

Report Type: Nominee Report

Year (Annual Report only):

Date of Appointment:

Date of Termination:

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

Filer's Information

Ratcliffe, John

Director, Central Intelligence Agency

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Select Committee on Intelligence
-

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/ Ratcliffe, John [electronically signed on 12/18/2024 by Ratcliffe, John 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/ George, Allison, Certifying Official [electronically signed on 01/14/2025 by George, Allison in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Huitema, David, Certifying Official [electronically signed on 01/14/2025 by Huitema, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	AMERICA FIRST POLICY INSTITUTE	See Endnote	FORT WORTH, Texas	Non-Profit	CO-CHAIR CENTER FOR AMERICAN SECURITY	4/2021	Present
2	BLACKSTONE, INC. (Asset Management Firm)	See Endnote	WASHINGTON, District of Columbia	Corporation	CONSULTANT	6/2024	Present
3	ALL WORLD HOLDINGS, LLC (Investment Management and Wealth Management Company)		LAS VEGAS , Nevada	Corporation	CONSULTANT	7/2023	11/2024
4	THE HERITAGE FOUNDATION		WASHINGTON, District of Columbia	Non-Profit	VISITING FELLOW	6/2023	Present
5	US TRINITY ENERGY SERVICES (Contractor in the Energy Sector that Specializes in the Construction of Oil and Gas Transmission Pipelines)		DENTON, Texas	Corporation	CONSULTANT	9/2021	Present
6	OBERHEIDEN, PC	See Endnote	DALLAS, Texas	Law Firm	OF COUNSEL	10/2023	Present
7	PEROT JAIN LP (Venture Capital Firm)		DALLAS, Texas	Corporation	CONSULTANT	4/2022	Present
8	PARADIGM OPERATIONS LP (Venture Capital Firm)		SAN FRANCISCO, California	Corporation	ADVISORY COUNCIL	10/2023	Present
9	AMERICAN GLOBAL STRATEGIES LLC (Strategic Advisory Firm)	See Endnote	ALEXANDRIA , Virginia	Corporation	SENIOR ADVISOR	6/2022	Present
10	ARCTOP, INC (Cognition Technology Company)		LOS ANGELES, California	Corporation	ADVISORY BOARD	1/2023	Present
11	DRILLING TOOLS INTERNATIONAL HOLDINGS, INC.	See Endnote	HOUSTON, Texas	Corporation	CONSULTANT	12/2021	Present

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
12	PACIFIC CAP ACQUISITION FUND, LLC	See Endnote	SHERMAN OAKS, California	Corporation	CONSULTANT	6/2024	Present
13	LATENT AI (AI Software Company)	See Endnote	MENLO, California	Corporation	ADVISORY BOARD	8/2022	Present
14	ARTICLE I LLC (Strategic Advisory Firm)	See Endnote	BAKERFIELD, California	Corporation	CONSULTANT	2/2024	Present
15	SHIELD AI (defense technology company that builds artificial intelligence)		DALLAS, Texas	Corporation	ADVISORY BOARD	3/2021	6/2022
16	PACIFIC SPECIALTY PROPERTY AND CASUALTY COMPANY	See Endnote	ANAHEIM, California	Corporation	Board of Directors	4/2022	Present
17	WESTERN SERVICE CONTRACT CORPORATION	See Endnote	ANAHEIM, California	Corporation	Board of Directors	4/2022	Present
18	MCGRAW INSURANCE INC.	See Endnote	ANAHEIM, California	Corporation	Board of Directors	4/2022	Present
19	PACIFIC SPECIALTY INSURANCE COMPANY	See Endnote	ANAHEIM, California	Corporation	Board of Directors	4/2022	Present
20	STARLIGHT FUTURES, LLC	See Endnote	Heath, Texas	Corporation	President and Registered Agent	2/2021	Present

