

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

Filer's Information

Pomeroy, Darla

Senior Advisor, Department of the Treasury

Date of Termination: 05/18/2021

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/ Pomeroy, Darla [electronically signed on 06/02/2021 by Pomeroy, Darla 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 07/12/2021 by Sonfield, Brian in Integrity.gov]

Other review conducted by

/s/ Bunaugh, Tremayne, Ethics Official [electronically signed on 07/01/2021 by Bunaugh, Tremayne in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 06/28/2021

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	PT Fund, Inc.	Washington, District of Columbia	Presidential Transition Team	Senior Advisor	6/2020	2/2021
2	Pomeroy Irrevocable Trust	Wilmington, Delaware	Trust containing life insurance policy	Trustee	5/2005	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA #1				
1.1	CASH DEPOSIT	N/A	None (or less than \$1,001)		None (or less than \$201)
1.2	S/T CORPORATE BOND (VANGUARD)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.3	BARCLAYS US TIPS 0-5 YEAR INDEX FUND (VANGUARD)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.4	BARCLAYS CAPITAL HIGH YIELD VERY LIQUID INDEX FUND	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	S&P TECHNOLOGY SELECT SECTOR INDEX FUND (SPDR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	ISHARES RUSSELL 1000 GROWTH INDEX FUND	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.7	ISHARES RUSSELL 1000 VALUE INDEX FUND	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.8	ISHARES RUSSELL 2000 GROWTH INDEX FUND	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.9	ISHARES RUSSELL 2000 VALUE INDEX FUND	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.10	DOW JONES US SELECT REIT INDEX FUND (SPDR)	Yes	None (or less than \$1,001)		None (or less than \$201)
1.11	ISHARES MSCI EAFE 100% HEDGED TO USD INDEX FUND	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.12	ISHARES MSCI EAFE INDEX FUND	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.13	FTSE EMERGING MARKETS INDEX FUND (VANGUARD)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.14	DJ GBL EX-US SELECT REAL ESTATE SEC INDEX FUND (SPDR)	Yes	None (or less than \$1,001)		None (or less than \$201)

