



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

November 17, 2022

The Honorable Emory A. Rounds III
Director
United States Office of Government Ethics
1201 New York Ave., N.W.
Suite 500
Washington, D.C. 20005-3917

Dear Mr. Rounds:

I am enclosing a supplement to Mr. Daniel Werfel's nominee public financial disclosure report, signed on September 23, 2022. I have reviewed the additional information. Based on my review of this supplemental disclosure, I continue to believe that Mr. Werfel is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**Brian J.
Sonfield**

Brian J. Sonfield
Assistant General Counsel
and Designated Agency Ethics Official

Digitally signed by Brian J.
Sonfield
Date: 2022.11.17 14:00:16
-05'00'

November 17, 2022

Brian J. Sonfield
Designated Agency Ethics Official
Department of the Treasury
1500 Pennsylvania Ave., NW
Washington, DC 20229

Re: Supplement to Financial Disclosure Report of Daniel Werfel

Dear Mr. Sonfield

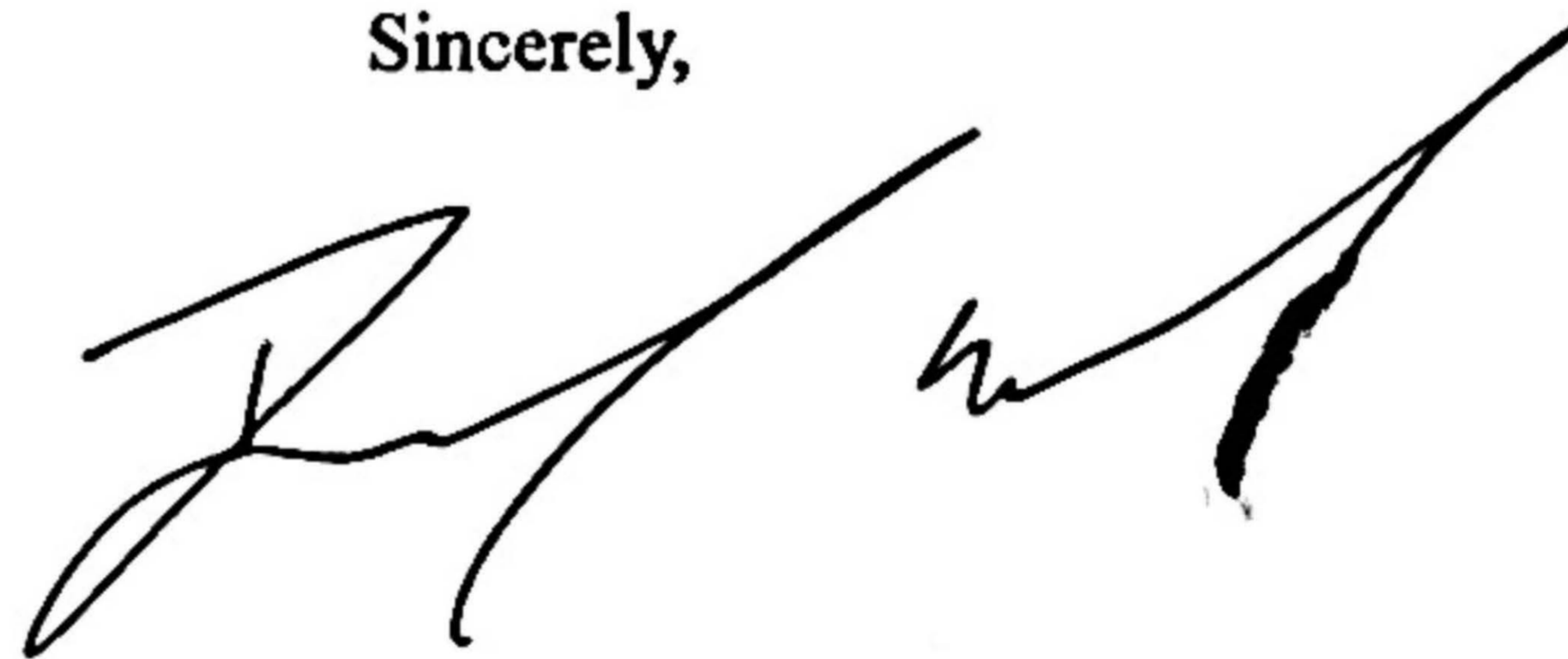
The purpose of this document is to supplement my financial disclosure report by reporting an asset that was inadvertently omitted from the financial disclosure report that I signed on September 23, 2022.

