

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

## Filer's Information

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Sullivan, John J

Ambassador to Russia, Department of State

Report Year: 2020

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Other Federal Government Positions Held During the Preceding 12 Months:

U.S. Deputy Secretary of State (5/2017 - 12/2019)

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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/ Sullivan, John J [electronically signed on 04/29/2020 by Sullivan, John J in Integrity.gov] - Filer received a 45 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/ Schnitker, John P, Certifying Official [electronically signed on 07/20/2020 by Schnitker, John P 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 08/06/2020 by Granahan, Megan in Integrity.gov]

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Data Revised 08/06/2020

Data Revised 07/20/2020

Data Revised 07/17/2020

Data Revised 07/15/2020

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

None

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

None

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## 3. Filer's Employment Agreements and Arrangements

None

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	King & Spalding LLP	N/A		Partnership profits distributions.	
2	King & Spalding LLP (401K)	No			
2.1	Schwab Moderate Strategic Portfolio	Yes	Over \$1,000,000		None (or less than \$201)

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#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.2	Third Avenue Focused Credit Instl	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	Galliard Retirement Income Fund 35	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	King & Spalding LLP (capital account)	N/A	\$250,001 - \$500,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Morgan Stanley BANK DEPOSIT PROGRAM (cash account)	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
2	SPDR S&P 500 ETF TRUST (SPY)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
3	VANGUARD GROWTH ETF (VUG)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
4	VANGUARD VALUE ETF INDEX (VTV)	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
5	VANGUARD SM CAP GROWTH ETF (VBK)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
6	VANGUARD SM CAP VALUE ETF (VBR)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
7	VANGUARD FTSE DEVELOPED MKTS E (VEA)	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
8	LORD ABBETT SHT DURATION INC (LDLFX)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
9	BLACKROCK TOTAL RET I (MAHQX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10	PIMCO INCOME P (PONPX)	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
11	DREYFUS GLOBAL REAL RETURN I (DRRIX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
12	JOHN HANCOCK SEAPORT I (JSFDX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
13	HSBC CD Linked to the EURO Stoxx 50 Index	N/A	\$100,001 - \$250,000		None (or less than \$201)
14	Capital One - (cash account)	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
15	M&T Bank Market Advantage Account (cash account)	N/A	\$100,001 - \$250,000		None (or less than \$201)
16	PNC Bank Premium Money Market Account (cash account)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
17	PNC Bank (cash account)	N/A	\$1,001 - \$15,000		None (or less than \$201)
18	PNC Bank Premium Money Market (cash account)	N/A	\$1,001 - \$15,000		None (or less than \$201)
19	PNC Bank (cash account)	N/A	None (or less than \$1,001)		None (or less than \$201)
20	SunTrust Bank Money Market Account (cash account)	N/A	\$250,001 - \$500,000		None (or less than \$201)
21	Wells Fargo Bank (cash account)	N/A	\$100,001 - \$250,000		None (or less than \$201)
22	Oppenheimer & Co. Inc. (cash account)	N/A	\$500,001 - \$1,000,000	Interest	\$1,001 - \$2,500
23	AMG MANAGERS MONTAG & CALDWELL GROWTH FD (MCGIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
24	AMG SOUTHERNSUN SMALL CAP-INV FD (SSSIX)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
25	ANNE ARUNDEL CNTY MD (bonds) 03588E5F6	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
26	ANNE ARUNDEL CNTY MD (bonds) 03588HJR8	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
27	AUSTIN TEX TX (bonds) 052396A73	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
28	BARON PARTNERS FD (BPTIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
29	CAUSEWAY INTERNATIONAL VALUE FUND (CIVIX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
30	CHARLES CNTY MD (bonds) 159808CE2	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
31	COLUMBUS OHIO (bonds) 199492GA1	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
