

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

Filer's Information

LaBolt, Benjamin Charles

Assistant to the President, White House - Biden-Harris Administration

Date of Appointment: 02/28/2023

Other Federal Government Positions Held During the Preceding 12 Months:

Nomination Advisor for Communications, WHO EOP (2/2022 - 4/2022)

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/ LaBolt, Benjamin C [electronically signed on 03/27/2023 by LaBolt, Benjamin C 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/ Phillips, Anjali, Certifying Official [electronically signed on 04/20/2023 by Phillips, Anjali in Integrity.gov]

Other review conducted by

/s/ Phillips, Anjali, Ethics Official [electronically signed on 04/20/2023 by Phillips, Anjali in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 04/20/2023

Data Revised - Workflow re-designation - 04/20/2023

Data Revised 04/18/2023

Data Revised 04/10/2023

Data Revised 04/07/2023

Data Revised 04/06/2023

Data Revised 04/04/2023

Data Revised 03/29/2023

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Bully Pulpit Interactive (BPI)	Washington, District of Columbia	Corporation	Partner, Board Director	9/2016	2/2023
2	Haun Ventures Management LP	Menlo Park, California	Venture Capital Fund	Advisor	6/2022	2/2023
3	The Incite Agency Holdings	San Francisco, California	Corporation	Controlling Officer	9/2016	Present
4	Benjamin LaBolt Living Trust	San Francisco, California	Trust	Trustee	6/2018	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Bully Pulpit Interactive (BPI) Equity Vested Units	N/A	None (or less than \$1,001)	Dividends	\$100,001 - \$1,000,000
2	BPI	N/A		Salary and Bonus	\$833,501
3	IRA	No			
3.1	VANGUARD GLOBAL EX-US REAL ESTATE ETF ETF (VNQI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	VANGUARD INDEX FUNDS - VANGUARD SMALL-CAP VALUE ETF (VBR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	VANGUARD REIT INDEX FUND CMN (VNQ)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.4	VANGUARD S&P 500 ETF (VOO)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.5	VANGUARD INDEX FUNDS - VANGUARD VANGUARD VALUE ETF (VTV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.6	ISHARES CORE S&P SMALL-CAP ETF (IJR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.7	ISHARES CORE MSCI EAFE ETF ETF (IEFA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.8	ISHARES CORE MSCI EMERGING MARKETS ETF (IEMG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.9	ISHARES TRUST-ISHARES CURRENCY HEDGED MSCI EAFE ETF (HEFA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.10	U.S. Brokerage Money Market Account (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)
4	BPI	N/A		Equity Payout	\$3,018,399
5	BPI, anticipated commission payments	N/A	\$50,001 - \$100,000		None (or less than \$201)
6	Haun Ventures	N/A		Carried Interest Payout	\$20,833
7	BPI	N/A		Commission Payment	\$48,252

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	BPI	Washington, District of Columbia	I have sold my stake in BPI and received an equity payout pursuant to the LLC agreement and my employment agreement. I forfeited any unvested stock units, and I no longer own any equity in BPI. I am due an outstanding commission payment for work done prior to my departure, pursuant to my employment agreement, and a tax distribution pursuant to my Contribution Agreement for my pro rata share of the taxable income of the company for any true-up amounts related to the period from January 1, 2022 to my date of departure.	9/2016
2	Incite Agency Holdings	San Francisco, California	Incite Agency Holdings will remain dormant during the duration of my government service and terminate following the completion of my final commission payments from BPI, payment of final taxes, and upon filing of my final tax return.	9/2016
3	Haun Ventures	Menlo Park, California	Pursuant to my separation agreement, I received a carried interest payment from Haun Ventures prior to starting Federal service. I forfeited any unvested stock units pursuant to my separation agreement. I no longer have any interest in the entity.	2/2023

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Adam Pritzker	Los Angeles, California	BPI communications client
2	Andreesen Horowitz	Menlo Park, California	BPI communications client
3	Builders Vision	Chicago, Illinois	BPI communications client
4	Credit Karma	Oakland, California	BPI communications client
5	Crusoe Energy	Denver, Colorado	BPI communications client

