

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

## Filer's Information

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Sauber, Richard A

General Counsel, Department of Veterans Affairs

Report Year: 2022

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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/ Sauber, Richard A [electronically signed on 03/15/2022 by Sauber, Richard A 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/ Mitrano, Catherine C, Certifying Official [electronically signed on 03/23/2022 by Mitrano, Catherine C in Integrity.gov]

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Other review conducted by

/s/ Britt, Christopher, Ethics Official [electronically signed on 03/23/2022 by Britt, Christopher in Integrity.gov]

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U.S. Office of Government Ethics Certification

Data Revised 04/12/2022

Data Revised 03/23/2022

Data Revised 03/22/2022

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Robbins Russell	Washington, District of Columbia	Law Firm	Partner	9/2007	4/2021
2	Irrevocable Family Trust #1	Arlington, Virginia	Trust	Co-Trustee	2/2001	4/2021
3	Irrevocable Family Trust #2	Arlington, Virginia	Trust	Co-Trustee	2/2001	4/2021
4	Revocable Family Trust #1	Washington, District of Columbia	Trust	Trustee	9/2019	Present
5	Revocable Family Trust #2	Washington, District of Columbia	Trust	Co-Trustee	9/2019	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Robbins Russell (law firm)	N/A		Partnership Share	\$393,100
2	Robbins Russell capital account	See Endnote	\$15,001 - \$50,000		\$100,001 - \$1,000,000
3	IRA	No			
3.1	Fidelity Government Cash Reserves (FDRXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.2	GraniteShares Gold Trust (BAR)	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
3.3	Fidelity Investment Grade Bond Fund (FBNDX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
3.4	PCM Taxable Bond Fund (PCM)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.5	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
3.6	Vanguard Institutional Target Retirement 2025 Fund (VTTVX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Robbins Russell	Washington, District of Columbia	I have no continuing relationship with the firm, with the exception of the capital account described below. The defined contribution plan mentioned in my nominee report has also been closed and its asset sold. My name has been taken out of the firm's name as of May 1, 2021.	3/2007
2	Robbins Russell	Washington, District of Columbia	The funds in this account were returned to me in May 2021, with the exception of approximately \$27,000 that has been retained for the purpose of state tax payments. After my share of those state tax payments are made, the remaining funds in the account will be returned to me by the end of 2022.	4/2007

