

## CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

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| 1.<br>Appointee's<br>Information | a. Appointee's Name:   | to be completed by OGE<br><b>David J. Glawe</b>   |
|                                  | b. Position Title:   | to be completed by OGE<br><b>Under Secretary for Intelligence and Analysis</b>  |
|                                  | c. Agency:   | to be completed by OGE<br><b>U.S. Department of Homeland Security</b>   |
|                                  | d. Date Ethics Agreement Signed:   | to be completed by OGE<br><b>April 4, 2017</b>  |
|                                  | e. Date Confirmed:   | to be completed by OGE<br><b>August 3, 2017</b>   |
|                                  | f. Due Date for Certification of Ethics Agreement Compliance:  | to be completed by OGE<br><b>November 8, 2017</b>   |
| 2.<br>Resignations               | I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.  | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A   |
| 3.<br>Divestitures               | a. I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.   | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A   |
|                                  | b. I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.   | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A<br><br>Filing Date(s) of OGE Form 278-T Report(s):<br><b>Nov. 7, 2017</b> |
| 4.<br>Managed<br>Accounts        | If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases. | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A   |
| 5.<br>Interim<br>Recusals        | I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.   | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A   |

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David J. Glawe


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| <p>6.</p> <p><b>Recusals</b></p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p> | <p>a. I am recusing from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.</p> | <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>                           |
|  | <p>b. I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</p>  | <p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p> |
|  | <p>c. I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.</p>                   | <p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p> |
| <p>7.</p> <p><b>Waivers and Authorizations</b></p>   | <p>a. I received a waiver pursuant to 18 U.S.C. § 208.</p>  | <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>                           |
|  | <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>   | <p>Date:<br/>Financial interest:</p>   |
|  | <p>b. I received a waiver pursuant to Executive Order 13770.</p>  | <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>                           |
|  | <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>   | <p>Date:<br/>Subject:</p>  |
|  | <p>c. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</p>   | <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>                           |
|  | <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>  | <p>Date:<br/>Covered person(s):</p>  |
|  | <p>d. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</p>   | <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>                           |
|  | <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>   | <p>Date:<br/>Former employer or payer:</p>   |

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| <p>8.</p> <p>Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>  | <p>Mark this box if not applicable:</p> <p><input checked="" type="checkbox"/></p>  | <p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>   | <p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I forfeited it.</p> |
| <p>9.</p> <p>Requirements for Regular Appointees</p>   | <p><i>I have completed my initial ethics briefing pursuant to 5 C.F.R. § 2638.305.</i></p> <p>If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.</p> <p><i>I have signed the ethics pledge pursuant to Executive Order 13770.</i></p> <p>If you are a SGE or career FSO or previously signed the pledge, select N/A.</p> | <p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p> <p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>                       |   |
| <p>10.</p> <p>Additional Ethics Agreement Requirements</p>   | <p>to be completed by OGE</p>   | <p>to be completed by appointee</p> <p><i>I am complying with these requirements as described in the adjacent box.</i></p> <p><input type="radio"/> Yes    <input type="radio"/> No    <input checked="" type="radio"/> N/A</p> |   |
| <p>11.</p> <p>Comments of Appointee</p>  |   |   |   |
| <p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p> |   |   |   |
| <p><i>I certify that the information I have provided is complete and accurate.</i></p>   | <p>Appointee's Signature:</p> <p></p>  |   | <p>Date:</p> <p>2/2/2018</p>  |