

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

## Filer's Information

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Tolentino, Raymond P

Special Assistant to the President and Associate Counsel, White House - Biden-Harris Administration

Date of Appointment: 01/29/2024

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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/ Tolentino, Raymond P [electronically signed on 04/19/2024 by Tolentino, Raymond P in Integrity.gov] - Filer received a 51 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/ Dorsey, Osasumwen Z, Certifying Official [electronically signed on 06/18/2024 by Dorsey, Osasumwen Z in Integrity.gov]

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Other review conducted by

/s/ Barrans, Michelle M, Ethics Official [electronically signed on 06/14/2024 by Barrans, Michelle M in Integrity.gov]

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U.S. Office of Government Ethics Certification

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Data Revised 06/14/2024

Data Revised 06/12/2024

Data Revised 06/06/2024

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Howard University School of Law		Washington, District of Columbia	University/College	Director of Civil Rights Clinic & Adjunct Professor (Unpaid)	8/2022	1/2024
2	Georgetown University Law Center	See Endnote	Washington, District of Columbia	University/College	Adjunct Professor (Unpaid)	8/2016	1/2024
3	ABA Litigation Journal		Washington, District of Columbia	Bar Association Journal	Associate Editor (Unpaid)	6/2022	2/2024
4	Kaplan Hecker & Fink LLP	See Endnote	Washington, District of Columbia	Law Firm	Partner	4/2020	1/2024

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Kaplan Hecker & Fink LLP (law firm)	See Endnote	N/A		Partnership Share/Income	\$596,693
2	Akin Gump Strauss Hauer & Feld LLP, 401k plan		No			
2.1	Vanguard Target Retirement 2050 Fund Investor Class Shares (VFIFX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	Dodge & Cox Income X (DOXIX)		Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.3	Diversified Multi-Asset Moderate Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	Fidelity Small/Mid Cap Core	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	State Street S&P 500 Index Non-Lending Series Fund Class N	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	Vanguard Russell 2000 Index Fund Institutional Shares (VRTIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Kaplan Hecker & Fink LLP, 401k/401a plan	No			None (or less than \$201)
3.1	DoubleLine Total Return Bond Fund Class R6 Shares (DDTRX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.2	MetWest Total Return Bond Fund Plan Class Shares (MWTSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	PIMCO Income Fund Institutional Class Shares (PIMIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.4	Cohen & Steers Real Assets Fund, Inc Class Z Shares (RAPZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.5	Vanguard Inflation-Protected Securities Fund Admiral Shares (VAIPX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.6	Vanguard Short-Term Bond Index Fund Admiral Shares (VBIRX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.7	Vanguard Total Bond Market Index Fund Admiral Shares (VBTLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.8	Vanguard Dividend Appreciation Index Fund Admiral Class Shares (VDADX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.9	Vanguard Emerging Markets Stock Index Fund Admiral Class Shares (VEMAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.10	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.11	Vanguard Real Estate Index Fund Admiral Shares (VGSLX)	Yes	None (or less than \$1,001)		None (or less than \$201)
3.12	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.13	Vanguard Small-Cap Index Fund Admiral Shares (VSMAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.14	Vanguard Developed Markets Index Fund Admiral Class Shares (VTMGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	Kaplan Hecker & Fink LLP, cash balance pension plan	See Endnote	N/A	\$50,001 - \$100,000	None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Akin Gump Strauss Hauer & Feld LLP	Washington, District of Columbia	Akin Gump 401k: I will continue to participate in this 401k defined contribution plan, but the plan sponsor no longer makes contributions.	10/2016
2	Kaplan Hecker & Fink LLP	Washington, District of Columbia	Kaplan Hecker & Fink 401k/401a: I will continue to participate in this defined contribution plan. The plan sponsor no longer makes contributions.	6/2021
3	Kaplan Hecker & Fink LLP	Washington, District of Columbia	Kaplan Hecker & Fink Cash Balance Plan: I will continue to participate in this cash balance pension plan, and the plan sponsor will make a contribution in September 2024 for my 2023 employment at the firm. After that final contribution, the plan sponsor will not make any further contributions because I am no longer employed at the firm.	12/2021

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
4	Kaplan Hecker & Fink LLP	Washington, District of Columbia	Kaplan Hecker & Fink Partnership Capital Account: This partnership capital account was not funded during my tenure at the firm, and I therefore did not receive a return of capital upon departure from the firm. During my government service, I will not receive any future distributions or payments from this capital account.	1/2022

