

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Chao, Elaine L

Secretary, Department of Transportation

Report Year: 2020

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/ Chao, Elaine L [electronically signed on 08/13/2020 by Chao, Elaine L in Integrity.gov] - Filer received a 90 day filing extension.

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/ Kaleta, Judith, Certifying Official [electronically signed on 09/10/2020 by Kaleta, Judith in Integrity.gov]

Other review conducted by

/s/ Carlson, Terence W, Ethics Official [electronically signed on 09/03/2020 by Carlson, Terence W in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 09/14/2020 by Granahan, Megan in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Firebird International LLC	See Endnote	Louisville, Kentucky	Limited Liability Company	Sole Member	5/2009	Present
2	Elaine L Chao Revocable Trust		Louisville, Kentucky	Trust	Trustee	9/2012	Present

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Firebird International LLC	See Endnote	N/A			
1.1	Firebird International LLC, SunTrust Business Checking		N/A	\$15,001 - \$50,000		None (or less than \$201)
1.2	Firebird International LLC, SunTrust Business Money Market Performance		N/A	\$15,001 - \$50,000		None (or less than \$201)
1.3	Wells Fargo & Company				DSU Vesting	\$206,824
2	Wells Fargo & Company, common stock		N/A	\$1,000,001 - \$5,000,000	Dividends	\$15,001 - \$50,000
3	Wells Fargo & Company, Deferred Stock Compensation		N/A	\$100,001 - \$250,000		None (or less than \$201)
4	UBS Pension Trust (Personal Retirement Account)		No			
4.1	UBS Brokerage Account (Cash)		N/A	None (or less than \$1,001)		None (or less than \$201)
4.2	WGIFX - American Funds Capital World Gr & Inc F2		Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.3	SDSCX - BNY Mellon Small/Mid Cap Growth Fund	See Endnote	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	FEGIX - First Eagle Gold I		Yes	\$1,001 - \$15,000		None (or less than \$201)
4.5	PEQPX - Principal Equity Income P		Yes	\$15,001 - \$50,000		None (or less than \$201)
4.6	GFFFX - American Funds Growth Fund of Amer F2		Yes	\$15,001 - \$50,000		None (or less than \$201)
4.7	DPFFX - Delaware Diversified Income Instl		Yes	\$15,001 - \$50,000		None (or less than \$201)
4.8	TGBAX - Templeton Global Bond Adv		Yes	\$1,001 - \$15,000		None (or less than \$201)
4.9	PGDPX - Principal Global Div Inc P		Yes	\$15,001 - \$50,000		None (or less than \$201)
5	Mutual of America Tax Deferred Annuity		No			
5.1	Deutsch VSI Capital Growth		Yes	\$100,001 - \$250,000		None (or less than \$201)
6	UBS PSP (Personal Retirement Account)		No			
6.1	UBS Brokerage Account (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)
6.2	JHIGX - JHancock International Growth Fund Class R2		Yes	\$15,001 - \$50,000		None (or less than \$201)
6.3	JDVPX - JHancock Disciplined Value Fund Class R2		Yes	\$15,001 - \$50,000		None (or less than \$201)
7	The Heritage Foundation 403(b)					
7.1	SWGXX - Schwab Government Money Fund		Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.2	VFIAX - Vanguard 500 Index Admiral	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.3	PREIX - T. Rowe Price Equity Index 500	Yes	\$100,001 - \$250,000		None (or less than \$201)
8	The Heritage Foundation Retirement Plan (defined contribution plan)				
8.1	SWGXX - Schwab Government Money Fund	Yes	None (or less than \$1,001)		None (or less than \$201)
8.2	ARTKX - Artisan International Value Investor	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.3	BARAX - Baron Asset Retail	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.4	FAIRX - Fairholme	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.5	LSBDX - Loomis Sayles Bond Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.6	OAKMX - Oakmark I	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.7	RSEIX - Royce Special Equity Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.8	SLASX - Selected American Shares S	Yes	\$15,001 - \$50,000		None (or less than \$201)
8.9	PRMSX - T.Rowe Price Emerging Markets Stock	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.10	VGSLX - Vanguard REIT Index Adm	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.11	WIIBX - Segall Bryant & Hamil Plus Bond Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
9	UBS IRA				

