

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

## Filer's Information

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**Ross, Wilbur L**

Secretary of Commerce, Department of Commerce

Report Year: 2019

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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/ Ross, Wilbur L [electronically signed on 08/15/2019 by Ross, Wilbur L in Integrity.gov] - Filer received a 92 day filing extension.**

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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/ Maggi, David, Certifying Official [electronically signed on 09/13/2019 by Maggi, David in Integrity.gov]**

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Other review conducted by

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U.S. Office of Government Ethics Certification

**/s/ Granahan, Megan, Certifying Official [electronically signed on 10/22/2019 by Granahan, Megan in Integrity.gov]**

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Data Revised 09/13/2019

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	El Vedado LLC		West Palm Beach, Florida	Limited Liability Company	Sole Member	12/2005	Present
2	1116 South Main Street, LLC	See Endnote	Wilmington, Delaware	Limited Liability Company	Managing Member	1/2003	Present
3	781 Fifth Ave. LLC	See Endnote	Wilmington, Delaware	Limited Liability Company	Managing Member	1/2003	Present

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Air Lease Corporation	See Endnote	N/A	None (or less than \$1,001)	Dividends	\$201 - \$1,000
2	BankUnited, Inc.	See Endnote	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
3	WLR/IVZ Mortgage Recovery Associates LLC (value not readily ascertainable)	See Endnote	No		Estimated Taxable Income	\$164,793
3.1	Invesco Mortgage Recovery Master Associates LLC		No			
3.1.1	Invesco Mortgage Recovery Offshore Feeder Fund, L.P.		No			
3.1.1.1	Invesco Mortgage Recovery Feeder Fund, L.P.		No			
3.1.1.1 .1	Invesco Mortgage Recovery Master Fund, L.P.		No			

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1.1.1 .1.1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.1.2	Invesco Mortgage Recovery Feeder Fund, L.P.		No			
3.1.2.1	Invesco Mortgage Recovery Master Fund, L.P.		No			
3.1.2.1 .1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.1.3	Invesco Legacy Securities Offshore Feeder Fund, L.P.		No			
3.1.3.1	Invesco Legacy Securities Feeder Fund, L.P.		No			
3.1.3.1 .1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.1.4	Invesco Mortgage Recovery Master Fund, L.P.		No			
3.1.4.1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.1.5	Invesco Legacy Securities Feeder Fund, L.P.		No			
3.1.5.1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.1.6	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.1.7	Invesco Recovery Loans Feeder Fund, L.P. (DE)		No			
3.1.7.1	Invesco Mortgage Recovery Loans AIV, L.P.		No			
3.1.7.1 .1	Invesco Mortgage Recovery Master Loans AIV, L.P.		No			
3.1.7.1 .1.1	WLR LeFrak (Northwest) LLC (real estate loans)		N/A			

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1.7.1 .1.2	Market Square Member LLC (real estate loans)		N/A			
3.1.7.1 .1.3	Indiana Retail Member LLC (real estate loans)		N/A			
3.1.7.1 .1.4	Shackleford Crossings Member LLC (real estate loan)		N/A			
3.1.7.1 .1.5	Colfin Milestone North Funding LLC (real estate loan)		N/A			
3.1.7.1 .1.6	IMRF Hotel Member LLC (real estate loan)		N/A			
3.1.7.1 .1.7	Park Place Apollo Investor LLC (real estate loan)		N/A			
3.1.7.1 .1.8	IMRF Watchtower Member LLC (real estate loan)		N/A			
3.1.7.1 .1.9	IMRF Industrial Member LLC (real estate loan)		N/A			
3.1.7.1 .1.10	IMRF Hotel Fifth Street member LLC (real estate loan)		N/A			
3.1.8	Invesco Mortgage Recovery Loans Feeder Fund, L.P. (Cayman)		No			
3.1.8.1	Invesco Mortgage Recovery Loans AIV, L.P.		No			
3.1.8.1 .1	Invesco Mortgage Recovery Master Loans AIV, L.P.	See Endnote	No			
3.1.9	Invesco Mortgage Recovery Loans AIV, L.P.		No			
3.1.9.1	Invesco Mortgage Recovery Master Loans AIV, L.P.	See Endnote	No			
3.1.10	Invesco Mortgage Recovery Master Loans AIV, L.P.	See Endnote	No			

