

May 5, 2025

The Honorable Jamieson Greer  
Acting Director  
U.S. Office of Government Ethics  
250 E Street, S.W., Suite 750  
Washington DC 20024

Dear Ambassador Greer:

I am enclosing an amendment to Scott K.H. Bessent's nominee public financial disclosure report, signed on December 28, 2024, and an amendment to his ethics agreement, signed on January 9, 2025. Based on my review of this additional information, I continue to believe that Secretary Bessent is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**Mark A.  
Vetter**

Digitally signed by  
Mark A. Vetter  
Date: 2025.05.05  
12:00:48 -04'00'

Mark A. Vetter

Alternate Designated Agency Ethics Official

Enclosures

May 2, 2025

Mark A. Vetter  
Alternate Designated Agency Ethics Official  
Department of Treasury  
1500 Pennsylvania Ave., NW  
Washington, DC 20029

**Re: Amendment to Financial Disclosure Report of Scott K.H. Bessent**

Dear Mr. Vetter:

The purpose of this document is to amend my financial disclosure report signed on December 28, 2024 by adding in two reportable organizations from which I had resigned in late 2024 and that I had inadvertently omitted from my Nominee report (OGE 278).

**Part 1**

Organization Name	City/State	Organization Type	Position Held	From	To
Classical American Homes Preservation Trust <sup>1</sup>	Hillsborough, NC	Non-Profit	Board Member	12/2015	12/2024
Middleton Place Foundation	Charleston, SC	Non-Profit	Trustee	11/2021	12/2024

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

Sincerely,



Scott K.H. Bessent

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<sup>1</sup> Now known as the Richard Hampton Jenrette Foundation.

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

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Bessent, Scott

Secretary, Department of the Treasury

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Names of Congressional Committees Considering Nomination:

- Committee on Finance
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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/ Bessent, Scott [electronically signed on 12/28/2024 by Bessent, Scott in Integrity.gov]

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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/ Sonfield, Brian, Certifying Official [electronically signed on 01/09/2025 by Sonfield, Brian in Integrity.gov]

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Other review conducted by

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U.S. Office of Government Ethics Certification

/s/ Huitema, David, Certifying Official [electronically signed on 01/09/2025 by Huitema, David in Integrity.gov]

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Key Square Group LP	Charleston, South Carolina	Business Partnership	CEO, Founder, Chief Investment Officer, Partner	1/2016	Present
2	Estate of BMB	Charleston, South Carolina	Estate	Executor	7/2021	Present
3	Estate of CB/OGB	Charleston, South Carolina	Estate	Executor	12/2015	Present
4	Estate of WNB	Charleston, South Carolina	Estate	Executor	8/2022	Present
5	Rockefeller University	New York, New York	University/College	Chairman of Investment Committee, Board of Trustee Member, Executive Committee	2/2016	11/2024
6	Kemnay Services Limited	New York, New York	Investment Advisory Panel	Advisory Panel Member	1/2015	12/2024
7	C.P. 2012 Trust	Charleston, South Carolina	Trust	Trustee	12/2012	Present
8	Palmetto Management 2020 Trust	Charleston, South Carolina	Trust	Investment Manager	12/2020	Present
9	Cape and Palmetto LLC	Charleston, South Carolina	LLC	Managing Member	12/2012	Present
10	Bessent Freeman Family Foundation	Charleston, South Carolina	Charitable Foundation	Vice President/Director	12/2019	Present
11	Maison Douze, LLC	New York, New York	Limited Liability Company	Sole Member	10/2013	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
12	Palmetto Management, LLC	Charleston, South Carolina	Limited Liability Company	Sole Member	10/2006	Present
13	Nichols-Gore, LLC	Charleston, South Carolina	Limited Liability Company	Sole Member	5/2013	Present
14	Maison Cinq, LLC	Charleston, South Carolina	Limited Liability Company	Sole Member	5/2016	Present
15	Palmetto 2020 Trust, LLC	Charleston, South Carolina	Limited Liability Company	Sole Member	10/2020	Present
16	Palmetto 98-100 Church, LLC	Charleston, South Carolina	Limited Liability Company	Sole Member	5/2020	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Key Square Group LP	N/A	None (or less than \$1,001)	Guaranteed Payment	\$1,041,134
2	Kemnay Services Limited	N/A		Consulting fee	\$250,000
3	Key Square Group LP, investment firm	See Endnote	Over \$50,000,000	Management fees/incentive allocations; dividends	\$2,787,000
4	Key Square Group LP 401(k) plan	No			
4.1	T Rowe Price Retirement 2025 Fund I	Yes	\$250,001 - \$500,000		None (or less than \$201)
5	Ghisallo Group L.P., underlying assets are not ascertainable; I have divested this asset	See Endnote	None (or less than \$1,001)	Management fees	\$128,026