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.1	WGIFX - American Funds Capital World Gr & Inc F2 (UBS)	Yes	\$50,001 - \$100,000		None (or less than \$201)
9.2	FEGIX - First Eagle Gold I (UBS)	Yes	\$15,001 - \$50,000		None (or less than \$201)
9.3	PEQPX - Principal Equity Income P (UBS)	Yes	\$50,001 - \$100,000		None (or less than \$201)
9.4	RSPYX - RS Partners Y (UBS)	Yes	\$15,001 - \$50,000		None (or less than \$201)
9.5	GFFFX - American Funds Growth Fund of Amer F2 (UBS)	Yes	\$50,001 - \$100,000		None (or less than \$201)
9.6	DPFFX - Delaware Diversified Income Instl (UBS)	Yes	\$50,001 - \$100,000		None (or less than \$201)
9.7	TGBAX - Templeton Global Bond Adv (UBS)	Yes	\$15,001 - \$50,000		None (or less than \$201)
10	Vanguard IRA Account (Personal Retirement Account)				
10.1	VFIAX - Vanguard 500 Index Admiral	Yes	\$250,001 - \$500,000		None (or less than \$201)
10.2	VUSXX - Vanguard Treasury Money Market	See Endnote	Yes	\$1,000,001 - \$5,000,000	None (or less than \$201)
11	AMCP Security Holdings, LP, capital account	See Endnote		\$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	Wells Fargo & Company		San Francisco, California	Pursuant to the terms of the company's Directors Stock Compensation and Deferral Plan – Stock Award Deferrals, I will receive a stock payout for my deferred stock compensation (all of which is fully vested at the time of grant) based on various elections I have made each year that I have served on the Board. I will continue to receive deferred stock compensation equivalents, which track dividends on the company's common stock until I receive the stock payout. The approximate portion of my remaining deferred stock compensation to be paid out as of December 31, 2019 is as follows: March 2020 – 50%; and March 2021 – 50%.	6/2011
2	The Heritage Foundation 403(b)		Washington, District of Columbia	I will continue to participate in this defined contribution plan. The sponsor has not made any further contributions since my separation from the company.	6/2016
3	Firebird International LLC, Defined Benefit Plan		Louisville, Kentucky	This plan was terminated during the year and the proceeds were rolled into an IRA account.	5/2009
4	Delta Airlines		Atlanta, Georgia	As a former director of Northwest Airlines, which merged with Delta Airlines in 2009, I receive discounted travel on Delta Airlines. I have never been a director of Delta Airlines, and this benefit is taxable on such discounted airfare at rates established by the Internal Revenue Service. I will forgo this benefit while in office per my ethics agreement.	10/2008
5	The Heritage Foundation Retirement Plan		Washington, District of Columbia	I will continue to participate in this defined contribution plan. The sponsor has not made any further contributions since my separation from the company.	6/2016
6	AMCP Security Holdings, LP	See Endnote	Greenwich, Connecticut	I retained incentive units in this limited partnership when I resigned from the Centerra Group, LLC advisory board on December 31, 2015. Centerra was a subsidiary of the partnership, but was sold in 4/2017. Future distributions could only occur from (1) outstanding indemnity escrow accounts related to the sale of Centerra and (2) receivables from Centerra customers for work performed before that sale.	8/2015

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	Merrill Lynch - IRA Mitch	N/A		IRA - Required Minimum Distribution and Withdrawal	\$27,916
2	Mitch IRA MLPA				
2.1	Bank of America - IRA Cash Account	N/A	\$1,001 - \$15,000	Interest	None (or less than \$201)
2.2	SCPB - SPDR Barclays Short Term Corp Bd ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	VCSH - Vanguard Short-Term Corporate Bond ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	IWM - iShares Russell 2000	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	VO - Vanguard Mid-Cap ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.6	SPY - SPDR S&P 500 ETF	Yes	\$50,001 - \$100,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	VMMXX - Vanguard Money Market Reserves	Yes	None (or less than \$1,001)		None (or less than \$201)
2	VMSXX - Vanguard Municipal Money Market	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
3	VFIAX - Vanguard 500 Index Admiral	Yes	\$5,000,001 - \$25,000,000		\$100,001 - \$1,000,000
4	US bank Money Market Account 1 (Cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5	Real Property with Carriage House Rental - Washington, DC	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$15,001 - \$50,000
6	US bank Account 1 (Cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	US bank Account 2 (Cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	TRBCX - T. Rowe Price Blue Chip Growth	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
9	PRITX - T.Rowe Price International Stock Fd	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
10	RPMGX - T. Rowe Price Mid-Cap Growth	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
11	PRSCX - T. Rowe Price Science & Tech	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
12	OTCFX - T. Rowe Price Small - Cap Stock	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
13	VGIAX - Vanguard Growth & Income Adm	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
14	VMSXX - Vanguard Municipal Money Market	Yes	\$500,001 - \$1,000,000		\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15	VFIAX - Vanguard 500 Index Admiral	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
16	Elaine L Chao Revocable Trust				
17	US bank Account 3 (Cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
18	MNNAX - Victory Munder Multi-Cap A	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
19	VHCAX - Vanguard Capital Opportunity Adm	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
20	VSIAX - Vanguard Small Cap Value Index Admiral	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
21	VFIAX - Vanguard 500 Index Admiral	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
22	A. Mitchell McConnell, Jr. Revocable Trust				
22.1	US Brokerage Money Market Account (Cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
23	Vanguard 529 College Savings Plan				
23.1	Vanguard 90STK10BND	Yes	\$100,001 - \$250,000		None (or less than \$201)
24	Vanguard 529 College Savings Plan				
24.1	Vanguard Aggressive Growth Portfolio (Age Based)	Yes	\$50,001 - \$100,000		None (or less than \$201)

