

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

## Filer's Information

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Silvers, Robert P

Under Secretary for Strategy, Policy, and Plans, Department of Homeland Security

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/ Silvers, Robert P [electronically signed on 06/20/2022 by Silvers, Robert P in Integrity.gov] - Filer received a 45 day filing extension.

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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/ O'Connor, Michael, Certifying Official [electronically signed on 10/14/2022 by O'Connor, Michael in Integrity.gov]

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Other review conducted by

/s/ O'Connor, Michael, Ethics Official [electronically signed on 10/14/2022 by O'Connor, Michael in Integrity.gov]

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U.S. Office of Government Ethics Certification

Data Revised 11/22/2022

Data Revised 10/14/2022

Data Revised 08/19/2022

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(10/14/2022, O'Connor, Michael): Assets deleted from prior report were sold prior to appointment to current position and not included as Part 7 transactions.

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Paul Hastings LLP	Los Angeles, California	Law Firm	Partner	4/2017	8/2021
2	CLEAR (biometric identification security)	New York, New York	Corporation	Advisory Board Member	4/2019	8/2021
3	Secure Community Network	Chicago, Illinois	Non-Profit	Member, Board of Directors	1/2020	8/2021
4	New York University	New York, New York	University/College	Adjunct Professor	3/2017	8/2021
5	DS 2019 Trust	Newark, Delaware	Trust	Investment/Distribution Manager and Trustee	1/2020	8/2021
6	S Family 2020 Insurance Trust	New York, New York	Trust	Trustee	7/2020	8/2021
7	Biden-Harris Transition Team (PT Fund, Inc.)	Washington, District of Columbia	Transition Team	Volunteer	10/2020	2/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA 1 - Traditional	No			
1.1	iShares MSCI Emerging Markets ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	Vanguard Cash Reserves Federal Money Market Fund (VMMXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	IRA 2 - Roth	No			
2.1	Vanguard Total Stock Market ETF (VTI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	iShares Russell 2000 ETF (IWM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Paul Hastings LLP (law firm)	N/A		Partnership Share/Income	\$1,990,578
4	Paul Hastings LLP capital account	See Endnote	\$250,001 - \$500,000		None (or less than \$201)
5	CLEAR	N/A		Advisory Board Fees	\$18,750
6	New York University	N/A		Salary	\$10,000
7	O'Melveny & Myers (defined contribution plan)	No			
7.1	Fidelity Total Int'l Index (FTIHX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
7.2	VANG Midcap IDX INST (VMCIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8	Paul Hastings LLP Defined Contribution Retirement Plan	No			
8.1	Vanguard Institutional Index	Yes	\$250,001 - \$500,000		None (or less than \$201)
8.2	American EuroPacific Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	Paul Hastings LLP Cash Balance Plan	N/A	\$100,001 - \$250,000		None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	O'Melveny & Myers LLP	Los Angeles, California	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	11/2007
2	Paul Hastings LLP	Los Angeles, California	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	4/2017
3	Paul Hastings LLP	Los Angeles, California	Pursuant to contract and law firm policy, I will receive a lump sum payment of my cash balance pension plan in May of the fiscal year following my separation (2023).	1/2021
4	Paul Hastings LLP	Los Angeles, California	Pursuant to contract and law firm policy, I received a lump sum payment of my capital account at the time of separation and prior to assuming the duties of the position, less the estimate for any tax payments/tax reconciliation that may be owed.	1/2021
5	Paul Hastings LLP	Los Angeles, California	I received a fixed rate of compensation based on services I rendered for the firm's fiscal year 2022. Amounts owed to me for my fiscal year 2022 services were calculated at the time of my separation and paid prior to assuming the duties of the position.	1/2021
6	Paul Hastings LLP	Los Angeles, California	Pursuant to my employment agreement, I received a performance-based bonus for services rendered in the fiscal year ending January 31, 2021. This bonus was paid prior to my assuming the duties of the position of Under Secretary.	1/2021

