OGE Form 278e (Updated 08/2024) (Expires 08/31/2027) U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type: Nominee Report Year (Annual Report only): Date of Appointment: Date of Termination:

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

Filer's Information

Duffy, Sean

Secretary, Department of Transportation

Other Federal Government Positions Held During the Preceding 12 Months: None

Names of Congressional Committees Considering Nomination:

• Committee on Commerce, Science, and Transportation

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/ Duffy, Sean [electronically signed on 01/02/2025 by Duffy, 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).

Other review conducted by

/s/ Constantine, Peter, Ethics Official [electronically signed on 01/13/2025 by Constantine, Peter in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Huitema, David, Certifying Official [electronically signed on 01/13/2025 by Huitema, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	то
1	BGR Government Affairs, LLC	See Endnote	Washington, District of Columbia	Government Affairs	Advisory Board Member	11/2019	11/2024
2	Duffy Enterprises LLC	See Endnote	Far Hills, New Jersey	Media	Managing Member	12/2022	Present
3	Fox Corporation		New York, New York	Media	Co-Host	1/2023	11/2024

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Morgan Stanley IRA	No			
1.1	U.S. bank #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.2	Alphabet Inc CL C	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.3	Amazon Com Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.4	American Tower Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.5	Apple Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.6	Applied Materials Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.7	Argenx SE ADR (biotechnology)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.8	ASML Holding NV NY Reg New	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.9	Blackstone Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.10	Broadcom Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.11	Danaher Corporation	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.12	Datadog Inc CL A	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.13	Deere & Co	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.14	Doordash Inc CL A	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.15	Draftkings Inc CL A	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.16	Eaton Corp PLC SHS	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.17	Eli Lilly & Co	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.18	Hilton Worldwide Hldgs Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.19	Howmet Aerospace Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.20	Intercontinental Exchange Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.21	Las Vegas Sands Corporation	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.22	Linde PLC	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.23	Madrigal Pharmaceuticals Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.24	Marvell Technology Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.25	Mastercard Inc CL A	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.26	Meta Platforms Inc CL A	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.27	Microsoft Corp	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.28	Monster Beverage Corp New Com	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.29	Nvidia Corporation	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.30	Oracle Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.31	Progressive Corp Ohio	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.32	Shopify Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.33	Taiwan SMCNDCTR Mfg Co LTD ADR (semiconductors)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.34	UnitedHealth GP Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.35	Vaxcyte Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.36	Vertex Pharmaceuticals	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	Morgan Stanley IRA #2	No			
2.1	Ares Capital Corp	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	Blue Owl Capital Corporation	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.3	Vaneck Fallen Angel High YIE	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	Vaneck Morningstar Wide Moat	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	Vanguard Small CAP ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	Vanguard Value ETF Index	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.7	BNS Trigger Plus Corporate Bond	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.8	American Funds New Perspective	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.9	Blackrock Mid Cap GRW EQ K	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.10	Hartford Div & Growth F	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.11	Hartford Schroders Intl Stk F	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.12	John Hancock Displnd Val R6	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.13	MFS Growth R6	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.14	MFS Intl Diversification R6	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.15	PGIM Jenn Emrg Mkt Eq Opps R6	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.16	Victory Sycamore Estbl Val R6	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.17	Blackstone Private Credit Fund (BCRED)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.18	K-INFRA - Class S Hedge Fund	No	\$50,001 - \$100,000		None (or less than \$201)
2.18.1	Dukes Education (social infrastructure)	N/A			
2.18.2	SMS (energy transition)	N/A			
2.18.3	Avantus (Energy transition)	N/A			
2.18.4	Albioma (energy transition)	N/A			
2.18.5	Refresco (industrial infrastructure)	N/A			
2.18.6	PGI (energy security)	N/A			
2.18.7	Greenvolt (energy transition)	N/A			
2.18.8	Vantage Towers (digital infrastructure)	N/A			
2.18.9	Port Arthur LNG (energy security)	N/A			
2.18.10	Zenobe (energy transition)	N/A			
2.18.11	Singtel (digital infrastructure)	N/A			
2.19	KKR Private Equity Conglomerate LLC (K- PEC) (other than the top ten holdings the underlying holdings are not ascertainable)	No	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.19.1	USI Insurance Services (financials)	N/A			-
2.19.2	CIRCOR International (industrials)	N/A			
2.19.3	PetVet Care Centers (health care)	N/A			
2.19.4	IVI RMA (health care)	N/A			
2.19.5	Potter Electric (industrials)	N/A			
2.19.6	April SAS (financials)	N/A			
2.19.7	Groundworks (consumer discretionary)	N/A			
2.19.8	Chase Corporation (materials)	N/A			
2.19.9	Accuris (industrials)	N/A			
2.19.10	Simon & Schuster (communication services)	N/A			
2.20	U.S. Bank #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Morgan Stanley IRA #3	No			
3.1	U.S. bank #3 (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	SEP	No			
4.1	U.S. bank #4 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.2	Baird Aggregate Bond Inst	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	Columbia Income Opportunities Inst2	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	Dodge & Cox Income Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.5	GMO Resources I	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	Goldman Sachs GQG Ptnrs Intl Opps Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.7	Goldman Sachs Intl Sm Cp Insghts Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.8	Lazard Global Listed Infrastructure Inst	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.9	MFS International Equity R6	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.10	MFS Mid Cap Growth I	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.11	Victory Sycamore Established Value I	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.12	Victory Sycamore Small Company Opp I	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.13	William Blair Small Cap Growth I	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.14	Alerian MLP Index ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.15	Avantis Emerging Markets	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.16	Avantis Real Estate ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.17	Fidelity Wise Origin Bitcoin Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.18	Ishares 10-20 Year Tsury	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.19	SPDR S&P 500 Growth ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.20	SPDR S&P 500 Value ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.21	Vanguard Long-Term Treasury Index Fund ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	BGR Government Affairs, LLC	N/A		Wages	\$304,878
6	American Resort Development Association - 4/16/2024	N/A		Speaking Fees	\$20,000
7	Meta Platforms Inc	N/A		Social Media Revenue	\$2,974
8	Duffy Enterprises LLC (consulting)	N/A	\$15,001 - \$50,000	Business Income	\$705,462
8.1	Fox Corporation	N/A		Contributor Fees	\$563,788
9	State of Wisconsin, defined benefit plan (value not readily ascertainable); eligible for \$1,038/mo at age 55	N/A			None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Duffy Enterprises LLC	Far Hill, New Jersey	My LLC will be inactive during my appointment and all outstanding fees will be fixed before I enter government service.	1/2025
2	State of Wisconsin	Madison, Wisconsin	I will continue to participate in this defined benefit plan.	8/2002