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	WFC - Wells Fargo & Co See Endnote	Purchase	03/05/2019	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
2	VMC - Vulcan Materials	See Endnote	Sale	06/03/2019	\$250,001 - \$500,000
3	IR- Ingersoll Rand	See Endnote	Sale	06/03/2019	\$250,001 - \$500,000
4	WFC - Wells Fargo & Co	See Endnote	Purchase	06/01/2019	\$1,001 - \$15,000
5	WFC - Wells Fargo & Co	See Endnote	Purchase	09/01/2019	\$1,001 - \$15,000
6	WFC - Wells Fargo & Co	See Endnote	Purchase	12/04/2019	\$1,001 - \$15,000
7	TRBCX - T. Rowe Price Blue Chip Growth	See Endnote	Purchase	12/13/2019	\$1,001 - \$15,000
8	PRITX - T. Rowe Price International Stock	See Endnote	Purchase	12/17/2019	\$1,001 - \$15,000
9	RPMGX - T. Rowe Price Mid-Cap Growth	See Endnote	Purchase	12/13/2019	\$15,001 - \$50,000
10	PRSCX - T. Rowe Price Science & Technology	See Endnote	Purchase	12/16/2019	\$1,001 - \$15,000
11	OTCFX - T. Rowe Price Small - Cap Stock	See Endnote	Purchase	12/13/2019	\$1,001 - \$15,000
12	VFIAX - Vanguard 500 Index Fund Adm	See Endnote	Purchase	03/20/2019	\$15,001 - \$50,000
13	VFIAX - Vanguard 500 Index Fund Adm	See Endnote	Purchase	06/26/2019	\$15,001 - \$50,000
14	VFIAX - Vanguard 500 Index Fund Adm	See Endnote	Purchase	09/25/2019	\$15,001 - \$50,000
15	VFIAX - Vanguard 500 Index Fund Adm	See Endnote	Purchase	12/20/2019	\$15,001 - \$50,000
16	VGIAX - Vanguard Growth & Income	See Endnote	Purchase	06/14/2019	\$1,001 - \$15,000
17	VGIAX - Vanguard Growth & Income	See Endnote	Purchase	12/17/2019	\$1,001 - \$15,000
18	MNNAX - Victory Munder Multi-Cap Fund Class A		Sale	02/01/2019	\$15,001 - \$50,000
19	VFAIX - Vanguard 500 Index Admiral (IRA)	See Endnote	Purchase	03/20/2019	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
20	VFAIX - Vanguard 500 Index Admiral (IRA)	See Endnote	Purchase	06/26/2019	\$1,001 - \$15,000
21	VFAIX - Vanguard 500 Index Admiral (IRA)	See Endnote	Purchase	09/25/2019	\$1,001 - \$15,000
22	VFAIX - Vanguard 500 Index Admiral (IRA)	See Endnote	Purchase	12/20/2019	\$1,001 - \$15,000
23	JDVPX - John Hancock Funds Disciplined Value Funds Class R2 (UBS PSP)	See Endnote	Purchase	12/16/2019	\$1,001 - \$15,000
24	GFFFX - American Funds The Growth Fund of America Class F2 (UBS PS)	See Endnote	Purchase	12/23/2019	\$1,001 - \$15,000