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	Longwood Foundation Inc.	N/A		Salary	
2	Burriss Logistics	N/A		Director's Fee	
3	Dupont Specialty Products USA, LLC	N/A		Director's Fee	
4	Deferred RSU Plan	No			
4.1	Dow Inc (DOW) vested and unvested restricted stock units	N/A	Over \$1,000,000		None (or less than \$201)
4.2	Corteva Inc (CTVA) vested and unvested restricted stock units	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
4.3	DuPont de Nemours, Inc. (DD) vested and unvested restricted stock units	N/A	Over \$1,000,000		None (or less than \$201)
5	Wilmington Savings Fund Society, FSB	N/A		Director's Fee	
6	IRA #1	No			
6.1	FID 500 INDEX	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
7	Longwood Defined Benefit Pension Plan	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
8	IRA #2	No			
8.1	GOLDMAN SACHS BANK USA DEPOSIT (BDA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.2	GS ENHANCED INCOME FUND CLASS P	Yes	\$250,001 - \$500,000		None (or less than \$201)
8.3	GS INFLATION PROTECTED SECURITIES FUND	Yes	\$50,001 - \$100,000		None (or less than \$201)
8.4	GS HIGH YIELD FUND CLASS P	Yes	\$100,001 - \$250,000		None (or less than \$201)
8.5	TECHNOLOGY SELECT INDEX 'SPDR' (XLK)	Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.6	GS STRATEGIC GROWTH FUND CLASS P (GSPPX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
8.7	RUSSELL 1000 GROWTH INDEX FUND (ISHARES) ISHARES RUSSELL 1000 GROWTH ETF (IWF)	Yes	\$250,001 - \$500,000		None (or less than \$201)
8.8	RUSSELL 1000 VALUE INDEX FUND (ISHARES) ISHARES RUSSELL 1000 VALUE ETF (IWD)	Yes	Over \$1,000,000		None (or less than \$201)
8.9	RUSSELL 2000 GROWTH INDEX FUND (ISHARES) ISHARES RUSSELL 2000 GROWTH ETF (IWO)	Yes	\$50,001 - \$100,000		None (or less than \$201)
8.10	RUSSELL 2000 VALUE INDEX FUND (ISHARES) ISHARES RUSSELL 2000 VALUE ETF (IWN)	Yes	\$100,001 - \$250,000		None (or less than \$201)
8.11	MSCI EAFE 100% HEDGED TO USD INDEX FUND (ISHARES) ISHARES TRUST-ISHARES CURRENCY HEDGED MSCI EAFE ETF (HEFA)	Yes	\$100,001 - \$250,000		None (or less than \$201)
8.12	MSCI EAFE INDEX FUND (ISHARES) ISHARES MSCI EAFE ETF (EFA)	Yes	\$250,001 - \$500,000		None (or less than \$201)
8.13	GS EMERGING MARKETS EQUITY FUND CLASS P (GAHPX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Pomeroy Investments, LLC	No			
1.1	US Bank (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.2	Investment Acct #1	No	None (or less than \$1,001)		None (or less than \$201)
1.2.1	Airbiquity (telematics connectivity infrastructure; Seattle, WA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.2.2	HarvestWest Investments LLC (agriculture fund; Bellevue, WA)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
2	Brokerage Acct #1	No			
2.1	US DOLLAR	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.2	CORTEVA INC (CTVA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.3	DOW INC (DOW)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.4	DUPONT DE NEMOURS INC (DD)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2.5	W S F S FINL CO (WSFS)	N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000
3	Brokerage Acct #2	No			
3.1	US DOLLAR	N/A	\$50,001 - \$100,000		None (or less than \$201)
3.2	SPDR S&P 500 ETF (SPY)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	MICROSOFT CORP (MSFT)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
3.4	NVIDIA CORP (NVDA)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.5	PENNYMAC FINL SVCS INC (PFSI)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.6	SERVICE NOW INC (NOW)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
3.7	TAIWAN SEMICONDUCTR FSPONSO (TSM)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.8	TERADYNE INCORPORATE (TER)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
3.9	TRADEWEB MKTS INC (TW)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.10	VEEVA SYSTEMS INC CLASS (VEEV)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.11	VERTEX PHARMACEUTICA (VRTX)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
3.12	ADOBE INC (ADBE)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.13	EMERGENT BIOSOLUTION (EBS)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
3.14	EPAM SYSTEMS INC (EPAM)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.15	FACEBOOK INC (FB)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