32	CULLEN HIGH DIVIDEND EQUITY FD (CHDVX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
33	FRISCO TX (bonds) 358776HA3	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
34	HARDING LOEVNER INTL EQUITY FD INVESTOR HLMIX	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
35	HOWARD CNTY MD (bonds)	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
36	KING CNTY WASH SCH DIST NO 405 (bonds) 495098YR0	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
37	LOOMIS SAYLES BD FD INSTITUTIONAL (LSDBX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
38	NORTH DAKOTA PUB FIN AUTH (bonds) 65887PJH9	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
39	OHIO ST WTR DEV AUTH (bonds) 67766WGX4	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
40	POPLAR FOREST PARTNERS FUND INSTL (IPFPX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
41	PRINCE GEORGES CNTY MD (bonds) 741701S31	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
42	SAN ANTONIO TEX WTR REV (bonds)	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
43	SEATTLE WASH MUN LT & PWR REV (bonds) 812643MV3	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
44	T ROWE PRICE MID CAP GROWTH FUND INC ADVISOR CL (PAMCX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
45	TEXAS A & M UNIV PERM UNIV FD (bonds)	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
46	TEXAS A & M UNIV REVS (bonds)	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
47	UNIVERSITY MD SYS AUXILIARY FA (bonds) 9144023X8	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
48	UTAH ST UNIV REV (bonds) 917563FU7	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
49	ADVANTAGE ADVISOR XANTHUS FUND LLC	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
50	CHARLES CNTY MD CNTY COMMRS-CONS (bonds) 159807W77	N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
51	MARYLAND ST (bonds) 574193MZ8	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
52	MARYLAND ST (bonds) 574192S50	N/A	None (or less than \$1,001)	Interest	\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
53	MARYLAND ST DEPT TRANS (bonds) 574203MA0	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
54	MONTGOMERY CNTY MD (bonds) 6133406F0	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
55	MONTGOMERY CNTY MD (bonds) 613340Q68	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
56	PRINCE GEORGES CNTY MD (bonds) 7417012G0	N/A	\$50,001 - \$100,000	Capital Gains	\$2,501 - \$5,000
57	WASHINGTON CNTY MD (bonds) 937751P41	N/A	None (or less than \$1,001)	Interest	\$201 - \$1,000
58	INVESCO HIGH YIELD MUNICIPAL FUND A (ACTHX)	Yes	\$1,000,001 - \$5,000,000		\$15,001 - \$50,000
59	INVESCO GLOBAL SMALL & MID CAP GROWTH FUND CL A (AGAAX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
60	INVESCO INTERNATIONAL GROWTH FUND CL A (AIIEX)	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
61	BLACKROCK HI YLD BD PORTFOLIO (BHYIX)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
62	AMERICAN CAPITAL WORLD GROWTH AND INCOME FD A (CWGIX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
63	HOTCHKIS AND WILEY LARGE CAP VALUE FUND A (HWLAX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
64	BANK OF AMERICA, NA (RASP) (money market) (cash account)	N/A	\$15,001 - \$50,000		None (or less than \$201)
65	INVESCO DIVERSIFIED DIVIDEND FUND CL A (LCEAX)	Yes	\$1,000,001 - \$5,000,000		\$50,001 - \$100,000
66	BLACKROCK EQUITY DIVIDEND FD A (MDDVX)	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
67	BLACKROCK CAPITAL APPRECIATION FD, INC.(MAFGX)	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
68	BLACKROCK GLOBAL ALLOCATION FD INC A (MDLOX/MALOX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
69	Merrill Lynch BANK DEPOSIT PROGRAM (cash account)	N/A	\$250,001 - \$500,000	Interest	\$2,501 - \$5,000
70	Maine (NextGen) 529 Plan (BLKRK Diversified Portfolio - 75% EQUITY )	Yes	\$100,001 - \$250,000		None (or less than \$201)
71	COLUMBIA LARGE CAP GROWTH FUND III CLASS A (NFEAX)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
72	NUVEEN MARYLAND QUALITY MUNICIPAL INCOME FUND (NMY)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
73	INVESCO EQUALLY WEIGHTED S&P FUND CL A (VADAX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
74	INVESCO MID CAP GROWTH FUND A (VGRAX)	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
75	LINCOLN MONEYGUARD II (Universal Life)	N/A	\$50,001 - \$100,000		None (or less than \$201)
76	EATON VANCE HIGH YIELD MUNICIPAL INCOME FUND CLASS I (EIHXY)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
77	VANGUARD FTSE EMERGING MARKETS (VWO)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
78	WELLS FARGO MUNI BOND INST (WMBIX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