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	Emerson Collective	Palo Alto, California	BPI communications client
7	General Mills	Golden Valley, Minnesota	BPI communications client
8	Haun Ventures	Menlo Park, California	BPI communications client
9	Instacart	San Francisco, California	BPI communications client
10	Leafly	Seattle, Washington	BPI communications client
11	Meta	Menlo Park, California	BPI communications client
12	New Belgium Brewing	Fort Collins, Colorado	BPI communications client
13	Secure Community Network	New York, New York	BPI communications client
14	Shopify	Ottawa, Outside U.S.	BPI communications client
15	Sterling Bay	Chicago, Illinois	BPI communications client
16	Teach for America	New York, New York	BPI communications client
17	Union Pacific	Omaha, Nebraska	BPI communications client
18	Uniswap	New York, New York	BPI communications client
19	Walton Enterprises Inc.	Bentonville, Arkansas	BPI communications client
20	West Street LLC	Palo Alto, California	BPI communications client

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
21	EXPS LLC	Menlo Park, California	BPI communications client
22	The States Project	New York, New York	BPI communications client
23	Bully Pulpit Interactive (BPI)	Washington, District of Columbia	Partner, Board Director

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

None

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Bitcoin	N/A	\$50,001 - \$100,000		None (or less than \$201)
2	Ethereum 2	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	U.S. bank #1 (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	Incite Agency Holdings (cash account)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	WESTINGHOUSE AIR BRAKE TECHNOL CMN (WAB)	See Endnote	N/A	None (or less than \$1,001)	Capital Gains \$201 - \$1,000
6	AMAZON.COM INC SRS 28153166 (AMZN)	See Endnote	N/A	None (or less than \$1,001)	Capital Gains \$1,001 - \$2,500