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Fox Corporation	New York, New York	Contributor - co-host of the Fox News show The Bottom Line from January 2023. All paid through Duffy Enterprises
2	Robinhood Markets	Menlo Park, California	Consulting
3	Polaris Inc (Client of BGR Government Affairs LLC)	Medina, Minnesota	Consulting
4	S&P Global Inc (Client of BGR Government Affairs LLC)	New York, New York	Consulting
5	SAS Institute, Inc (Client of BGR Government Affairs LLC)	Cary, North Carolina	Consulting
6	Structured Finance Association (Client of BGR Government Affairs LLC)	Washington, District of Columbia	Consulting
7	Grammercy Funds Management, LLC (Client of BGR Government Affairs LLC)	Greenwich, Connecticut	Consulting
8	ULINE	Pleasant Prairie, Wisconsin	Speaking Fees
9	Capital One	McLean, Virginia	Consulting
10	American Resort Development Association	Washington, District of Columbia	Speaking Fee
11	Partnership for Fair and Open Skies (Client of BGR Government Affairs LLC)	Washington, District of Columbia	Consulting
12	Cleary Gottlieb - Consulting for the Venezuela Creditor Committee (Client of BGR Government Affairs LLC)	New York, New York	Consulting
13	Marcum (Client of BGR Government Affairs LLC)	New York, New York	Consulting

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
14	MetLife (Client of BGR Government Affairs LLC)	New York, New York	Consulting
15	Enterprise Products Operating LLC (Client of BGR Government Affairs LLC)	Houston, Texas	Consulting
16	Diem Networks (Client of BGR Government Affairs LLC)	Richardson, Texas	Consulting
17	Forward Global US Inc.	Washington, District of Columbia	Honorarium for article
18	American Consumer & Investor Institute	Washington, District of Columbia	Consulting
19	BGR Government Affairs, LLC	Washington, District of Columbia	Consulting
20	Duffy Enterprises LLC	Far Hill, New Jersey	Consulting

