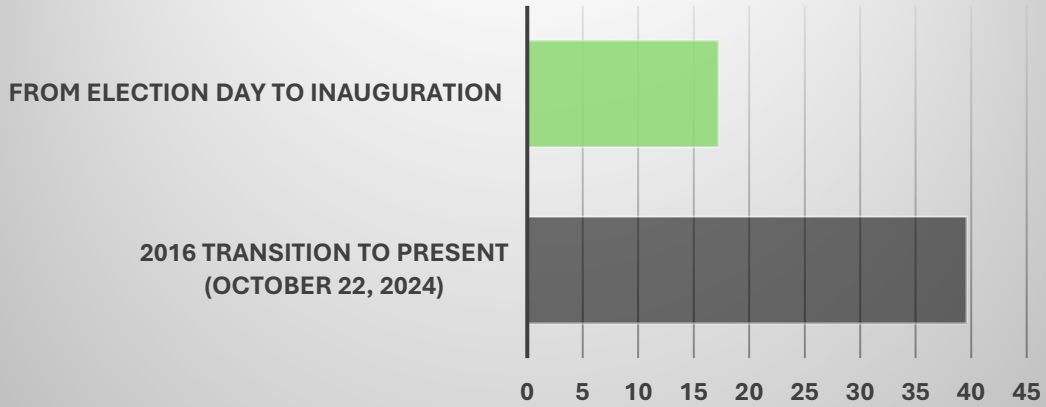


Averaged PAS Nominee Data

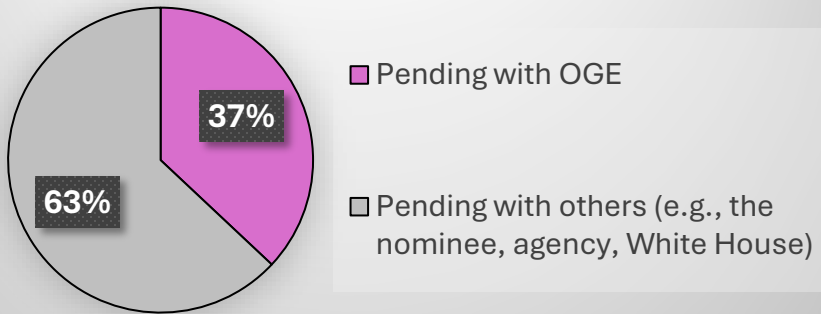
Past Two Presidential Transitions from Election Day to Inauguration Day

Mean Average Days from OGE Receipt to Preclearance*



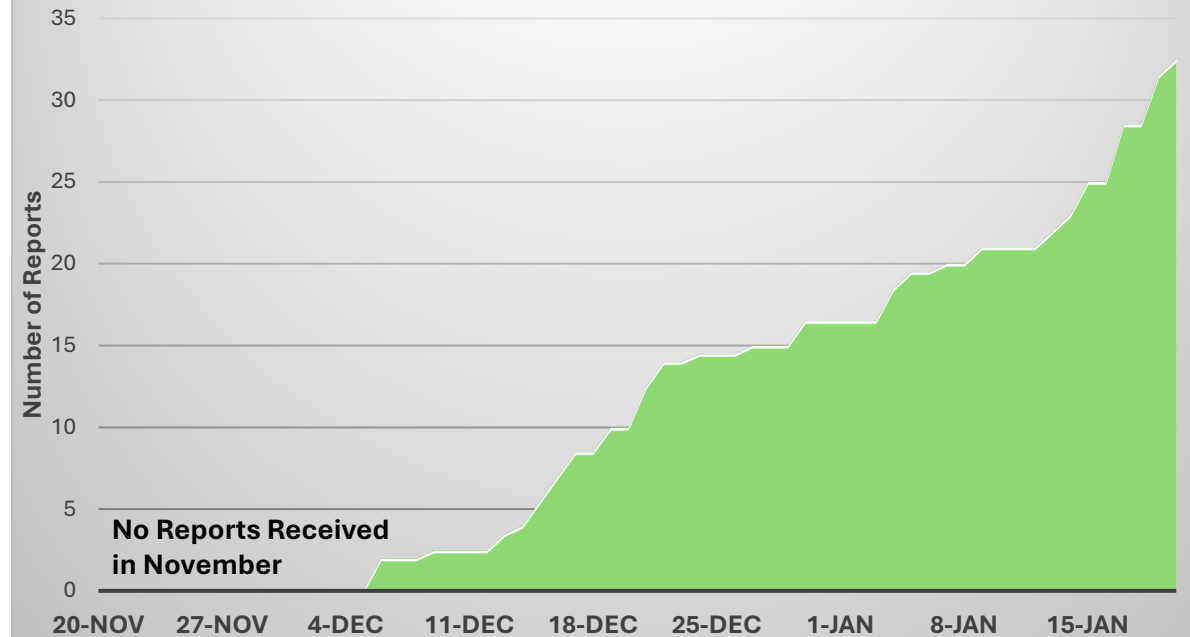
Average Share of Preclearance Time

(tracking began in FY19, therefore this chart only draws from the 2020 transition data)