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7	COSTCO WHOLESALE CORPORATION CMN (COST)	See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
8	MICROSOFT CORPORATION CMN (MSFT)	See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
9	UNITEDHEALTH GROUP INCORPORATE CMN (UNH)	See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
10	APPLE INC. CMN (AAPL)	See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
11	VANGUARD FTSE DEVELOPED MKTS CMN (VEA)	See Endnote	Yes	None (or less than \$1,001)		\$201 - \$1,000
12	VANGUARD TAX-EXEMPT BOND ETF (VTEB)	See Endnote	Yes	None (or less than \$1,001)		None (or less than \$201)
13	Residential Real Estate (1), San Francisco, California		N/A	\$500,001 - \$1,000,000	Rent or Royalties	\$15,001 - \$50,000
14	Residential Real Estate, Washington, DC		N/A	None (or less than \$1,001)	Capital Gains Rent or Royalties	\$100,001 - \$1,000,000
15	Benjamin LaBolt Living Trust		No			
15.1	CPR Media LLC	See Endnote	N/A	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000
15.2	GOLDEN ST TOB SECURITIZATION REV 5.0000% 06/01/40-CA JD -CA JD ASSET BACKED BDS MSF S-T SPL RDM S-T X-ORD		N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.3	SAN DIEGO CALIF UNI SCH DIST REV 4% 06/30/23 JD TAX AND REV ANTIC NTS 2022-2023 A BEO		N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.4	ISHARES MSCI ACWI ETF (ACWI)	See Endnote	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.5	GOLDEN ST TOB SECURITIZATION REV 5.0000% 06/01/40-CA JD CA JD ENH ASSET BACKED BDS PR ERE S-T SPL RDM S-T XORD RDM	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.6	WESTN PLACER CALIF WASTE MGMT REV 5% 06/01/26 JD BDS MATERIALS RECOVERY FAC 2022A GREEN BOND BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.7	MOUNT SAN ANTONIO CALIF CMNTY GO 5% 09/01/24 MS COLLEGE DIST GO BDS A PRERE 09/01/23 UT BEO SR LIEN	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.8	MINNESOTA ST GO 5% 08/01/26 FA GO VAR PURP REF BDS 2022D UT BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.9	RIVERSIDE CALIF CMNTY COLLEGE GO 5% 08/01/25 FA DIST GO REF BDS 2014 A PRERE 08/01/24 LT BEO SR LIEN	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.10	POWAY CALIF UNI SCH DIST GO 5.0000% 08/01/24 FA RFDG-SCH FACS IMPT DIST NO 2002-1 BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.11	SAN BERNARDINO CALIF CMNTY GO 4.0000% 08/01/49 FA COLLEGE DIST ELECTION 2018 GO BDS 2019 A PRERE 08/01/27 LT	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.12	SAN FRANCISCO CALIF BAY AREA REV 5% 07/01/25 JJ RAPID TRAN DIST SALES TAX REV REF BDS 2017 A GREEN BOND BEO	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.13	CALIFORNIA ST GO 5% 12/01/28 JD OBLIGATION BONDS VARIOUS PURPOSE GENERAL UT BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.14	CALIFORNIA ST GO 5% 04/01/27 AO VAR PURP GO REF BDS UT BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.15	GOLDEN ST TOB SECURITIZATION REV 5.0000% 06/01/35-CA JD CORP CALIF TOB SETTLEMENT REV ASSET BACKED BDS 2018A-1 BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.16	STATE OF CALIFORNIA REV 5% 09/01/31 MS OBLIGATION REFUNDING BONDS (FORWARD DELIVERY) BEO	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.17	UNIVERSITY CALIF REVS REV 4% 05/15/33-CA MN GEN REV BDS 2017 AY BEO	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.18	STATE OF CALIFORNIA GO 5% 11/01/30 MN VARIOUS PURPOSE GENERAL OBLIGATION REFUNDING BONDS BEO	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.19	CALIFORNIA ST DEPT WTR RES REV 5% 12/01/32-CA JD CENT VY PROJ REV SYS BDS BB BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.20	CALIFORNIA ST GO 5% 09/01/30 MS OBLIGATION REFUNDING BONDS (FORWARD DELIVERY) UT BEO	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.21	CALIFORNIA ST DEPT WTR RES REV 5% 12/01/32 JD CENT VY PROJ REV SYS BDS BF BEO	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.22	PENNSYLVANIA ST GO 5% 10/01/32 AO GO BDS FIRST 2022 UT BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
15.23	ISHARES SHORT TERM NATIONAL MUNI BOND ETF (MUB)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
15.24	SPDR NUVEEN BLOOMBERG MUNICIPAL MUTUAL FUND Short Term Common (SHM)	Yes	\$50,001 - \$100,000		None (or less than \$201)
15.25	LOS ANGELES CALIF WASTEWATER REV 5% 06/01/31 JD REVENUE BONDS REFUNDING SERIES 2022-C BEO	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.26	DEPARTMENT OF AIRPORTS REV 5% 05/15/29 MN OF THE CITY OF LOS ANGELES,CA LOS ANGELES INTERNATNL AIRPORT	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
15.27	LOS ANGELES CALIF DEPT WTR & REV 5% 07/01/29 JJ PWR REV SYS BDS 2020 A BEO	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.28	VANGUARD FTSE EMERGING MKTS ETF (VWO)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15.29	SCHWAB STRATEGIC TRUST-SCHWAB CMN (SCHF)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