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA	No			
1.1	iShares Preferred and Income Securities ETF (PFF)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	SPDR S&P Dividend ETF (SDY)	Yes	\$100,001 - \$250,000		None (or less than \$201)
1.3	Fidelity Government Cash Reserves (FDRXX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank account (cash)	N/A	\$1,000,001 - \$5,000,000	Interest	\$201 - \$1,000
2	AXA Equitable Whole Life Insurance	N/A	\$50,001 - \$100,000		None (or less than \$201)
3	Irrevocable GST Trust #1	No			
3.1	Fidelity Government Money Market Fund (SPAXX)	Yes	\$1,000,001 - \$5,000,000		\$1,001 - \$2,500
3.2	American Tower Corporation (REIT) (AMT)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
3.3	Cisco Systems, Inc. (CSCO)	N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.4	eBay, Inc. (EBAY)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
3.5	Alphabet, Inc. (GOOG)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
3.6	Alphabet, Inc. (GOOG)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
3.7	The Goldman Sachs Group, Inc. (GS)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
3.8	JP Morgan Chase (JPM)	N/A	None (or less than \$1,001)	Dividends	\$50,001 - \$100,000
3.9	Leidos Holdings, Inc. (LDOS)	N/A	None (or less than \$1,001)	Dividends	\$15,001 - \$50,000
3.10	Microsoft Corp. (MSFT)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
3.11	PayPal Holdings, Inc. (PYPL)	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
3.12	Science Applications International Corp. (SAIC)	N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000
3.13	Direxion Daily S&P 500 Bear 1X (SPDN)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.14	Apple, Inc. (AAPL)	N/A	\$100,001 - \$250,000	Dividends	None (or less than \$201)
3.15	Valor Equity Partners IV	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.16	MSA Enterprises LLP	No			
3.16.1	88Rising Inc. (mass media company)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.2	BeautyCon Media Inc. (fashion company)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.16.3	Dreamscape Immersive Inc. (VR company)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.4	Everfi Inc. (community engagement and education company)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.5	Hound Labs Inc. (breathalyzer company)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.6	Hyperice (portable massage compression sleeves)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.7	Hypothermia Devices Inc. (cooling and heating devices)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.8	Loto Labs Inc. (induction vaporizer technology)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.9	Medocino Farms Inc. (restaurants)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.10	MMAX Investment Partners Inc. (PFL mixed martial arts)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.11	NTWRK LLC (mobile video shopping)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.12	On Running (Swiss running shoes)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.13	One Team Partners (sports agency)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.14	Scopely Inc. (mobile games)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.15	SG IV Co-Invest II LP (Erewhon Natural Foods)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16.16	The Beachbody Company Group LLC (fitness products)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	Irrevocable GST Trust #2	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.1	Enterprise Products Partners LP (EPD)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
4.2	Magellan Midstream Partners LP (MMP)	N/A	\$100,001 - \$250,000	Dividends	\$5,001 - \$15,000
4.3	Energy Transfer LP (ET)	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
4.4	Vanguard World FDS Information Technology (VGT)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
4.5	Vanguard Institutional Target Retirement 2030 Fund Institutional Class Shares (VTTWX)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
4.6	Fidelity Government Money Market Fund (SPAXX)	Yes	\$1,000,001 - \$5,000,000		\$1,001 - \$2,500
5	Revocable Trust #1	No			
5.1	Cisco Systems, Inc. (CSCO)	N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000
5.2	SPDR Gold Shares (GLD)	Yes	\$500,001 - \$1,000,000		\$1,001 - \$2,500
5.3	Fidelity Municipal Money Market Fund (FTEXX)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
5.4	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$500,001 - \$1,000,000		\$2,501 - \$5,000
5.5	Vanguard World FDS Information Technology (VGT)	Yes	\$1,000,001 - \$5,000,000		\$5,001 - \$15,000
5.6	Fidelity Government Money Market Fund (SPAXX)	Yes	\$500,001 - \$1,000,000		\$201 - \$1,000
5.7	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000
5.8	Microsoft Corp. (MSFT)	N/A	None (or less than \$1,001)	Capital Gains	\$100,001 - \$1,000,000