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Kaplan Hecker & Fink LLP	Washington, District of Columbia	Partner at Law Firm
2	Columbia University	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
3	Dechert LLP	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
4	New York University	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
5	Metropolitan Transportation Authority (MTA)	See Endnote	Legal services (client of Kaplan Hecker & Fink LLP)
6	Triborough Bridge and Tunnel Authority	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
7	Vesttoo Ltd.	Tel Aviv, Outside U.S.	Legal services (client of Kaplan Hecker & Fink LLP)
8	Vet Voice Foundation	Washington, District of Columbia	Legal services (client of Kaplan Hecker & Fink LLP)
9	States United Democracy Center	Washington, District of Columbia	Legal services (client of Kaplan Hecker & Fink LLP)

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
10	TransUnion LLC	Chicago, Illinois	Legal services (client of Kaplan Hecker & Fink LLP)
11	Neil Phillips	London, Outside U.S.	Legal services (client of Kaplan Hecker & Fink LLP)
12	India Walton & Friends of India Walton	Buffalo, New York	Legal services (client of Kaplan Hecker & Fink LLP)
13	The Highland Project Inc.	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
14	Center for Tech and Civic Life	Chicago, Illinois	Legal services (client of Kaplan Hecker & Fink LLP)
15	McKinsey & Company	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
16	The Renew Democracy Initiative Inc.	Washington, District of Columbia	Legal services (client of Kaplan Hecker & Fink LLP)
17	Tony Evers (Governor of Wisconsin)	Maple Bluff, Wisconsin	Legal services (client of Kaplan Hecker & Fink LLP)
18	Tom Wolf (Governor of Pennsylvania), Leigh Chapman (Acting Secretary of Pennsylvania), and Jessica Mathis (Director for the Pennsylvania Bureau of Election Services and Notaries)	Harrisburg, Pennsylvania	Legal services (client of Kaplan Hecker & Fink LLP)
19	E. Jean Carroll	Upstate, New York	Legal services (client of Kaplan Hecker & Fink LLP)
20	Mary Trump	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
21	Zellnor Myrie and Diana Richardson	New York, New York	Legal services (client of Kaplan Hecker & Fink LLP)
22	Catherine McKoy, Markus Frazier, Lynn Chadwick, and Millard Williams	See Endnote	(Different Cities) Legal services (client of Kaplan Hecker & Fink LLP)
23	Democracy 21	Washington, District of Columbia	Legal services (client of Kaplan Hecker & Fink LLP)

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
24	Confidential Representation 1		Representation of individual client; identity of client not disclosed pursuant to D.C. Bar Rule of Professional Conduct 1.6 and N.Y. Rule of Professional Conduct 1.6
25	Confidential Representation 2		Representation of entity; identity of client not disclosed pursuant to D.C. Bar Rule of Professional Conduct 1.6 and N.Y. Rule of Professional Conduct 1.6
26	Confidential Representation 3		Representation of several organizations and 1 individual client; identities of clients not disclosed pursuant to D.C. Bar Rule of Professional Conduct 1.6 and N.Y. Rule of Professional Conduct 1.6
27	Confidential Representation 4		Representation of institution; identity of client not disclosed pursuant to D.C. Bar Rule of Professional Conduct 1.6 and N.Y. Rule of Professional Conduct 1.6
28	Confidential Representation 5		Representation of institution; identity of client not disclosed pursuant to D.C. Bar Rule of Professional Conduct 1.6 and N.Y. Rule of Professional Conduct 1.6