79	Frederick County MD (bonds) 35569PBW2	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
80	Edgewood Growth Fund (EGFIX)	Yes	\$100,001 - \$250,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
81	Invesco Oppenheimer Short Term Muni (ORSYX)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
82	PGIM Short Duration Multi-Sector Bond (SDMZX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
83	Western Asset Core Plus Bond (WACPX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
84	iShares Core MSCI Emerging (IEMG)	Yes	\$50,001 - \$100,000		None (or less than \$201)
85	Anne Arundel County MD Bond - 03588HLH7	N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
86	Howard County MD Bond - 4425PDW0	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
87	Maryland State GO Bond - 574193PL6	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
88	Maryland State GO Bond - 574193PR3	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
89	Maryland State GO St Local - 574193QD3	N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
90	Maryland State Dept of Trans - 574204M59	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
91	Montgomery County MD GO Bond - 6133402W7	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
92	Prince Georges County MD Bond - 7417012S4	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
93	Invesco Core Plus Bond (ACPSX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
94	Guggenheim Total Return Bond - GIBIX	Yes	None (or less than \$1,001)		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
95	Bank of America Capped Leveraged Index Return Note (CLIRN) linked to the EURO Stoxx 50 Index - MLVCR	N/A	\$100,001 - \$250,000		None (or less than \$201)
96	Bank of America CLIRN Linked to the EURO Stoxx 50 Index - MLVDM	N/A	\$100,001 - \$250,000		None (or less than \$201)
97	HSBC CLIRN Linked to the Russell 2000 Index - MLVDO	N/A	\$100,001 - \$250,000		None (or less than \$201)
98	HSBC CLIRN Linked to the S&P 500 Index - MLVEI	N/A	\$100,001 - \$250,000		None (or less than \$201)
99	RBC CLIRN Linked to the Russell 2000 Index - MLVHW	N/A	\$100,001 - \$250,000		None (or less than \$201)
100	Bank of America Accelerated Return Note (ARN) Linked to the S&P 500 Index - MLVKI	N/A	\$100,001 - \$250,000		None (or less than \$201)
101	Credit Suisse ARN Linked to the EURO Stoxx 50 Index - MLVKJ	N/A	\$100,001 - \$250,000		None (or less than \$201)
102	Bank of Nova Scotia ARN Linked to the Russell 2000 Index - MLVKK	N/A	\$100,001 - \$250,000		
103	Bank of Nova Scotia CLIRN Linked to MSCI Emerging Markets Index - MLVKT	N/A	\$100,001 - \$250,000		None (or less than \$201)
104	JPMorgan Small Cap Growth (OGGFX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
105	First Trust Unit Investment Trust 7122 Sabrient Bakers Dozen Jan 18 - SBDZ18A	Yes	None (or less than \$1,001)		\$201 - \$1,000
106	Angel Oak Multi Strat Inc (ANGIX)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
107	SPDR Gold Trust (GLD)	Yes	\$100,001 - \$250,000		None (or less than \$201)
108	Invesco Ultra Short Duration (GSY)	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
109	Lord Abbett Floating Rate (LFRFX)		Yes	None (or less than \$1,001)		\$201 - \$1,000
110	Federated US Treasury Cash Reserves (UTIXX)		Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
111	First Trust Unit Investment Trust 7152 Sabrient Bakers Dozen Feb 18 - SBDZ18B		Yes	None (or less than \$1,001)		\$201 - \$1,000
112	Maryland State GO Bonds - 574193KK3		N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
113	Maryland State St. and Local FACS Bonds - 574193ND6		N/A	None (or less than \$1,001)	Interest	\$1,001 - \$2,500
114	Univ MD Sys Aux FAC Tuition Bonds - 9144027D8		N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
115	Univ MD Sys Aux FAC Tuition Bonds - 9144027E6		N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
116	First Trust Uit Investment Trust DW Relative Strength DWRS33	See Endnote	Yes	\$100,001 - \$250,000		\$201 - \$1,000
117	MFS International Diversification Fund - MDIJX		Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
118	International Basket LIRN HSBC - MLVNU	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)
119	International Basket CLIRN CIBC - MLVQM	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)
120	First Trust Unit Investment Trust Sabrient Bakers Dozen Feb 19 - SBDZ19B		Yes	\$50,001 - \$100,000		\$201 - \$1,000
121	First Trust Unit Investment Trust Sabrient Bakers Dozen March 19 - SBDZ19C		Yes	\$100,001 - \$250,000		\$201 - \$1,000
122	AAM/HIMCO Short Duration - ASDIX		Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
123	Calamos Market Neutral Income - CMNIX	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