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	Revocable Trust # 2	No			
6.1	Blackstone Group (BX)	N/A	\$500,001 - \$1,000,000	Dividends	\$5,001 - \$15,000
6.2	iShares Gold Trust (IAU)	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
6.3	Vanguard High-Yield Tax-Exempt Fund Investor Shares (VWAHX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
6.4	Fidelity Government Money Market Fund (SPAXX)	Yes	\$500,001 - \$1,000,000		\$201 - \$1,000
6.5	Vanguard International Growth Fund Investor Shares (VWIGX)	Yes	None (or less than \$1,001)		\$50,001 - \$100,000
7	Dee Zee Group LLC (restaurants)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8	BEN	N/A	\$250,001 - \$500,000		None (or less than \$201)
9	APO Global	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
10	KKR & Co., Inc. (KKR)	N/A	\$250,001 - \$500,000	Dividends	\$2,501 - \$5,000
11	Carlyle Group	N/A	\$500,001 - \$1,000,000	Dividends	\$5,001 - \$15,000
12	Aledo TX Indpt Sch Dis Tax Ref Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
13	Am Mun Pwr Ohio Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
14	Char-Meck Hosp Auth NC Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
15	O Hare Arpt Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16	Clark Cnty Wash Pub Util Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
17	Cobb Cnty GA Kenn Hosp Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
18	Denton Tx Util Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
19	Denver Col Arpt Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
20	DC GO Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
21	Dubois PA Hosp Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
22	Fla Brd Ed Lottery Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
23	Franklin Cnty Ohio Hosp Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
24	Hamilton Cnty Ohio Hosp Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
25	Honolulu Hawaii Cnty GO Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
26	Houston Tx Arpt Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
27	Houston Tx Indpt Sch Dist Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
28	Indiana Mun Pwr Supply Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
29	LA Cal Arpts Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
30	Louisville Feff Cnty KY Health Sys Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
31	Met Trans Auth NY Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
32	Miami-Dade Fla GO Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
33	Miami-Dade Fla Sch Brd Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
34	Mich Fin Hospital Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
35	Mich St Bldg Auth Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
36	Mun Elec Auth GA Proj One Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
37	Neb Pub Pwr Gen Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
38	NJ Healthcare Facs Fin Auth Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
39	NM Sev Tax Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
40	NO La Aviation Brd Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
41	NY Twy Auth Gen Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
42	N Harris Cnty Tx Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
43	N Tx Mun wtr Sys Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
44	Ohio Tpk Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
45	OK Dev Fin Auth Rev ref Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
46	Orange Cnty Fla Sch Brd Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
47	Palm Beach Fla Health Facs Hosp Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
48	PA Tpk Comm Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
49	Phila PA GO Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
50	Port Arthur Tx Indpt Sch Tax Ref Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
51	SF Cal Cnty Arpts Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
52	Triborough Brdg & Tunl Gen Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
53	Univ Kansas Hosp FACS Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
54	Univ Minn GO Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
55	Utah Cnty Hosp Rev Ref Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
56	Wash St seattle Cancer Alliance Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
57	West Ottawa Mich Sch Dist GO Bonds	No	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
58	WV GO Rd Bds Ser Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
59	Wisc GO Ref Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
60	Wisc health & Ed Facs Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
61	Arizona BRD Regents Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
62	Broward CNTY FLA Port FACS Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
63	Central TEX REGL MOBILITY Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
64	Chicago ILL O HARE Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
65	CONN Health & Ed FAC Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
66	Dallas Ft Worth Arpt Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
67	Dallas Indpt Sch Tax Ref Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
68	Dauphin PA Gen Heakth Sys Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
69	DC GO Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
70	Dubois PA Hospital Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
71	El Paso TX Tax Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
72	Energy NW Wash Elec Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
73	Farmington Mich Pub Sch Tax Go bonds	No	\$1,001 - \$15,000		None (or less than \$201)
74	Greenville Tenn Health & Ed Facs bonds	No	\$1,001 - \$15,000		None (or less than \$201)
75	Harris County TX Ed Facs Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
76	Houston TX ARPT Sys Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
77	Ill Fin Auth Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
78	LA Cal Arpts Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
79	Lower Col Riv TX Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
80	Mass Dev Fin Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
81	Mesa AR Util Sys Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
82	Met Trans Auth NY Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
83	Miami-Dade FLA CTFS PARTN Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
84	Missouri Health & Ed Auth Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
85	Muni Elec Auth GA Bonds	No	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
86	N TEX Twy Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
87	Ohio Hosp Univ Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
88	OK Dev Health Sys Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
89	Omaha Pub Pwr Elec Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
90	Pasco FLA Sch Bd CTFS Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
91	Penn Econ Dev Fing Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
92	Penn TPK Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
93	Port Auth NY & NJ Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
94	Port Portland Ore Intl Arpt Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
95	SLC Utah Arpt Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
96	S FLA WTR CTFS Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
97	SCEN PA GEN AUTH Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
98	S Minn Mun Pwr Supply Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
99	Univ ILL Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
100	Univ Wis Hosp Auth Rev Bonds	No	\$1,001 - \$15,000		None (or less than \$201)
101	Wayne City Mich ARPT Rev Bonds	No	\$15,001 - \$50,000		None (or less than \$201)
102	W Ottawa Mich Pub Sch GO Bonds	No	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Leidos Holdings, Inc. (LDOS)	Sale	05/27/2021	\$500,001 - \$1,000,000
2	JPMorgan	Sale	05/27/2021	\$100,001 - \$250,000
3	Fidelity MSCI Industrials Index ETF (FIDU)	Purchase	05/27/2021	\$250,001 - \$500,000
4	Vanguard Value Index Fund ETF Shares (VTV)	Purchase	05/27/2021	\$500,001 - \$1,000,000
5	Blackstone Group	Sale	07/21/2021	\$250,001 - \$500,000
6	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Sale	07/21/2021	\$250,001 - \$500,000
7	GraniteShares Gold Trust (BAR)	Sale	09/22/2021	\$500,001 - \$1,000,000
8	Carlyle Group	Purchase	09/22/2021	\$500,001 - \$1,000,000
9	WisdomTree Trust US Efficient	Sale	09/22/2021	\$500,001 - \$1,000,000