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	Ghisallo Master Fund General Partner L.P., underlying assets are not ascertainable; I have divested this asset	See Endnote	No	None (or less than \$1,001)	Incentive Fees	\$417,901
7	Key Square GP, LP, underlying assets are not ascertainable.	See Endnote	No	None (or less than \$1,001)	Ordinary Income	\$29,555

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Key Square Group LP	Charleston, South Carolina	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	1/2016
2	Key Square Group, LP	New York, New York	As CEO of Key Square Group, LP, I was entitled to management fees and incentive allocations. Management fees were generated from the assets under management. Incentive allocations were generated from the profits of the funds managed and paid to the general partner entities for the funds, then paid out to those persons entitled to a percentage of the allocation.	1/2016

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Key Square Group LP	Charleston, South Carolina	Services as CEO, Founder, Chief Investment Officer, Partner
2	Kemnay Services Limited	New York, New York	Services as Advisory Panel Member

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA #1	No			
1.1	U.S. Bank #5 (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
1.2	Archer Daniels Midland (ADM) (food processing and trading)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.3	Verizon Communications (VZ)	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.4	WABTEC (WAB) (industrial technology)	N/A	None (or less than \$1,001)		None (or less than \$201)
1.5	SPDR Gold Shares ETF (GLD)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.6	SPDR S&P 500 ETF IV (SPY)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2	IRA #2	No			
2.1	MFS Massachusetts Investors Tr A (MITTX)	Yes	\$100,001 - \$250,000		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	\$1,000,001 - \$5,000,000	Interest	\$201 - \$1,000
2	U.S. Bank #2 (cash)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	U.S. Bank #3 (cash)		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
4	Residential Real Estate, Nassau, Bahamas		N/A	\$5,000,001 - \$25,000,000	Rent or Royalties	\$50,001 - \$100,000
5	Residential Real Estate, Cashiers, NC		N/A	\$5,000,001 - \$25,000,000		None (or less than \$201)
6	Art and Antiques		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
7	Presight RV Co.-Invest Fund LP, underlying assets are not ascertainable; I will divest this asset if confirmed		No	\$50,001 - \$100,000		None (or less than \$201)
8	All Season's Press		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
9	iShares Bitcoin Trust ETF (IBIT)		Yes	\$250,001 - \$500,000		None (or less than \$201)
10	Maison Douze, LLC		No			
10.1	Key Square Partners L.P. (cash), I will divest this asset if confirmed	See Endnote	N/A	\$250,001 - \$500,000	Ordinary income and non-portfolio capital gains	\$74,461
10.2	Key Square Partners II LP (cash), I will divest this asset if confirmed	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)
10.3	Key Square Partners, L.P. & Key Square Partners II, L.P.	See Endnote	No			
10.3.1	SPDR S&P 500 ETF Trust (SPY)		Yes	Over \$50,000,000		None (or less than \$201)
10.3.2	Invesco QQQ Trust, Series 1 (QQQ)		Yes	Over \$50,000,000		None (or less than \$201)
10.3.3	Invesco S&P 500 Equal Weight ETF (RSP)		Yes	Over \$50,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10.3.4	U.S. Treasury Bills (11/28/25)	N/A	Over \$50,000,000		None (or less than \$201)
10.3.5	U.S. Dollar-Offshore Deliverable CNY Currency (USD/CNH), open position	N/A	Over \$50,000,000		None (or less than \$201)
10.3.6	Euro-U.S. Dollar (EUR/USD), open position	N/A	Over \$50,000,000		None (or less than \$201)
10.3.7	U.S. Dollar-JPY (USD/JPY), open position	N/A	Over \$50,000,000		None (or less than \$201)
10.3.8	SPDR S&P 500 ETF Trust (SPY), put option position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
10.3.9	Invesco QQQ Trust, Series 1 (QQQ), put option position	N/A	\$5,000,001 - \$25,000,000		None (or less than \$201)
10.3.10	Invesco S&P 500 Equal Weight ETF (RSP), put option position	N/A	\$5,000,001 - \$25,000,000		None (or less than \$201)
10.3.11	U.S. Bank #1 (cash)	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
10.3.12	U.S. Treasury Bills (11/30/26)	N/A	Over \$50,000,000		None (or less than \$201)
11	Palmetto Management LLC	No			
11.1	U.S. Bank #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
12	Nichols-Gore LLC	No			
12.1	U.S. Bank #1 (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
13	Maison Cinq LLC	No			
13.1	U.S. Bank #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
14	C.P. 2012 Trust	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.1	Cape and Palmetto, LLC	No			
14.1.1	U.S. Bank #1 (cash)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