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	AMERICA FIRST POLICY INSTITUTE		N/A		Salary	\$180,000
2	THE HERITAGE FOUNDATION		N/A		Salary	\$90,000
3	PACIFIC SPECIALTY INSURANCE COMPANY	See Endnote	N/A		Director Fees	\$240,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	OBERHEIDEN, PC	N/A		Salary/Bonus	\$375,000
5	PARADIGM OPERATIONS LP (Venture Capital Firm that invests in crypto currency)	N/A		Advisory Fees	\$160,008
6	SEP IRA	No			
6.1	Fidelity Government Cash Reserves (FDRXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	JPMorgan Active Growth ETF (JGRO)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.3	JPMorgan Active Value ETF (JAVA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.4	JPMorgan Betabuilders US Aggregate Bond ETF (BBAG)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.5	JPMorgan BetaBuilders US Mid Cap Equity ETF (BBMC)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.6	JPMorgan BetaBuilders U.S. Small Cap Equity ETF (BBSC)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.7	JPMorgan BetaBuilders US Equity ETF (BBUS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.8	JPMorgan Core Plus Bond ETF (JCPB)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	STARLIGHT FUTURES LLC	No		Salary and Draw	\$1,159,000
7.1	BLACKSTONE, INC. (Asset Management Firm)	N/A		Consulting Fees	\$80,000
7.1.1	BLACKSTONE, INC. (Asset Management Firm) receivable for consulting services October and November 2024	See Endnote	N/A		None (or less than \$201)
7.2	ALL WORLD HOLDINGS, LLC (Investment Management and Wealth Management Company)	N/A		Consulting Fees	\$75,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.3	US TRINITY ENERGY SERVICES (Contractor in the Energy Sector that Specializes in the Construction of Oil and Gas Transmission Pipelines)		N/A		Consulting Fees	\$500,000
7.3.1	US TRINITY ENERGY SERVICES (Contractor in the Energy Sector that Specializes in the Construction of Oil and Gas Transmission Pipelines) receivable for consulting fees for October and November 2024	See Endnote	N/A	\$15,001 - \$50,000		None (or less than \$201)
7.4	PEROT JAIN LP (Venture Capital Firm)		N/A		Consulting Fees	\$420,000
7.5	AMERICAN GLOBAL STRATEGIES LLC (Strategic Advisory Firm)		N/A		Consulting Fees	\$13,500
7.5.1	AMERICAN GLOBAL STRATEGIES LLC (Strategic Advisory Firm) receivable for services provided 2024	See Endnote	N/A	\$15,001 - \$50,000		None (or less than \$201)
7.6	ARTICLE I LLC (Strategic Advisory Firm)		N/A		Consulting Fees	\$50,000
8	ARCTOP, INC (Cognition Technology Company), unvested stock options		N/A	\$1,001 - \$15,000		None (or less than \$201)
9	DRILLING TOOLS INTERNATIONAL CORP (DTI)		N/A	\$15,001 - \$50,000		None (or less than \$201)
10	HYPERX LOGIC, INC., (Company that manufactures low-power, high-performance, C-programmable processors for the embedded systems market)		N/A	\$100,001 - \$250,000		None (or less than \$201)
11	LATENT AI, INC. (AI Software Company)		N/A	\$100,001 - \$250,000		None (or less than \$201)
12	SHIELD AI (defense technology company that builds artificial intelligence (AI) systems)		N/A	\$50,001 - \$100,000		None (or less than \$201)
13	"How US Patent Litigation Threatens National Security" paid by U.S. Manufacturers Association for Development and Enterprise, published by Daily Caller - 5/15/2024		N/A		Honorarium	\$3,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	"How to Stop Patent Trolls from Gaining Access to Sensitive Information", paid by U.S. Manufacturers Association for Development and Enterprise, published by Dallas Morning News - 12/20/2023	N/A		Honorarium	\$3,000
15	Gatestone Institute - 9/9/2024-9/10/2024	N/A		Honorarium	\$25,000
16	ARCTOP, INC (Cognition Technology Company)	N/A	\$1,001 - \$15,000		None (or less than \$201)
17	ARCTOP, INC (Cognition Technology Company), vested stock options	N/A	\$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	Blackstone, Inc. (Asset Management Firm)	Washington, District of Columbia	On or before December 31, 2024, I terminated my consultancy agreement with the company. Pursuant to the terms the agreement that I have with the company I am entitled to receive the balance of my consulting fees for services provided in 2024. All amounts due and owing to me are fixed. I will receive this amount within 90 days of my confirmation.	6/2024
2	US Trinity Energy Services	Denton, Texas	Pursuant to the terms of my consultancy agreement that I have with the company I am entitled to receive a fixed amount monthly for consulting services I provide to the company. Upon confirmation I will terminate the agreement and I will receive the balance of all fees due and owing to me for services provided up to the date that I terminate my agreement and services with the company. All amounts due and owing to me will be fixed as of that date. I will receive this amount within 90 days of my confirmation.	8/2021