25	GFFFX - American Funds The Growth Fund of America Class F2 (UBS IRA))	See Endnote	Purchase	12/23/2019	\$1,001 - \$15,000
26	PEQPX - Principal Equity Income (UBS IRA)	See Endnote	Purchase	12/20/2019	\$1,001 - \$15,000
27	RSPYX - Victory RS Partners Fund Class Y (UBS IRA)	See Endnote	Purchase	12/18/2019	\$1,001 - \$15,000
28	MNNAX - Victory Munder Multi-Cap Fund Class A	See Endnote	Purchase	12/17/2019	\$1,001 - \$15,000
29	VHCAX - Vanguard Capital Opportunity Fund Admiral Shares	See Endnote	Purchase	12/17/2019	\$1,001 - \$15,000
30	VHCAX - Vanguard Capital Opportunity Fund Admiral Shares	See Endnote	Purchase	12/17/2019	\$15,001 - \$50,000
31	VSIAX - Vanguard Small Cap Value Index Fund Admiral Shares	See Endnote	Purchase	03/27/2019	\$1,001 - \$15,000
32	VSIAX - Vanguard Small Cap Value Index Fund Admiral Shares	See Endnote	Purchase	06/26/2019	\$1,001 - \$15,000
33	VSIAX - Vanguard Small Cap Value Index Fund Admiral Shares	See Endnote	Purchase	09/13/2019	\$1,001 - \$15,000
34	VSIAX - Vanguard Small Cap Value Index Fund Admiral Shares	See Endnote	Purchase	12/23/2019	\$1,001 - \$15,000
35	VFIAX - Vanguard 500 Index Fund Admiral Shares	See Endnote	Purchase	03/20/2019	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
36	VFIAX - Vanguard 500 Index Fund Admiral Shares	See Endnote	Purchase	06/26/2019	\$1,001 - \$15,000
37	VFIAX - Vanguard 500 Index Fund Admiral Shares	See Endnote	Purchase	09/25/2019	\$1,001 - \$15,000
38	VFIAX - Vanguard 500 Index Fund Admiral Shares	See Endnote	Purchase	12/20/2019	\$1,001 - \$15,000
39	SPY - SPDR S & P 500 ETF Trust (IRA)		Sale	07/03/2019	\$1,001 - \$15,000
40	SPY - SPDR S & P 500 ETF Trust (IRA)		Sale	11/08/2019	\$15,001 - \$50,000
41	Vanguard 90STK10BND		Purchase	11/25/2019	\$1,001 - \$15,000
42	Vanguard Aggressive Growth Portfolio (Age Based)		Purchase	11/25/2019	\$1,001 - \$15,000
43	Vanguard Aggressive Growth Portfolio (Age Based)		Sale	04/04/2019	\$50,001 - \$100,000
44	Vanguard 90STK10BND Portfolio (Age Based)		Purchase	04/04/2019	\$50,001 - \$100,000
45	VFIAX - Vanguard 500 Index Fund Admiral Shares		Purchase	07/09/2019	\$50,001 - \$100,000
46	VFIAX - Vanguard 500 Index Fund Admiral Shares		Purchase	08/01/2019	\$50,001 - \$100,000
47	VFIAX - Vanguard 500 Index Fund Admiral Shares		Purchase	08/05/2019	\$100,001 - \$250,000
48	VFIAX - Vanguard 500 Index Fund Admiral Shares		Sale	11/08/2019	\$1,001 - \$15,000