14.1.2	U.S. Bank #1 money market account (cash)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.3	U.S. Bank #2 (cash)	N/A	\$1,001 - \$15,000	Interest	\$15,001 - \$50,000
14.1.4	U.S Bank #2 money market account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
14.1.5	U.S Bank #3 (cash)	N/A	\$100,001 - \$250,000	Interest	\$15,001 - \$50,000
14.1.6	U.S. Bank #4 (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
14.1.7	Lombardi Capital Fund, other than the top 5 holdings, underlying assets are not ascertainable; I will divest this asset if confirmed	No	\$250,001 - \$500,000	Ordinary income and gains	\$59,609
14.1.7.1	UMG (industrial)	N/A			
14.1.7.2	Richemont (industrial)	N/A			
14.1.7.3	Sandvik (industrial)	N/A			
14.1.7.4	Knorr-Bremse (industrial)	N/A			
14.1.7.5	Ryanair Holdings plc American Depositary Shares (RYAAY)	N/A			
14.1.8	Old Farm Partners Master Fund LP, underlying assets are not ascertainable; I will divest this asset if confirmed	No	\$250,001 - \$500,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.1.9	Half Acre WSW LLC (consumable products)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.10	Cambrian Biopharma, Inc. (Series A) (clinical-stage drug development company); I will divest this asset if confirmed	N/A	\$250,001 - \$500,000		None (or less than \$201)
14.1.11	Cambrian Biopharma, Inc. (Series C) (clinical-stage drug development company); I will divest this asset if confirmed	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
14.1.12	Crake Global U.S. Feeder LP, underlying assets are not ascertainable; I have already divested this asset	No	\$1,000,001 - \$5,000,000	Capital Gains	\$100,001 - \$1,000,000
14.1.13	Roxo Energy, LLC, Preferred (energy, water and infrastructure acquisition, production and development company); I will divest this asset if confirmed	N/A	\$1,000,001 - \$5,000,000	Dividends	\$100,001 - \$1,000,000
14.1.14	Roxo Energy Partners IV, LLC (energy, water and infrastructure acquisition, production and development company); I will divest this asset if confirmed	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.15	Totem Macro Global Alpha Select Onshore Fund LLC, underlying assets are not ascertainable; I will divest this asset if confirmed	No	\$250,001 - \$500,000		None (or less than \$201)
14.1.16	Skye Global Fund, underlying assets are not ascertainable; I have divested this asset	No	None (or less than \$1,001)	Capital Gains Dividends Interest	\$50,001 - \$100,000
14.1.17	JPMorgan US Government Money Market Fund Capital Shares (OGVXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.18	Federated Treasury Obligations Fund Institutional Shares (TOIXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.19	Morgan Stanley Institutional Fund Trust Government Portfolio Institutional Class Shares (MVRXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.1.20	Morgan Stanley Institutional Fund Trust Treasury Securities Portfolio Institutional Class Shares (MSUXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.21	Federated Government Obligations Fund Premier Shares (GOFXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.22	Federated Hermes Treasury Obligations Fund - PRM Class (TOPXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23	Key Square Partners II, LP	No			
14.1.23 .1	SPDR S&P 500 ETF Trust (SPY)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .2	Invesco QQQ Trust, Series 1 (QQQ)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .3	Invesco S&P 500 Equal Weight ETF (RSP)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .4	U.S. Treasury Bills (11/28/25)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .5	U.S. Treasury Bills (11/30/26)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .6	U.S. Dollar-Offshore Deliverable CNY Currency (USD/CNH), open position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .7	Euro-U.S. Dollar (EUR/USD), open position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
14.1.23 .8	U.S. Dollar-JPY (USD/JPY), open position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
15	Palmetto Management 2020 Trust	No			
15.1	Palmetto 2020 Trust, LLC	No			
15.1.1	U.S. Bank #1 (cash)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.1.2	U.S. Bank #2 (cash)	N/A	\$1,001 - \$15,000	Interest	\$2,501 - \$5,000
15.1.3	U.S. Bank #2 money market account (cash)	N/A	\$1,001 - \$15,000	Interest	\$15,001 - \$50,000
15.1.4	U.S. Bank #3 money market account (cash)	N/A	\$1,001 - \$15,000	Interest	\$15,001 - \$50,000
15.1.5	U.S. Bank #4 (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)
15.1.6	Undeveloped Land, Cashiers, NC	N/A	\$250,001 - \$500,000		None (or less than \$201)
15.1.7	Undeveloped Land, Kiawah Island, SC	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
15.1.8	Castle Hook Fund LP, underlying assets are not ascertainable; I have divested this asset	No	None (or less than \$1,001)	Capital Gains	\$100,001 - \$1,000,000