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.2	WLR IV PPIP Co-Invest Offshore Feeder Fund, L.P.		No			
3.2.1	WLR IV PPIP Co-Invest, L.P.		No			
3.2.1.1	Invesco Mortgage Recovery Master Fund, L.P.		No			
3.2.1.1 .1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.3	WLR IV PPIP Co-Invest, L.P.		No			
3.3.1	Invesco Mortgage Recovery Master Fund, L.P.		No			
3.3.1.1	Invesco Legacy Securities Master Fund, L.P.	See Endnote	N/A			
3.4	WLR IV PPIP Coinvest Loans Feeder Fund, L.P. (DE)		No			
3.4.1	WLR IV PPIP Co-Invest Loans AIV, L.P.		No			
3.4.1.1	Invesco Mortgage Recovery Master Loans AIV, L.P.	See Endnote	No			
3.5	WLR IV PPIP Coinvest Loans Feeder Fund (Cayman), L.P.		No			
3.5.1	WLR IV PPIP Co-Invest Loans AIV, L.P.		No			
3.5.1.1	Invesco Mortgage Recovery Master Loans AIV, L.P.	See Endnote	No			
3.6	WLR Whole Loan Fund, L.P.	See Endnote	No			
3.7	WLR IV PPIP Co-Invest Loans AIV, L.P.		No			
3.7.1	Invesco Mortgage Recovery Master Loans AIV, L.P.	See Endnote	No			
3.8	WLR/IVZ Mortgage Recovery Associates LLC -- Carried Interest	See Endnote	N/A	None (or less than \$1,001)		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	Starboard GP Ltd.	See Endnote	No	Estimated Taxable Income	\$998
4.1	Transportation Recovery Fund, L.P. -- Carried Interest	See Endnote	N/A	None (or less than \$1,001)	
4.2	Starboard Recovery Associates L.P.	See Endnote	No	\$1,001 - \$15,000	
4.2.1	WLR Navig8 Co-Investment, L.P.		No		
4.2.1.1	WLR/TRF Shipping S.a. r.l.	See Endnote	No		
5	IRA - Traditional	No		Cash distributions	\$68,634
5.1	U.S. brokerage/investment account (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)
5.2	UBS AG Deposit Account (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5.3	U.S. Treasury Notes (due 4/30/19)	N/A	\$100,001 - \$250,000		None (or less than \$201)
5.4	U.S. Treasury Notes (due 9/30/19)	N/A	\$250,001 - \$500,000		None (or less than \$201)
5.5	U.S. Treasury Notes (due 11/15/20)	N/A	\$250,001 - \$500,000		None (or less than \$201)
5.6	U.S. Treasury Bills (due 5/23/19)	N/A	\$250,001 - \$500,000		None (or less than \$201)
6	IRA - Roth	No			
6.1	U.S. brokerage/investment account (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.2	U.S. Treasury Bills (due 5/23/19)	N/A	\$50,001 - \$100,000		None (or less than \$201)
6.3	U.S. Treasury Notes (due 4/30/19)	N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.4	U.S. Treasury Notes (due 9/30/19)		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
6.5	U.S. Treasury Notes (due 11/15/20)		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
7	Starboard WLR Associates L.P.	See Endnote	No	None (or less than \$1,001)	Estimated Taxable Income	\$611,422
8	Ross CG Cypress Associates, LLC	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Starboard GP Ltd.	New York, New York	Prior to my confirmation, I served as Director of this entity, which serves as General Partner ("GP") of various underlying funds. The GP is entitled to a carried interest. After investors recoup their principal plus an 8% return, the General Partner receives 2% as a carried interest. Any profit above that is divided 80% to investors, 20% to the General Partner.	10/2013
2	WLR/IVZ Mortgage Recovery Associates LLC	New York, New York	Prior to my confirmation, WL Ross Group LP served as Managing Member of this entity, which serves as General Partner ("GP") of various underlying funds. The GP is entitled to a carried interest. After investors recoup their principal plus an 8% return, the General Partner receives 2% as a carried interest. Any profit above that is divided 80% to investors, 20% to the General Partner.	10/2009