15.30	VANECK HIGH YIELD MUNI ETF CMN (HYD) See Endnote	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15.31	U.S. bank #2 (cash)	N/A	\$1,000,001 - \$5,000,000	Interest	None (or less than \$201)
15.32	UBER TECHNOLOGIES, INC. CMN (UBER)	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
15.33	ALPHABET INC. CMN CLASS A (GOOGL)	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
15.34	ALPHABET INC. CMN CLASS C (GOOG)	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
15.35	ISHARES RUSSELL 1000 GROWTH ETF (IWF)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
15.36	VANGUARD INDEX FUNDS VANGUARD LARGE-CAP ETF (VV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
15.37	VANGUARD INDEX FUNDS VANGUARD EXTENDED MARKET ETF MUTUAL FUND (VXF)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15.38	ISHARES RUSSELL 1000 VALUE ETF (IWD)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.39	VANGUARD SPECIALIZED PORTFOLIO VANGUARD DIVIDEND APPRECIATION MUTUAL FUND CL ETF SER VIPERS (VIG)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
15.40	CONSTELLATION ENERGY CORP CMN (CEG)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
15.41	FORTUNE BRANDS INNOVATIONS INC CMN (FBIN)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
15.42	EXELON CORPORATION CMN (EXC)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
15.43	GENERAL ELECTRIC COMPANY CMN (GE)	N/A	\$50,001 - \$100,000	Dividends	None (or less than \$201)
15.44	MASTERBRAND INC CMN (MBC)	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
15.45	GE HEALTHCARE TECHNOLOGIES INC CMN (GEHC)	N/A	\$15,001 - \$50,000	Dividends	None (or less than \$201)
15.46	YUM CHINA HOLDINGS, INC. CMN (YUMC)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
15.47	YUM BRANDS, INC. CMN (YUM)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
15.48	PEPSICO, INC. CMN (PEP)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
15.49	Vanguard S&P 500 Fund ETF (VOO)	Yes	\$1,000,001 - \$5,000,000		\$201 - \$1,000
15.50	iShares Core MSCI EAFE ETF (IEFA)	Yes	\$250,001 - \$500,000		\$201 - \$1,000
15.51	iShares Currency Hedged MSCI EAFE ETF (HEFA)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
15.52	iShares Core S&P Small-Cap ETF (IJR)	Yes	\$100,001 - \$250,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.53	Vanguard Small-Cap Value Index Fund ETF Class Shares (VBR)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
15.54	VanguardGlobal ex-US Real Estate Index Fund ETF Shares (VNQI)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15.55	Vanguard Real Estate Index Fund ETF Shares (VNQ)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15.56	REDLANDS CALIF UNI SCH DIST GO 5% 07/01/27 JJ GO REF BDS 2017 UT BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
15.57	SANTA CLARA CALIF UNI SCH DIST GO 5% 07/01/25 JJ ELECTION 2018 GO BDS 2023 LT BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
15.58	LA COMMUNITY COLLEGE DIST GO 5.0000% 08/01/30-CA FA ANGELES COUNTY, CALIFORNIA BEO	N/A	\$50,001 - \$100,000		None (or less than \$201)
15.59	NEBO UTAH SCH DIST LOC BLDG REV 5% 07/01/29 JJ AUTH LEASE REV BDS 2023 BEO S-T X-ORD RDM	N/A	\$15,001 - \$50,000		None (or less than \$201)
15.60	LOS ANGELES CALIF UNI SCH DIST GO 5% 07/01/32-CA JJ GO BDS 2018 B-1 UT BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
15.61	LOS ANGELES CALIF CMNTY GO 5.0000% 08/01/31 FA COLLEGE DIST ANGELES COUNTY, CALIFORNIA) PRERE 08/01/24 LT	N/A	\$15,001 - \$50,000		None (or less than \$201)
15.62	SAN FRANCISCO CALIF CITY & REV 5% 11/01/30-CA MN CNTY PUB UTILS COMMN WTR REV WTR REV BDS 2015A BEO	N/A	\$15,001 - \$50,000		None (or less than \$201)
16	iShares Core MSCI Emerging Markets ETF (IEMG)	Yes	\$50,001 - \$100,000		None (or less than \$201)
17	Vanguard Value Index Fund ETF Shares (VTV)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
18	Residential Real Estate (2), San Francisco, California	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	SPDR Nuveen Bloomberg High Yield ETF (HYMB)	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	Goldman Sachs	See Endnote	Mortgage (investment/rental property)	\$500,001 - \$1,000,000	2022	2.75	30 year mortgage, 7 year ARM
2	US Bank Home Mortgage	See Endnote	Mortgage (investment/rental property)	\$500,001 - \$1,000,000	2014	4.125	30 year
3	GS Bank	See Endnote	Mortgage (investment/rental property)	\$1,000,001 - \$5,000,000	2019	3.1%	30 Year, 7 Year ARM

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
6.	5	Sold 7/19/22
6.	6	Sold 7/19/22
6.	7	Sold 7/19/22
6.	8	Sold 7/19/22
6.	9	Sold 7/19/22
6.	10	Sold 7/19/22
6.	11	Sold 7/19/22
6.	12	Sold 7/19/22
6.	15.1	Divested of the asset subsequent to submission of report.
6.	15.4	Sold January 19, 2023
6.	15.30	Sold Jan. 19, 2023
8.	1	Mortgage for residential real estate properties in San Francisco
8.	2	DC residential real estate property sold during 2022
8.	3	Mortgage for residential real estate properties in San Francisco prior to refinance in 2022.

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).