15.1.9	Plenty (OurCrowd LP) (agricultural technology)	N/A	\$50,001 - \$100,000		None (or less than \$201)
15.1.10	BlueGreen Water Technologies (OurCrowd LP) (ecological technology)	N/A	\$250,001 - \$500,000		None (or less than \$201)
15.1.11	Skye Global Fund, underlying assets are not ascertainable; I have divested this asset	No	None (or less than \$1,001)	Capital Gains	\$100,001 - \$1,000,000
15.1.12	Aperion (DE) Feeder Fund LP - Mind Capital Fund One Series, Underlying assets are not disclosed due to a preexisting confidentiality agreement; I will divest this asset if confirmed	No	\$250,001 - \$500,000		None (or less than \$201)
15.1.13	Carbon SPV - Kyndle; I will divest this asset if confirmed	No			
15.1.13.1	Global Carbon Credit Corp. (investment vehicle for voluntary carbon credits on the Toronto Stock Exchange)	N/A	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.1.14	Greengage Global Holding Ltd. (provider of digital merchant banking services); I will divest this asset if confirmed	N/A	\$250,001 - \$500,000		None (or less than \$201)
15.1.15	Roxo Energy, LLC (Preferred) (energy, water and infrastructure acquisition, production and development company); I will divest this asset if confirmed	N/A	\$1,000,001 - \$5,000,000	Dividends	\$100,001 - \$1,000,000
15.1.16	Federated Government Obligations Fund Premier Shares (GOFXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.17	BlackRock Liquid Federal Trust Fund Institutional Shares (TFFXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.18	BlackRock Liquidity Funds Treasury Trust Fund Institutional Shares (TTTXX)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.19	Paragon Title (escrow account for future real estate purchase)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20	Key Square Partners II, LP	No			
15.1.20 .1	SPDR S&P 500 ETF Trust (SPY)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20 .2	Invesco QQQ Trust, Series 1 (QQQ)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20 .3	Invesco S&P 500 Equal Weight ETF (RSP)	Yes	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20 .4	U.S. Treasury Bills (11/28/25)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20 .5	U.S. Treasury Bills (11/30/26)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20 .6	U.S. Dollar-Offshore Deliverable CNY Currency (USD/CNH), open position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
15.1.20 .7	Euro-U.S. Dollar (EUR/USD), open position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15.1.20 .8	U.S. Dollar-JPY (USD/JPY), open position	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
16	U.S. Bank #5 (UTMA brokerage account)	No			
16.1	Cash Sweep Account	N/A	\$500,001 - \$1,000,000	Interest	\$5,001 - \$15,000
16.2	SPDR Gold Shares (GLD)	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
16.3	VanEck Vectors Gold Miners ETF (GDX)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
16.4	iShares Gold Trust (IAU)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
16.5	iShares Silver Trust (SLV)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
17	High Plains Acres LLP	No			
17.1	U.S. Bank #1 (cash)	N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
17.2	U.S. Bank # 2 (cash)	N/A	\$500,001 - \$1,000,000	Interest	\$2,501 - \$5,000
17.3	Farmland (Burleigh, ND; Kidder, ND; Eddy, ND; Benson, ND; Wells, ND)	See Endnote	\$5,000,001 - \$25,000,000	Rent or Royalties	\$100,001 - \$1,000,000
18	U.S. Bank #5 (cash)	N/A	\$1,000,001 - \$5,000,000	Interest	\$5,001 - \$15,000
19	U.S. Bank #6 (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)
20	Barclays, UK (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
21	Palmetto 98-100 Church LLC	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
21.1	Totem Management Seed, underlying assets are not ascertainable; I will divest this asset if confirmed	No	\$250,001 - \$500,000		None (or less than \$201)
21.2	Roxo Energy, LLC (Preferred) (energy, water and infrastructure acquisition, production and development company); I will divest this asset if confirmed	N/A	\$100,001 - \$250,000	Dividends	\$50,001 - \$100,000
21.3	Commercial Real Estate, Charleston, SC	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$100,001 - \$1,000,000
21.4	U.S. Bank #1 (cash)	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
21.5	U.S. Bank #3 money market account (cash)	N/A	\$15,001 - \$50,000	Interest	\$15,001 - \$50,000
22	Residual Estate of BMB	N/A	\$15,001 - \$50,000		None (or less than \$201)
23	Residual Estate of WNB	N/A	\$15,001 - \$50,000		None (or less than \$201)
24	Chattooga Club Share Deposit (cash)	N/A	\$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	Bank of America	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2020	2.75	20 years
2	Goldman Sachs	Margin Account	Over \$50,000,000	2024	SOFR + .51	On demand
3	Bank of America	Exercised Line of Credit	\$5,000,001 - \$25,000,000	2018	SOFR + 1.75	Annual