### 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 3 - Roth	No			
1.1	Fidelity Freedom 2030 Fund (FFFEX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	Fidelity Freedom 2040 Fund (FFFFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	iShares Russell 2000 ETF (IWM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	Columbia Acorn International Class A Shares (LAIAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	O'Melveny & Myers (defined contribution plan)	No			
2.1	Fidelity Managed Income Portfolio II Class 1	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	Dodge & Cox Stock Fund (DODGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	Fidelity Diversified International Fund Class K Shares (FDIKX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.4	Fidelity Low-Priced Stock Fund Class K Shares (FLPKX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	T Rowe Price Large-Cap Growth Fund (TRLGX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3	University of California Defined Contribution Plan Retirement Account	No			
3.1	UC Savings Fund	N/A	\$1,001 - \$15,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
1	US bank 1 - Joint Checking account (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)	
2	US bank 1 - Checking account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)	
3	US bank 1 - Checking account (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)	
4	US bank 2 - Checking account (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)	
5	US bank 2 - Preferred Money Market Account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)	
6	US bank 2 - Savings Plus Account (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)	
7	US bank 3 - Certificate of Deposit Account	N/A	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000	
8	US bank 3 - Savings Account (cash)	N/A	\$50,001 - \$100,000	Interest	\$201 - \$1,000	
9	GoodDog Stock (pet consultation services)	N/A	\$1,001 - \$15,000		None (or less than \$201)	
10	US bank 3 - Certificates of Deposit	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000	
11	US brokerage - Insured Deposit Account	N/A	\$50,001 - \$100,000		None (or less than \$201)	
12	Tahl-Propp Manhattan LP, New York, NY	See Endnote	N/A		\$1,001 - \$15,000	None (or less than \$201)
13	Fednorth Associates LLC	See Endnote	N/A		\$100,001 - \$250,000	Capital Gains Rent or Royalties \$100,001 - \$1,000,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	450 Remainder LLC	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)
15	99 Equity I LLC	See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$100,001 - \$1,000,000
16	DS 2019 Trust		No			
16.1	The Ader-Silvers Families LLC		No			
16.1.1	Mack Real Estate Group	See Endnote	N/A	\$100,001 - \$250,000	Rent or Royalties	\$5,001 - \$15,000
16.2	US bank 4 (cash)		N/A	\$1,000,001 - \$5,000,000	Interest	\$201 - \$1,000
16.3	Note from David Silvers		No			\$15,001 - \$50,000
17	PBS 2019 Trust		No			
17.1	US bank 4 (cash)		N/A	Over \$1,000,000		
17.2	78 BH Matthews LLC	See Endnote	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
17.3	Note from P Silvers		No		Interest	\$50,001 - \$100,000
18	DS 2020 Insurance Trust		No			
18.1	Axa Equitable, whole life		N/A	\$1,001 - \$15,000		None (or less than \$201)
18.2	Northwest Mutual Ins., whole life		N/A	\$50,001 - \$100,000		None (or less than \$201)
18.3	New York Life, whole life		N/A	\$50,001 - \$100,000		None (or less than \$201)
18.4	AIG / US Life Insurance Company, whole life		N/A	\$1,001 - \$15,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	S Family 2020 Insurance Trust	No			
19.1	Voya Reliastar Insurance, whole life	N/A	\$250,001 - \$500,000		None (or less than \$201)
19.2	John Hancock Ins., whole life	N/A	\$50,001 - \$100,000		None (or less than \$201)
19.3	Guardian Ins., whole life	N/A	\$50,001 - \$100,000		None (or less than \$201)
19.4	New York Life, whole life	N/A	\$100,001 - \$250,000		None (or less than \$201)
19.5	Met Life, whole life	N/A	\$15,001 - \$50,000		None (or less than \$201)
20	The Silvers GC Trust	No			
20.1	Mitchfield Equity LLC	See Endnote	\$15,001 - \$50,000	Rent or Royalties	\$5,001 - \$15,000
20.2	The Ader-Silvers Families LLC	No			
20.2.1	Mack Real Estate Group, LLC	N/A	\$100,001 - \$250,000	Rent or Royalties	\$5,001 - \$15,000
20.3	US bank 4 (cash)	N/A	\$500,001 - \$1,000,000	Interest	\$201 - \$1,000
20.4	US bank 2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
20.5	US brokerage money market account (cash)	N/A	\$500,001 - \$1,000,000		\$2,501 - \$5,000
21	Brokerage Account	No			
21.1	Vanguard Target Retirement 2020 VTW NX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
21.2	Fidelity Emerging Asia Fund (FSEAX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
21.3	Vanguard Dividend Appreciation Index Fund ETF Class Shares (VIG)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
21.4	Vanguard FTSE All-World ex US Index Fund ETF Shares (VEU)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
21.5	Vanguard FTSE All-World ex-US Small-Cap Index Fund ETF Shares (VSS)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
21.6	Vanguard Emerging Markets Stock Index Fund ETF Shares (VWO)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
21.7	Vanguard Small-Cap Growth Index Fund ETF Class Shares (VBK)	Yes	\$250,001 - \$500,000		\$201 - \$1,000
21.8	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
21.9	Vanguard Total International Stock Index Fund ETF Shares (VXUS)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
21.10	First Trust NASDAQ Clean Edge Smart Grid Infrastructure Index Fund (GRID)	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
21.11	Invesco DB US Dollar Index Bearish Fund (UDN)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
