

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

Filer's Information

Bannon, Steve

Assistant to the President and Chief Strategist, White House

Date of Appointment: 11/13/2016

Other Federal Government Positions Held During the Preceding 12 Months:

None

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/ Bannon, Stephen N [electronically signed on 03/30/2017 by Bannon, Stephen N in Integrity.gov] - Filer received a 5 day filing extension.

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/ Passantino, Stefan, Certifying Official [electronically signed on 03/31/2017 by Passantino, Stefan in Integrity.gov]

Other review conducted by

/s/ Schultz, James D, Ethics Official [electronically signed on 03/31/2017 by Schultz, James D in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 03/31/2017

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	TALLAHASSEE, Florida	Non-Profit	CHAIRMAN	3/2012	8/2016
2	BANNON STRATEGIC ADVISORS, INC.	LOS ANGELES, California	Corporation	PRESIDENT	6/2005	Present
3	BANNON FILM INDUSTRIES, INC.	LOS ANGELES, California	Corporation	PRESIDENT	11/1990	Present
4	BREITBART NEWS NETWORK, LLC	LOS ANGELES, California	LLC	EXECUTIVE CHAIRMAN	1/2012	8/2016
5	CAMBRIDGE ANALYTICA, LLC	WASHINGTON, District of Columbia	LLC	VICE-PRESIDENT AND SECRETARY	6/2014	8/2016
6	GLITTERING STEEL, LLC	ARLINGTON, Virginia	LLC	CHAIRMAN	6/2015	8/2016
7	RECLAIM NEW YORK, INC.	NEW YORK, New York	Non-Profit	VICE-CHAIRMAN	11/2013	8/2016
8	VICTORY FILM GROUP, LLC	LOS ANGELES, California	LLC	MANAGER	2/2012	Present
9	VICTORY FILM PROJECT, LLC	TALLAHASSEE, Florida	LLC	MANAGER	12/2010	Present
10	VFP II, LLC	TALLAHASSEE, Florida	LLC	MANAGER	12/2010	Present
11	VFP III, LLC	TALLAHASSEE, Florida	LLC	MANAGER	2/2011	Present
12	VFG V, LLC	LOS ANGELES, California	LLC	MANAGER	3/2012	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	N/A	None (or less than \$1,001)	Salary	\$61,539
2	BANNON FILM INDUSTRIES, INC. (ENTERTAINMENT AND MEDIA SERVICES COMPANY)	N/A	\$1,000,001 - \$5,000,000	FLOW-THRU ORDINARY INCOME FROM PRIVATELY HELD CORPORATION	
2.1	CITIZENS UNITED PRODUCTION IV, LLC	No	None (or less than \$1,001)	DIRECTOR FEES PAID TO BANNON FILM INDUSTRIES, INC.	\$100,000
2.2	SPECIAL PROJECTS DIV	No	None (or less than \$1,001)	DIRECTOR FEES PAID INTO BANNON FILM INDUSTRIES, INC.	\$19,500
2.3	SOCIETE GENERALE	No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
3	BANNON STRATEGIC ADVISORS, INC. (CONSULTANCY CORPORATION)	N/A	\$5,000,001 - \$25,000,000	FLOW-THRU INCOME FROM PRIVATELY HELD CORPORATION	\$493,836
3.1	BREITBART NEWS NETWORK, LLC	No	None (or less than \$1,001)	CONSULTING FEES RECEIVED INTO MR. BANNON'S CONSULTANCY CORPORATION	\$191,000
3.2	CAMBRIDGE ANALYTICA, LLC	No	None (or less than \$1,001)	CONSULTING FEES RECEIVED BY MR. BANNON'S CONSULTANCY CORPORATION.	\$125,333

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	GLITTERING STEEL, LLC	No	None (or less than \$1,001)	CONSULTING AND DIRECTOR FEES PAID INTO MR. BANNON'S RESPECTIVE CORPORATIONS	\$167,500
4	CAMBRIDGE ANALYTICA, LLC, MEMBERSHIP UNITS See Endnote	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
5	GLITTERING STEEL, LLC, MEMBERSHIP UNITS See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	AFFINITY MEDIA HOLDINGS, LLC	No	\$100,001 - \$250,000	Capital Gains	\$100,001 - \$1,000,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	GLITTERING STEEL, LLC	ARLINGTON, Virginia	CHAIRMAN. RECEIVED A MONTHLY CONSULTING FEE INTO BANNON STRATEGIC ADVISORS, INC. UNTIL RESIGNATION ON AUGUST 16, 2016.	6/2014
2	CAMBRIDGE ANALYTICA, LLC	WASHINGTON, District of Columbia	VICE-PRESIDENT AND SECRETARY. RECEIVED A MONTHLY CONSULTING FEE INTO BANNON STRATEGIC ADVISORS, INC. UNTIL RESIGNATION ON AUGUST 16, 2016.	6/2015
3	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	TALLAHASSEE, Florida	EMPLOYED AS CHAIRMAN OF THE 501(C)(3) UNTIL AUGUST 16, 2016 WHEN A LEAVE OF ABSENCE BEGAN UPON APPOINTMENT AS THE CAMPAIGN CHIEF FOR PRESIDENT ELECT DONALD J. TRUMP.	3/2012
4	BREITBART NEWS NETWORK, LLC	LOS ANGELES, California	EXECUTIVE CHAIRMAN. RECEIVED A MONTHLY CONSULTING FEE INTO BANNON STRATEGIC ADVISORS, INC. UNTIL RESIGNATION ON AUGUST 16, 2016.	1/2012
5	BANNON STRATEGIC ADVISORS, INC. See Endnote	LOS ANGELES, California	EMPLOYED AS PRESIDENT OF SOLELY OWNED CORPORATION TO PROVIDE CONSULTING AND ADVISORY SERVICES TO A VARIETY OF COMPANIES.	6/2005