Part 6

Description	EIF	Value	Income Type	Income Amount
Vanguard Intermediate Tax Exempt Admiral (VWIUX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,



Daniel Werfel

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Werfel, Daniel

IRS Commissioner, Department of the Treasury

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Committee on Finance
-

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/ Werfel, Daniel [electronically signed on 09/23/2022 by Werfel, Daniel in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Sonfield, Brian, Certifying Official [electronically signed on 11/15/2022 by Sonfield, Brian in Integrity.gov]

Other review conducted by

/s/ Vetter, Mark, Ethics Official [electronically signed on 11/15/2022 by Vetter, Mark in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 11/15/2022 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	The Boston Consulting Group, Inc., The Boston Consulting Group, LLP and BCG Federal Corp. (a wholly owned subsidiary of BCG Inc.)	See Endnote	Washington, District of Columbia	Corporation	Managing Director and Partner	7/2017	Present
2	National Capital Region Red Cross Board	See Endnote	Fairfax, Virginia	Non-Profit	Board Member	9/2021	Present
3	Duke Terry Sanford School of Public Policy Alumni Board	See Endnote	Durham, North Carolina	University/College	Board Member	6/2017	Present
4	Center for Public Impact	See Endnote	Boston, Massachusetts	Non-Profit	Board Member	6/2022	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	The Boston Consulting Group, Inc., The Boston Consulting Group, LLP and BCG Federal Corp. (a wholly owned subsidiary of BCG Inc.) (Management Consulting Firm)	N/A		Salary/Bonus	\$6,631,306
2	Boston Consulting Group, Inc. and BCG Federal Corp. (a wholly owned subsidiary of BCG Inc.) (Management Consulting Firm), anticipated Managing Director Performance Bonus (FY22)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
3	BCG Employees Profit Sharing Retirement Fund, Deferred Income Plan	No			
3.1	Vanguard Target Retire 2035 Tr P	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	BCG Employees' Savings Plan and Profit Sharing Retirement Fund, Defined Contribution Plan		No			
4.1	Vanguard Target Retire 2035 Tr P		Yes	\$250,001 - \$500,000		None (or less than \$201)
5	IRA #1		No			
5.1	Fidelity Government Cash Reserves (FDRXX)		Yes	\$500,001 - \$1,000,000		None (or less than \$201)
5.2	iShares Core US Aggregate Bond ETF (AGG)		Yes	\$50,001 - \$100,000		None (or less than \$201)
5.3	SPDR S&P 500 ETF Trust (SPY)		Yes	\$100,001 - \$250,000		None (or less than \$201)
5.4	SPDR S&P500 ETF (SPY), Open Call Option, Exp. 12/16/2022, Strike \$460 (100 SHS)		N/A	\$1,001 - \$15,000		None (or less than \$201)
5.5	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 12/16/2022, Strike \$410 (100 SHS)		N/A			None (or less than \$201)
5.6	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$400 (100 SHS)		N/A			None (or less than \$201)
6	Boston Consulting Group, Inc. - equity share	See Endnote	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
7	Boston Consulting Group, Inc., defined benefit plan		N/A	\$500,001 - \$1,000,000		None (or less than \$201)
8	U.S. brokerage IRA money market account (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9	The Boston Consulting Group, Inc., The Boston Consulting Group, LLP, and BCG Federal Corp. (a wholly owned subsidiary of BCG Inc.) (Management Consulting Firm), anticipated Regional System Performance Bonus (FY22)	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	The Boston Consulting Group, Inc.	Washington, District of Columbia	BCG provides an annual Regional System Performance Bonus for the fiscal year (1/1-12/31), typically determined within the first weeks of the following calendar year. The RSPB is normally paid in December of following year. The bonus amount is based on a formula composed of objective elements tied to the company's performance during the fiscal year. If I depart prior to the end of the year, the RSPB is pro-rated, and paid out on the same schedule.	7/2017
2	The Boston Consulting Group, Inc.	Boston, Massachusetts	I will not participate in the defined contribution plan after my separation.	3/2014
3	The Boston Consulting Group, Inc.	Boston, Massachusetts	I will continue to participate in this defined benefit plan.	3/2014
4	The Boston Consulting Group, Inc.	Boston, Massachusetts	Loan from BCG to make initial purchase of equity share in partnership (details in Part 8, Line 3). Upon separation, loan will be paid off with proceeds from return of equity.	7/2017
5	The Boston Consulting Group, Inc.	Boston, Massachusetts	Loan from BCG to make additional purchase of equity share in partnership (details in Part 8, Line 4). Upon separation, loan will be paid off with proceeds from return of equity.	7/2020

