

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Vazirani, Ashish

Deputy Under Secretary of Defense for Personnel and Readiness, Department of Defense

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Committee on Armed Services
-

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/ Vazirani, Ashish [electronically signed on 07/11/2021 by Vazirani, Ashish 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/ Thompson, Scott F, Certifying Official [electronically signed on 09/28/2021 by Thompson, Scott F in Integrity.gov]

Other review conducted by

/s/ Raab, Dean, Ethics Official [electronically signed on 09/28/2021 by Raab, Dean in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 10/01/2021 by Apol, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	A2O Strategies, LLC	Silver Spring, Maryland	Corporation	Principal	5/2017	Present
2	National Military Family Association, Inc.	Alexandria, Virginia	Non-Profit	Executive Director & CEO	9/2019	2/2021
3	Armed Services YMCA of the USA	Woodbridge, Virginia	Non-Profit	Chief Development Officer & SVP for Programs	6/2017	9/2019
4	Stone Ridge School of the Sacred Heart	Bethesda, Maryland	Private Elementary and Secondary School	Trustee	5/2021	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	A2O Strategies, LLC (Limited Liability Corporation (Sole Proprietor) - Provides advisory services to high growth, mid-size, and large enterprises, commercial and non-profit, on the development, implementation, and execution of growth strategies.	N/A	\$1,001 - \$15,000	Professional fees for consulting services.	\$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	National Military Family Association, Inc.	N/A		Salary (\$215,000 annually), Sign on bonus (\$10,000 paid in two installments - 6 & 12 months), Payout of unused vacation at termination of employment.	\$264,584
3	National Military Family Association, Inc.	N/A		Severance; 6 months severance based on annual salary of \$215,000. Payment received April 2021.	\$107,500
4	ZS Associates, Inc.	No			
4.1	31617E836 FID GROWTH CO POOL	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.2	DFEVX DFA EMERG MKTS VAL I	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.3	FLPKX FID LOW PRICED STK K	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.4	FSNQX FIDELITY FREEDOM 2030 FUND - CLASS K	Yes	\$100,001 - \$250,000		None (or less than \$201)
5	National Military Family Association, Inc.	No			
5.1	AmFds Wshngtn Mut Inv R3 (RWMCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	BlkRk Eq Divd Inv A (MDDVX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.3	AmFds Am Bal R3 (RLBCX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	Roche Laboratories, Inc. (U.S. ROCHE 401(K) SAVINGS PLAN)	No			
6.1	NON40TDJF ROCHE TARGET 2030	See Endnote	Yes	\$15,001 - \$50,000	None (or less than \$201)
7	A Vazirani Roth IRA (Fidelity)	No			
7.1	FDRXX** FIDELITY GOVERNMENT CASH RESERVES	Yes	\$1,001 - \$15,000		None (or less than \$201)
8	A Vazirani Traditional IRA (Fidelity)	No			
8.1	FDRXX** FIDELITY GOVERNMENT CASH RESERVES	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.2	FCNTX FIDELITY CONTRAFUND	Yes	\$50,001 - \$100,000		None (or less than \$201)
8.3	FDIVX FIDELITY DIVERSIFIED INTERNATIONAL	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.4	FLPSX Fidelity Low-Priced Stock Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.5	FMAGX FIDELITY MAGELLAN	Yes	\$50,001 - \$100,000		None (or less than \$201)
8.6	FXAIX Fidelity 500 Index Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	A Vazirani SEP IRA (Kingdom Trust)	No			
9.1	Black Falcon Global Macro Fund I, LP	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.2	Black Falcon Global Macro Fund I, LP- SP	Yes	\$1,001 - \$15,000		None (or less than \$201)
10	A Vazirani Traditional IRA (Kingdom Trust)	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.1	Black Falcon Global Macro Fund I, LP- SP	Yes	\$100,001 - \$250,000		None (or less than \$201)
10.2	Black Falcon Global Macro Fund I, LP	Yes	\$50,001 - \$100,000		None (or less than \$201)
11	403(b) Smart Account	No			
11.1	YMCA Retirement Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
12	YMCA Account	No			
12.1	YMCA Retirement Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	YMCA 403(b) Smart Account	Woodbridge, Virginia	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	7/2019
2	YMCA Account (cash annuity)	Woodbridge, Virginia	I will continue to participate in this plan in which I can take a lump sum distribution or cash annuity at retirement age. The plan sponsor will not make further contributions after my separation.	1/2018
3	National Military Family Association, Inc.	Alexandria, Virginia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	1/2020
4	ZS Associates, Inc.	Evanston, Illinois	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	1/2011
5	Roche Laboratories, Inc. (U.S. ROCHE 401(K) SAVINGS PLAN)	Nutley, New Jersey	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	1/1997

