

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

## Filer's Information

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Smith, Jessica Amy

Principal Deputy Director, IEA, Department of Health & Human Services

Date of Appointment: 12/06/2021

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Other Federal Government Positions Held During the Preceding 12 Months:

Chief of Staff to U.S. Senator Michael Bennet (4/2021 - 12/2021)

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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/ Smith, Jessica Amy [electronically signed on 11/12/2021 by Smith, Jessica Amy 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/ Olesh, Stanley, Certifying Official [electronically signed on 01/18/2022 by Olesh, Stanley in Integrity.gov]

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Other review conducted by

/s/ Olesh, Stanley, Ethics Official [electronically signed on 01/18/2022 by Olesh, Stanley in Integrity.gov]

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U.S. Office of Government Ethics Certification

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Data Revised 01/18/2022

Data Revised 01/06/2022

Data Revised 01/05/2022

Data Revised 12/08/2021

Data Revised 12/04/2021

Data Revised 12/03/2021

Data Revised 12/02/2021

Data Revised 11/19/2021

Data Revised 11/18/2021

Data Revised 11/17/2021

Data Revised 11/14/2021

Data Revised 11/12/2021

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(01/18/2022, Olesh, Stanley): 1/18/22 - rec'd signed EA. Filer also confirmed that Apple has been divested -- SO
N/A	N/A	General	(01/18/2022, Olesh, Stanley): Apple gifted/transferred - no 278-T necessary - SO

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	J Street	Washington, District of Columbia	Non-Profit	Chief Operating Officer	3/2017	4/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	J Street - retirement plan	No			
1.1	Voya Intermediate Bond Port S	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	VY TRowePrice Eqty Income Pt Srv	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.3	Voya U.S. Stock Index Port Inst	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.4	Victory Sycmr Sm Comp Oppority Fd R	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	Inv Dev Mrkts Fd A	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	Burson-Marsteller WPP	No			
2.1	Vanguard Target Retire 2040	Yes	\$100,001 - \$250,000		None (or less than \$201)
3	Fenton Communications - retirement plan	No			
3.1	John Hancock Multimanager Growth LS	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	J Street	N/A		Salary	\$251,311
5	indiv. IRA #1	No			
5.1	FDIC Insured Cash	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
5.2	APDLX - Artisan Value Advisor	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	BEMIX - Brandes Inst Emerging Markets I	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	BEXIX - Baron Emerging Markets Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	CFSIX - Touchstone Sands Cap Sel Growth Y	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.6	DFSGX - Forum DF Dent SM Inst	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.7	FMIQX - FMI Large Cap Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.8	HACAX - Harbor Capital Appreciation Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.9	LISIX - Lazard Int'l Strategic Equity I	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.10	MAIIX - iShares MSCI EAFE Int'l Index Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.11	NCVLX - Nuance Concentrated Value Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.12	OAYWX - Oakmark Global Select Advisor	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.13	REEIX - RBC Emerging Mkts Equity	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.14	SBHVX - Segall Bryant & Hamill Sm Cap Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.15	SLADX - Selected American Shares D	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	J Street	Washington, District of Columbia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	4/2017
2	Burson-Marsteller WPP	Washington, District of Columbia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	2/2013
3	Fenton Communications	New York, New York	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	2/2003

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	J Street	Washington, District of Columbia	Manage staff, run operations of the organization.

