

Public Financial Disclosure Checklist

The following is a *non-exhaustive* list of items you should include in the public financial disclosure report that you file as a nominee:

Part 1 (Filer's Positions Held Outside the United States Government)

Report all positions as an officer, director, trustee, general partner, proprietor, representative, employee, or consultant. Be sure to include both paid and unpaid positions. Do not include political, religious, or honorary positions.

Part 2 (Filer's Employment Assets & Income and Retirement Accounts)

Report all assets and income related to your current or former employment (excluding U.S. government employment). Also, list any retirement plans or individual retirement accounts (excluding federal government retirement accounts). Examples include:

- Salary, bonuses, partnership or LLC distributions, other business income, client fees, receivables, director fees, consulting fees, deferred compensation, severance payments, etc.
- Equity in an employer and similar interests (e.g., stock, stock options, restricted stock, restricted stock units, stock appreciation rights, capital account, etc.)
- Carried interest or profits interest
- Retirement plans with a current or former employer, including: defined contribution plans, defined benefit pension plans, and any other type (excluding federal employee retirement)
- Individual retirement accounts (IRAs and Roth IRAs)
- Trustee fees or executor fees
- Honoraria
- Patents, copyrights, and other intellectual property

Part 3 (Filer's Employment Agreements and Arrangements)

Report all arrangements with your current and former employers. Examples include:

- Ongoing participation in a retirement or deferred compensation plan
- An ongoing leave of absence
- Anticipated payments from your employer (e.g., bonus, severance, return of capital account, partnership or LLC distribution, buyout, carried or profits interest, etc.)
- Employee benefits that will continue (e.g., health insurance, life insurance, use of car or office, housing benefits, etc.)
- Retention or disposition of any vested or unvested stock options, restricted stock, or other equity-related interests (e.g., forfeit upon resignation, accelerated vesting, exercise, etc.)

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

Report all sources of compensation (even if paid to your employer) exceeding \$5,000 in any one calendar year during the reporting period.

- Remember to list your employer and clients, if applicable
- Do *not* include payments from the United States government

Part 5 (Spouse's Employment Assets & Income and Retirement Accounts)

Report all assets and income related to your spouse's current or former employment. Also list any retirement plans or individual retirement accounts.

- See the discussion in Part 2 above for examples
- Do not include payments from the United States government

Part 6 (Other Assets and Income)

Report all other assets and investment income for you, your spouse, and your dependent child. Examples include:

- Stocks, bonds, notes, options, futures, mutual funds, exchange-traded funds, private equity funds, and hedge funds
- Life insurance, excluding term life insurance
- Cash accounts
- Annuities
- Qualified tuition plans (also called 529 plans, college savings plans, or prepaid tuition plans)
- Digital Assets (including virtual currency and non-fungible tokens)
- Real estate that you rent out or hold for investment purposes (including farms or farmland)
- Investment partnerships, LLCs, and S-corporations
- Assets of any trust in which you, your spouse, or your dependent child: (1) is currently entitled to receive income or access the principal; (2) has a vested future interest in principal or income; or (3) pays the income taxes (i.e., a grantor trust)
- Uniform Gifts to Minors Act accounts and Uniform Transfers to Minors Act accounts

Part 7 (Transactions)

Nominees do not complete this Part.

Part 8 (Liabilities)

Report all liabilities that exceeded \$10,000 at any time during the reporting period. Examples include:

- A mortgage on a personal residence
- A mortgage on other real estate
- A student loan
- A credit card balance exceeding \$10,000 at the end of the reporting period
- An equity line of credit (but only if you have exercised the equity line of credit)
- A margin loan
- A capital commitment
- A personal loan

Part 9 (Gifts and Travel Reimbursements)

Additional Checklist for Attorneys

The following is a non-exhaustive list of additional items that nominees who are attorneys (or are married to attorneys) often need to include in their public financial disclosure reports:

If you or your spouse held a position with a law firm, you may find these reminders helpful:

1. Report your position with the law firm in Part 1. (Do not report your spouse's position in Part 1.)
2. Report the law firm as a source of income in Part 4 if you earned more than \$5,000 in a calendar year during the reporting period. Also, report the name of any client who paid more than \$5,000 to the law firm (or to you) for your services in a calendar year during the reporting period. You may describe your services simply as "legal services." (Do not report your spouse's law firm or clients in Part 4.)
3. If you received any of the following kinds of income from the law firm during the reporting period, report the exact amount of income in Part 2. (If your spouse received any of these types of income, report your spouse's receipt of income from the law firm in Part 5, but do not include the amount of income.)
 - Salary and/or bonus
 - Partnership share or LLC distribution
 - Severance payment
 - Other compensation
4. If the law firm owes you any of the following kinds of payments, report the anticipated payments in Part 2, and indicate the anticipated amount by selecting the appropriate category (as opposed to the exact amount) in the "Value" column (as opposed to the "Income" column). Explain your arrangement for the payment in Part 3. (If the law firm owes any of these kinds of payments to your spouse, report the anticipated payments in Part 5, and indicate the anticipated amount by selecting the appropriate category in the "Value" column. Do not report information about your spouse in Part 3.)
 - Anticipated salary or bonus
 - Anticipated partnership share or LLC distribution

- Anticipated severance
 - Any other outstanding compensation
5. Report all items listed below that currently have a value greater than \$1,000 or from which more than \$200 in income was received during the reporting period. If the item is associated with you, report it in Part 2 and describe any arrangement with the law firm (e.g., return of capital account after separation from the firm) in Part 3. (If the item is associated with your spouse, report it in Part 5. Do not report information about your spouse in Part 3.)
- Law firm capital account
 - Law firm stock
 - A financial interest in a contingency fee case (see item 4 in the solo legal practice section for more details on contingency fee cases)
 - A financial interest in an investment fund that the law firm created
 - A financial interest in other firm investments (e.g., real estate partnerships)
 - Retirement plans
6. If your name is used in the name of the law firm, describe what will happen to the firm's name in Part 3 (e.g., "my name will be removed from the name of the firm upon my withdrawal"). Note that the Ethics in Government Act prohibits certain high level government officials from allowing firms to use their names.
7. If your law firm is small enough that it will be dissolved after your separation, describe the arrangements for the firm's dissolution in Part 3. (Do not provide information about your spouse's firm in Part 3.)

If you or your spouse are engaged in a solo legal practice, you may find these reminders helpful:

1. Report your position as a solo practitioner in Part 1. (Do not report your spouse's position in Part 1.)
2. Report the solo practice as a source of income in Part 4 if you earned more than \$5,000 in a calendar year during the reporting period. Also, report the name of any client who paid more than \$5,000 for your services in a calendar year during the reporting period in Part 4. You may describe your services simply as "legal services." (Do not report your spouse's clients in Part 4.)
3. Report the exact amount of your income from your solo legal practice during the reporting period in Part 2. Do not report your clients in Part 2. (Report your spouse's solo legal practice as a source of income in Part 5, but do not disclose the amount of income. Do not disclose your spouse's clients in Part 5.)
4. Report any interest you have in a contingency fee case in Part 2. You may estimate the value of your interest in the "Value" column. (You may use any good faith method of estimating the value. For example, you may describe the value based on the amount sought by your client in damages, with or without reducing the value based on the likelihood of a favorable decision or settlement.) If you cannot ascertain the value, leave the value field blank and write "value not readily ascertainable" in the "Description" field. In Part 3, describe what will happen to your interest in the contingency fee case upon entering government service. (Do not report information about your spouse's individual cases or clients.)
5. Report any anticipated referral fees in Part 2. In Part 3, describe what will happen to your anticipated referral fee upon entering government service. (Do not report information about your spouse's individual cases or clients.)
6. In Part 3, describe what will happen to the practice while you are in government (e.g., "it will be placed in an inactive status during my appointment") and any remaining fees owed to you (e.g., "the amounts of all outstanding client fees will be fixed before I enter government service"). Describe any ongoing arrangement for the payment of referral fees by attorneys to whom you refer your clients. (Do not provide information about your spouse in Part 3.)

