

Report Type: Annual Report

Year (Annual Report only): 2026

Date of Appointment: 08/2025

Date of Termination:

Appointment Type: PAS

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

Filer's Information

Cairncross , Sean

National Cyber Director, Office of the National Cyber Director

Report Year: 2026

Other Federal Government Positions Held During the Preceding 12 Months:

None

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/ Cairncross , Sean [electronically signed on 05/15/2026 by Cairncross , Sean 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/ Martin, Ashley L, Certifying Official [electronically signed on 07/13/2026 by Martin, Ashley L in Integrity.gov]

Other review conducted by

/s/ Martin, Ashley L, Ethics Official [electronically signed on 07/13/2026 by Martin, Ashley L in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 08/07/2026 by Granahan, Megan in Integrity.gov]

Data Revised 07/27/2026

Data Revised 07/13/2026

Data Revised 07/10/2026

Data Revised 07/09/2026

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	American Global Strategies	Washington, District of Columbia	Corporation	Senior Advisor	2/2025	8/2025
2	Eurasia Foundation (uncompensated)	Washington, District of Columbia	Non-Profit	Member, Board of Directors	10/2023	2/2025
3	Krach Institute for Tech Diplomacy (uncompensated)	Washington, District of Columbia	Non-Profit	Advisor	8/2021	8/2025
4	BITT Inc. (uncompensated)	Salt Lake, Utah	Corporation	Advisor	3/2023	2/2025
5	Cairncross Group	Washington, District of Columbia	Corporation	Managing Member	9/2023	8/2025
6	United States Global Leadership Coalition (uncompensated)	Washington, District of Columbia	Non-Profit	Advisor	3/2021	2/2025

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Republican National Committee	N/A		Salary	\$98,000
2	IRA	No			
2.1	Global X Future Analytics Tech ETF (AIQ)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.2	iShares iBonds Dec 2029 Term Corporate ETF (IBDU)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	iShares iBonds Dec 2030 Term Corporate ETF (IBDV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	iShares iBonds Dec 2031 Term Corporate ETF (IBDW)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	iShares Expanded Tech Sector ETF (IGM)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.6	iShares iBonds Dec 2026 Term Corporate ETF (IBDR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.7	iShares iBonds Dec 2028 Term Corporate ETF (IBDT)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.8	iShares iBonds Dec 2033 Corporate ETF (IBDY)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.9	iShares iBonds Dec 2032 Term Corporate ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.10	iShares iBonds Dec 2027 Term Corporate ETF (IBDS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.11	Materials Select Sector SPDR Fund (XLB)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.12	Consumer Staples Select Sector SPDR Fund (XLP)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.13	SPDR S&P Capital Markets ETF (KCE)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.14	SPDR Portfolio Developed World ex-US ETF (SPDW)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
2.15	Vanguard Consumer Discretionary Index Fund ETF Shares (VCR)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.16	Vanguard Energy Index Fund ETF Class Shares (VDE)	Yes	None (or less than \$1,001)		None (or less than \$201)
2.17	Vanguard Industrials Index Fund ETF Class Shares (VIS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.18	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
2.19	Vanguard Real Estate Index Fund ETF Shares (VNQ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.20	Vanguard Utilities Index Fund ETF Shares (VPU)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.21	Federal Farm Bank Credit Bank Bond 2033	N/A	\$1,001 - \$15,000		\$201 - \$1,000
2.22	Global X Data Center & Digital Infrastructure ETF (DTCR)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.23	Invesco S&P 500 Equal Weight Industrials ETF (RSPN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.24	Invesco S&P 500 Equal Weight ETF (RSP)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.25	iShares Dow Jones US ETF (IYY)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.26	iShares Edge MSCI USA Momentum Factor ETF (MTUM)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.27	Health Care Select Sector SPDR Fund (XLV)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.28	Utilities Select Sector SPDR Fund (XLU)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.29	SPDR S&P 500 ETF Trust (SPY)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.30	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.31	Vanguard 500 Index Fund ETF Shares (VOO)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	RNC 401K	No			
3.1	Columbia Dividend Income Fund Institutional 3 Class Shares (CDDYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	Fidelity 500 Index Fund (FXAIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	Fidelity Mid Cap Index Fund (FSMDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.4	MFS Mid Cap Growth Fund Class R6 Shares (OTCKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	Holtzman Vogel 401K	No			
4.1	DFA Investment Grade Portfolio Institutional Class Shares	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	Emerging Markets Core Equity Portfolio Institutional Class Shares (DFCEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	US Core Equity 1 Portfolio Institutional Class Shares (DFEOX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	DFA Short-Term Extended Quality Portfolio Institutional Class Shares (DFEQX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.5	DFA Five-YearGlobal Fixed Income Portfolio Institutional Class Shares (DFGBX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	International Core Equity Portfolio Institutional Class Shares (DFIEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.7	US Core Equity 2 Portfolio Institutional Class Shares (DFQTX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	RNC 401K	Washington, DC, District of Columbia	I continue to participate in this defined contribution plan. The sponsor will not make any further contributions after my separation.	3/2024
2	Holtzman Vogel 401K	Warrenton, Virginia	I continue to participate in this defined contribution plan. The plan sponsor ceased making contributions at my separation.	6/2013