#	EMPLOYER OR PARTY		CITY, STATE	STATUS AND TERMS	DATE
6	BANNON FILM INDUSTRIES, INC.	See Endnote	LOS ANGELES, California	EMPLOYED AS PRESIDENT OF SOLELY OWNED CORPORATION TO ENTERTAINMENT AND MEDIA RELATED SERVICES TO A VARIETY OF COMPANIES.	11/1990

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

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.		TALLAHASSEE, Florida	CHAIRMAN
2	BANNON FILM INDUSTRIES, INC.		LOS ANGELES, California	PRESIDENT
3	BANNON STRATEGIC ADVISORS, INC.		LOS ANGELES, California	PRESIDENT
4	BREITBART NEWS NETWORK, LLC		LOS ANGELES, California	CONSULTING AND ADVISORY SERVICES VIA BANNON STRATEGIC ADVISORS, INC.
5	CAMBRIDGE ANALYTICA, LLC		WASHINGTON, District of Columbia	CONSULTING AND ADVISORY SERVICES VIA BANNON STRATEGIC ADVISORS, INC.
6	GLITTERING STEEL, LLC		ARLINGTON, Virginia	CONSULTING AND ADVISORY SERVICES VIA BANNON STRATEGIC ADVISORS, INC.

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

None

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. BANK ACCOUNT	No	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	U.S. BANK ACCOUNT		No	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
3	U.S. BANK ACCOUNT		No	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
4	LIFE INSURANCE SURRENDER VALUE		No	\$50,001 - \$100,000		None (or less than \$201)
5	RENTAL REAL ESTATE		No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
6	RENTAL REAL ESTATE		No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$15,001 - \$50,000
7	RENTAL REAL ESTATE		No	\$250,001 - \$500,000	Rent or Royalties	\$5,001 - \$15,000
8	ARC ENTERTAINMENT, LLC		No	\$250,001 - \$500,000		None (or less than \$201)
9	VICTORY FILM GROUP LLC	See Endnote	No	None (or less than \$1,001)		None (or less than \$201)
9.1	VFG V	See Endnote	No	None (or less than \$1,001)		None (or less than \$201)
10	VICTORY FILM PROJECT, LLC	See Endnote	No	None (or less than \$1,001)		None (or less than \$201)
10.1	VFP II, LLC	See Endnote	No	None (or less than \$1,001)		None (or less than \$201)
10.2	VFP III, LLC	See Endnote	No	None (or less than \$1,001)		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	HOME LOAN #1	Mortgage (investment/rental property)	\$250,001 - \$500,000	2002	3.125%	30 YEAR
2	HOME LOAN #2	Mortgage (investment/rental property)	\$250,001 - \$500,000	2006	3.625%	Matures January 2037
3	HOME LOAN #3	Mortgage (investment/rental property)	\$500,001 - \$1,000,000	2004	3.625%	30 YEAR
4	HOME LOAN #4	Mortgage (investment/rental property)	\$100,001 - \$250,000	2015	4.125%	30 YEAR
5	CAMBRIDGE ANALYTICA, LLC	SECURED RECOURSE PROMISSORY NOTE	\$50,001 - \$100,000	2016	3.5%	5 YEARS

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
2.	4	Filer has an agreement in principle for sale of this asset. Timing for sale subject to receipt of Certificate of Divestiture from Office of Government Ethics.
2.	5	Filer has an agreement in principle for sale of this asset. Timing for sale subject to receipt of Certificate of Divestiture from Office of Government Ethics.

PART	#	ENDNOTE
3.	5	DUE TO THE NEW POSITION WITH THE WHITE HOUSE, THE ENTITY WILL BE GOING DORMANT AND WILL ONLY RECEIVE PASSIVE INCOME.
3.	6	DUE TO THE NEW POSITION WITH THE WHITE HOUSE, THE ENTITY WILL BE GOING DORMANT AND WILL ONLY RECEIVE PASSIVE INCOME.
6.	9	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	9.1	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	10	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	10.1	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	10.2	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.

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.

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).