124	Nuveen Strategic Muni Opp - NSIOX	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
125	Thompson Bond Fund - THOPX	Yes	\$15,001 - \$50,000		\$201 - \$1,000
126	BNY Mellon Equity Income Fund - DQIRX	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
127	Vanguard Total Intl Stock (VXUS)	Yes	None (or less than \$1,001)		\$201 - \$1,000
128	Fidelity Advisor Growth Opps (FAGCX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
129	Invesco S&P SmallCap Low Volatility (XSLV)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
130	Maryland State GO Bonds - 574193KK3	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
131	Maryland State State and Local - 574193ND6	N/A	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
132	PGIM High Yield (PHYZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
133	PGIM Total Return (PDBZX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	First Trust Sabrient Bakers Dozen March 2019 Series	Purchase	03/22/2019	\$100,001 - \$250,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
2	Maryland State GO Bond - CUSIP 574193KK3		Purchase	02/14/2019	\$50,001 - \$100,000
3	Maryland State GO Bond - CUSIP 574193ND6		Purchase	02/14/2019	\$50,001 - \$100,000
4	First Trust Dorsey Wright Top 50 UIT	See Endnote	Purchase	02/14/2019	\$100,001 - \$250,000
5	University of Maryland Bond - CUSIP 9144027D8		Purchase	02/14/2019	\$100,001 - \$250,000
6	First Trust Sabrient Bakers Dozen Feb 2019		Purchase	02/21/2019	\$50,001 - \$100,000
7	Western Asset Core Plus Bond I - WACPX		Purchase	02/14/2019	\$1,001 - \$15,000
8	MFS International Diversification I - MDIJX		Purchase	02/14/2019	\$50,001 - \$100,000
9	Dreyfus Equity Income I - DQIRX		Purchase	02/14/2019	\$50,001 - \$100,000
10	MFS International Diversification I - MDIJX		Purchase	02/14/2019	\$15,001 - \$50,000
11	Dreyfus Equity Income I - DQIRX		Purchase	02/14/2019	\$15,001 - \$50,000
12	Guggenheim Total Return Bond I - GIBIX		Purchase	02/14/2019	\$1,001 - \$15,000
13	University of Maryland Bond - CUSIP 9144027E6		Purchase	02/14/2019	\$100,001 - \$250,000
14	International Basket LIRN - HSBC - CUSIP 40436A495		Purchase	02/21/2019	\$50,001 - \$100,000
15	CLIRN Linked to International Basket issued CIBC - MLVQM		Purchase	05/30/2019	\$100,001 - \$250,000
16	Invesco High Yield Muni A (ACTHX)		Purchase	12/17/2019	\$15,001 - \$50,000
17	Edgewood Growth Fund I (EGFIX)		Purchase	12/17/2019	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
18	Fidelity Advisor Growth Opportunities I (FAGCX)		Purchase	12/17/2019	\$50,001 - \$100,000
19	Invesco Mid Cap Gr A (VGRAX)		Purchase	12/17/2019	\$15,001 - \$50,000
20	Invesco S&P Small Cap Low Vol (XSLV)		Purchase	12/17/2019	\$100,001 - \$250,000
21	Invesco Core Plus Bond A (ACPSX)		Purchase	12/17/2019	\$15,001 - \$50,000
22	PGIM Total Return Bond Z (PDBZX)		Purchase	12/17/2019	\$15,001 - \$50,000
23	Invesco Diversified Dividend A (LCEAX)		Purchase	12/17/2019	\$50,001 - \$100,000
24	PGIM High Yield Fund (PHYZX)		Purchase	12/17/2019	\$15,001 - \$50,000
25	Blackstone Alt Mult Strat Inst (BXMIX)	See Endnote	Sale	06/03/2019	\$100,001 - \$250,000
26	Vanguard Total Intl Stock (VXUS)		Sale	05/20/2019	\$250,001 - \$500,000
27	Diamond Hill Large Cap (DHLRX)	See Endnote	Sale	02/15/2019	\$50,001 - \$100,000
28	MFS International Diversification (MDIJX)		Purchase	02/14/2019	\$50,001 - \$100,000
29	AAM/HIMCO Short Duration (ASDIX)		Purchase	05/20/2019	\$1,001 - \$15,000
30	Calamos Market Neutral (CMNIX)		Purchase	05/20/2019	\$100,001 - \$250,000
31	Nuveen Strategic Muni Opps (NSOIX)		Purchase	05/20/2019	\$100,001 - \$250,000
32	Thompson Bond Fund (THOPX)		Purchase	05/20/2019	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
33	Guggenheim Total Return Bond (GIBIX)	Sale	12/17/2019	\$15,001 - \$50,000
34	Nuveen Strategic Mortgage Opportunity (NSIOX)	Purchase	05/20/2019	\$100,001 - \$250,000

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

None

## Endnotes

PART	#	ENDNOTE
6.	116	This purchase was reported in the 278T filed on 3/31/2019 under the name "First Trust Dorsey Wright Top 50 UIT."
6.	118	Basket comprised of the EURO STOXX 50 Index, the FTSE 100 Index, the Nikkei Stock Average Index, the Swiss Market Index, the S&P/ASX 200 Index and the Hang Seng Index
6.	119	Basket comprised of the EURO STOXX 50® Index, the FTSE® 100 Index, the Nikkei Stock Average Index, the Swiss Market Index, the S&P/ASX 200 Index and the Hang Seng® Index
7.	4	This purchase (listed at # 116 in Section 6) was reported in a 3/31/2019 278T under the prior name, First Trust UIT Investment Trust DW Relative Strength DWRS33.
7.	25	Earning for 2019 were less than \$200.
7.	27	Earnings for 2019 were less than \$200.

# 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).

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