlackRock Strategic Income Opps Instl (BSIIX)	Sale	01/23/2019	$1,001 - $15,000
59	BlackRock Strategic Income Opps Instl (BSIIX)	Sale	01/17/2019	$1,001 - $15,000
60	DFA U.S. Large Cap Value Instl (DFLVX)	Purchase	10/31/2019	$50,001 - $100,000
61	AQR Diversified Arbitrage Instl (ADAIX)	Purchase	08/12/2019	$15,001 - $50,000
62	EV Tax_mgd Emerging Markets Fund Instl (EITEX)	Sale	10/31/2019	$15,001 - $50,000
63	Goldman achs MLP Energy Infras Instl (GMLPX)	Sale	10/31/2019	$15,001 - $50,000
64	Longleaf Partners Small-Cap	Sale	10/31/2019	$50,001 - $100,000
65	AT&T Inc (T)	Sale	10/31/2019	$1,001 - $15,000
66	BCE Inc (BCE)	Sale	10/31/2019	$1,001 - $15,000
67	ConocoPhillips (COP)	Sale	10/31/2019	$1,001 - $15,000
68	Corning Inc (GLW)	Sale	10/31/2019	$1,001 - $15,000
69	Exxon Mobil Corp (XOM)	Sale	10/31/2019	$1,001 - $15,000
70	HCP Inc (HCP)	Sale	10/31/2019	$1,001 - $15,000
71	Johnson Controls Inc (JCI)	Sale	10/31/2019	$1,001 - $15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
72	Royal Dutch Shell B ADR F (RDSB)	Sale	10/31/2019	$1,001 - $15,000
73	Siemens AG Spons ADR (SI)	Sale	10/31/2019	$1,001 - $15,000
74	AQR Diversified Arbitrage Instl (ADAIX)	Purchase	08/06/2019	$50,001 - $100,000
75	IVA International Instl (IVIQX)	Sale	12/19/2019	$50,001 - $100,000
76	Vanguard Short-Term Bond Index Fund (VBIRX)	Sale	12/19/2019	$15,001 - $50,000
77	Vanguard Sort-Term Bond Index Fund (VBIRX)	Sale	08/12/2019	$15,001 - $50,000
78	American Beacon Ionic Strat Arbtrg (IONYX)	Sale	08/05/2019	$50,001 - $100,000
79	Vanguard Developed Markets Index Fund (VDIPX)	Purchase	05/15/2019	$1,001 - $15,000
80	Vanguard Institutional Total Stock Market Index Fund (VITPX) Total	Purchase	05/15/2019	$1,001 - $15,000
81	Vanguard Total International Stock Index Fund (VTPSX)	Purchase	05/15/2019	$1,001 - $15,000
82	Vanguard Growth Index Fund (VIGIX)	Purchase	05/15/2019	$1,001 - $15,000
83	Vanguard Small-Cap Index Fund (VSCPX)	Purchase	05/15/2019	$1,001 - $15,000
84	Vanguard Value Index Fund (VIVIX)	Purchase	05/15/2019	$1,001 - $15,000
85	Vanguard Developed Markets Index Fund (VDIPX)	Purchase	05/15/2019	$1,001 - $15,000
86	Vanguard Institutional Total Stock Market Index Fund (VITPX)	Purchase	05/15/2019	$1,001 - $15,000
87	Vanguard Total International Stock Index Fund (VTPSX)	Purchase	05/15/2019	$1,001 - $15,000
88	Vanguard Growth Index Fund (VIGIX)	Purchase	05/15/2019	$1,001 - $15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
89	Vanguard Small-Cap Index Fund (VSCPX)	Purchase	05/15/2019	$1,001 - $15,000
90	Vanguard Value Index Fund (VIVIX)	Purchase	05/15/2019	$1,001 - $15,000
91	SEP-IRA: AQR Diversified Arbitrage Instl. (ADAIX)	Purchase	08/12/2019	$15,001 - $50,000
92	SEP-IRA: DFA US Large Cap Value Instl. (DFLVX)	Purchase	10/31/2019	$50,001 - $100,000
93	IRA-American Beacon Ionic Strategic Arbitrage (IONYX)	Sale	08/05/2019	$50,001 - $100,000

8. Liabilities

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Investors Bank	See Endnote	Mortgage on Personal Residence	$500,001 - $1,000,000	2011	5	30
2	PIMCO Corp Opportunity Fund II		Committed Capital	$100,001 - $250,000	2016	N/A	On Demand

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
6.	1.4.25	Corteva was acquired on 6/1/19 as a spin-off from DowDuPont Inc. (DWDP). The value for reporting period was less than $1,001, and the income was less than $201.
6.	2.2	Commercial Real Estate, Gahanna, Ohio
6.	4.20	Commercial Real Estate, Gahanna, Ohio
6.	5.18	Commercial Real Estate, Gahanna, Ohio
6.	5.19	Residential Real Estate, Gahanna, Ohio
6.	6	Fixed option selected, earning the guaranteed minimum return of 3.0%
6.	7	Fixed option selected, earning the guaranteed minimum return of 3.0%
6.	8	100% of the funds are invested in the "Interest Accumulation Account" with a current Effective Annual Yield of 1.75%
6.	10	Receivable from P. Squire.
6.	29	Fixed note receivable from M. Nodo paid in full in April 2019.
8.	1	Refinanced to Citizens Bank NA in January 2020.

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.

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