

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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Hadjiyane, Paul

General Counsel, Department of Defense Office of Inspector General

Report Year: 2021

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Hadjiyane, Paul [electronically signed on 05/16/2021 by Hadjiyane, Paul in Integrity.gov]

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Kraus, William, Certifying Official [electronically signed on 06/25/2021 by Kraus, William in Integrity.gov]

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Other review conducted by

/s/ Williams, Keith, Ethics Official [electronically signed on 06/24/2021 by Williams, Keith in Integrity.gov]

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U.S. Office of Government Ethics Certification

Data Revised 06/21/2021

Data Revised 06/10/2021

Data Revised 06/08/2021

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

None

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

None

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## 3. Filer's Employment Agreements and Arrangements

None

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

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

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## 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	MaineHealth			salary, bonus	
4	MaineHealth 403B Retirement Plan				

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#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.1	American Century Mid Cap Value Fund Investor Class Shares (ACMVX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.2	MFS Value Fund Class A Shares (MEIAX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.3	MetWest Total Return Bond Fund Class I Shares (MWTIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	EuroPacific Growth Fund Class A Shares (AEPGX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.5	American Funds Fundamental Investors Class A Shares (ANCFX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.6	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Inc (PRDSX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.7	Vanguard Intermediate-Term Bond Index Fund Admiral Shares (VBILX)	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
4.8	Vanguard Extended Market Index Fund Admiral Shares (VEXAX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.9	Vanguard Institutional Index Fund Institutional Plus Shares (VIIIX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.10	Victory Sycamore Small Company Opportunity Fund Class A Shares (SSGSX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.11	Vanguard Developed Markets Index Fund Admiral Class Shares (VTMGX)	Yes	None (or less than \$1,001)		None (or less than \$201)
4.12	Lincoln Stable Value sep Account (LNSXG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	Inova Health Systems 401(k) Plan				
5.1	American Fund Washington Mutual Investors Fund Class R6 Shares (RWMGX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
5.2	Fidelity International Index Fund (FSPSX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.3	Fidelity 500 Index Fund (FXAIX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
5.4	Fiam Core Plus Commingled Pool Class K	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
5.5	Janus Henderson Enterprise Fund Class I Shares (JMGRX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.6	American Fund Europac Growth R6	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.7	American Century Mid Cap Value Fund Investor Class Shares (ACMVX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.8	Fidelity Growth Commingled Pool	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.9	Fidelity US Bond Index (FBIDX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.10	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	Invesco QQQ Trust, Series 1 (QQQ)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