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Venn Strategies (Consulting firm)	N/A		salary + bonuses + commissions	
2	Convenntus (Consulting/ DC Hill events)	N/A	\$1,001 - \$15,000	commissions + dividends (part ownership interest)	
3	Venn Strategies 401K Profit Sharing Plan	No			
3.1	AMER FUNDS EUROPACIFIC R6	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.2	AMER FUNDS NEW WORLD R6	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.3	AMER FUNDS SMALLCAP R6	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.4	Vanguard Small Cap Value Index ADM	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.5	VANG MIDCAP VAL INDEX ADM	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.6	VANG EQUITY INCOME ADM	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.7	VANG GROWTH INDEX ADM	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.8	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	Roth IRA #1	No			
4.1	Insured Cash	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
4.2	ASFYX - AlphaSimplex Managed Futures Strat Y	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.3	DSEEX - DoubleLine Shiller CAPE I	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	IDEV - iShares Core MSCI Intl Dev Mkts	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.5	IEMG - iShares Core MSCI Emerging Mkts	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	VOO - Vanguard S&P 500	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.7	VXF - Vanguard Extended Market Index ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	indiv. IRA #2	No			
5.1	Qty 4122.18 - FDIC Insured Cash	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
5.2	Qty 6639.36 - BBKA - JPMorgan Beta Bldrs Canada	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	Qty 4044.8 - EWL - iShares MSCI Switzerland Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	Qty 5522 - GXC - SPDR S&P China	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	Qty 21127.68 - IEMG - iShares Core MSCI Emerging Mkts	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.6	Qty 23046.1 - IEUR - iShares Core MSCI Europe ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.7	Qty 11798.5 - IPAC - iShares Core MSCI Pacific ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.8	Qty 20442.37 - VBK - Vanguard Small Cap Growth ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.9	Qty 14826.4 - VBR - Vanguard Small Cap Value ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.10	Qty 9026.56 - VNQ - Vanguard REIT Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.11	Qty 5140.64 - VNQI - Vanguard Global ex-US Real Estate	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.12	Qty 13989 - VSS - Vanguard FTSE All-Wld ex-U.S.SmCp	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.13	Qty 51358.32 - VTV - Vanguard Value ETF	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.14	Qty 49340.06 - VUG - Vanguard Growth ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	SunTrust bank account	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	Bank of America bank account	N/A	\$50,001 - \$100,000	Interest	None (or less than \$201)
3	Capital One/ 360 bank account	N/A	\$50,001 - \$100,000	Interest	\$201 - \$1,000
4	Son's 529, DC	No			None (or less than \$201)
4.1	DC College Savings 2031 Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	Daughter's 529, DC	No			None (or less than \$201)
5.1	DC College Savings 2034 Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	Son's T. Rowe Price 529	No			None (or less than \$201)
6.1	PORTFOLIO 2033	Yes	\$50,001 - \$100,000		None (or less than \$201)
7	Belmont Street apartment	N/A	\$500,001 - \$1,000,000	Rent or Royalties	\$15,001 - \$50,000
8	Florida Avenue apartment	N/A	\$250,001 - \$500,000	Rent or Royalties	\$15,001 - \$50,000
9	Silex Bancshares bancshares	N/A	\$15,001 - \$50,000	Dividends	\$15,001 - \$50,000
10	JTWROS TOD Savos GMS Global	No			
10.1	FDIC Insured Cash	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
10.2	AAPL - Apple, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
10.3	ABBV - AbbVie, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.4	BIO - Bio-Rad Laboratories, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.5	CDNS - Cadence Design Systems, Inc.	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
10.6	CVS - CVS Health Corporation	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.7	FB - Facebook, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.8	GOOGL - Alphabet, Inc. A	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
10.9	HUM - Humana, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.10	IDXX - IDEXX Laboratories, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.11	KR - Kroger Company	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.12	MET - MetLife, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.13	MSFT - Microsoft Corporation	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
10.14	NKE - Nike, Inc. CI B	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.15	NSRGY - Nestle SA	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.16	NVO - Novo-Nordisk AS ADR	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.17	PG - Procter & Gamble Company	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.18	PWR - Quanta Services, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.19	SNY - Sanofi	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.20	SONY - Sony Group Corp. ADR	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.21	Target Corporation	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
10.22	TSN - Tyson Foods, Inc. CI A	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
10.23	TXN - Texas Instruments, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.24	UTHR - United Therapeutics Corporation	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.25	ZTS - Zoetis, Inc.	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
