

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Benczkowski, Brian Allen

Assistant Attorney General (Criminal Division), Department of Justice

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- **Committee on the Judiciary**
-

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/ Benczkowski, Brian Allen [electronically signed on 05/11/2017 by Benczkowski, Brian Allen 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/ Allen, Michael H, Certifying Official [electronically signed on 06/09/2017 by Allen, Michael H in Integrity.gov]

Other review conducted by

/s/ Shaw, Cynthia K, Ethics Official [electronically signed on 06/09/2017 by Shaw, Cynthia K in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 06/09/2017 by Apol, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Kirkland & Ellis LLP	Washington, District of Columbia	Law Firm	Partner	9/2010	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Kirkland & Ellis LLP Defined Contribution 401k Savings Plan	No			
1.1	Vanguard Target Retirement 2030 Trust II	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
1.2	Vanguard Short Term investment Grade Fund Institutional Shares (VFSIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.3	Vanguard Total International Stock Index Fund Institutional Shares (VTSNX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
1.4	Vanguard Total Stock Market Index Fund Institutional Shares (VITSX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
2	Kirkland & Ellis LLP	N/A		Salary and bonus	\$847,500
3	Health Savings Account (cash)	No	\$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	KIRKLAND & ELLIS LLP DEFINED CONTRIBUTION 401K SAVINGS PLAN	Washington, District of Columbia	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	1/2013

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Kirkland & Ellis LLP	Washington, District of Columbia	Partner
2	AbbVie	Chicago, Illinois	Legal services
3	Blue Cross Blue Shield Association	Washington, District of Columbia	Legal services
4	Blue Cross Blue Shield of Alabama	Birmingham, Alabama	Legal services
5	BP America	Houston, Texas	Legal services
6	Charter Communications, Inc.	Stamford, Connecticut	Legal services
7	Citibank, N.A.	New York, New York	Legal services
8	Commonwealth of Puerto Rico	San Juan, Puerto Rico	Legal services
9	Fortinet	Sunnyvale, California	Legal services
10	Greenbriar Equity Group	Rye, New York	Legal services
11	HSBC Holdings PLC	New York, New York	Legal services
12	Valeant Pharmaceuticals and Valeant Independent Directors	Bridgewater, New Jersey	Legal services
13	Viking Global Investors	Greenwich, Connecticut	Legal services

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
14	Volkswagen Group of America		Herndon, Virginia	Legal services
15	Covanta Holding Corporation		Morristown, New Jersey	Legal services
16	Elect Blake Farenthold Committee		Washington, District of Columbia	Legal services
17	Legacy Cabinets, Inc.		Eastaboga, Alabama	Legal services
18	Two confidential clients	See Endnote	n/a	Legal services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	West Front Strategies LLC (a lobbying firm)	N/A	\$500,001 - \$1,000,000	Spousal salary and interest in LLC	
2	West Front Strategies SEP	No			
2.1	BlackRock Global Allocation Fund (MALOX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.2	IVA Worldwide Fund Class I (IWWIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	FPA Crescent Fund (FPACX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.4	Vanguard Total International Stock Index Fund Admiral Shares (VTIAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	Vanguard Short-Term Bond Index Fund Admiral Shares (VBIRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	Vanguard Total Stock Market Index (VTSAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	Blank Rome LLP 401k	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1	Thornburg International Value Fund Class R6 (TGIRX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.2	Vanguard Small Cap Index Adm (VSMAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.3	Fidelity Contrafund Fund Class K (FCNKX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
3.4	JPMorgan Equity Income R6 (OIEJX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.5	Fidelity Managed Income Portfolio Class 1	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.6	Fidelity Freedom K 2030 (FFKEX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US bank 1 Money Market Account (cash)	No	\$250,001 - \$500,000	Interest	\$201 - \$1,000
2	VA CollegeAmerica 529 Plan (DC)	No			
2.1	American Funds Global Balanced Fund Class (CBFCX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.2	American Funds The Growth Fund of America (CGFCX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
2.3	American Funds EuroPacific Growth Fund (CEUCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	American Funds Washington Mutual Investors Fund (CWMCX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
2.5	American Funds The Bond Fund of America (CFACX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Cambiar Opportunity Fund Class Institutional (CAMWX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
4	Calamos Growth Fund Institutional Class (CGRIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	Royce Premier Fund Class W (RPRWX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Thornburg International Value Fund Class I (TGVIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7	Vanguard Extended Market Index Fund Admiral Shares (VEXAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
8	Vanguard Total International Stock Index Fund Admiral Shares (VTIAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
9	Vanguard Total Stock Market Index Fund Admiral Shares (VTSAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
10	American Funds Global Balanced Fund Class A (GBLAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
11	BlackRock Global Allocation Fund, Inc. Institutional Shares (MALOX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
12	BlackRock Global Allocation Fund, Inc. Investor C Shares (MCLOX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
13	FPA Crescent Fund (FPACX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
14	IVA Worldwide Fund Class I (IWWIX)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
15	US Bank1 Checking Account (cash)	No	\$1,001 - \$15,000	Interest	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	Citibank N.A.	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2012	4.125	360 months

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
4.	18	Two confidential organizational clients are not disclosed. One is subject of a non-public investigation and the other has a written confidentiality agreement expressly prohibiting disclosure, entered into at the time services were retained.

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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 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 three 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.

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