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
1.	1	This is a single-member pass-through entity whose sole source of income is from my director fees and speaking fees, as separately disclosed herein. The only income in 2019 in Firebird International LLC is from director fees that were earned in a prior year, but deferred until 2019.
2.	1	This is a single-member pass-through entity whose sole source of income is from my director fees and speaking fees, as separately disclosed herein. The only income in 2019 in Firebird International LLC is from director fees that were earned in a prior year, but deferred until 2019.
2.	4.3	Security name change in 2019; formerly Dreyfus/The Boston Co Sm/Md Cp Gr I
2.	10.2	The entire amount of the Firebird International LLC, defined benefit plan that was previously reported was rolled over to the Vanguard IRA account in 2019

PART	#	ENDNOTE
2.	11	<p>This asset was inadvertently omitted from the financial disclosure reports filed on 5/15/2018 and 5/15/2019 as my accountants did not realize the 2017 K-1 form was not final and reported a continuing financial interest. The error was realized upon receipt of the 2019 K-1 form, which reported a capital account value of \$2,137. We had no record of a 2018 K-1 form prior to receipt of the 2019 K-1 form. For the same reason, the report filed on 5/15/2018 incorrectly reported income from this asset.</p> <p>The periodic transaction report filed on 6/12/2017 should not have reported the sale transaction listed on line 2 of that report because the 4/21/2017 event was a limited partnership distribution, and the incentive units were retained after that distribution.</p> <p>The financial disclosure report filed on 5/15/2018 should not have reported the sale transaction described on line 32 of part 7 of that report because the 4/21/2017 event was a limited partnership distribution, and the incentive units were retained after that distribution. Instead, it should have reported the following asset and income in Part 2:</p> <p>Part 2 Description: AMCP Security Holdings, LP, capital account EIF: N/A Value: \$1,001 - \$15,000 Income Type: Limited Partnership Distribution Income Amount: \$30,194</p> <p>The financial disclosure report filed on 5/15/2019 should have reported the following asset in Part 2:</p> <p>Part 2 Description: AMCP Security Holdings, LP, capital account EIF: N/A Value: \$1,001 - \$15,000 Income Type: Income Amount: None (or less than \$201)</p>

PART	#	ENDNOTE
3.	6	<p>This agreement was inadvertently omitted from the financial disclosure reports filed on 12/6/2016 and 5/15/2019, and it was incorrectly described in the periodic transaction report filed on 6/12/2017 and financial disclosure report filed on 5/15/2018 as an agreement with Centerra Group, LLC.</p> <p>The financial disclosure report filed on 12/6/2016 should have reported the following agreement in Part 3:</p> <p>Part 3 Employer or Party: AMCP Security Holdings, LP City/State: Greenwich, CT Status and Terms: I retained incentive units in this limited partnership when I resigned from the Centerra Group, LLC advisory board on December 31, 2015. Date: 8/2015</p> <p>The periodic financial disclosure report filed on 6/12/2017 should not have reported the agreement described in the endnote to line 2 of that report.</p> <p>The financial disclosure report filed on 5/15/2018 should not have reported the agreement described at line 9 of part 3 of that report and should not have reported the agreement described in the endnote to line 32 of part 7 of that report. Instead, it should have reported the following agreement in Part 3:</p> <p>Part 3 Employer or Party: AMCP Security Holdings, LP City/State: Greenwich, CT Status and Terms: I retained incentive units in this limited partnership when I resigned from the Centerra Group, LLC advisory board on December 31, 2015. Centerra was a subsidiary of the partnership, but was sold in 4/2017. Future distributions could only occur from (1) outstanding indemnity escrow accounts related to the sale of Centerra and (2) receivables from Centerra customers for work performed before that sale. Date: 8/2015</p> <p>The financial disclosure report filed on 5/15/2019 should have reported the following agreement in Part 3:</p> <p>Part 3 Employer or Party: AMCP Security Holdings, LP City/State: Greenwich, CT Status and Terms: I retained incentive units in this limited partnership when I resigned from the Centerra Group, LLC advisory board on December 31, 2015. Centerra was a subsidiary of the partnership, but was sold in 4/2017. Future distributions could only occur from (1) outstanding indemnity escrow accounts related to the sale of Centerra and (2) receivables from Centerra customers for work performed before that sale. Date: 8/2015</p>
7.	1	Dividend Reinvestment
7.	2	Complete Disposition of Vulcan Materials Stock

PART	#	ENDNOTE
7.	3	Complete Disposition of Ingersoll Rand Stock
7.	4	Dividend reinvestment
7.	5	Dividend Reinvestment
7.	6	Dividend Reinvestment
7.	7	Dividend Reinvestment
7.	8	Dividend Reinvestment
7.	9	Dividend Reinvestment
7.	10	Dividend Reinvestment
7.	11	Dividend Reinvestment
7.	12	Dividend Reinvestment
7.	13	Dividend Reinvestment
7.	14	Dividend Reinvestment
7.	15	Dividend Reinvestment
7.	16	Dividend Reinvestment
7.	17	Dividend Reinvestment
7.	19	Dividend Reinvestment
7.	20	Dividend Reinvestment
7.	21	Dividend Reinvestment
7.	22	Dividend Reinvestment
7.	23	Dividend Reinvestment
7.	24	Dividend Reinvestment
7.	25	Dividend Reinvestment

PART	#	ENDNOTE
7.	26	Dividend Reinvestment
7.	27	Dividend Reinvestment
7.	28	Capital Gains Reinvestment
7.	29	Dividend Reinvestment
7.	30	Capital Gains Reinvestment
7.	31	Dividend Reinvestment
7.	32	Dividend Reinvestment
7.	33	Dividend Reinvestment
7.	34	Dividend Reinvestment
7.	35	Dividend Reinvestment
7.	36	Dividend Reinvestment
7.	37	Dividend Reinvestment
7.	38	Dividend Reinvestment

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 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. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, N.W., Washington, DC 20005-3917.

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