Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Benaim, Daniel

Deputy Assistant Secretary of State, Department of State

Date of Appointment: 01/14/2021

Other Federal Government Positions Held During the Preceding 12 Months:
None

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

/s/ Benaim, Daniel [electronically signed on 01/14/2021 by Benaim, Daniel 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/ Chabora, Paige E, Certifying Official [electronically signed on 03/18/2021 by Chabora, Paige E in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

Data Revised 05/13/2021

Data Revised 03/26/2021

Data Revised 03/09/2021

Data Revised 03/05/2021

Data Revised 02/19/2021

Data Revised 02/04/2021

Data Revised 02/03/2021

Data Revised 02/02/2021

Data Revised 01/31/2021

Data Revised 01/29/2021

Data Revised 01/27/2021

Data Revised 01/26/2021

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	The Century Foundation	New York, New York	Non-Profit	Fellow	4/2019	1/2021
2	New York University	New York, New York	University/College	Visiting Assistant Professor (and Adjunct Lecturer)	9/2015	12/2019
3	Center for American Progress	Washington, District of Columbia	Non-Profit	Senior Fellow	9/2015	1/2021
4	Mastercard Foundation	Toronto, Outside U.S.	Non-Profit	Communications Consultant	2/2018	12/2019
5	National Security Action	Washington, District of Columbia	Non-Profit	Consultant, Lead Investigator on Research Project	6/2019	3/2020

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	The Century Foundation	N/A		Salary	$50,937
2	National Security Action	N/A		Consulting Fees	$6,500
3	United Nations Institute for Training and Research (taught seminar 6/26/2019)	N/A	None (or less than $1,001)		$2,501 - $5,000
4	Al Hurra / Middle East Broadcasting Network - Multiple TV Appearances				$201 - $1,000
5	Johns Hopkins SAIS - honorarium - August 2020				$201 - $1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	GWU - July 8, 2020			Honoraria	
7	Honorarium for Speaking to University Students (American Enterprise Institute) - June 11, 2019				$201 - $1,000
8	Contract Speechwriting for AH Levy & Co (March - December 2020)				$5,001 - $15,000
9	The New York Times Co. (NYT) - Fee for Publication of Article (January 8, 2020)				$201 - $1,000
10	Foreign Affairs - Publication of two articles (May 22, 2020; August 7, 2019)				$201 - $1,000
11	World Politics Review - Article Payment (April 9, 2019)				$201 - $1,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	New York University	New York NY, New York	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	9/2016

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	The Century Foundation	New York, New York	Senior Fellow
2	New York University	New York, New York	Adjunct Lecturer

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
3	Center for American Progress	Washington, District of Columbia	Visiting Senior Fellow
4	Mastercard Foundation	Toronto, Outside U.S.	Consultant
5	National Security Action	Washington, District of Columbia	Consultant

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	New America Fellow			Salary	
2	Columbia University			Salary	
3	Dialectica Project (honorarium)				$201 - $1,000
4	My Society NGO (honorarium April2, 2020)				$201 - $1,000
5	TIAA-CREF	Yes	$100,001 - $250,000		None (or less than $201)
5.1	T. Rowe Price Ret 2050 Fd		$15,001 - $50,000		$15,001 - $50,000
6	Vanguard Retirement Plan	Yes	$50,001 - $100,000		
6.1	Vanguard Institutional Target Retirement 2050 Fund		$50,001 - $100,000		