### 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	IRA	No			
1.1	Dreyfus Government Cash Mgmt Admin (DAGXX)	Yes	Over \$1,000,000		None (or less than \$201)
1.2	iShares Russell 2000 ETF (IWM)	Yes	Over \$1,000,000		None (or less than \$201)
1.3	SPDR S&P 500 ETF (SPY)	Yes	Over \$1,000,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Brokerage Account #1	No			
1.1	Cash	N/A	\$25,000,001 - \$50,000,000	Interest	\$100,001 - \$1,000,000
1.2	U.S. Treasury Notes (due 3/31/19)	See Endnote	\$25,000,001 - \$50,000,000	Interest	\$100,001 - \$1,000,000
1.3	U.S. Treasury Notes (due 3/31/20)	N/A	\$25,000,001 - \$50,000,000	Interest	\$100,001 - \$1,000,000
1.4	U.S. Treasury Notes (due 3/31/21)	N/A	\$5,000,001 - \$25,000,000	Interest	\$100,001 - \$1,000,000
1.5	U.S. Treasury Notes (due 3/31/22)	N/A	\$5,000,001 - \$25,000,000	Interest	\$100,001 - \$1,000,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.6	U.S. Treasury Notes (due 1/31/23)	N/A	\$5,000,001 - \$25,000,000	Interest	\$100,001 - \$1,000,000
2	U.S. Brokerage Account #2	No			
2.1	Cash	N/A	\$100,001 - \$250,000	Interest	\$15,001 - \$50,000
2.2	UBS AG Deposit Account (cash)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
2.3	U.S. Treasury Bills (due 1/31/19)	N/A	\$25,000,001 - \$50,000,000		None (or less than \$201)
2.4	U.S. Treasury Notes (due 1/31/20)	N/A	\$25,000,001 - \$50,000,000	Interest	\$100,001 - \$1,000,000
3	U.S. Brokerage Account #3	No			
3.1	Cash	N/A	\$250,001 - \$500,000		None (or less than \$201)
3.2	U.S. Treasury Notes (due 3/31/20)	N/A	\$5,000,001 - \$25,000,000	Interest	\$100,001 - \$1,000,000
4	U.S. Brokerage Account #4	See Endnote	\$1,000,001 - \$5,000,000	Interest	\$5,001 - \$15,000
5	U.S. Brokerage Account #5	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
6	U.S. Bank Account #1 (cash)	N/A	\$500,001 - \$1,000,000	Interest	\$201 - \$1,000
7	U.S. Money Market Account #1 (cash)	N/A	\$50,001 - \$100,000	Interest	\$50,001 - \$100,000
8	U.S. Money Market Account #2 (cash)	N/A	\$500,001 - \$1,000,000	Interest	\$1,001 - \$2,500
9	Art Collection	N/A	Over \$50,000,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10	U.S. Brokerage Account #6	See Endnote	No		
10.1	Cash	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
10.2	UBS Select Govt Capital	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
11	U.S. Bank Account #2 (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)
12	U.S. Brokerage Account #7	No			
12.1	Spouse - Trust: Under Will No. 1	No			
12.1.1	Dreyfus Government Cash Mgmt Admin (DAGXX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
12.1.2	SPDR S&P 500 ETF Trust Unit SER 1 S&P (SPY)	Yes	Over \$1,000,000		\$15,001 - \$50,000
12.1.3	iShares Russell 2000 ETF (IWM)	Yes	Over \$1,000,000		\$15,001 - \$50,000
12.2	Spouse - Trust: Under Agreement	No			
12.2.1	Dreyfus Government Cash Mgmt Admin (DAGXX)	Yes	Over \$1,000,000		\$15,001 - \$50,000
12.2.2	SPDR S&P 500 ETF Trust Unit SER 1 S&P (SPY)	Yes	Over \$1,000,000		\$50,001 - \$100,000
12.2.3	iShares Russell 2000 ETF (IWM)	Yes	Over \$1,000,000		\$15,001 - \$50,000
12.3	Spouse - Trust: Under Will No. 2	No			
12.3.1	Illinois St Go BDS	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
12.3.2	Harris Cnty Tex Permanent Im	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12.3.3	Champaign Cnty Ill Cmnty Unit Sch Dist.	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
12.3.4	Chicago Ill O'Hare Arpt Rev Gen	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.5	St. Paul Minn Port Auth Lease Re	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
12.3.6	Dreyfus Government Cash Mgmt Admin (DAGXX)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
12.3.7	Atlanta GA Dev Auth Rev Rev BDS Panther	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
12.3.8	Michigan Fin Auth Rev Rev Ref	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.9	Atlanta Ga Dev Auth Rev Rev Bds Georgia	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.1 0	Gainesville & Hall Cnty Ga Hos P Auth	N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
12.3.1 1	Chicago Ill Tran Auth Cap Grnt Rcpts	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.1 2	Fort Myers Fla Cap Impt Rev Cap Impt	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