2	Ishares Core US Aggregate (AGG)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	Vanguard Information Technology ETF (VGT)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
4	Comm Serve Sector Select SPDR (XLC)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	Invesco QQQ Trust, Series 1 (QQQ)		Yes	\$50,001 - \$100,000		\$201 - \$1,000
6	Ishares Core U.S. Aggregate (AGG)		Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7	IShares Edge MSCI US Momentum (MTUM)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
8	Vanguard Information Technology ETF (VGT)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
9	Intel Corp (INTC)	See Endnote	No	\$15,001 - \$50,000	Dividends Capital Gains	\$1,001 - \$2,500
10	Johnson & Johnson (JNJ)	See Endnote	No	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
11	Rental Property, Richmond, VA		No	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000
12	JP Morgan Equity Income C (OINCX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
13	US Bank Account #5 (cash)		No	None (or less than \$1,001)	Interest	None (or less than \$201)
14	US Bank Account #4 (cash)		No	None (or less than \$1,001)	Interest	None (or less than \$201)
15	US Bank Account #6 (cash)		No	\$15,001 - \$50,000	Interest	None (or less than \$201)
16	American Investment Company of America F2 (ICAFX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
17	US Bank Account #1 (cash)		No	\$15,001 - \$50,000	Interest	None (or less than \$201)
18	US Bank Account #2 (cash)		No	\$15,001 - \$50,000	Interest	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	US Bank Account #3 (cash)	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
20	TD Ameritrade - Deposit Account		None (or less than \$1,001)	Interest	None (or less than \$201)
21	Condominium apartment, Portland, ME	See Endnote	\$500,001 - \$1,000,000	Rent or Royalties	\$2,501 - \$5,000
22	Apple, Inc. (AAPL)	See Endnote	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
23	crowdstrike holdings CI A (CRWD)		\$15,001 - \$50,000		None (or less than \$201)
24	DocuSign, Inc. (DOCU)		\$1,001 - \$15,000		None (or less than \$201)
25	Intuitive Surgical, Inc. (ISRG)	See Endnote	\$1,001 - \$15,000		None (or less than \$201)
26	PayPal Holdings, Inc. (PYPL)		\$1,001 - \$15,000		None (or less than \$201)
27	ARK Genomic Revolution ETF (ARKG)	Yes	\$15,001 - \$50,000		None (or less than \$201)
28	Consumer Discretionary Select Sector SPDR Fund (XLY)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
29	iShares Core S&P US Growth ETF (IUSG)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
30	iShares MSCI China ETF (MCHI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
31	iShares MSCI South Korea ETF (EWY)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
32	iShares Russell 2000 ETF (IWM)	Yes	\$50,001 - \$100,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
33	iShares Silver Trust (SLV)	Yes	\$15,001 - \$50,000		None (or less than \$201)
34	iShares Transportation Average ETF (IYT)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
35	Vanguard Total Bond Market Index Fund ETF Shares (BND)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
36	iShares Core S&P US Growth ETF (IUSG)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
37	iShares MSCI China ETF (MCHI)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
38	iShares Nasdaq Biotechnology ETF (IBB)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
39	Cisco Systems, Inc. (CSCO)	See Endnote	No	\$1,001 - \$15,000	Dividends None (or less than \$201)
40	Garmin Ltd. (GRMN)	See Endnote	No	\$1,001 - \$15,000	Dividends \$201 - \$1,000
41	Starbucks Corp. (SBUX)	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Intuitive Surgical, Inc. (ISRG)	See Endnote	Purchase	10/28/2020 \$1,001 - \$15,000
2	DocuSign, Inc. (DOCU)	See Endnote	Purchase	10/28/2020 \$1,001 - \$15,000
3	CrowdStrike Holdings Inc CI A (CRWD)	See Endnote	Purchase	10/28/2020 \$1,001 - \$15,000
4	Apple, Inc. (AAPL)	See Endnote	Purchase	11/10/2020 \$1,001 - \$15,000
5	Apple, Inc. (AAPL)	See Endnote	Purchase	10/28/2020 \$1,001 - \$15,000