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
6	The Boston Consulting Group, Inc.	Boston, Massachusetts	I have an equity share in BCG. Pursuant to my employment agreement, upon my separation, BCG will immediately redeem my equity share and use the gross proceeds to pay off any outstanding loan balance (Part 8, Lines 3 and 4). BCG will continue to hold the remaining net proceeds in an interest bearing account (market rate), then will return these proceeds plus interest to me on the one year anniversary of my departure.	7/2017
7	The Boston Consulting Group, Inc.	Boston, Massachusetts	I will not participate in the deferred income plan after my separation.	3/2014
8	The Boston Consulting Group, Inc.	Boston, Maryland	BCG provides an annual Managing Director Performance Bonus (MDPB) for the fiscal year (1/1-12/31), typically determined at the end of the year. The MDPB is normally paid in May of following year, although BCG may opt to pay 50% of the MDPB amount in December of the year it was earned (with the balance still paid in May of the following year). The bonus amount is based on a formula composed of both objective elements tied to the company's performance during the fiscal year and a subjective element tied to my performance during the fiscal year. If I depart prior to the end of the year, the bonus is pro-rated, and paid out on the same schedule.	7/2017

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	BCG Inc.	Boston, Massachusetts	Managing Director and Partner
2	BCG Federal Corp	Washington, District of Columbia	Managing Director and Partner
3	CBRE Group, Inc.	Dallas, Texas	Strategic management consulting services (BCG client)

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fairfax County Public Schools	N/A		salary	
2	Virginia Retirement System, defined benefit plan	N/A	\$100,001 - \$250,000		None (or less than \$201)
3	U.S. brokerage IRA money market account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	ERFC Direct, Defined Benefit Plan (Fairfax County Schools Supplemental Retirement System)	N/A	\$50,001 - \$100,000		None (or less than \$201)
5	403(B) Defined Contribution (T Rowe Price Target 2030 Fund Class I Shares (TWRRX))	Yes	\$100,001 - \$250,000		None (or less than \$201)
6	State Teachers Retirement System of Ohio, Defined Benefit Plan	N/A	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Vanguard Total International Bond Index Fund ETF Shares (BNDX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
2	Vanguard Short-Term Bond Index Fund ETF Shares (BSV)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	SPDR Gold Shares (GLD)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	iShares Gold Trust (IAU)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	SPDR S&P 500 ETF Trust (SPY)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
6	SPDR S&P 500 ETF Trust (SPY)	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
7	Vanguard Intermediate-Term Treasury Index Fund ETF Class Shares (VGIT)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8	SPDR S&P500 ETF (SPY), Open Call Option, Exp. 12/16/2022, Strike \$305 (100 SHS)	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
9	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 12/16/2022, Strike \$315 (100 SHS)	N/A			None (or less than \$201)
10	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 12/16/2022, Strike \$490 (100 SHS)	N/A			None (or less than \$201)
11	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 12/16/2022, Strike \$310 (100 SHS)	N/A			None (or less than \$201)
12	SPDR S&P500 ETF (SPY), Open Put Option, Exp. 12/16/2022, Strike \$460 (100 SHS)	N/A	\$100,001 - \$250,000		None (or less than \$201)
13	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$400 (100 SHS)	N/A			None (or less than \$201)
14	SPDR S&P500 ETF (SPY), Open Call Option, Exp. 1/20/2023, Strike \$415 (100 SHS)	N/A	\$100,001 - \$250,000		None (or less than \$201)
15	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$440 (100 SHS)	N/A			None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$450 (100 SHS)	N/A			None (or less than \$201)
17	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$290 (100 SHS)	N/A			None (or less than \$201)
18	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$310 (100 SHS)	N/A			None (or less than \$201)
19	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$360 (100 SHS)	N/A			None (or less than \$201)
20	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$390 (100 SHS)	N/A			None (or less than \$201)
21	SPDR S&P500 ETF (SPY), Open Position for Written Put Option (value not readily ascertainable), Exp. 1/20/2023, Strike \$400 (100 SHS)	N/A			None (or less than \$201)
22	SPDR S&P500 ETF (SPY), Open Put Option, Exp. 1/20/2023, Strike \$455 (100 SHS)	N/A	\$250,001 - \$500,000		None (or less than \$201)
23	SPDR S&P500 ETF (SPY), Open Put Option, Exp. 1/20/2023, Strike \$460 (100 SHS)	N/A	\$100,001 - \$250,000		None (or less than \$201)
24	SPDR S&P500 ETF (SPY), Open Position for Written Call Option (value not readily ascertainable), Exp. 6/16/2023, Strike \$330 (100 SHS)	N/A			None (or less than \$201)
25	SPDR S&P500 ETF (SPY), Open Put Option, Exp. 12/20/2024, Strike \$270 (100 SHS)	N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
26	SPDR S&P500 ETF (SPY), Open Put Option, Exp. 12/20/2024, Strike \$350 (100 SHS)		N/A	\$100,001 - \$250,000		None (or less than \$201)
27	IRONVIEW PRIVATE EQUITY PARTNERS I LP	See Endnote	No	\$100,001 - \$250,000	Capital Gains Dividends Interest	\$15,001 - \$50,000
27.1	Bain Capital Tech Opportunities Fund & Alternative Vehicle (13.30%)		Yes			None (or less than \$201)
27.2	Bain Capital Fund XIII, LP - Class A Interests (0.61%)		Yes			None (or less than \$201)
27.3	Bain Capital Fund XIII, LP - Class B Shares (0.63%)		Yes			None (or less than \$201)
27.4	Landmark Equity Partners XVI, LP (7.77%)		Yes			None (or less than \$201)
27.5	LightBay Executive Fund, LP (5.23%)		Yes			None (or less than \$201)
27.6	Sun Capital Partners VII, LP (12.88%)		Yes			None (or less than \$201)
27.7	Dyal IV US Investors LP (9.17%)		Yes			None (or less than \$201)
27.8	Carlyle Private Equity Access Fund IV, LP (40.16%)		Yes			None (or less than \$201)
27.9	HarbourVest Access - 2019 Global Fund Cayman LLC (8.26%)		Yes			None (or less than \$201)
27.10	U.S. bank account (cash) (1.99%)		N/A			None (or less than \$201)
28	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF DEC 17 21 \$200 (100 SHS)		N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
29	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF JUN 18 21 \$305 (100 SHS)		N/A	None (or less than \$1,001)	Capital Gains	\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
30	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF JUN 18 21 \$355 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
31	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF JUN 18 21 \$375 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
32	CLOSED CALL OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$360 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
33	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$230 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
34	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$230 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
35	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$340 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
36	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$340 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
37	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$380 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$15,001 - \$50,000
38	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF SEP 17 21 \$380 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
39	CLOSED CALL OPTION (SPY) SPDR S&P500 ETF JAN 21 22 \$350 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$100,001 - \$1,000,000
40	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF JAN 21 22 \$390 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$15,001 - \$50,000
41	CLOSED CALL OPTION (SPY) SPDR S&P500 ETF JAN 21 22 \$351 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
42	CLOSED CALL OPTION (SPY) SPDR S&P500 ETF DEC 16 22 \$315 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$15,001 - \$50,000
43	CLOSED PUT OPTION (SPY) SPDR S&P500 ETF JUN 30 22 \$375 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
44	CLOSED CALL OPTION (SPY) SPDR S&P500 ETF JUN 30 22 \$350 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000
45	CLOSED CALL OPTION (SPY) SPDR S&P500 ETF SEP 30 22 \$360 (100 SHS)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
46	US federal credit union (cash)	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
47	US bank account (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
48	Virginia 529 Plan	No		Distributions	\$105,009
48.1	Stable Value Portfolio	Yes	\$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	2022	3.25%	30 years
2	Pentagon Federal Credit Union	See Endnote	Mortgage on Personal Residence	\$100,001 - \$250,000	2015	2.85%	15 years
3	BCG Equity (partnership share), outstanding loan		Loan from Employer to purchase equity share.	\$250,001 - \$500,000	2017	1.89%	9 years