Additional Checklist for Corporate Officers, Employees, and Directors

The following is a non-exhaustive list of additional items that nominees who are current or former corporate officers, employees, or directors (or are married to current or former corporate officers or directors) often need to include in their public financial disclosure reports:

1. Report your position with the corporation in Part 1. (Do not report your spouse's position in Part 1.)
2. If you received any of the following kinds of income during the reporting period, report the exact amount of income in Part 2. (If your spouse received any of these types of income, report your spouse's receipt of income in Part 5, but do not include the amount of income.)
 - Salary and/or bonus
 - Director fees
 - Severance payment
 - Other compensation
3. If you are owed any of the following kinds of payments, report the anticipated payments in Part 2, and indicate the anticipated amount by selecting the appropriate category (as opposed to the exact amount) in the "Value" column (as opposed to the "Income" column). Explain your arrangement for the payment in Part 3.
 - Salary and/or bonus
 - Director fees
 - Severance payment
 - Other compensation

4. Report in Part 2 any of the employment-related items listed below that you currently hold or from which more than \$200 in income was received during the reporting period. If you currently hold the item, explain in Part 3 what will happen to it when you enter government service (e.g., divest, forfeit, vest, exercise, etc.). (If the item is associated with your spouse, report it in Part 5. Do not provide information about your spouse in Part 3.)
- Stock options or warrants (incentive, nonqualified, etc.)
 - Restricted stock or restricted stock units
 - Employee stock ownership plan (ESOP) account or employee stock purchase plan (ESPP) account
 - Stock appreciation right
 - Dividend equivalent units
 - Phantom stock
 - Deferred compensation plan
 - Retirement plans
 - Any other asset or right to payment associated with the corporation that you hold as a result of your position with the corporation
5. If you will retain any benefits following your separation from the corporation, report them in Part 3. Examples may include health or life insurance; estate, tax, or financial planning services; health club or country club memberships; use of a company car, car service, or plane; use of a residence or office; use of secretarial or IT support; use of a telephone; discounts on company services and products; travel planning services; housing or a mortgage subsidy; tickets or use of a skybox; the right to attend board meetings, other than as an ordinary shareholder of common stock; etc. (Do not provide information about your spouse in Part 3.)

Additional Checklist for University Professors and Deans

The following is a non-exhaustive list of additional items that nominees who are university professors or deans (or are married to university professors or deans) often need to include in their public financial disclosure reports:

1. Report your position with the university in Part 1. (Do not report your spouse's position in Part 1.)
2. If you received any income from the university during the reporting period, report the exact amount of income in Part 2. (If your spouse received income, report your spouse's receipt of income in Part 5, but do not include the amount of income.)
3. If the university owes you a bonus or severance payment, report the anticipated payment in Part 2, and indicate the anticipated amount by selecting the appropriate category (as opposed to the exact amount) in the "Value" column (as opposed to the "Income" column). Describe your arrangement for the payment in Part 3. (If your spouse is owed a payment, report the anticipated payment in Part 5, and indicate the anticipated amount by selecting the appropriate category in the "Value" column. Do not provide information about your spouse in Part 3.)
4. If you will be taking a leave of absence from your position while you are in government, report the leave of absence in Part 3. Indicate whether the leave of absence will be paid or unpaid and specify its duration. Indicate whether your employer will continue to make contributions to any retirement plan during your leave of absence. (Do not provide information about your spouse in Part 3.)
5. If you will retain any of the benefits listed below during your government service, report the benefits in Part 3. (Do not provide information about your spouse in Part 3.)
 - University housing, a housing allowance, a mortgage subsidy or supplement, a reduced rate mortgage, mortgage loan forgiveness, etc.
 - Reduced tuition rate for a child or other individual
 - Student loan forgiveness