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Bank #1 (Cash)	Yes	$15,001 - $50,000		None (or less than $201)
2	Brokerage Account #2	No	$50,001 - $100,000		None (or less than $201)
2.1	American Express Co. (AXP)	No	$1,001 - $15,000		
2.2	Bank of America Corp. (BAC)	No	$15,001 - $50,000		
2.3	Carnival Corp. (CCL)	No	$1,001 - $15,000		
2.4	salesforce.com, inc. (CRM)	No	$1,001 - $15,000		
2.5	Castlight Health, Inc. (CSLT)	No	None (or less than $1,001)		
2.6	Netflix, Inc. (NFLX)	No	$1,001 - $15,000		
2.7	Oracle Corp. (ORCL)	No	$1,001 - $15,000		
2.8	Square, Inc. (SQ)	No	$15,001 - $50,000		
3	U.S. Bank #2 (Cash)	Yes	$15,001 - $50,000		None (or less than $201)
4	U.S. Bank #4 (Cash)	N/A	$1,001 - $15,000		None (or less than $201)
5	U.S. Bank #3 (Cash)	N/A	$15,001 - $50,000	Capital Gains	None (or less than $201)
6	Supreme Partnership interest 2.223% - residential rental real estate ny, ny	No	$1,000,001 - $5,000,000	Rent or Royalties	$50,001 - $100,000
7	Schenck Partnership interest 3.222% - residential rental real estate ny, ny	No	$1,000,001 - $5,000,000	Rent or Royalties	$15,001 - $50,000
8	Benaim Family Partners - 16.667%- marketable securities	No	$500,001 - $1,000,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.1	CASH	N/A	$1,001 - $15,000	Interest	None (or less than $201)
8.2	Alphabet, Inc. (GOOG)	No	$15,001 - $50,000		
8.3	Amazon.com, Inc. (AMZN)	No	$15,001 - $50,000		
8.4	APPLE INC	No	$15,001 - $50,000	Dividends	None (or less than $201)
8.5	Bank of America Corp. (BAC)	No	$1,001 - $15,000	Dividends	$201 - $1,000
8.6	PayPal Holdings, Inc. (PYPL)	No	$15,001 - $50,000		
8.7	VANGUARD MUTUAL FUNDS	Yes	$15,001 - $50,000		$201 - $1,000
8.7.1	vanguard intermediate term tax exempt (vwiux)	Yes	$15,001 - $50,000		$201 - $1,000
8.7.2	vanguard limited tax exempt fund (vmlux)	Yes	$1,001 - $15,000		None (or less than $201)
8.7.3	vanguard limited tax empt fund (vmlux	Yes	$15,001 - $50,000		$201 - $1,000
8.8	ETFS- gentrust	Yes	$250,001 - $500,000		$2,501 - $5,000
8.8.1	USGlobal Jets ETF (JETS)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.2	Invesco Dynamic Leisure & Entertainment ETF (PEJ)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.3	iShares MSCI Canada ETF (EWC)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.4	iShares MSCI South Korea ETF (EWY)	Yes	$1,001 - $15,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.8.5	iShares TIPS Bond ETF (TIP)	Yes	$1,001 - $15,000		$201 - $1,000
8.8.6	iShares Core S&P Mid-Cap ETF (IJH)	Yes	$15,001 - $50,000		$201 - $1,000
8.8.7	SPDR S&P Regional Banking ETF (KRE)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.8	VanEck Vectors AMT-Free Intermediate Municipal Index ETF (ITM)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.9	Vanguard Total Bond Market Index Fund ETF Shares (BND)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.10	Vanguard Total Bond Market Index Fund ETF Shares (BND)	Yes	$15,001 - $50,000		$201 - $1,000
8.8.11	VanguardEmerging Markets Stock Index Fund ETF Shares (VWO)	Yes	$15,001 - $50,000		$201 - $1,000
8.8.12	VanguardPacific Stock Index FundVanguard FTSEPacific ETF Shares (VPL)	Yes	$15,001 - $50,000		$201 - $1,000
8.8.13	Vanguard European Stock Index Fund ETF Shares (VGK)	Yes	$15,001 - $50,000		$201 - $1,000
8.8.14	Vanguard Short-Term Corporate Bond Index Fund ETF Class Shares (VCSH)	Yes	$15,001 - $50,000		$201 - $1,000