#	DESCRIPTION		TYPE	DATE	AMOUNT
6	ConocoPhillips (COP)	See Endnote	Sale	07/23/2020	\$1,001 - \$15,000
7	PayPal Holdings, Inc. (PYPL)	See Endnote	Purchase	10/28/2020	\$1,001 - \$15,000
8	Phillips 66 (PSX)	See Endnote	Sale	09/03/2020	\$1,001 - \$15,000
9	Intuitive Surgical, Inc. (ISRG)	See Endnote	Purchase	10/28/2020	\$1,001 - \$15,000
10	Residential condominium, Portland, ME	See Endnote	Purchase	08/28/2020	\$500,001 - \$1,000,000
11	Consumer Discretionary Select Sector SPDR Fund (XLY)		Purchase	01/02/2020	\$1,001 - \$15,000
12	iShares Core US Aggregate Bond ETF (AGG)		Purchase	01/02/2020	\$1,001 - \$15,000
13	First Trust Cloud Computing ETF (SKYY)		Sale	01/02/2020	\$15,001 - \$50,000
14	Consumer Discretionary Select Sector SPDR Fund (XLY)		Sale	01/06/2020	\$1,001 - \$15,000
15	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)		Purchase	01/06/2020	\$1,001 - \$15,000
16	Invesco QQQ Trust, Series 1 (QQQ)		Purchase	01/06/2020	\$1,001 - \$15,000
17	iShares Edge MSCI USA Momentum Factor ETF (MTUM)		Sale	01/06/2020	\$1,001 - \$15,000
18	Investment Company of America Class F2 Shares (ICAFX)		Sale	03/26/2020	\$15,001 - \$50,000
19	Vanguard Mega Cap Index Fund ETF Shares (MGC)		Purchase	03/26/2020	\$1,001 - \$15,000
20	Invesco QQQ Trust, Series 1 (QQQ)		Purchase	03/26/2020	\$1,001 - \$15,000
21	iShares MSCI China ETF (MCHI)		Purchase	03/26/2020	\$1,001 - \$15,000
22	iShares MSCI China ETF (MCHI)		Purchase	03/26/2020	\$1,001 - \$15,000
23	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)		Sale	03/26/2020	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
24	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Sale	03/26/2020	\$50,001 - \$100,000
25	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Purchase	03/26/2020	\$1,001 - \$15,000
26	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Purchase	03/26/2020	\$1,001 - \$15,000
27	iShares Core S&P US Growth ETF (IUSG)	Purchase	03/26/2020	\$1,001 - \$15,000
28	iShares Core S&P US Growth ETF (IUSG)	Purchase	03/26/2020	\$50,001 - \$100,000
29	iShares US Aerospace & Defense ETF (ITA)	Sale	03/13/2020	\$1,001 - \$15,000
30	Vanguard Consumer Discretionary Index Fund ETF Shares (VCR)	Sale	03/11/2020	\$1,001 - \$15,000
31	Financial Select Sector SPDR Fund (XLF)	Sale	03/10/2020	\$1,001 - \$15,000
32	iShares MSCI China ETF (MCHI)	Purchase	05/28/2020	\$1,001 - \$15,000
33	iShares Core US Aggregate Bond ETF (AGG)	Purchase	05/28/2020	\$1,001 - \$15,000
34	iShares Nasdaq Biotechnology ETF (IBB)	Purchase	05/28/2020	\$15,001 - \$50,000
35	SPDR Gold Shares (GLD)	Purchase	05/20/2020	\$1,001 - \$15,000
36	iShares MSCI China ETF (MCHI)	Purchase	05/20/2020	\$1,001 - \$15,000
37	Proshares VIX Mid-Term Futures ETF (VIXM)	Sale	07/27/2020	\$1,001 - \$15,000
38	Proshares VIX Mid-Term Futures ETF (VIXM)	Purchase	07/23/2020	\$1,001 - \$15,000
39	iShares Core US Aggregate Bond ETF (AGG)	Purchase	07/23/2020	\$1,001 - \$15,000
40	ARK Genomic Revolution ETF (ARKG)	Purchase	10/28/2020	\$15,001 - \$50,000
41	Vanguard Mega Cap Index Fund ETF Shares (MGC)	Sale	10/28/2020	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
42	iShares Silver Trust (SLV)	Purchase	10/28/2020	\$15,001 - \$50,000
43	Invesco QQQ Trust, Series 1 (QQQ)	Purchase	10/28/2020	\$15,001 - \$50,000
44	iShares MSCI China ETF (MCHI)	Purchase	10/28/2020	\$1,001 - \$15,000
45	iShares Transportation Average ETF (IYT)	Purchase	10/28/2020	\$15,001 - \$50,000
46	iShares Russell 2000 ETF (IWM)	Purchase	10/28/2020	\$15,001 - \$50,000
47	iShares MSCI South Korea ETF (EWY)	Purchase	10/28/2020	\$15,001 - \$50,000
48	Vanguard Total Bond Market Index Fund ETF Shares (BND)	Purchase	10/28/2020	\$100,001 - \$250,000