21.12	Invesco Exchange Global Water ETF (PIO)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
21.13	Invesco India ETF (PIN)	Yes	None (or less than \$1,001)		None (or less than \$201)
21.14	Invesco Water Resources ETF (PHO)	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
21.15	SPDR S&P 500 ETF Trust (SPY)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
21.16	VanEck Vectors Africa Index ETF (AFK)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
21.17	PepsiCo, Inc. (PEP)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
21.18	PICO Holdings, Inc. (PICO)	N/A	None (or less than \$1,001)		None (or less than \$201)
21.19	Procter & Gamble Co. (PG)	N/A	None (or less than \$1,001)	Dividends	\$201 - \$1,000
21.20	The Charles Schwab Corp. (SCHW)	N/A	None (or less than \$1,001)		
21.21	Stanley Black & Decker, Inc. (SWK)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$50,001 - \$100,000
21.22	Yum! Brands, Inc. (YUM)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
21.23	Yum China Holdings (YUMC)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$5,001 - \$15,000
21.24	Vanguard FTSE All-World ex-US Small-Cap Index Fund ETF Shares (VSS)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
21.25	Vanguard Emerging Markets Stock Index Fund ETF Shares (VWO)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
21.26	Vanguard 500 Index Fund ETF Shares (VOO)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
21.27	Vanguard Total International Stock Index Fund ETF Shares (VXUS)	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
21.28	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Yes	\$1,000,001 - \$5,000,000		\$5,001 - \$15,000
21.29	Vanguard STAR Fund Investor Shares (VGSTX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
21.30	Amazon.com, Inc. (AMZN)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
21.31	Vanguard Federal Money Market Fund (VMFXX)		Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
21.32	Vanguard Federal Money Market Fund (VMFXX)		Yes	\$500,001 - \$1,000,000		\$201 - \$1,000
21.33	Vanguard Cash Reserves Federal Money Market Fund (VMMXX)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
21.34	Vanguard 500 Index Fund ETF Shares (VOO)		Yes	\$1,000,001 - \$5,000,000		\$5,001 - \$15,000
21.35	Vanguard Large-Cap Index Fund ETF Shares (VV)		Yes	\$250,001 - \$500,000		\$201 - \$1,000
22	Silfamhold Property LLC		No			
22.1	98 BH Matthews LLC	See Endnote	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
22.1.1	Undeveloped Land, Suffolk County, New York		N/A	\$500,001 - \$1,000,000		None (or less than \$201)
22.2	USRA Equity I LLC	See Endnote	N/A	\$250,001 - \$500,000	Dividends Rent or Royalties	\$15,001 - \$50,000
22.3	Prospect Pointe Acquisition LLC	See Endnote	N/A	\$100,001 - \$250,000	Rent or Royalties	\$2,501 - \$5,000
22.4	Provident Management LLC	See Endnote	N/A	\$100,001 - \$250,000	Rent or Royalties	\$15,001 - \$50,000
22.5	Highview Acquisition LLC	See Endnote	N/A	\$50,001 - \$100,000		None (or less than \$201)
22.6	Roark-Carvel Fund	See Endnote	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
22.7	Mitchfield Equity LLC	See Endnote	N/A	\$100,001 - \$250,000	Rent or Royalties	\$15,001 - \$50,000
22.8	The Ader-Silvers Families LLC		No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
22.8.1	Mack Real Estate Group	See Endnote	N/A	Capital Gains Rent or Royalties	\$15,001 - \$50,000
22.9	Note from D. Silvers	No		Interest	\$50,001 - \$100,000
22.10	US Bank 4 - Checking/MM	No	\$1,000,001 - \$5,000,000		\$201 - \$1,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	The Charles Schwab Corp. (SCHW)	Sale	08/16/2021	\$1,001 - \$15,000
2	PICO Holdings, Inc. (PICO) (a/k/a Vidler Water Resources)	Sale	08/16/2021	\$1,001 - \$15,000
3	Invesco India ETF (PIN)	Sale	08/16/2021	\$15,001 - \$50,000
4	Amazon.com, Inc. (AMZN)	Sale	08/11/2021	\$1,001 - \$15,000
5	MLCP GLL Funding LLC	Sale	08/16/2021	\$15,001 - \$50,000
6	Invesco Water Resources ETF (PHO)	Sale	10/04/2021	\$15,001 - \$50,000
7	Yum China Holdings (YUMC)	Sale	10/04/2021	\$1,001 - \$15,000
8	Stanley Black & Decker, Inc. (SWK)	Sale	10/04/2021	\$50,001 - \$100,000
9	Invesco Exchange Global Water ETF (PIO)	Sale	10/04/2021	\$15,001 - \$50,000
10	Procter & Gamble Co. (PG)	Sale	10/04/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
11	First Trust NASDAQ Clean Edge Smart Grid Infrastructure Index Fund (GRID)	Sale	10/04/2021	\$50,001 - \$100,000
12	Vanguard Small-Cap Growth Index Fund ETF Class Shares (VBK)	Purchase	09/09/2021	\$50,001 - \$100,000
13	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	07/19/2021	\$15,001 - \$50,000
14	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	06/23/2021	\$1,001 - \$15,000
15	Vanguard Total International Stock Index Fund ETF Shares (VXUS)	Purchase	06/23/2021	\$1,001 - \$15,000
16	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Purchase	11/30/2021	\$15,001 - \$50,000
17	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Purchase	11/10/2021	\$100,001 - \$250,000
18	Vanguard Total International Stock Index Fund ETF Shares (VXUS)	Purchase	11/10/2021	\$15,001 - \$50,000
19	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	09/09/2021	\$15,001 - \$50,000
20	Vanguard Total International Stock Index Fund ETF Shares (VXUS)	Purchase	09/09/2021	\$50,001 - \$100,000
21	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	08/06/2021	\$100,001 - \$250,000
22	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	07/19/2021	\$15,001 - \$50,000
23	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	06/23/2021	\$15,001 - \$50,000
24	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	06/04/2021	\$15,001 - \$50,000
25	Silfamhold Property LLC	See Endnote	Exchange	06/30/2021