8.8.15	Vanguard Intermediate-Term Corporate Bond Index Fund ETF Class Shares (VCIT)	Yes	$1,001 - $15,000		$201 - $1,000
8.8.16	Vanguard 500 Index Fund ETF Shares (VOO)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.17	vanguard index fds midcap (VO)	Yes	$1,001 - $15,000		None (or less than $201)
8.8.18	Vanguard Small-Cap Index Fund ETF Shares (VB)	Yes	$1,001 - $15,000		None (or less than $201)
8.9	CASH	N/A	$50,001 - $100,000	Interest	None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.10	Aerojet Rocketdyne Holdings, Inc. (AJRD)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.11	AMC Networks Inc. (AMCX)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.12	American Express Co. (AXP)	No	$15,001 - $50,000		$201 - $1,000
8.13	Archer-Daniels-Midland Co. (ADM)	No	$1,001 - $15,000	Dividends	$201 - $1,000
8.14	Astec Industries, Inc. (ASTE)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.15	At&T	No	$1,001 - $15,000	Dividends	$201 - $1,000
8.16	Avangrid, Inc. (AGR)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.17	AZZ, Inc. (AZZ)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.18	BNY MELLON corp bk	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.19	Bank of America Corp. (BAC)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.20	Chemed Corp. (CHE)	No	$15,001 - $50,000	Dividends	None (or less than $201)
8.21	CNH INDUSTRIAL cnhi	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.22	comScore, Inc. (SCOR)	No	None (or less than $1,001)		None (or less than $201)
8.23	Crane Co. (CR)	No	$1,001 - $15,000		None (or less than $201)
8.24	Cutera, Inc. (CUTR)	No	$1,001 - $15,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.25	DANONE SPONSORED ADR	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.26	DAVIDE CAMPARI DVDCF	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.27	DIEBOLD NIXDORF INCORP	No	$1,001 - $15,000		None (or less than $201)
8.28	Discovery, Inc. (DISCK)	No	$1,001 - $15,000		None (or less than $201)
8.29	DISH Network Corp. (DISH)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.30	Ducommun, Inc. (DCO)	No	$1,001 - $15,000		None (or less than $201)
8.31	Ecolab, Inc. (ECL)	No	$15,001 - $50,000	Dividends	None (or less than $201)
8.32	Edgewell Personal Care Co. (EPC)	No	$1,001 - $15,000		None (or less than $201)
8.33	Energizer Holdings, Inc. (ENR)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.34	EnPro Industries, Inc. (NPO)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.35	ENERGY INC EVRG	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.36	Ferro Corp. (FOE)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.37	FLO SERVE CORP (FOE)	No	$1,001 - $15,000		None (or less than $201)
8.38	GATX Corp. (GATX)	No	$15,001 - $50,000	Dividends	$201 - $1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.39	CASH	N/A	$1,001 - $15,000		None (or less than $201)
8.40	GENUINE PARTS COMPANY (GPC)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.41	Griffon Corp. (GFF)	No	$1,001 - $15,000		None (or less than $201)
8.42	GRUPO TELE	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.43	IAC INTERACTIVE CORP	No	$1,001 - $15,000		None (or less than $201)
8.44	Interpublic Group of Cos., Inc. (IPG)	No	$1,001 - $15,000		$201 - $1,000
8.45	International Flavors & Fragrances, Inc. (IFF)	No	$1,001 - $15,000		None (or less than $201)
8.46	KELLOGG COMPANY	No	$1,001 - $15,000		None (or less than $201)
8.47	KINNEVIK (KNVKF)	No	$1,001 - $15,000		None (or less than $201)