#	DESCRIPTION	TYPE	DATE	AMOUNT
10	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Sale	09/22/2021	\$500,001 - \$1,000,000
11	Fidelity MSCI Industrials Index ETF (FIDU)	Sale	09/22/2021	\$500,001 - \$1,000,000
12	Vanguard Value Index Fund ETF Shares (VTV)	Sale	09/22/2021	\$1,000,001 - \$5,000,000
13	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Sale	09/22/2021	\$500,001 - \$1,000,000
14	Franklin Resources, Inc. (BEN)	Purchase	11/18/2021	\$500,001 - \$1,000,000
15	Cisco Systems, Inc. (CSCO)	Purchase	11/18/2021	\$500,001 - \$1,000,000
16	KKR & Co., Inc. (KKR)	Purchase	10/27/2021	\$250,001 - \$500,000
17	apollo global Management	Purchase	10/27/2021	\$250,001 - \$500,000
18	Blackstone (BX)	Purchase	12/02/2021	\$100,001 - \$250,000
19	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Purchase	12/02/2021	\$250,001 - \$500,000
20	Science Applications International Corp. (SAIC)	Sale	12/21/2021	\$500,001 - \$1,000,000
21	KKR & Co., Inc. (KKR)	Sale	12/21/2021	\$250,001 - \$500,000
22	Carlyle Group	Sale	12/21/2021	\$250,001 - \$500,000
23	Future Group Holdings	Purchase	10/18/2021	\$15,001 - \$50,000
24	Science Applications International Corp. (SAIC)	Sale	12/21/2021	\$500,001 - \$1,000,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
25	KKR & Co., Inc. (KKR)	Sale	12/21/2021	\$250,001 - \$500,000
26	carlyle group	Sale	12/21/2021	\$250,001 - \$500,000
27	Future Group Holdings (Convertible Note)	Purchase	10/18/2021	\$15,001 - \$50,000
28	Arizona BRD Regents Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
29	Broward CNTY FLA Port FACS Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
30	Central TEX REGL MOBILITY Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
31	Dallas Indpt Sch Tax Ref Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
32	Chicago ILL O HARE Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
33	Dallas Ft Worth Arpt Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
34	CONN Health & Ed FAC Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
35	Dauphin PA Gen Heakth Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
36	DC GO Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
37	Dubois PA Hospital Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
38	Energy NW Wash Elec Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
39	Farmington Mich Pub Sch Tax Go bonds	Purchase	12/01/2021	\$1,001 - \$15,000
40	El Paso TX Tax Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
41	Greenville Tenn Health & Ed Facs bonds	Purchase	12/01/2021	\$1,001 - \$15,000
42	Harris County TX Ed Facs Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
43	Houston TX ARPT Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
44	Ill Fin Auth Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
45	LA Cal Arpts Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
46	Lower Col Riv TX Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
47	Mass Dev Fin Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
48	Mesa AR Util Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
49	Met Trans Auth NY Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
50	Miami-Dade FLA CTFS PARTN Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
51	Missouri Health & Ed Auth Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
52	Muni Elec Auth GA Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
53	Ohio Hosp Univ Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
54	OK Dev Health Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
55	N TEX Twy Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
56	Omaha Pub Pwr Elec Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
57	Pasco FLA Sch Bd CTFS Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
58	Penn Econ Dev Fing Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
59	Penn TPK Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
60	Port Auth NY & NJ Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
61	SLC Utah Arpt Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
62	Port Portland Ore Intl Arpt Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
63	S FLA WTR CTFS Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
64	SCEN PA GEN AUTH Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
65	S Minn Mun Pwr Supply Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
