

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

Filer's Information

Pon, Jeff

Director, Office of Personnel Management

Date of Termination: 11/03/2018

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/ Pon, Jeff [electronically signed on 10/17/2018 by Pon, Jeff 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/ Plunkett, Wade, Certifying Official [electronically signed on 11/27/2018 by Plunkett, Wade in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Christopher, Dale, Certifying Official [electronically signed on 01/31/2019 by Christopher, Dale in Integrity.gov]

Data Revised 01/28/2019

Data Revised 11/09/2018

Data Revised 10/31/2018

Data Revised 10/17/2018

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(01/28/2019, Leary, Maura K): Per 12/19/18 email to Ethics Official, filer confirmed that he had sold Part 6, Item 28 ("Booz Allen Hamilton HLDG CORP CL A") on 8/24/17.

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO	
1	Society for Human Resource Management	Alexandria, Virginia	Non-Profit	Chief Human Resources and Strategy Officer	3/2012	10/2017	
2	Goodland Central Corp	See Endnote	San Francisco, California	Corporation	Vice President	6/2010	10/2017

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Society for Human Resource Management	N/A		Salary/Bonus	\$820,706
2	Fidelity Government Cash Reserves	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3	AIG Focus Dividend Strategy CL A	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
4	American Funds New World Fund CL F2	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5	Dodge&Cox International Stock Fund	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
6	Fidelity Contrafund	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
7	Gabelli Small Cap Growth CL A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
8	Hancock Horizon Burkenroad SML CAP I	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9	Victory Sycamore Established Value A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
10	Fidelity Diversified INTL K	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
11	Fidelity Growth Company Fund K	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
12	Fidelity Mid CAP Stock K	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
13	Fidelity Freedom K 2035	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
14	Fidelity OTC Portfolio K	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
15	Fidelity 500 Index PR	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
16	Society for Human Resource Management, defined benefit plan (value not readily ascertainable): Eligible for \$1,947/month at age 65	N/A			None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Society for Human Resource Management	Alexandria, Virginia	I will continue to participate in the defined contribution plan but that the employer will cease making contributions upon separation.	3/2012
2	Society for Human Resource Management	Alexandria, Virginia	I will continue to participate in this defined benefit plan but that the employer will cease making contributions upon separation.	3/2012