8.48	LENAR CORP (LEN/B)	No	$1,001 - $15,000		None (or less than $201)
8.49	Liberty Broadband Corp. (LBRDK)	No	$15,001 - $50,000		None (or less than $201)
8.50	The Madison Square Garden Co. (MSG)	No	$1,001 - $15,000		None (or less than $201)
8.51	Marriott Vacations Worldwide Corp. (VAC)	No	None (or less than $1,001)	Dividends	None (or less than $201)
8.52	Match Group, Inc. (MTCH)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.53	MILLICOM INTL CELLULAR	No	$1,001 - $15,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.54	Modine Manufacturing Co. (MOD)	No	$1,001 - $15,000		None (or less than $201)
8.55	Mondelez International, Inc. (MDLZ)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.56	MSG Networks, Inc. (MSGN)	No	$1,001 - $15,000		None (or less than $201)
8.57	MULELLER INDUSTRIES (MWA)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.58	MULLER WATER PRODUCTS (MWA)	No	$1,001 - $15,000		None (or less than $201)
8.59	NATIOLNAL BEVERAGE CORP (FIZZ)	No	$1,001 - $15,000		None (or less than $201)
8.60	NATIONAL FUEL GAS COMPANY	No	$1,001 - $15,000		None (or less than $201)
8.61	Navistar International Corp. (NAV)	No	$1,001 - $15,000		None (or less than $201)
8.62	Northern Trust Corp. (NTRS)	No	$1,001 - $15,000		None (or less than $201)
8.63	PATERSON COMPANIES (PDCO)	No	$1,001 - $15,000		None (or less than $201)
8.64	Primo Water Corp. (PRMW)	No	$1,001 - $15,000		None (or less than $201)
8.65	Qurate Retail, Inc. (QRTEA)	No	$1,001 - $15,000	Dividends	None (or less than $201)
8.66	Ryman Hospitality Properties, Inc. (RHP)	No	$1,001 - $15,000		None (or less than $201)
8.67	Sensient Technologies Corp. (SXT)	No	$1,001 - $15,000		None (or less than $201)
8.68	Southwest Gas Holdings, Inc. (SWX)	No	$1,001 - $15,000		$201 - $1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.69	SWEEDISH MATCH (SWMAF)	No	$1,001 - $15,000		None (or less than $201)
8.70	Telephone & Data Systems, Inc. (TDS)	No	$1,001 - $15,000		None (or less than $201)
8.71	Team, Inc. (TISI)	No	$1,001 - $15,000		None (or less than $201)
8.72	TREDGEAR CORPORATION (TG)	No	None (or less than $1,001)		None (or less than $201)
8.73	United States Cellular Corp. (USM)	No	$1,001 - $15,000		None (or less than $201)
8.74	Valvoline, Inc. (VVV)	No	$1,001 - $15,000		None (or less than $201)
8.75	Vectrus, Inc. (VEC)	No	None (or less than $1,001)		
8.76	Verizon Communications, Inc. (VZ)	No	$1,001 - $15,000		None (or less than $201)
8.77	ViacomCBS, Inc. (CBS)	No	None (or less than $1,001)		None (or less than $201)
8.78	VIVENDI SA (VIVEF)	No	$1,001 - $15,000		None (or less than $201)
8.79	WASTEMANAGEMENT INC	No	$1,001 - $15,000		None (or less than $201)
8.80	Watts Water Technologies, Inc. (WTS)	No	$15,001 - $50,000		None (or less than $201)
8.81	WELLS FARGO (WFC)	No	$1,001 - $15,000		None (or less than $201)
8.82	WINN RESORTS LTD (WYNN)	No	$1,001 - $15,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.83	Xylem, Inc. (XYL)	No	$1,001 - $15,000		None (or less than $201)
8.84	Zimmer Biomet Holdings, Inc. (ZBH)	No	$1,001 - $15,000		None (or less than $201)
9	aria investment partners l.p. llc - .3416% RESIDENTAL rental real estate multiple states (NY, MA, DC, KS))	No	$100,001 - $250,000	Rent or Royalties	None (or less than $201)
10	Daniel Benaim trust (revocable) owns 25% bedford re partners- residential rental real estate ny ny	No	$1,000,001 - $5,000,000	Rent or Royalties	$5,001 - $15,000