- Subsidized child care]
 - Any other benefit that will be provided during your leave of absence (other than retention of tenure)
6. If you received an honorarium (i.e., fee for speaking, writing an article, or making an appearance) in excess of \$200 during the reporting period, report the honorarium in Part 2. Provide the date your service was provided and indicate the exact amount of the payment in the “Income” column. Be sure to provide an exact amount (e.g., \$7,250) of the payment, instead of merely a category of amount.
 7. If you are owed an honorarium in excess of \$1,000, report the honorarium in Part 2, and indicate the appropriate category in the “Value” column (e.g., \$1,001-\$15,000), as opposed to the exact amount that you are owed.
 8. If your spouse received an honorarium (i.e., fee for speaking, writing an article, or making an appearance) in excess of \$200 during the reporting period, report the honorarium in Part 5 and indicate the exact amount of the payment in the “Income” column. Be sure to provide an exact amount (e.g., \$7,250) of the payment, instead of merely a category of amount. (Note: For most types of earned income, you do not have to provide the amount that your spouse received. However, the law imposes a special requirement for honoraria, which requires you to disclose the exact amount that your spouse received for each honorarium payment in excess of \$200.)
 9. If you have interests in intellectual property (e.g., books, book deals, patents, etc.) that are currently worth more than \$1,000, or from which more than \$200 in income was received during the reporting period, report those interests in Part 2. Also, report any advance on Part 2.
 10. If your spouse has interests in intellectual property (e.g., books, book deals, patents, etc.) that are currently worth more than \$1,000, or from which more than \$200 in income was received during the reporting period, report those interests in Part 5. Also, report any advance on Part 5.

Additional Checklist for Investment Fund Managers

The following is a non-exhaustive list of additional items that nominees, whose work (or whose spouse's work) involves, or previously involved, managing investment funds, often need to include in their public financial disclosure reports:

1. Any paid or unpaid position with the fund manager, the fund, a subaccount, a subsidiary fund, or any other entity or business venture in Part 1. (Do not disclose your spouse's position in Part 1.)
2. If you received any of the following payments during the reporting period, report the exact amount of income in Part 2 in the "Income" column. (If your spouse received a payment, report your spouse's receipt of the payment in Part 5, but do not include the amount of the payment.)
 - Salary and/or bonus
 - Severance
 - Other compensation
3. If you are owed any of the following types of payments, report the anticipated payment in Part 2 and indicate the anticipated amount by selecting the appropriate category (as opposed to the exact amount) in the "Value" column (as opposed to the "Income" column). Describe your arrangement for the payment in Part 3.
 - Outstanding bonus payment
 - Outstanding severance payment
 - Other outstanding compensation

4. Report any of the following items that you currently hold (or are owed) or from which more than \$200 in income was received during the reporting period in Part 2. If you currently hold the item, explain in Part 3 what will happen to the item when you enter government service (e.g., divest, forfeit, vest, etc.). (If the item is associated with your spouse, report it in Part 5. Do not provide information about your spouse in Part 3.)
 - Stock (or other equity) in the fund
 - Equity share in a partnership or limited liability company
 - Carried interest
 - Co-investment interest
 - Profit interest
 - Warrants, options, or other equity interest
 - Any other financial interest, investment, or right
5. In Part 8, report any capital commitments by you, your spouse, or your dependent child. Also, describe (either in Part 8 or in an endnote) any arrangement with the fund manager (or with any other individual or entity) to assist you in satisfying this capital commitment (e.g., a leveraging agreement, a subsidy, a supplemental payment, a credit, etc.).
6. In Part 3, describe any arrangement related to your work. For example, describe any continuing right, share, interest, payment, etc., associated with the fund manager, the investment fund, or any other entity. (Do not provide information about your spouse in Part 3.)

Additional Checklist for Trust Interests

The following is a non-exhaustive list of additional items that nominees who have an interest in a trust (or whose spouses or dependent children have an interest in a trust) often need to include in their public financial disclosure reports:

1. Report your position as trustee of a trust in Part 1, including positions with revocable trusts. (Do not report your spouse's position in Part 1.)
2. If you, your spouse, or your dependent child have a revocable trust, report the assets held by the trust in Part 6. You do not need to report the assets from a revocable trust established for you, spouse, or dependent child by someone else.
3. If you, your spouse, or your dependent child received a mandatory distribution from a revocable trust, report the trust and distribution in Part 6.
4. If you, your spouse, or your dependent child have a vested beneficial interest in income or principal, either current or remainder, in an irrevocable trust, report the trust and the assets held by the trust in Part 6. Your remainder interest must be considered vested by the state law that governs the trust.
5. If you, your spouse, or your dependent child have an interest in a discretionary trust, report the discretionary trust on Part 6 and any distribution that you received from the trust.
6. If you, your spouse, or your dependent child pays the taxes on an irrevocable trust, report the trust and the assets held by the trust in Part 6.