49	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Purchase	10/28/2020	\$15,001 - \$50,000
50	Consumer Discretionary Select Sector SPDR Fund (XLY)	Purchase	10/28/2020	\$15,001 - \$50,000
51	iShares Core S&P US Growth ETF (IUSG)	Purchase	10/28/2020	\$15,001 - \$50,000
52	SPDR Gold Shares (GLD)	Sale	11/23/2020	\$1,001 - \$15,000
53	iShares Russell 2000 ETF (IWM)	Purchase	11/10/2020	\$15,001 - \$50,000
54	iShares MSCI South Korea ETF (EWY)	Purchase	11/10/2020	\$1,001 - \$15,000
55	Vanguard Total Bond Market Index Fund ETF Shares (BND)	Purchase	11/10/2020	\$1,001 - \$15,000
56	EuroPacific Growth Fund Class R6 Shares (RERGX)	Purchase	03/16/2020	\$1,001 - \$15,000
57	American Century Mid Cap Value Fund Investor Class Shares (ACMVX)	Purchase	03/16/2020	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
58	FIAM Core Plus commingled pool class k	Sale	03/16/2020	\$15,001 - \$50,000
59	Fidelity 500 Index Fund (FXAIX)	Sale	03/16/2020	\$15,001 - \$50,000
60	Fidelity growth company commingled pool	Purchase	03/16/2020	\$1,001 - \$15,000
61	Fidelity International Index Fund (FSPSX)	Purchase	03/16/2020	\$1,001 - \$15,000
62	Fidelity US Bond Index Fund (FXNAX)	Sale	03/16/2020	\$15,001 - \$50,000
63	Janus Henderson Enterprise Fund Class I Shares (JMGRX)	Sale	03/16/2020	\$1,001 - \$15,000
64	JPMorgan US Equity Fund Class L Shares (JMUEX)	Purchase	03/16/2020	\$50,001 - \$100,000
65	Fidelity managed income portfolio class 2	Sale	03/16/2020	\$15,001 - \$50,000
66	FIAM Core Plus commingled pool class k	Sale	04/21/2020	\$1,001 - \$15,000
67	Fidelity 500 Index Fund (FXAIX)	Purchase	04/21/2020	\$1,001 - \$15,000
68	Fidelity Growth company commingled pool	Sale	04/21/2020	\$1,001 - \$15,000
69	Fidelity International Index Fund (FSPSX)	Sale	04/21/2020	\$1,001 - \$15,000
70	Fidelity US Bond Index Fund (FXNAX)	Purchase	04/21/2020	\$15,001 - \$50,000
71	Janus Henderson Enterprise Fund Class I Shares (JMGRX)	Sale	04/21/2020	\$1,001 - \$15,000
72	JPMorgan US Equity Fund Class L Shares (JMUEX)	Sale	04/21/2020	\$1,001 - \$15,000
73	American Beacon Small Cap Value Fund Class R5 Shares (AVFIX)	Purchase	07/01/2020	\$1,001 - \$15,000
74	EuroPacific Growth Fund Class R6 Shares (REGX)	Purchase	07/01/2020	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
75	American Century Mid Cap Value Fund Investor Class Shares (ACMVX)		Purchase	07/01/2020	\$1,001 - \$15,000
76	FIAM core plus commingled pool class k		Sale	07/01/2020	\$1,001 - \$15,000
77	Fidelity 500 Index Fund (FXAIX)		Sale	07/01/2020	\$15,001 - \$50,000
78	Fidelity Growth company commingled pool		Purchase	07/01/2020	\$1,001 - \$15,000
79	Fidelity International Index Fund (FSPSX)		Sale	07/01/2020	\$1,001 - \$15,000
80	Janus Henderson Enterprise Fund Class I Shares (JMGRX)		Sale	07/01/2020	\$15,001 - \$50,000
81	JPMorgan US Equity Fund Class L Shares (JMUEX)		Purchase	07/01/2020	\$50,001 - \$100,000
82	American Beacon Small Cap Value Fund Class R5 Shares (AVFIX)	See Endnote	Sale	09/29/2020	\$1,001 - \$15,000
83	EuroPacific Growth Fund Class R6 Shares (RERGX)	See Endnote	Sale	09/29/2020	\$50,001 - \$100,000
84	American Century Mid Cap Value Fund Investor Class Shares (ACMVX)	See Endnote	Sale	09/29/2020	\$50,001 - \$100,000
85	FIAM core plus commingled pool class k	See Endnote	Sale	09/29/2020	\$15,001 - \$50,000
86	Fidelity 500 Index Fund (FXAIX)	See Endnote	Sale	09/29/2020	\$1,001 - \$15,000
87	Fidelity growth company commingled pool	See Endnote	Sale	09/29/2020	\$50,001 - \$100,000
88	Fidelity International Index Fund (FSPSX)	See Endnote	Sale	09/29/2020	\$15,001 - \$50,000
89	Fidelity US Bond Index Fund (FXNAX)	See Endnote	Sale	09/29/2020	\$15,001 - \$50,000
90	JPMorgan US Equity Fund Class L Shares (JMUEX)	See Endnote	Sale	09/29/2020	\$100,001 - \$250,000