11	Segnaim LLC - bio technology startup partnership interest owns 83.33 %	No	$50,001 - $100,000		
12	22 P STREET HOLDING LLC - owns .892260% residential rental real estate DC	No	$50,001 - $100,000	Rent or Royalties	None (or less than $201)
13	BNY MELLON PERSONAL CHECKING ACCOUNT [redacted]	No	$15,001 - $50,000		None (or less than $201)
14	Brokerage Account #1	N/A	$500,001 - $1,000,000		$15,001 - $50,000
14.1	CASH	N/A	$1,001 - $15,000		
14.2	BNY Mellon High Yield Fund - Class I	Yes	$50,001 - $100,000		$1,001 - $2,500
14.3	ISHARES Kld 400 Social Index Fund (DSI)	Yes	$250,001 - $500,000		$2,501 - $5,000
14.4	The BNY Mellon Mid Cap (MPMCX)	Yes	$100,001 - $250,000		$201 - $1,000
14.5	The BNY Mellon Small Cap (MPSSX)	Yes	$50,001 - $100,000		
14.6	BNY Mellon International Equity (MLIMX)	Yes	$50,001 - $100,000		$1,001 - $2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.7	BNY Mellon Emerging Markets Fund (MEMKX)	Yes	$15,001 - $50,000		$201 - $1,000
14.8	BNY Mellon Global Real Estate (DRLYX)	Yes	$1,001 - $15,000		None (or less than $201)
14.9	BNY Mellon Global Real Return Fund	Yes	$1,001 - $15,000		$201 - $1,000
14.10	BNY Mellon Dynamic Total Return Fund Class Y Shares (AVGYX)	Yes	$1,001 - $15,000		
14.11	BNY Mellon High Yield Fund - Class I	Yes	$100,001 - $250,000		$2,501 - $5,000
15	Brokerage Account #3	N/A	$500,001 - $1,000,000		$5,001 - $15,000
15.1	CASH	N/A	$1,001 - $15,000	Interest	None (or less than $201)
15.2	BNY Mellon High Yield Fund - Class I	Yes	$1,001 - $15,000		$1,001 - $2,500
15.3	ISHARES Kld 400 Social Index Fund	Yes	$250,001 - $500,000		$2,501 - $5,000
15.4	The BNY Mellon Mid Cap (MPMCX)	Yes	$50,001 - $100,000		$201 - $1,000
15.5	The BNY Mellon Small Cap (MPSSX)	Yes	$50,001 - $100,000		None (or less than $201)
15.6	BNY Mellon International Equity (MLIMX)	Yes	$50,001 - $100,000		$1,001 - $2,500
15.7	BNY Mellon Emerging Markets Fund (MEMKX)	Yes	$15,001 - $50,000		
15.8	BNY Mellon Global Real Return Fund	Yes	$1,001 - $15,000		
16	THE 2012 cpw trust (IRREVOCABLE) - owns partnership interest in RESIDENTAL rental real estate NY NY - (No Control)	No	$1,000,001 - $5,000,000	Rent or Royalties	None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
17	The manocherian benaim 1995 trust (irrevocable) - owns residential rental real estate ny ny (no control)	No	$1,000,001 - $5,000,000		None (or less than $201)
18	U.S. Bank #5 (Cash)	N/A	$1,001 - $15,000		None (or less than $201)
19	Brokerage Account #4	N/A	$250,001 - $500,000		
19.1	CASH	N/A	$1,001 - $15,000		
19.2	BNY Mellon Floating Rate Income Fund Class Y Shares (DFLYX)	Yes	$15,001 - $50,000		
19.3	BNY Mellon Mid Cap Multi-Strategy Fund Class M Shares (MPMCX)	Yes	$15,001 - $50,000		
19.4	BNY Mellon Small Cap Multi-Strategy Fund Class M Shares (MPSSX)	Yes	$15,001 - $50,000		$15,001 - $50,000
19.5	BNY Mellon Global Return Fund Class Y	Yes	None (or less than $1,001)		
19.6	ASG Global Alternatives Fund-7	Yes	None (or less than $1,001)		
19.7	BNY Mellon Dynamic Total Return Fund Y	Yes	$1,001 - $15,000		
20	BNY Mellon National Intermediate Municipal Bond Fund Class M Shares (MPNIX)	Yes	$15,001 - $50,000		
21	BNY Mellon High Yield Fund Class I Shares (DLHRX)	Yes	$1,001 - $15,000		

7. Transactions

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

8. Liabilities

None

9. Gifts and Travel Reimbursements

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

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).