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	Growth Energy (Trade Association)	N/A		salary, bonus	
2	IRA	No			
2.1	Global X Future Analytics Tech ETF (AIQ)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	Health Care Select Sector SPDR Fund (XLV)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.3	iShares Expanded Tech Sector ETF (IGM)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.4	Materials Select Sector SPDR Fund (XLB)	Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.5	Consumer Staples Select Sector SPDR Fund (XLP)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.6	SPDR S&P Capital Markets ETF (KCE)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
2.7	SPDR Portfolio Developed World ex-US ETF (SPDW)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
2.8	Vanguard Consumer Discretionary Index Fund ETF Shares (VCR)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.9	Vanguard Energy Index Fund ETF Class Shares (VDE)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.10	Vanguard Industrials Index Fund ETF Class Shares (VIS)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.11	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
2.12	Vanguard Real Estate Index Fund ETF Shares (VNQ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.13	Vanguard Utilities Index Fund ETF Shares (VPU)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.14	American Express Corporate Bond 2027	N/A	\$15,001 - \$50,000		\$201 - \$1,000
2.15	Caterpillar Corporate Bond 2044	N/A	\$1,001 - \$15,000		\$201 - \$1,000
2.16	Marsh and McLennan Corporate Bond 2039	N/A	\$1,001 - \$15,000		\$201 - \$1,000
2.17	Prudential Financial Corporate Bond 2040	N/A	\$1,001 - \$15,000		\$201 - \$1,000
2.18	Toyota Motor Corporate Bond 2031	N/A	\$15,001 - \$50,000		\$201 - \$1,000
2.19	Union Pacific Corporate Bond 2038	N/A	\$1,001 - \$15,000		\$201 - \$1,000
2.20	United Health Corporate Bond 2042	N/A	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.21	Walmart Corporate Bond 2041	N/A	\$1,001 - \$15,000		\$201 - \$1,000
2.22	Walt Disney Corporate Bond 2029	N/A	\$15,001 - \$50,000		\$201 - \$1,000
2.23	Federal Farm Credit Bank Bond 2033	N/A	\$15,001 - \$50,000		\$1,001 - \$2,500
2.24	Charles Schwab Corporate Bond 2028	No	\$1,001 - \$15,000		\$201 - \$1,000
2.25	Waste Management Corporate Bond 2035	No	\$1,001 - \$15,000		\$201 - \$1,000
2.26	Lockheed Martin Corporate Bond 2036	No	\$1,001 - \$15,000		\$201 - \$1,000
2.27	Global X Data Center & Digital Infrastructure ETF (DTCR)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.28	Invesco S&P 500 Equal Weight Industrials ETF (RSPN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.29	Invesco S&P 500 Equal Weight ETF (RSP)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.30	iShares Dow Jones US ETF (IYY)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.31	iShares Edge MSCI USA Momentum Factor ETF (MTUM)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.32	Utilities Select Sector SPDR Fund (XLU)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
2.33	SPDR S&P 500 ETF Trust (SPY)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.34	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.35	Vanguard 500 Index Fund ETF Shares (VOO)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	Growth Energy 401K	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1	Vanguard Total Bond Market Index Fund Admiral Shares (VBTLX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
3.2	Vanguard Intermediate-Term Bond Index Fund Admiral Shares (VBILX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
3.3	Vanguard Mid-Cap Index Fund Admiral Shares (VIMAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.4	Vanguard Small-Cap Index Fund Admiral Shares (VSMAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.5	iShares S&P 500 Index Fund Service Class Shares (BSPSX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
3.6	TIAA-CREF International Equity Index Fund Institutional Class Shares (TCIEX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
4	Growth Energy 457B	No			
4.1	Ivy Small Cap Growth Fund Class A Shares (WSGAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
4.2	Delaware Diversified Income Fund Class A Shares (DPDFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.3	Ivy Science & Technology Fund Class A Shares (WSTAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
4.4	Ivy Large Cap Growth Fund Class A Shares (WLGAX)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
4.5	Ivy Mid Cap Growth Fund Class A Shares (WMGAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Brokerage Account #1	No			