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	AOL, now Oath, owned by Verizon (Telecommunications, Media, Internet Content and Services)	N/A		Salary and bonus	
2	Verizon, deferred compensation	N/A			
2.1	Verizon cash account: tracks Moody's high-grade corporate bond yield average	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
2.2	Verizon Stock Fund (holds Verizon stock)	No	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
3	Verizon Restricted Stock Units	N/A	\$250,001 - \$500,000		None (or less than \$201)
4	Verizon Performance Stock Units	N/A	\$100,001 - \$250,000		None (or less than \$201)
5	AOL Synthetic Stock Units	See Endnote	\$500,001 - \$1,000,000		None (or less than \$201)
6	Fidelity Government Money Market	Yes	None (or less than \$1,001)		None (or less than \$201)
7	Hancock Horizon Burkenroad SML CAP I	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8	Verizon Savings Plan 401K	No		Interest	
8.1	Verizon Stock Fund (holds Verizon stock)	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
8.2	Private Global Real Estate	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.3	Verizon 2035 Fund	Yes	\$500,001 - \$1,000,000		\$50,001 - \$100,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Government Money Market	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
2	Fidelity Government Money Market Daily Class	Yes	None (or less than \$1,001)		None (or less than \$201)
3	Bank of America Corp	N/A	\$1,001 - \$15,000	Dividends	\$1,001 - \$2,500
4	Walt Disney Co	N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
5	General Electric Co	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
6	Limited Brands Inc	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
7	AIG Focused Dividend Strategy Class A	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
8	Artisan Global Opportunities Inv	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
9	Cohen & Steers Real Estate Securities A	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
10	Dodge and Cox International Stock Fund	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
11	Fidelity Contra Fund	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
12	First Eagle Global Class A	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
13	Gabelli Small Cap Growth CL A	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
14	Janus Henderson Balanced A	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
15	Janus Henderson Triton T	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
16	Vanguard Equity Income Investor CL	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
17	Vanguard Strategic Equity Investor	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
18	Victory Sycamore Established Value A	Yes	\$100,001 - \$250,000		\$201 - \$1,000
19	JP Morgan Tax Free Bond Class I	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
20	Oppenheimer Rochester High Yield Muni A	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
21	Pimco Income Fund CL D	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
22	Principal Global Diversified Income A	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
23	Vanguard Hi Yield Tax Exempt Admiral	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
24	iShares Russell 1000 Growth ETF	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
25	iShares Russell 1000 Value ETF	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
26	iShares Select Dividend ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
27	Fidelity Government MMKT Daily Money Class	Yes	\$1,001 - \$15,000		None (or less than \$201)
28	Booz Allen Hamilton HLDG CORP CL A	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
29	AIG Focused Dividend Strategy CL A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
30	American New World Fund CL F2	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
31	Dodge & Cox International Stock Fund	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
32	Fidelity Contrafund	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
33	Gabelli Small Cap Growth AAA	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
34	Victory Sycamore Established Value A	Yes	\$1,001 - \$15,000		\$201 - \$1,000
35	Principal Global Diversified Income A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
36	Boston Scientific Corp	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
37	Charter Communications	N/A	\$15,001 - \$50,000	Dividends	None (or less than \$201)
38	Salesforce Com Inc	N/A	\$15,001 - \$50,000	Dividends	\$5,001 - \$15,000
39	ILG INC COM	N/A	\$1,001 - \$15,000	Dividends	None (or less than \$201)
40	Pfizer Inc	N/A	\$50,001 - \$100,000	Dividends	\$2,501 - \$5,000
41	QQQ Powershares	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
42	Fidelity Government Income	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
43	Seagate Technology	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
44	Goodland Central Corp	See Endnote	No		
44.1	Residential Real Estate, San Francisco, California	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
44.2	Commercial Real Estate, Pewaukee, Wisconsin	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$100,001 - \$1,000,000
44.3	Commercial Real Estate, Richmond, VA	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$100,001 - \$1,000,000
45	US bank, Cash Accounts #1	See Endnote	N/A	Interest	None (or less than \$201)
46	New Hampshire College Savings Plan: NH Portfolio 2024 (Fidelity Funds)	Yes	\$1,001 - \$15,000		None (or less than \$201)
47	Ameritas Variable Universal Life Insurance	No			
47.1	American Century VP Midcapvalue Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.2	American Century VP Income & Growth	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.3	Calvert VP EAFE International Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.4	Calvert VP NASDAQ 100 Ind Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.5	Calvert VP Russell 2000 Small Cap Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.6	Calvert VP S&P Midcap 400 Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.7	Calvert VP Volatility Managed Moderate Growth	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.8	Fidelity VIP High Income IC	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.9	Invesco VI International Growth Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.10	MFS Research International IC	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
47.11	Morgan Stanley VIF Emerging Market Equity Index	Yes	\$1,001 - \$15,000		\$201 - \$1,000
47.12	Morgan Stanley VIF US Real Estate Index	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
47.13	T Rowe Price Bluechip Growth-II	Yes	\$1,001 - \$15,000		\$201 - \$1,000
48	Splunk Inc. - Common Stock	N/A	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
49	US bank, Cash Account #2	N/A	\$100,001 - \$250,000	Interest	None (or less than \$201)

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Kimberly-Clark	Sale	06/25/2018	\$15,001 - \$50,000

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	AIG	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2018	5.125%	30 Year

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
1.	2	Wholly owned family real estate corporation.
5.	5	AOL Synthetic Stock Units was a program/stock pool created by the parent company, Verizon, based upon the valuation of the AOL business at the time of acquisition and its underlying assets. The units are valued quarterly by Deloitte through a 409A valuation process to reflect any increase/decrease in the value. The program only lasted two years and is now sunset and my spouse received two grants of these units (July of 2015 and March of 2016).
6.	44	Family Real Estate Corporation 100% owned by myself and two family members.
6.	45	Checking, Savings, Money Market Accounts

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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 reporting period.

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

8. Liabilities

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

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. 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 three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).