3.16	FRANCO NEVADA CORP (FNV)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4	US BANK ACCT #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	US BANK ACCT #2 (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
6	US BANK ACCT #3 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7	US BANK ACCT #4 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8	US BANK ACCT #5 (cash)	N/A	None (or less than \$1,001)		None (or less than \$201)
9	US BANK ACCT #6 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	US BANK ACCT #7 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
11	US BANK ACCT #8 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
12	US BANK ACCT #9 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
13	Wawa Common Stock (JOINT) - (convenience store Wawa, PA)	N/A	\$500,001 - \$1,000,000	Dividends	\$50,001 - \$100,000
14	Wawa Common Stock (DC)- (convenience store Wawa, PA)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
15	Wawa Common Stock (DC)- (convenience store Wawa, PA)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
16	Blue Jay Oil	N/A	\$1,001 - \$15,000		None (or less than \$201)
17	BIP LLC (Wilmington, DE; loan disbursement)	No			
17.1	U.S. BANK ACCT #14	N/A	\$100,001 - \$250,000		None (or less than \$201)
18	Trust #1 (personal residential property)	No			
19	Eagle's Nest Six, LLC (personal residential property)	No			
20	US BANK ACCT #10 (cash) (Dependent Child)	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
21	US BANK ACCT #11 (cash) (Dependent Child)	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
22	US BANK ACCT #12 (cash) (Dependent Child)	N/A	None (or less than \$1,001)	Interest	None (or less than \$201)
23	US BANK ACCT #13 (cash) (Dependent Child)	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)
24	Brokerage Acct #3 (Dependent Child)	No			
24.1	CASH	N/A	None (or less than \$1,001)		None (or less than \$201)
24.2	MICROSOFT CORP (MSFT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
24.3	SPDR S&P 500 ETF (SPY)	Yes	\$1,001 - \$15,000		None (or less than \$201)
25	Brokerage Acct #4 (Dependent Child)	No			
25.1	CASH	N/A	None (or less than \$1,001)		None (or less than \$201)
25.2	MICROSOFT CORP (MSFT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
25.3	SPDR S&P 500 ETF (SPY)	Yes	\$1,001 - \$15,000		None (or less than \$201)
26	Brokerage Acct #5 (Dependent Child)	No			
26.1	CASH	N/A	None (or less than \$1,001)		None (or less than \$201)
26.2	Colgate Palmolive Co (CL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
26.3	SPDR S&P 500 ETF (SPY)	Yes	\$1,001 - \$15,000		None (or less than \$201)
27	Trust #2	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
27.1	Brokerage Acct #6	No			
27.1.1	GOLDMAN SACHS BANK USA DEPOSIT (BDA)	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
27.1.2	GS HIGH YIELD MUNICIPAL FUND CLASS P	Yes	\$100,001 - \$250,000		\$201 - \$1,000
27.1.3	GS EMERGING MARKETS EQUITY FUND CLASS P (GAHPX)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
27.2	Brokerage Acct #7	No			
27.2.1	GOLDMAN SACHS BANK USA DEPOSIT (BDA)	N/A	None (or less than \$1,001)		None (or less than \$201)
27.2.2	GS Short Duration Tax Free Fund Class P	N/A	\$250,001 - \$500,000		None (or less than \$201)
27.2.3	OSAGE SCH LAKE OZARK MO GO 5% 03/01/21 MS GO SCH BDS C UT BEO Not Rated	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.4	SPARTANBURG CNTY S C SCH DIST GO 5% 03/01/21 MS NO 002 GO BDS 2018 UT BEO S&P A+	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.5	ADRIAN MICH CITY SCH DIST GO 5% 05/01/21 MN ULTD GO SCH BLDG AND SITE BDS 2016 UT BEO SR LIEN Moody's Aa1	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.6	ALASKA MUN BD BK AUTH REV 5% 05/01/21 MN SER ONE BEO S&P A+	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.7	EASTERN IOWA CMNTY COLLEGE GO 5% 06/01/21 JD DIST IOWA GO SCH BDS 2010-A UT BNK QUAL BEO Moody's Aa1	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.8	FLA ST BRD ED PUB ED DB 4.0000% 06/01/21 JD RFDG-CAP OUTLAY-SER A BEO S&P AAA /Moody's Aaa	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