## 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 year
2	Morgan Stanley		Interest-only loan from managed investment holdings	\$50,001 - \$100,000	2020	1.75	12 months
3	United Wholesale Mortgage	See Endnote	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2020	2.875	30 year
4	Quicken Loans		Mortgage (investment/rental property)	\$100,001 - \$250,000	2020	3.25	30 year

## 9. Gifts and Travel Reimbursements

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION	VALUE
1	MaineHealth	Portland, Maine	I received roundtrip commercial air travel, local travel, corporate lodging, and some reimbursement for meals when I accompanied my wife from 9-12 July 2020 on her final job interview for an executive position with MaineHealth, in Portland, ME.	Approximately \$700

## Endnotes

PART	#	ENDNOTE
6.	9	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.	10	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.	21	Condominium was purchased in August 2020 and serves as primary residence for my wife who relocated to Portland, ME, for a professional employment opportunity. The property is jointly owned. We rented it for approximately 30 days to the former owners under a lease-back arrangement to accommodate their post-closing moveout plans. The property was otherwise occupied by my spouse for the remainder of 2020.
6.	22	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.	25	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.	39	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.	40	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.
7.	1	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.

PART	#	ENDNOTE
7.	2	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	3	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	4	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	5	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	6	I learned of this transaction involving my financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	7	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	8	I learned of this transaction involving my financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	9	I learned of this transaction involving my spouse's financial holdings on 12/29/20. It was made without my knowledge by a financial account manager that historically has managed only mutual funds and other excepted investment funds. I will arrange more timely notice for future transactions of this type.
7.	10	Condominium purchased as primary residence for spouse who relocated to Portland, ME, for a professional employment opportunity. Property is reported here only because it was subject a 30-day lease-back to former owners after closing to accommodate their moving schedule. Property has been occupied otherwise during the reporting period solely by spouse.
7.	82	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	83	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	84	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	85	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.



PART	#	ENDNOTE
7.	86	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	87	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	88	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	89	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
7.	90	Reported as a "withdrawal" from the 401(k) plan in association with termination of spouse's employment.
8.	3	Mortgage is on personal residence used primarily by spouse who resides in Portland, ME, for professional employment. Mortgage is reported because property was subject to a 30-day lease-back to former owners following August 2020 closing on purchase.

# Summary of Contents

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

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

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

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

Part 2 discloses the following:

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

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

## 3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

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

Part 5 discloses the following:

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

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

#### 6. Other Assets and Income

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

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

## 7. Transactions

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

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

## 8. Liabilities

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

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

## 9. Gifts and Travel Reimbursements

This section discloses:

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

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

## Privacy Act Statement

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

## Public Burden Information

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

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

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