12.3.1 3	New Jersey St Higher Ed Assistance Auth	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.1 4	Houston Tex Cmnty College Sys Rev	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.1 5	Key West Fla Util Brd Elec Rev Elec	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
12.3.1 6	Buffalo & Ft Erie N Y Pub Brog Auth Toll	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12.3.1 7	Lee Cnty Fla Sch Brd Cifs Partn Cops	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
12.3.1 8	Texas St Pub Fin Auth Rev Financing	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
12.3.1 9	New Orleans La Go Ref Bds Ser 2015	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
12.3.2 0	Reedy Creek Impt Dist Fla Ad Valorem	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.2 1	Northern Ind Commuter Transn Dist	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.2 2	Indiana St Fin Auth Wastewater Util Rev	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
12.3.2 3	Alamo Tex Cmnty College Dist Ltd Tax	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
12.3.2 4	New York Liberty Dev Corp Liberty Rev	N/A	\$250,001 - \$500,000	Interest	\$15,001 - \$50,000
13	U.S. Brokerage Account #8	No			
13.1	U.S. Deposit Account (cash)	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
13.2	U.S. Treasury Bills (due 5/23/19)	N/A	\$50,001 - \$100,000		None (or less than \$201)
13.3	U.S. Treasury Notes (due 4/30/19)	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
13.4	U.S. Treasury Notes (due 9/30/19)	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
13.5	U.S. Treasury Notes (due 11/15/20)	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
13.6	UBS AG Deposit Account (cash)	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	U.S. Brokerage Account #9		No			
14.1	Houston Tex Hotel Occupancy Tax & SPL	See Endnote	N/A	None (or less than \$1,001)	Interest	\$5,001 - \$15,000
14.2	Wyandotee Cnty Kans City Kans Uni Govt		N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
14.3	North Tex Twy Auth Rev Ref Bds Ser. A		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.4	Houston Tex Cmnty College Sys Rev		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.5	Key West FLA Util Brd Elec Rev Elec		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.6	New Jersey St Higher Ed Assistance Auth Ref BDS 1A		N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
14.7	Kansas City Mo Spl Oblig Spl Dblig Sds		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.8	Pennsylvania St Tpk Commn TpkRev Rev		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.9	Indiana St Fin Auth Wastewaster Util Rev		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.10	St Charles Cnty Mo Pub Wtr Supply Dist		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.11	Dreyfus Government Cash Mgmt Admin (DAGXX)		Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
14.12	Atlanta Ga Dev Auth Rev Rev Bds Georgia		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.13	Michigan Fin Auth Rev Hosp Ref BDS		N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.14	Fort Worth Tex SPL Tax Rev. BDS Ser.		N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.15	Harris Cnty Tex Permanent Im	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.16	Utah Wtr Fin Agy Rev Rev BDS Central	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
14.17	Hillsborough Cnty Fla Sch Brd CTFS	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.18	Socorro Tex Indpt Sch Dist Ultd Tax	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
14.19	Michigan Fin Auth Rev Ref BDS	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.20	St. Paul Minn Port Auth Lease Re	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
14.21	Atlanta GA Dev Auth Rev Rev BDS Panther	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
14.22	iShares Russell 2000 ETF (IWM)	Yes	Over \$1,000,000		\$100,001 - \$1,000,000
14.23	SPDR S&P 500 ETF Trust Unit SER 1 S&P (SPY)	Yes	Over \$1,000,000		\$100,001 - \$1,000,000
14.24	New Jersey Economic Dev Auth Rev Sch	N/A	\$250,001 - \$500,000	Interest	\$5,001 - \$15,000
14.25	Clark Cnty Nev Arpt Rev Jr Sub Lien Rev	N/A	\$250,001 - \$500,000	Interest	None (or less than \$201)
15	U.S. Brokerage Account #10	No			
15.1	U.S. Treasury Bills (due 4/25/19)	N/A	\$5,000,001 - \$25,000,000	Interest	\$100,001 - \$1,000,000