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
6	A20 Strategies, LLC	Silver Spring, Maryland	My consulting business will be inactive during my appointment and all outstanding client fees will be fixed before I enter government service.	7/2021
7	National Military Family Association, Inc.	Alexandria, Virginia	National Military Family Association, Inc., will pay my COBRA health insurance premiums until August 19, 2021. I signed a confidentiality agreement with this former employer.	1/2020

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	National Military Family Association	Alexandria, Virginia	Executive Director & CEO
2	Armed Services YMCA of the USA	Woodbridge, Virginia	Chief Development Officer and SVP for Programs
3	Operation Homefront, Inc.	San Antonio, Texas	Operation Homefront is a client of A20 Strategies, LLC. I am the sole proprietor of A20 Strategies
4	A20 Strategies, LLC	Silver Spring, Maryland	Sole Proprietor

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Urban Health Media Project (Non-Profit 501(c)(3))	N/A		consulting fees	
2	Professional & Scientific Associates (Consulting Firm / Government Contractor)	N/A		consulting fees	
3	Hinge Strategy LLC (Marketing Consulting Firm)	N/A		consulting fees	

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	National Association of School Nurses (Non-profit Specialty Nursing Organization)	N/A		consulting fees	
5	401K (Kingdom Trust)	No			
5.1	Black Falcon Global Macro Fund I, LP	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.2	Black Falcon Global Macro Fund I, LP-SP	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	Rollover IRA (Fidelity)	No			
6.1	FDEGX FIDELITY GROWTH STRATEGIES FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	FDGRX FIDELITY GROWTH COMPANY	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.3	FEQIX FIDELITY EQUITY INCOME	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.4	FGRIX FIDELITY GROWTH & INCOME	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.5	FMLX FIDELITY NEW MILLENNIUM	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.6	FOCPX FIDELITY OTC PORT	Yes	\$50,001 - \$100,000		None (or less than \$201)
6.7	FXAIX FIDELITY 500 INDEX FUND	Yes	\$50,001 - \$100,000		None (or less than \$201)
7	SEP IRA (Fidelity)	No			
7.1	FOCPX FIDELITY OTC PORT	Yes	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US Bank #1 - Cash	N/A	\$15,001 - \$50,000		None (or less than \$201)
2	US Credit Union #1 - Cash	See Endnote	\$250,001 - \$500,000	Interest	\$1,001 - \$2,500
3	US Credit Union #2 - Cash	See Endnote	\$250,001 - \$500,000	Interest	\$201 - \$1,000
4	US Bank #2 - Cash	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	American Century Investments - TWCUX Ultra Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
6	SPAXX** FIDELITY GOVERNMENT MONEY MARKET	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	BRKB BERKSHIRE HATHAWAY INC COM USD0.0033 CLASS B	N/A	\$15,001 - \$50,000		None (or less than \$201)
8	CI CIGNA CORP NEW COM	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	CMCSA COMCAST CORP	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	CSCO CISCO SYSTEMS INC	N/A	\$1,001 - \$15,000		None (or less than \$201)
11	FTEXX FIDELITY MUNICIPAL MONEY MARKET	Yes	\$1,001 - \$15,000		None (or less than \$201)
12	INTC INTEL CORP COM USD0.001	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
13	MRK MERCK &CO. INC COM	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	OGN ORGANON &CO COMMON STOCK	N/A	\$1,001 - \$15,000		None (or less than \$201)
15	USAA 529- Victory Capital (Nevada)	No		Distributions	\$43,852
15.1	Age-Based Option 18+: In College Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
15.2	Aggressive Growth Portfolio	Yes	\$15,001 - \$50,000		None (or less than \$201)
15.3	Growth Portfolio	Yes	\$15,001 - \$50,000		None (or less than \$201)
15.4	In College Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
15.5	Moderately Aggressive Portfolio	Yes	\$15,001 - \$50,000		None (or less than \$201)

7. Transactions

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

8. Liabilities

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Arvest Central Mortgage Co.	See Endnote	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2021	2.875%	30 years
2	Bank of America	See Endnote	Mortgage on Personal Residence	\$100,001 - \$250,000	2006	3.010	25 years

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
3	Navy Federal Credit Union	See Endnote	Mortgage on Personal Residence	\$250,001 - \$500,000	2019	4.625	30 years

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
2.	6.1	No longer held. This asset was sold after submission of this report.
6.	2	Some funds owned jointly with non-dependent relatives.
6.	3	Owned jointly with non-dependent relative.
8.	1	Mortgage on Primary Residence. Refinanced in February 2021.
8.	2	Home equity line of credit which was paid in full in February 2021. (The amount reflects the maximum loan amount in 2020.)
8.	3	Mortgage on 2nd residence. Paid in full in February 2021. (The amount reflects the maximum loan amount in 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 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).