#	EMPLOYER OR PARTY		CITY, STATE	STATUS AND TERMS	DATE
3	Perot Jain LP (Venture Capital Firm)	See Endnote	Dallas, Texas	Pursuant to the terms of my agreement that I have with the company I am entitled to receive a fixed amount monthly for services I provide to the company. Upon confirmation I will terminate the agreement and I will receive the balance of all fees due and owing to me for services provided up to the date that I terminate my agreement and services with the company. All amounts due and owing to me will be fixed as of that date. I will receive this amount within 90 days of my confirmation.	3/2022
4	Paradigm Operations LP (Venture Capital Firm that invests in crypto currency)	See Endnote	San Francisco, California	Pursuant to the terms of my agreement that I have with the company I am entitled to receive a fixed amount monthly for my services on the Advisory Council. Upon my confirmation I will resign and I will be entitled to receive the balance of my fees for services provided up to the date that I resign and cease to provide services to the company. All amounts due and owing to me will be fixed as of that date. I will receive this amount within 90 days of my confirmation.	10/2023
5	American Global Strategies LLC (Strategic Advisory Firm)		Alexandria, Virginia	<p>In June 2022 I entered into an agreement to provide services to the company. On or before December 31, 2024, I terminated my consultancy agreement with the company. Pursuant to the terms of the agreement I am paid on a per project basis. In October 2024 I completed a project and agreed to be paid \$3,000.00 per month over the course of 12 months.</p> <p>As of January 2025 I have received 3 payments totaling \$9,000. Upon my confirmation I will continue to be entitled to receive my fixed monthly payment from the company. All payments will be received on or before October 31, 2025.</p>	6/2022

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
6	Arctop Inc. (Cognition Technology Company)	Los Angeles, California	<p>Pursuant to the terms of my consulting agreement with the company as part of my compensation I was granted 5,000 shares of stock options in the company between the periods of 1/1/2023 to 12/31/2024. The options vested quarterly, at 625 option shares per quarter. As of the date of this report, I have exercised 3,750 option shares which are now private company stock. Subsequent to the submission of this report I received 5,000 vested option shares that the company granted to all members of the Board. I currently retain 3,750 shares of private company stock, 5,625 vested stock options, and 625 unvested stock options.</p> <p>Upon confirmation the company has agreed to permit me to divest my equity and forfeit my unvested stock options. I agree that I will complete this divestiture and forfeiture within 90 days of my confirmation.</p>	1/2025
7	Pacific Cap Acquisition Fund LLC	Sherman Oaks, California	<p>Pacific Cap Acquisition Fund, LLC ("PCAF"), is the majority owner of HyperX Holdings, LLC which in turn owns HyperX Logic, Inc. I entered into an agreement with PCAF in which I was granted company stock options in HyperX Logic, Inc., that have since vested and have been exercised. I currently own shares of HyperX Logic Inc. private stock. The company has agreed to permit me to divest my equity and I agree that I will complete this divestiture within 90 days of my confirmation.</p>	1/2025