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
4	BCG Equity (purchase of additional shares), outstanding loan	Loan from employer to purchase equity share in partnership.	\$250,001 - \$500,000	2020	0.45	9 years
5	Ironview Partners PE Fund	Capital Commitment	\$50,001 - \$100,000	2018	On Demand	10 years

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	1	Was previously with BCG in Director role since 3/2014.
1.	2	Uncompensated.
1.	3	Uncompensated.
1.	4	The Center for Public Impact (CPI) is a non profit wholly owned subsidiary of BCG. When I was named leader of the Public Sector Practice at BCG in June, 2022, I was named a member if the CPI Board. It is standard procedure for CPI that the person who heads the Public Sector Practice at BCG is also a member of the CPI Board. I receive no compensation from CPI.
2.	6	Although BCG is incorporated, the company still uses the terms partner and partnership for historical purposes to describe its relationship to its equity holders. BCG equity may only be held by its partner/employees and must be redeemed upon the partner's departure from the company. BCG does not issue dividends on the equity shares.
6.	27	Percentages list in sub-assets below represent amount of holdings held in Ironview Private Equity Partners I, LP (as of 12/31/2021). This asset was completely divested on 10/31/2022.

PART	#	ENDNOTE
8.	2	House for this mortgage was sold in May of 2022. The mortgage has been paid off in full.

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).
