

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

Filer's Information

Smith, Julianne C

United States Permanent Representative to NATO, Department of State

Other Federal Government Positions Held During the Preceding 12 Months:

Senior Advisor to the Secretary of State (1/2021 - Present)

Names of Congressional Committees Considering Nomination:

- Committee on Foreign Relations
-

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, Julianne C [electronically signed on 04/19/2021 by Smith, Julianne 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/ Huitema, David, Certifying Official [electronically signed on 06/24/2021 by Huitema, David in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 06/29/2021 by Apol, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

| # | ORGANIZATION NAME | CITY, STATE | ORGANIZATION TYPE | POSITION HELD | FROM | TO |
|---|---|----------------------------------|------------------------------|--|---------|---------|
| 1 | German Marshall Fund of the United States | Washington, District of Columbia | Non-Profit | Director, Asia and Geopolitics Program | 9/2019 | 7/2020 |
| 2 | WestExec Advisors (Geostrategic Advisory Service) | WASHINGTON, District of Columbia | Corporation | Senior Advisor | 10/2018 | 7/2020 |
| 3 | Bosch Academy | Berlin, Germany, Outside U.S. | Non-Profit | Weizsaecker Fellow | 7/2018 | 7/2019 |
| 4 | PT Fund, Inc | Washington, District of Columbia | Biden-Harris Transition Team | Deputy for Policy | 7/2020 | 1/2021 |
| 5 | American Institute of Contemporary German Studies | Washington, District of Columbia | Non-Profit | Trustee | 12/2014 | 1/2021 |
| 6 | Revocable Living Trust | Washington, District of Columbia | Trust | Trustee | 3/2014 | Present |

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

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|---|---|-----|-------|-----------------|---------------|
| 1 | German Marshall Fund of the United States | N/A | | Salary | \$118,991 |
| 2 | WestExec Advisors (geopolitical and advisory services firm) | N/A | | Consulting Fees | \$34,100 |
| 3 | IRA#1 Rollover | No | | | |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|--------------------------------------|-----|-----------------------|-------------|---------------------------|
| 3.1 | ISHARE's CORE S&P small CAP E | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.2 | ISHARES INC ESG AWR MSCI EM | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.3 | ISHARES S&P Global Technology Sector | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.4 | ISHARES S&P 500 | Yes | \$100,001 - \$250,000 | | None (or less than \$201) |
| 3.5 | ISHARES TR EAFE GRWTH EIF | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.6 | ISHARES TR ESG Aware MSCI USA | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 3.7 | ISHARES TR MSCI USA MIN VOL | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.8 | ISHARES TR MSCI USA VALUE | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.9 | ISHARES TR U.S. MED DVC ETF | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.10 | ISHARES TRUST CORE MSCI EAFE ETF | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.11 | ISHARES IBOXX \$ INVESTMENT GRADE | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.12 | ISHARES TR ISHS 1-5 YR INVS | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3.13 | ISHARES TR MBS ETF | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 3.14 | ISHARES TR US TREAS BD ETF | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|---|-----|-----------------------------|---|---------------------------|
| 3.15 | ISHARES TR 20 YR TR BD ETF | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 4 | Center for a New American Security, 401K Plan | No | | | |
| 4.1 | Vanguard Target Retirement 2035 Inv | Yes | \$100,001 - \$250,000 | | None (or less than \$201) |
| 5 | CREF#1 | No | | | |
| 5.1 | CREF Growth R1 | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 5.2 | CREF Global Equities R1 | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 6 | TIAA Traditional | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 7 | CREF#2 | No | | | |
| 7.1 | CREF Growth R1 | Yes | None (or less than \$1,001) | | None (or less than \$201) |
| 7.2 | CREF Global Equities | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 8 | Honorarium - Nuclear Threat Initiative, honorarium Nov 12, 2019 | N/A | | Honorarium from Nuclear Threat Initiative (payment was made in 2020). | \$1,000 |
| 9 | Honorarium from CENTRA - Feb 12 2020 | N/A | | Honorarium for participation in a seminar on Europe | \$500 |
| 10 | PT Fund, Inc | N/A | | Salary | \$88,600 |