1.1	Global X Future Analytics Tech ETF (AIQ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	Health Care Select Sector SPDR Fund (XLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	iShares iBonds Dec 2029 Term Corporate ETF (IBDU)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.4	iShares iBonds Dec 2030 Term Corporate ETF (IBDV)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.5	iShares iBonds Dec 2031 Term Corporate ETF (IBDW)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.6	iShares Expanded Tech Sector ETF (IGM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	iShares iBonds Dec 2026 Term Corporate ETF (IBDR)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.8	iShares iBonds Dec 2028 Term Corporate ETF (IBDT)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.9	IBDX iShares iBonds Term Corporate	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.10	iShares iBonds Dec 2027 Term Corporate ETF (IBDS)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.11	Consumer Staples Select Sector SPDR Fund (XLP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.12	Energy Select Sector SPDR Fund (XLE)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.13	Industrial Select Sector SPDR Fund (XLI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.14	SPDR S&P Capital Markets ETF (KCE)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.15	Vanguard Consumer Discretionary Index Fund ETF Shares (VCR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.16	Vanguard Energy Index Fund ETF Class Shares (VDE)	Yes	None (or less than \$1,001)		None (or less than \$201)
1.17	Vanguard Industrials Index Fund ETF Class Shares (VIS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.18	Vanguard Information Technology Index Fund ETF Class Shares (VGT)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.19	Vanguard Utilities Index Fund ETF Shares (VPU)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.20	U.S. Brokerage Account #1 (cash)	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
2	Merrill Lynch College Savings 529 (D.C.)	No			
2.1	BlackRock Equity Dividend Portfolio BEDAT	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	BlackRock Global Allocation Portfolio NAAHJ	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	Franklin Templeton Balanced NAAAR	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	iShares 2029 Enrollment ISWAT	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.5	Lord Abbett Total Return GOART	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.6	New York Life Large Cap Growth Portfolio NGCAT	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	Merrill Brokerage (cash)	N/A	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000
4	Citi Checking (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	DC College 529 Savings Plan 1	No			
5.1	DC college savings 2028 portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	DC College Savings 529 Plan 2	No			
6.1	DC college savings 2025 portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
7	U.S. brokerage account #2	No			
7.1	Massachusetts Investors Trust Class I Shares (MITIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
8	Bank of America Checking (cash)	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Communication Services Select Sector SPDR Fund (XLC)	Sale	10/29/2025	\$15,001 - \$50,000
2	SPDR S&P Software & Services ETF (XSW)	Sale	10/29/2025	\$15,001 - \$50,000
3	Vanguard Financials Index Fund ETF Shares (VFH)	Sale	10/29/2025	\$50,001 - \$100,000
4	Vanguard Communication Services Index Fund ETF Shares (VOX)	Sale	10/10/2025	\$1,001 - \$15,000
5	iShares Expanded Tech-Software ETF (IGV)	Sale	10/29/2025	\$1,001 - \$15,000
6	DTCR	Purchase	12/02/2025	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
7	DTCR	Purchase	12/02/2025	\$15,001 - \$50,000
8	Invesco S&P 500 Equal Weight ETF (RSP)	Purchase	10/30/2025	\$15,001 - \$50,000
9	Invesco S&P 500 Equal Weight ETF (RSP)	Purchase	10/30/2025	\$15,001 - \$50,000
10	iShares Dow Jones US ETF (IYY)	Purchase	10/30/2025	\$15,001 - \$50,000
11	iShares Dow Jones US ETF (IYY)	Purchase	10/30/2025	\$15,001 - \$50,000
12	iShares Edge MSCI USA Momentum Factor ETF (MTUM)	Purchase	10/30/2025	\$15,001 - \$50,000
13	iShares Edge MSCI USA Momentum Factor ETF (MTUM)	Purchase	10/30/2025	\$15,001 - \$50,000
14	SPDR S&P 500 ETF Trust (SPY)	Purchase	10/30/2025	\$15,001 - \$50,000
15	SPDR S&P 500 ETF Trust (SPY)	Purchase	10/30/2025	\$15,001 - \$50,000
16	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	10/30/2025	\$15,001 - \$50,000
17	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	10/30/2025	\$15,001 - \$50,000
18	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Purchase	10/30/2025	\$15,001 - \$50,000
19	Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)	Purchase	10/30/2025	\$15,001 - \$50,000
20	Communication Services Select Sector SPDR Fund (XLC)	Sale	10/29/2025	\$50,001 - \$100,000
21	SPDR S&P Software & Services ETF (XSW)	Sale	10/29/2025	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
22	Vanguard Financials Index Fund ETF Shares (VFH)	Sale	10/29/2025	\$100,001 - \$250,000
23	Communication Services Select Sector SPDR Fund (XLC)	Sale	10/29/2025	\$15,001 - \$50,000
24	SPDR S&P Software & Services ETF (XSW)	Sale	10/29/2025	\$1,001 - \$15,000
25	Vanguard Financials Index Fund ETF Shares (VFH)	Sale	10/29/2025	\$15,001 - \$50,000

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Bank of America	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2017	2.625%	30 years

9. Gifts and Travel Reimbursements

None

Endnotes

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (note: certain PAS nominees and appointees are required to report all mortgages); (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

5 U.S.C. § 13101 et seq., 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 5 U.S.C. §§ 13107 and § 13122(b)(1) 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) 250 E Street, S.W., Suite 750, Washington, DC 20024-3249.

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 (that control number 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).