27.2.9	HOUSTON TEX ARPT SYS REV FOR REV 5.0000% 07/01/21 JJ FUTURE ISSUES SEE442349 SUB LIEN REF BDS 2012B BEO SUB S&P A	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.10	REGIONAL PUB TRANSN AUTH ARIZ REV 5.0000% 07/01/21 JJ TRANSN EXCISE TAX REV RFDG-MARICOPA CNTY PUB BEO S&P AA+	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.11	WISCONSIN ST TRANSN REV REV 5% 07/01/21 JJ REV BDS 2012 SERIES 2 BEO S&P AA+ /Moody's Aa2	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.12	UNIVERSITY UTAH UNIV REVS REV 5.0000% 08/01/21 FA GEN REV REF BDS 2015B ETM REFUNDED 02/02/21 BEO S&P AA+ /Moody's Aaa	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.13	SEATTLE WASH MUN LT & PWR REV REV 5% 09/01/21 MS REF BDS 2014 BEO SR LIEN S&P AA /Moody's Aa2	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.14	COLUMBIA S C WTRWKS & SWR SYS REV 4% 02/01/22 FA REV REV BDS 2011A PRERE 02/01/21 BEO SR LIEN	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.15	SAUK RAPIDS MINN INDPT SCH GO 5% 02/01/21 FA DIST NO 047 GO SCH BLDG REF BDS 2015 A UT BEO	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.16	CYPRESS-FAIRBANKS TEX INDPT GO 5.0000% 02/15/21 FA SCH DIST RFDG-SCH BLDG UT BEO	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.17	SUGAR LAND TEX GO 5% 02/15/21 FA GO REF BDS 2014 LT BEO	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.18	TEXAS ST GO 5% 08/01/21-CA FA GO BDS 2012G UT BEO SR LIEN S-T SPL RDM	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.19	CONNECTICUT ST GO 3% 01/15/21 JJ GO REF BDS 2020	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
27.2.20	CLARK CNTY NEV SD GO 5% 06/15/21 JD GO LTD	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
27.2.21	TEXAS ST REV 4.0000% 08/26/21 FA TAX & REV ANTIC	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.22	HONOLULU HAWAII CITY & CNTY GO 5% 09/01/21	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.2.23	KING CNTY WASH SWR REV FOR REV 5.25% 01/01/27	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
27.3	Brokerage Acct #8	No			
27.3.1	U S DOLLAR	N/A	None (or less than \$1,001)		None (or less than \$201)
27.3.2	S&P TECHNOLOGY SELECT SECTOR INDEX FUND (SPDR) TECHNOLOGY SELECT INDEX 'SPDR' (XLK)	Yes	None (or less than \$1,001)		None (or less than \$201)
27.3.3	RUSSELL 1000 GROWTH INDEX FUND (ISHARES) ISHARES RUSSELL 1000 GROWTH ETF (IWF)	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
27.3.4	RUSSELL 1000 VALUE INDEX FUND (ISHARES) ISHARES RUSSELL 1000 VALUE ETF (IWD)	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
27.3.5	ISHARES RUSSELL 2000 SMALL-CAP INDEX FUND ISHARES RUSSELL 2000 SMALL-CAP INDEX FUND K SHARES (BDBKX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
27.3.6	ISHARES MSCI EAFE INTERNATIONAL INDEX FUND ISHARES MSCI EAFE INTERNATIONAL INDEX FUND K SHARES (BTMKX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
27.3.7	JOHCM INTERNATIONAL SELECT FUND JOHCM INTERNATIONAL SELECT FUND INSTITUTIONAL (JOHIX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
27.3.8	PRUDENTIAL GLOBAL REAL ESTATE DE DISCRETION EXERCISED		Yes	None (or less than \$1,001)		None (or less than \$201)
27.4	Brokerage Acct #9		No			
27.4.1	GOLDMAN SACHS BANK USA DEPOSIT (BDA)		N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
27.4.2	CHEMOURS COMPANY (THE) CMN (CC)		N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
27.4.3	CORTEVA, INC. CMN (CTVA)		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
27.4.4	DOW INC. CMN (DOW)		N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
27.4.5	DUPONT DE NEMOURS INC CMN (DD)		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
27.4.6	WSFS FINANCIAL CORP CMN (WSFS)		N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000
27.4.7	SPDR S&P 500 ETF TRUST (SPY)		Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
27.5	Wawa Common Stock- (convenience store Wawa, PA)		N/A	\$1,000,001 - \$5,000,000	Dividends	\$50,001 - \$100,000
28	The Anchorage, LLC (personal residential property)	See Endnote	No			
29	The Anchorage, LP (personal residential property)		No			
30	Thorofare, LLC (personal residential property)		No			

7. Transactions

None

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
6.	28	The Anchorage, LLC, is a Delaware limited liability company that owns a general partnership interest in The Anchorage, LP (see line 29), which owns residential real estate.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$166 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, N.W., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).