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
8	Latent AI (AI Software Company)	Menlo, California	<p>In August 2022 I entered into an agreement to provide services to the company as a member of the company's Advisory Board. On or before December 31, 2024, I terminated my agreement with the company. Pursuant to the terms of my agreement with the company I was granted stock options in the company as compensation for my services that have since vested and have been exercised. I own currently own shares of private stock in the company.</p> <p>The company has agreed to permit me to divest my equity and I agree that I will complete this divestiture within 90 days of my confirmation.</p>	1/2025
9	Shield AI (Defense technology company that builds artificial intelligence in (AI) systems)	Dallas, Texas	<p>I terminated my position with Shield AI in June 2022. Pursuant to the terms of my agreement with the company I was granted stock options as compensation for my services. These options have since vested and have been exercised. I own currently retain shares of private stock in the company.</p> <p>The company has agreed to permit me to divest my equity and I agree that I will complete this divestiture within 90 days of my confirmation.</p>	1/2025
10	STARLIGHT FUTURES LLC	Heath, Texas	Company will be inactive during my appointment.	1/2025

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	BLACKSTONE, INC. (Asset Management Firm)	WASHINGTON, District of Columbia	Services as CONSULTANT
2	AMERICA FIRST POLICY INSTITUTE	FORT WORTH, Texas	Services as CO-CHAIR CENTER FOR AMERICAN SECURITY

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
3	ALL WORLD HOLDINGS, LLC (Investment Management and Wealth Management Company)		LAS VEGAS , Nevada	Services as CONSULTANT
4	THE HERITAGE FOUNDATION		WASHINGTON, District of Columbia	Services as VISITING FELLOW
5	US TRINITY ENERGY SERVICES (Contractor in the Energy Sector that Specializes in the Construction of Oil and Gas Transmission Pipelines)		DENTON, Texas	Services as CONSULTANT
6	PACIFIC SPECIALTY INSURANCE COMPANY	See Endnote	ANAHEIM, California	Services as member of the BOARD OF DIRECTORS
7	OBERHEIDEN, PC		DALLAS, Texas	Services as OF COUNSEL
8	PEROT JAIN LP (Venture Capital Firm)		DALLAS, Texas	Services as CONSULTANT
9	PARADIGM OPERATIONS LP (Venture Capital Firm)		SAN FRANCISCO, California	Services as a member of the ADVISORY COUNCIL
10	SHIELD AI (defense technology company that builds artificial intelligence (AI) systems)		DALLAS, Texas	Services as a member of the ADVISORY BOARD
11	AMERICAN GLOBAL STRATEGIES LLC (Strategic Advisory Firm)		ALEXANDRIA , Virginia	Services as SENIOR ADVISOR
12	ARTICLE I LLP (Strategic Advisory Firm)		BAKERFIELD, California	Services as CONSULTANT
13	GATESTONE INSTITUTE		NEW YORK, New York	Provide Services for a SPEAKING ENGAGEMENT
14	U.S. MANUFACTURERS ASSOCIATION FOR DEVELOPMENT AND ENTERPRISE		NEW YORK, New York	SERVICES AS OPINION EDITORIALS
15	ARCTOP INC. (Cognition Technology Company)		LOS ANGELES, California	Services as member of an Advisory Board
16	DRILLING TOOLS INTERNATIONAL HOLDINGS, INC.		HOUSTON, Texas	Services as CONSULTANT

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
17	PACIFIC CAP ACQUISTION FUND, LLC		SHERMAN OAKS, California	Services as a CONSULTANT
18	LATENT AI (AI Software Company)		MENLO, California	Services as member of an ADVISORY BOARD
19	STARLIGHT FUTURES, LLC (pass through company)	See Endnote	Heath, Texas	Bills and receives consulting fees for services