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
2.	3	I retain an incentive allocation interest in Key Square until it winds down by 3/31/2025.
2.	5	Key Square Group LP had an economic interest in Ghisallo Group LP. Management fees were generated by a fixed percentage of the assets under management and paid to Key Square Group, LP., based on its profit-sharing agreement. This agreement ended on 12/31/2023.  Filer did not have an employment or consulting position with Ghisallo.
2.	6	Key Square Group LP had an economic interest in Ghisallo Master Fund General Partner, LP. Incentive fees were generated from the profits of the funds managed and paid to Key Square Group, LP., based on its profit-sharing agreement. This agreement ended on 12/31/2023.  Filer did not have an employment or consulting position with Ghisallo.
2.	7	Filer has taken all steps necessary to divest this General Partner interest. The partnership is in the process of winding down, with final audit and net distribution of the capital account completed by 3/31/2025. At the time of signing, the amount attributable to Filer in the capital account was below the reporting threshold.

PART	#	ENDNOTE
6.	10.1	This cash account was held at the Key Square GP level and is a legacy of the General Partnership (now divested).
6.	10.2	This cash account was held at the Key Square GP level and is a legacy of the General Partnership (now divested).
6.	10.3	Maison Douze is a limited partner to both the Key Square and Key Square II, LPs. The assets listed below are the cumulative assets held between the two funds. Key Square Partner, LP holds the assets on lines 10.3.1-10.3.10 and Key Square Partners II, LP holds the assets on lines 10.3.1 - 10.3.7. The cash accounts and income for each fund is reported at Lines 10.1. and 10.2, respectively, based on the Schedule K-1 for each.
6.	17.3	Rent payments are through a revenue sharing agreement, which is tied to the price of the crops produced (corn and soybeans).

# 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).

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