66	Univ ILL Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
67	Univ Wis Hosp Auth Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
68	Wayne City Mich ARPT Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
69	W Ottawa Mich Pub Sch GO Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
70	Future Group Holdings (Convertible Note)	Purchase	10/18/2021	\$15,001 - \$50,000
71	Arizona BRD Regents Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
72	Broward CNTY FLA Port FACS Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
73	Central TEX REGL MOBILITY Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
74	Chicago ILL O HARE Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
75	CONN Health & Ed FAC Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
76	Dallas Ft Worth Arpt Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
77	Dallas Indpt Sch Tax Ref Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
78	Dauphin PA Gen Heakth Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
79	DC GO Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
80	Dubois PA Hospital Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
81	Energy NW Wash Elec Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
82	El Paso TX Tax Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
83	Farmington Mich Pub Sch Tax Go bonds	Purchase	12/01/2021	\$1,001 - \$15,000
84	Greenville Tenn Health & Ed Facs bonds	Purchase	12/01/2021	\$1,001 - \$15,000
85	Harris County TX Ed Facs Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
86	Houston TX ARPT Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
87	Ill Fin Auth Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
88	LA Cal Arpts Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
89	Lower Col Riv TX Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
90	Mesa AR Util Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
91	Mass Dev Fin Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
92	Met Trans Auth NY Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
93	Miami-Dade FLA CTFS PARTN Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
94	Missouri Health & Ed Auth Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
95	Muni Elec Auth GA Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
96	N TEX Twy Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
97	Ohio Hosp Univ Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
98	OK Dev Health Sys Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
99	Omaha Pub Pwr Elec Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
100	Pasco FLA Sch Bd CTFS Bonds	Purchase	12/01/2021	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
101	Penn Econ Dev Fing Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
102	Penn TPK Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
103	Port Auth NY & NJ Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
104	Port Portland Ore Intl Arpt Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
105	SLC Utah Arpt Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
106	S FLA WTR CTFS Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
107	SCEN PA GEN AUTH Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
108	Univ ILL Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
109	S Minn Mun Pwr Supply Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
110	Univ Wis Hosp Auth Rev Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
111	Wayne City Mich ARPT Rev Bonds	Purchase	12/01/2021	\$15,001 - \$50,000
112	W Ottawa Mich Pub Sch GO Bonds	Purchase	12/01/2021	\$1,001 - \$15,000
113	John Hancock Funds II Multi-Index Income Preservation Portfolio Class 1 Shares (JRFOX)	Sale	03/15/2021	\$50,001 - \$100,000

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Chase Bank	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2012	3.2%	30 year mortgage
2	Chase Bank	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2015	2.8%	15 year

## 9. Gifts and Travel Reimbursements

None

## Endnotes

PART	#	ENDNOTE
2.	2	Capital account returned to me on May 2021, in the amount of \$151,241. As explained in Part 3, approximately \$27,000 remains in the capital account for the purpose of paying any state taxes owed.

# 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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