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	LAMBERTH RATCLIFFE COVINGTON PLLC (LAW FIRM)	See Endnote	N/A		salary, bonus	
2	MICHELE RATCLIFFE PLLC (LEGAL SERVICES)		N/A	\$1,001 - \$15,000	salary	
3	SEP - IRA		No			
3.1	Fidelity Government Cash Reserves (FDRXX)		Yes	None (or less than \$1,001)		None (or less than \$201)
3.2	JPMorgan Active Growth ETF (JGRO)		Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	JPMorgan Active Value ETF (JAVA)		Yes	\$1,001 - \$15,000		None (or less than \$201)
3.4	JPMorgan Betabuilders US Aggregate Bond ETF (BBAG)		Yes	\$1,001 - \$15,000		None (or less than \$201)
3.5	JPMorgan BetaBuilders US Mid Cap Equity ETF (BBMC)		Yes	\$1,001 - \$15,000		None (or less than \$201)
3.6	JPMorgan BetaBuilders U.S. Small Cap Equity ETF (BBSC)		Yes	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.7	JPMorgan BetaBuilders US Equity ETF (BBUS)	Yes	None (or less than \$1,001)		None (or less than \$201)
3.8	JPMorgan Core Plus Bond ETF (JCPB)	Yes	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	JOHN HANCOCK FIXED RATE ANNUITY	N/A	\$1,000,001 - \$5,000,000	Cash distributions	\$177,500
2	PRUDENTIAL FIXED RATE ANNUITY	N/A	\$1,000,001 - \$5,000,000	Cash distributions	\$177,500
3	US bank (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)

7. Transactions

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

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	NEW REZ	Mortgage on Personal Residence	\$250,001 - \$500,000	2021	2.75	30 YEARS

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	1	Subsequent to the submission of this report the filer has resigned from his Co-Chair position on or before 12/31/24.
1.	2	Subsequent to the submission of this report the filer has terminated his consulting agreement 12/31/24.
1.	6	Subsequent to the submission of this report, the filer has resigned from his position with the firm effective 12/31/24 and has received his fixed monthly payment for December 2024 on 12/30/24.
1.	9	Subsequent to the submission of this report the filer has terminated his consulting agreement 12/31/24.
1.	11	Subsequent to the submission of this report the filer resigned from his position on 12/31/24
1.	12	Compensation for his services on the Board the filer received stock options in HyperXLogic, Inc. See Part 2, Line item 10.
1.	13	Subsequent to the submission of this report the filer has terminated his consulting agreement on or before 12/31/24.
1.	14	Subsequent to the submission of this report the filer has terminated his consulting agreement on 12/31/24.
1.	16	Subsequent to the submission of this report the filer has resigned from his board position and received his monthly payment for services on or before 12/31/24.
1.	17	Subsequent to the submission of this report the filer has resigned from his board position and received his monthly payment for services on or before 12/31/24.
1.	18	Subsequent to the submission of this report the filer has resigned from his board position and received his monthly payment for services on or before 12/31/24.

PART	#	ENDNOTE
1.	19	Filer received income for his services on the Board of Directors for line items 16-19 through this entity. Subsequent to the submission of this report the filer has resigned from his board position and received his monthly payment for services on or before 12/31/24.
1.	20	All of the filer's consulting fees are billed from are paid to this entity. This entity is not a party to any of the consulting agreements which the filer entered into for consulting services
2.	3	All income in fees for line items 16-19 on Part 1 are paid through this entity
2.	7.1.1	Subsequent to the submission of this report consulting fees for December 2024 are currently owed to the filer.
2.	7.3.1	Subsequent to the submission of this report consulting fees for December 2024 have become due and owing to the filer
2.	7.5.1	See Part 3, Line item 5
3.	3	As of the date of filing filer was not due any fees for services.
3.	4	As of the date of filing there were no fees due and owing to the filer
4.	6	Director fees for Pacific Specialty Insurance Company; Pacific Specialty Property and Casualty Company, Western Service Contract, McGraw Insurance Inc. are all paid by Pacific Specialty Insurance Company. See Part 1, Line items 16-19
4.	19	This entity is not a party to any consulting agreement or contract.
5.	1	Not a partner, no equity and not capital account

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

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

8. Liabilities

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

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

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$192 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5 U.S.C. §§ 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE) 250 E Street, S.W., Suite 750, Washington, DC 20024-3249.

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