10.26	GLIFX/ Lazard US Global	Yes	None (or less than \$1,001)		\$201 - \$1,000
11	Ameren Corp. (AEE)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
12	Bristol-Myers Squibb (BMY)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
13	Carnival Corp. (CCL)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
14	Duke Energy Corp. (DUK)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
15	The Home Depot, Inc. (HD)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$1,001 - \$2,500
16	Kimberly-Clark Corp. (KMB)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
17	Merck & Co., Inc. (MRK)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
18	Mondelez International, Inc. (MDLZ)	N/A	None (or less than \$1,001)		None (or less than \$201)
19	ORGANON & CO COM	N/A	None (or less than \$1,001)	Dividends Capital Gains	None (or less than \$201)
20	US Bancorp (USB)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	None (or less than \$201)
21	Canadian National Railway Co	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
22	Caterpillar, Inc. (CAT)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
23	Cerner Corp. (CERN)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
24	ConocoPhillips (COP)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
25	CVS Health Corporation	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
26	Enbridge Inc	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
27	Johnson & Johnson	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
28	JPMorgan Chase & Co	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
29	McDonald's Corp. (MCD)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
30	NextEra Energy, Inc. (NEE)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
31	PepsiCo, Inc. (PEP)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
32	Procter & Gamble Co	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
33	Welltower Inc Reit	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
34	Sector Spdr Trust Technology	Yes	\$1,001 - \$15,000		None (or less than \$201)
35	American Growth Fd of Amer A	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
36	American Invest Co of Amer A	Yes	\$1,001 - \$15,000		None (or less than \$201)
37	American New Perspective A	Yes	\$1,001 - \$15,000		None (or less than \$201)
38	Amern Tax-Ex Bond of Amer A	Yes	None (or less than \$1,001)		None (or less than \$201)
39	American Wash Mutual INV A	Yes	\$1,001 - \$15,000		None (or less than \$201)
40	Franklin Fed Tax-Free Inc A1	Yes	\$1,001 - \$15,000		None (or less than \$201)
41	Franklin Income A1	Yes	None (or less than \$1,001)		None (or less than \$201)
42	Franklin Mutual Global Disc A	Yes	\$1,001 - \$15,000		None (or less than \$201)
43	Pgim Jennison Health Sci A	Yes	\$1,001 - \$15,000		None (or less than \$201)
44	Pgim Total Return Bond A	Yes	\$1,001 - \$15,000		None (or less than \$201)
45	Continuum Health Partners, LLC (consulting firm) (partial ownership interest)	N/A	\$15,001 - \$50,000		None (or less than \$201)
46	Apple, Inc. (AAPL)	N/A	\$50,001 - \$100,000		None (or less than \$201)
47	Aflac, Inc. (AFL)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
48	Alexion Pharmaceuticals, Inc. (ALXN)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
49	Athene Holding Ltd. (ATH)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
50	Bank of America Corp. (BAC)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
51	Canadian Natural Resources	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
52	Duke-Weeks Realty Corp	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
53	eBay, Inc. (EBAY)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
54	Intel Corp. (INTC)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
55	Jefferies Financial Group (JEF)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
56	L#Harris Tech (LHX)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
57	Linde Plc (LIN)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
58	Eli Lilly & Co. (LLY)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
59	Louisiana-Pacific Corp. (LPX)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
60	Mastercard, Inc. (MA)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
61	Moderna (MRNA)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
62	Netease (NTES)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
63	Public Service Enterprise Group, Inc. (PEG)	N/A	None (or less than \$1,001)		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
64	Pulte Group (PHM)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
65	Snap-On, Inc. (SNA)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
66	STMicroelectronics (STM)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
67	Molson Coors Beverage Co. (TAP)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
68	Taiwan Semiconductor (TSM)	N/A	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
69	United Rentals, Inc. (URI)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
70	Vipshop Holdings (VIPS)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
71	Xerox Holdings Corp. (XRX)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000

## 7. Transactions

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

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	SunTrust	Mortgage (investment/rental property)	\$250,001 - \$500,000	2015	4.125%	30 years



#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
2	Wells Fargo	Mortgage (investment/rental property)	\$100,001 - \$250,000	2012	3.625%	30 years

## 9. Gifts and Travel Reimbursements

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

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## Endnotes

# 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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