## 7. Transactions

None

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	JP Morgan	Guarantee of Loan to Social Club	\$500,001 - \$1,000,000	2016	N/A	On demand
2	Starboard GP LTD	Capital Commitment	\$10,001 - \$15,000	2013	N/A	Life of fund
3	Starboard WLR Associates, L.P.	Capital Commitment	\$1,000,001 - \$5,000,000	2013	N/A	Life of fund
4	WLR/IVZ Mortgage Recovery Associates LLC	Capital Commitment	\$250,001 - \$500,000	2009	N/A	Life of fund

## 9. Gifts and Travel Reimbursements

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION	VALUE
1	Adrienne Arsht	Washington, District of Columbia	One ticket to the Atlantic Council Distinguished Leadership Awards Dinner (May 10, 2018)	\$2,500

## Endnotes

PART	#	ENDNOTE
1.	2	The listed start date is approximate and is based on a good-faith estimate.
1.	3	The listed start date is approximate and is based on a good-faith estimate.



PART	#	ENDNOTE
2.	1	Shares were divested on 6/11/18. A 278-T Transaction Report was filed on 6/15/18.
2.	2	Shares were divested on 10/3/18. A 278-T Transaction Report was filed on 10/31/18.
2.	3	K-1 is not available at time of filing. Income represents most recent available estimate of income, as of 9/30/2018.
2.	3.1.1.1.1.1	This fund no longer holds any underlying assets.
2.	3.1.2.1.1	This fund no longer holds any underlying assets.
2.	3.1.3.1.1	This fund no longer holds any underlying assets.
2.	3.1.4.1	This fund no longer holds any underlying assets.
2.	3.1.5.1	This fund no longer holds any underlying assets.
2.	3.1.6	This fund no longer holds any underlying assets.
2.	3.1.8.1.1	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.1.9.1	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.1.10	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.2.1.1.1	This fund no longer holds any underlying assets.
2.	3.3.1.1	This fund no longer holds any underlying assets.
2.	3.4.1.1	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.5.1.1	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.6	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.7.1	Underlying assets previously disclosed at 3.1.7.1.1.
2.	3.8	Represents carried interests of General Partner in all funds disclosed within 3.1 to 3.7, including underlying funds. Income accounted for at Line 3.
2.	4	K-1 is not available at time of filing. Income represents most recent available estimate of income, as of 9/30/2018.

PART	#	ENDNOTE
2.	4.1	This represents the carried interest held by Starboard GP Ltd. in the Transportation Recovery Fund. This interest was divested on 10/31/18, and a 278-T Transaction Report was filed on 11/30/18.
2.	4.2	K-1 not available at time of filing. Value is a good faith estimate.  Income accounted for at Line 4.
2.	4.2.1.1	This entity owns subsidiaries which each own individual transoceanic tanker ships. There are individual LLCs that own the ships: NCM Holding I LLC; NCM Holding II LLC; WLR/TRF KZ Holding I LLC; WLR/TRF KZ Holding II LLC; WLR/TRF KZ Holding III LLC; WLR/TRF Holding III LLC; WLR/TRF Maemi LLC; NT Suez Holdco LLC; NT Suez GP LLC; NT Suez One LLC; NT Suez Two LLC; WLR/TRF Tanker Two LLC; WLR/TRF HMN8 Holdings I LLC; WLR/TRF HMN8 Holdings II LLC; WLR/TRF HMN8 Holdings III LLC; WLR/TRF HMN8 Holdings IV LLC; WLR/TRF HMN8 Holdings V LLC; WLR/TRF HMN8 Holdings VI LLC; TRF/Solus JV LLC; TRF/Solus GP LLC; HAN VLCC 1 LLC; HAN VLCC II LLC; SWS VLCC JV LLC; SWS VLCC GPLLC; SWS VLCC LLC; WLR/TRF KZ Holding IV; WLR/TRF SH Container Holding I LLC; WLR/TRF SH Container Holding II LLC; WLR/TRF SH Container Holding III LLC; WLR/TRF SH Container Holding IV LLC; WLR/TRF AWL Container Ship I LLC; WLR/TRF AWL Container Ship II LLC; Nautical Bulk Holdings Ltd. This entity also owns an interest in Bluewater Holding Schiffahrtsgesellschaft GmbH & Co. KG.
2.	7	Asset was divested on 10/31/18. A 278-T Transaction Report was filed on 11/30/18.  K-1 is not available at time of filing. Income represents most recent available estimate of income, as of 9/30/2018.
2.	8	Asset holds only cash.
6.	1.2	Consistent with federal regulations and OGE guidance, interest income reported for all U.S. Treasury securities and municipal bonds listed in Part 6 reflects only interest payments received during the reporting period.
6.	4	Held as an account for the benefit of First Republic Bank.
6.	10	Account was closed in September 2018.
6.	14.1	Asset was sold on 7/23/18. A 278-T Transaction Report was filed on 11/30/18.

# 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. 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 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, 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).

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