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Premier Speakers Bureau, Inc				
1.1	Students for Life of America (booked through Premier Speakers Bureau, Inc) - 1/20/24	N/A		Speaking Fees	\$15,000
1.2	Attorney General Lynn Fitch (booked through Premier Speakers Bureau, Inc) - 8/19/24	N/A		Speaking Fees	\$25,000
1.3	The Siegfried Group (booked through Premier Speakers Bureau, Inc) - 9/27/24	N/A		Speaking Fees	\$25,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.4	Monroe County Right to Life (booked through Premier Speakers Bureau, Inc) - 10/22/24	N/A		Speaking Fees	\$22,500
2	Fox 401k	No			
2.1	U.S. Bank (cash) in 401k plan	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.2	Nicolet Bankshares	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.3	Baird Aggregate Bond Ins	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	Columbia Income Opportunities Inst2	Yes	\$1,001 - \$15,000 None than \$		None (or less than \$201)
2.5	Dodge & Cox Income I	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	GMO Resources I	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.7	Goldman Sachs GQG PTNRS	Yes	\$1,001 - \$15,000 N tł		None (or less than \$201)
2.8	Goldman Sachs INTL SM CP	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.9	Lazard Global Listed Inf	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.10	MFS International Equity	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.11	MFS Mid Cap Growth I	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.12	Victory Sycamore Established Value I	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.13	Victory Sycamore Small Copany Opp I	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.14	William Blair Small Cap Growth I	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.15	Alerian MLP Index ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.16	Avantis Emerging Markets	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.17	Avantis Real Estate ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.18	Ishares 10-20 Year Tsury	Yes	\$1,001 - \$15,000	-	None (or less than \$201)
2.19	SPDR S&P 500 Growth ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.20	SPDR S&P 500 Value ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	All American Entertainment Agency	No			
3.1	Indiana Pregnancy and Parenting Support Services Program Banquet and Awards Ceremony (Booked through All American Entertainment Agency) - 4/3/2024	N/A		Speaking Fees	\$20,000
4	Fox News Network LLC	N/A		Wages	
5	Meta Platforms Inc	N/A		Social Media Revenue	
6	Fox Retirement Account	No			
6.1	MFS Intl Divrsn R6	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.2	Fid Mid Cap Idx	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.3	FID 500 Index	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.4	TRP Blue Chip GR T4	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.5	Dodge & Cox Stock X	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.6	WT CIF II CR PL BD 2	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.7	Vanguard Target 2035	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.8	Vanguard Target 2055	Yes	\$50,001 - \$100,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Bitcoin (held in Gemini Wallet)	N/A	\$250,001 - \$500,000		None (or less than \$201)
2	Brokerage Account	No			
2.1	U.S. brokerage account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.2	Nicolet Bankshares	N/A	\$15,001 - \$50,000	Proceeds from sale. Cost basis not available.	\$77,365
3	Silver Coins	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	Silver Bars	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Gold Coins	N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	12 Assorted Gold Coins	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	U.S. bank - Money Market Account	N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
8	U.S. bank #2 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9	U.S. bank #1 (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
10	Personal Crypto Wallet	No			
10.1	Solana	N/A	\$1,001 - \$15,000		None (or less than \$201)
10.2	Bitcoin	N/A	\$250,001 - \$500,000		None (or less than \$201)
10.3	Litecoin	N/A	\$1,001 - \$15,000		None (or less than \$201)
10.4	LIDO Staked ETH (Lido delegated staking agreement)	N/A	\$15,001 - \$50,000		None (or less than \$201)
11	529 College Savings Plans - WI	No			
11.1	Index-Based Aggressive Portfolio 1800 (dependent #1)	Yes	\$1,001 - \$15,000		None (or less than \$201)
11.2	Index-Based Aggressive Portfolio 1800 (dependent #2)	Yes	\$15,001 - \$50,000		None (or less than \$201)
11.3	Small-Cap Index Portfolio1808 (dependent #2)	Yes	\$1,001 - \$15,000		None (or less than \$201)
11.4	Large-Cap Stock Index Portfolio 1807 (dependent #2)	Yes	\$1,001 - \$15,000		None (or less than \$201)
11.5	Index-Based Aggressive Portfolio 1800 (dependent #3)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
11.6	Index-Based Aggressive Portfolio 1800 (dependent #4)	Yes	\$1,001 - \$15,000	_	None (or less than \$201)
11.7	Index-Based Aggressive Portfolio 1800 (dependent #5)	Yes	\$1,001 - \$15,000		None (or less than \$201)
11.8	Large-Cap Stock Index Portfolio 1807 (dependent #5)	Yes	\$1,001 - \$15,000		None (or less than \$201)
12	Robinhood Brokerage Account	No			
12.1	Rumble Inc	N/A	\$1,001 - \$15,000	Capital Gains	\$2,501 - \$5,000
12.2	Robinhood Markets	N/A	\$15,001 - \$50,000	Capital Gains	\$2,501 - \$5,000

7. Transactions

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

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Nicolet National Bank	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2021	3.375%	30 years
2	Nicolet National Bank	Mortgage on Personal Residence	\$250,001 - \$500,000	2020	3.25%	30 years

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	1	 a. Polaris Inc, Consulting b. S&P Global Inc, Consulting c. SAS Institute, Inc, Consulting d. Structured Finance Association, Consulting e. Grammercy Funds Management, LLC, Consulting f. Partnership for Fair and Open Skies, Consulting g. Cleary Gottlieb, Consulting h. Marcum, Consulting i. MetLife, Consulting j. Enterprise Products Operating LLC, Consulting k. Diem Networks, Consulting
1.	2	This LLC was created to receive compensation for my position with Fox News and other consulting positions.

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).