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Sumitomo Mitsui Banking Corporation (Finance/Banking)	N/A		Salary and Bonus	
2	Sumitomo Mitsui Banking Corporation Retirement Account (401k)	No			
2.1	Vanguard Target Retirement 2050 Trust II	Yes	\$250,001 - \$500,000		None (or less than \$201)
3	Sumitomo Mitsui Banking Corporation (Cash Balance Pension Plan)	N/A	\$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 #1 (cash)	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)
2	U.S. Bank #2 (cash)	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
3	HSA: U.S. Bank (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	New York Life Variable Universal Life Accumulator Plus, variable life insurance	No			
4.1	Mainstay VP S&P 500 Index - Initial Class	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	New York Life Variable Universal Life Accumulator II, variable life insurance	N/A			
5.1	MainStay VP S& 500 Index - Initial Class	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	NY Life Securities, Managed Account	No			
6.1	Fidelity Government Money Market Fund (SPAXX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
6.2	Destinations Equity Income Fund Class I Shares (DGEFX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
6.3	Destinations International Equity Fund Class I Shares (DIEFX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
6.4	Destinations Large Cap Equity Fund Class I Shares (DLCFX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
6.5	Destinations Multi Strategy Alternatives Fund Class I Shares (DMSFX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6.6	Destinations Small-Mid Cap Equity Fund Class I Shares (DSMFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.7	Destinations Global Fixed Income Opportunities Fund Class I Shares (DGFFX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.8	Destinations Low Duration Fixed Income Fund Class I Shares (DLDFX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6.9	Destinations Municipal Fixed Income Fund Class I Shares (DMFFX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
7	NY Life Securities, Managed Account # 2	No			
7.1	Fidelity Government Money Market Fund (SPAXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.2	Vanguard Developed Markets Index Fund ETF Shares (VEA)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.3	Vanguard Extended Markets Index Fund ETF Shares (VXF)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.4	Vanguard 500 Index Fund ETF Shares (VOO)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7.5	Vanguard International Equity Index FDS Emerging Markets Stock Index Fund ETF Shares (VWO)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.6	Vanguard Intermediate-Term Bond Index Fund ETF Shares (BIV)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.7	Vanguard Long-Term Bond Index Fund ETF Shares (BLV)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.8	Vanguard Short-Term Bond Index Fund ETF Shares (BSV)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.9	Vanguard Charlotte FDS Total International Bond Index Fund ETF Shares (BNDX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.10	Vanguard Scottsdale FDS Mortgage-Backed Securities Index Fund ETF Class Shares (VMBS)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8	New York Life Variable Universal Life Insurance, variable life insurance	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.1	Mainstay VP S&P 500 Index - Initial Class	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	Residential Real Estate, Washington, DC	N/A	\$500,001 - \$1,000,000	Rent or Royalties	\$50,001 - \$100,000
10	Residential Real Estate, Hyogo Japan	N/A	\$100,001 - \$250,000		None (or less than \$201)
11	Sumitomo Mitsui Banking Corporation (cash)	N/A	\$100,001 - \$250,000	Interest	None (or less than \$201)
12	US Credit Union #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
13	DC 529 College Savings Plan # 1A	No			
13.1	DC College Savings 2037 Portfolio	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
14	DC 529 College Savings Plan # 2A	No			
14.1	DC College Savings 2040 Portfolio	Yes	\$1,001 - \$15,000		\$201 - \$1,000
15	DC 529 College Savings Plan # 1B	No			
15.1	DC College Savings 2037 Portfolio	Yes	\$1,001 - \$15,000		\$201 - \$1,000
16	DC 529 College Savings Plan # 2B	No			
16.1	DC College Savings 2040 Portfolio	Yes	\$1,001 - \$15,000		\$201 - \$1,000

## 7. Transactions

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

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Central Loan Administration and Reporting (CENLAR)	Mortgage (investment/rental property)	\$500,001 - \$1,000,000	2020	3.125	30 Years

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	2	I taught during the Fall 2016, Spring 2019, Spring 2020, Spring 2021, and Spring 2022 semesters. I taught one class session during the Spring 2024 semester, but departed my position to begin my job at the Office of the White House Counsel.
1.	4	In October 2020, I took a leave of absence from Kaplan Hecker & Fink LLP to serve as special counsel to the Senate Judiciary Committee on the staff of Senator Amy Klobuchar. Between April 2020 and December 2021 (when I was elected a partner), my title was Counsel.
2.	1	The income amount listed on this form is an estimated amount supplied by the firm.
2.	4	The plan sponsor will make a final contribution to this cash balance plan in September 2024 for my 2023 employment at the firm.
4.	5	(Legal representation included MTA subsidiaries and affiliates)
4.	22	At the time of the representation, Catherine McKoy was a resident of California, Markus Frazier was a resident of Maryland, Lynn Chadwick was a resident of Pennsylvania, and Millard Williams was a resident of California.

# 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 \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 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 \$192 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. § 13101 et seq., as amended by the Representative Louise McIntosh Slaughter 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 13989 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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