## 8. Liabilities

None

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## 9. Gifts and Travel Reimbursements

None

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## Endnotes

PART	#	ENDNOTE
2.	4	Capital account refunded in full, less the estimate for any tax payments/tax reconciliation that may be owed, prior to assumption of the duties of Under Secretary.
6.	12	Interest in a portfolio of NYC residential properties.
6.	13	Interest in commercial net leased property, San Bernadino, CA.
6.	14	Remainder interest in ground lease of commercial real estate property, New York, NY.
6.	15	Interest in net lease of commercial real estate properties consisting of multiple restaurant properties across MA, RI and NH.
6.	16.1.1	Residential real estate in New York, NY; Redmond, WA, Seattle, WA, Los Angeles, CA and Miami, FL.
6.	17.2	Real Property in Suffolk County, New York
6.	20.1	This owns interests in a portfolio of net ground leases of commercial properties
6.	22.1	Real property in Suffolk County, New York
6.	22.2	Portfolio of interests in commercial net lease real estate assets
6.	22.3	Investment in portfolio of residential apartments, Jackson, NJ.

PART	#	ENDNOTE
6.	22.4	Investment in single tenant commercial real estate asset, Providence, RI.
6.	22.5	Investment in residential real estate asset, Jackson, NJ.
6.	22.6	Owns fast food, healthclub/spa, auto repair and similar franchisor entities.
6.	22.7	Portfolio of net ground leases of commercial properties.
6.	22.8.1	Residential real estate portfolio in New York, NY, Redmond, WA, Seattle, WA, Los Angeles, CA and Miami, FL.
7.	25	Pursuant to my Ethics Agreement dated May 2, 2021, exchanged my interest in Silfamhold LLC for equivalent interest in Silfamhold Property LLC.



# 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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