3. Filer's Employment Agreements and Arrangements

| # | EMPLOYER OR PARTY | CITY, STATE | STATUS AND TERMS | DATE |
|---|--|----------------------------|---|--------|
| 1 | Center for a New American Security 401K | Valley Forge, Pennsylvania | I will continue to participate in this defined contribution plan although no further contributions will be made by the plan sponsor. | 9/2016 |
| 2 | Association of the US Army | New York, New York | CREF #1 - I will continue to participate in this defined contribution plan. The plan sponsor no longer makes any contributions. | 3/2000 |
| 3 | Center for Strategic and International Studies | New York, New York | TIAA #1 and #2 - - I participate in two defined contribution plans whose asset is combined and reported on Part 2, Line 6. The plan sponsor does not make contributions to the plans. | 4/2003 |
| 4 | Association of the US Army | New York, New York | CREF #2 - I will continue to participate in this defined contribution plan. The plan sponsor no longer makes any contributions. | 3/2000 |

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

| # | SOURCE NAME | CITY, STATE | BRIEF DESCRIPTION OF DUTIES |
|---|---|----------------------------------|--|
| 1 | German Marshall Fund of the United States | Washington, District of Columbia | Employed as Director of the Asia and Geopolitics Programs |
| 2 | WestExec Advisors | WASHINGTON, District of Columbia | Employed as a Senior Advisor. |
| 3 | The Robert Bosch Academy | Berlin, Outside U.S. | Served as a Fellow at the Academy from July 2018 to July 2019. |
| 4 | Boeing | Chicago, Illinois | Boeing was a client at WestExec Advisors for whom I worked. My billable work for this client in both 2019 and 2020 exceeded \$5,000 each year. |

| # | SOURCE NAME | CITY, STATE | BRIEF DESCRIPTION OF DUTIES |
|---|-------------|----------------------------------|---|
| 5 | Soft Bank | Tokyo, Outside U.S. | Soft Bank was a client at WestExec Advisors. My billable work for that client exceeded \$5,000 in both 2019 and 2020. |
| 6 | PT Fund | Washington, District of Columbia | Employed by the Biden-Harris Transition Team |

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

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-----|--|-----|----------------------|-------------|---------------------------|
| 1 | IRA | No | | | |
| 1.1 | Fidelity Select Biotechnology Mutual Fund | Yes | \$50,001 - \$100,000 | | None (or less than \$201) |
| 2 | IRA - Roth | No | | | |
| 2.1 | Vanguard Global Equity Fund | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 3 | IRA - Traditional | No | | | |
| 3.1 | Vanguard High-Yield Corporate Fund Investor Shares (VWEHX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |

6. Other Assets and Income

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|---|-----------------------|-----|--------------------|-------------|---------------------------|
| 1 | Amgen Inc. (AMGN) | N/A | \$1,001 - \$15,000 | Dividends | \$201 - \$1,000 |
| 2 | Broadcom, Inc. (AVGO) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|----|---|-----|---------------------|-------------|---------------------------|
| 3 | Deere & Co. (DE) | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 4 | Intel Corp. (INTC) | N/A | \$1,001 - \$15,000 | Dividends | \$201 - \$1,000 |
| 5 | Oracle Corp. (ORCL) | N/A | \$15,001 - \$50,000 | Dividends | \$201 - \$1,000 |
| 6 | Alkermes Plc (ALKS) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 7 | American Express Co. (AXP) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 8 | Citigroup, Inc. (C) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 9 | Cisco Systems, Inc. (CSCO) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 10 | The Coca-Cola Co. (KO) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 11 | The Walt Disney Co. (DIS) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 12 | NIKE, Inc. (NKE) | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 13 | Johnson & Johnson (JNJ) | N/A | \$15,001 - \$50,000 | Dividends | \$201 - \$1,000 |
| 14 | The Travelers Cos., Inc. (TRV) | N/A | \$1,001 - \$15,000 | | None (or less than \$201) |
| 15 | Invesco QQQ Trust, Series 1 (QQQ) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 16 | Vanguard Extended Market Index Fund Admiral Shares (VEXAX) | Yes | \$15,001 - \$50,000 | | \$201 - \$1,000 |
| 17 | Vanguard Short-Term Investment-Grade Fund Investor Shares (VFSTX) | Yes | \$15,001 - \$50,000 | | \$201 - \$1,000 |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|--|-----|-----------------------|-------------|---------------------------|
| 18 | Vanguard Health Care Fund Admiral Shares (VGHAX) | Yes | \$50,001 - \$100,000 | | \$201 - \$1,000 |
| 19 | Vanguard Growth Index Fund Admiral Class Shares (VIGAX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 20 | Vanguard Federal Money Market Fund Investor Shares (VMFXX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 21 | Vanguard Prime Money Market Fund Investor Shares (VMMXX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 22 | Vanguard Tax-Managed Balanced Fund Admiral Shares (VTMFX) | Yes | \$15,001 - \$50,000 | | \$201 - \$1,000 |
| 23 | Vanguard Target Retirement 2035 Fund Investor Class Shares (VTTHX) | Yes | \$250,001 - \$500,000 | | \$5,001 - \$15,000 |
| 24 | Vanguard Intermediate-Term Tax-Exempt Fund Investor Shares (VWITX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 25 | Vanguard Windsor Fund Investor Shares (VWNDX) | Yes | \$15,001 - \$50,000 | | \$201 - \$1,000 |
| 26 | T Rowe Price Global Technology Fund, Inc (PRGTX) | Yes | \$100,001 - \$250,000 | | \$5,001 - \$15,000 |
| 27 | BlackRock International Fund Institutional Shares (MAILX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 28 | Artisan International Fund Investor Shares (ARTIX) | Yes | \$15,001 - \$50,000 | | \$1,001 - \$2,500 |
| 29 | DWS Latin America Equity Fund Class S Shares (SLAFX) | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 30 | Tweedy, Browne Global Value Fund (TBGVX) | Yes | \$15,001 - \$50,000 | | \$201 - \$1,000 |
| 31 | DC College Savings Plan 529 #1 | No | | | |
| 31.1 | US total stock market index portfolio | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|------|---|-----|---------------------|-------------|---------------------------|
| 31.2 | US Large Cap Equity Portfolio | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 32 | DC College Savings Plan 529 # 2 | No | | | |
| 32.1 | DC College Savings 2028 Portfolio | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 33 | DC College Savings Plan 529 #3 | No | | | |
| 33.1 | DC College Savings 2028 Portfolio | Yes | \$15,001 - \$50,000 | | None (or less than \$201) |
| 34 | DC College Savings Plan 529 # 4 | No | | | |
| 34.1 | DC College Savings 2031 Portfolio | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35 | Envestnet Sigma Growth (managed account) | No | | | |
| 35.1 | Baird Aggregate Bond Fund Institutional Class Shares (BAGIX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.2 | Madison Small Cap Fund Class Y Shares (BVAOX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.3 | Credit Suisse Commodity Return Strategy Fund Institutional Class Shares (CRSOX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.4 | Diamond Hill Large Cap Fund Class I Shares (DHLRX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.5 | Fidelity Government Cash Reserves (FDRXX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.6 | Janus Henderson Flexible Bond Fund Class I Shares (JFLEX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.7 | John Hancock Funds III Disciplined Value Fund Class I Shares (JVLIX) | Yes | \$1,001 - \$15,000 | | \$201 - \$1,000 |
| 35.8 | AMG Managers Montag & Caldwell Growth Fund Class I (MCGIX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |

| # | DESCRIPTION | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|-------|--|-----|----------------------|-------------|---------------------------|
| 35.9 | Northern Funds Small Cap Value Fund (NOSGX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.10 | Oakmark International Fund Advisor Class Shares (OAYIX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.11 | PRIMECAP Odyssey Growth Fund (POGRX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.12 | T Rowe Price Emerging Markets Stock Fund Class I Shares (PRZIX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.13 | PIMCO Total Return Fund Institutional Class Shares (PTTRX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 35.14 | WCM Focused International Growth Fund Institutional Class Shares (WCMIX) | Yes | \$1,001 - \$15,000 | | None (or less than \$201) |
| 36 | Mass Mutual, Whole Life | N/A | \$15,001 - \$50,000 | | None (or less than \$201) |
| 37 | Mass Mutual, Whole Life | N/A | \$50,001 - \$100,000 | | None (or less than \$201) |
| 38 | US bank (cash) - filer | N/A | \$50,001 - \$100,000 | | 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 | Wells Fargo | Mortgage on Personal Residence | \$500,001 - \$1,000,000 | 2016 | 3.25 | 30 year |

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).