PAS Nominee Reports Received by OGE

(cumulative average over 2016 and 2020 transitions between election day and inauguration day)

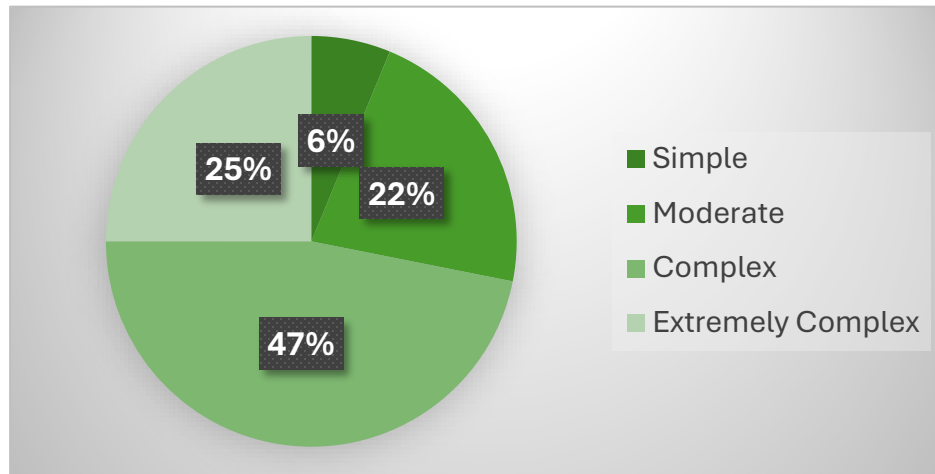


* Note: A nominee’s ethics package is “precleared” when all substantive ethics work has been completed (i.e., all information has been received and corrected, the financial report has been reviewed, and all identified conflicts of interest are addressed in an ethics agreement). Thereafter, the ethics package can be submitted for final review and certification before its transmission to the Senate.

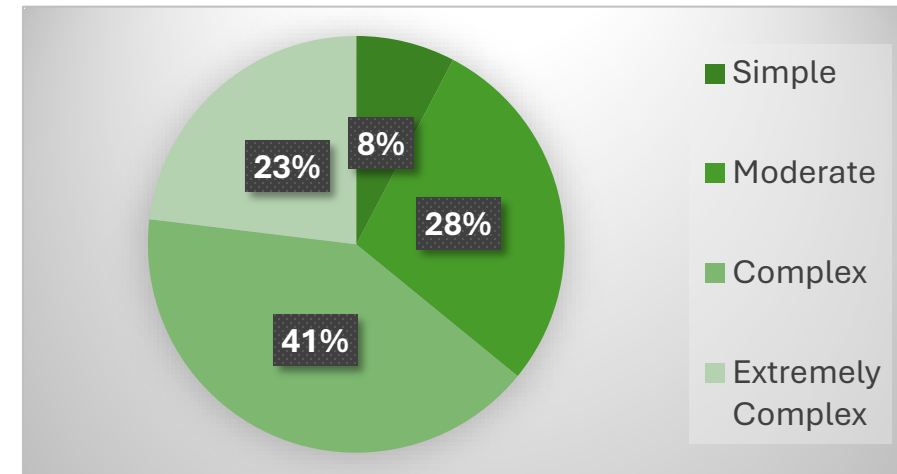
PAS Nominee Report Data by Complexity Level

Past Two Presidential Transitions from Election Day to Inauguration Day

**Average Distribution of Nominee Reports
Received by OGE**



**Average Distribution of Nominee Reports
Precleared by OGE**



Definition of Complexity Levels

- **Simple (Level 1):** Filer has few assets. The filer's assets are common and uncomplicated (e.g., mutual funds, cash accounts, municipal bonds, stocks, etc.).
- **Moderate (Level 2):** Filer has a variety of assets of different types.
- **Complex (Level 3):** Filer has complicated financial interests. Filer has a wide range of financial interests (e.g., stock options, restricted stock, restricted stock units, unusual business arrangements, book deals, patents, private equity funds, capital commitments, trusts for extended family, etc.). The typical filer often has complex arrangements related to employment, business ownership, or private equity funds. The typical filer may be a high-level corporate executive, business owner, or senior law firm partner, etc.
- **Extremely Complex (Levels 4 and 5):** Only the most experienced financial disclosure reviewers can handle reports at this level, and the ethics review usually requires a team of OGE employees. The filer is extremely wealthy and has complex business arrangements (e.g., multi-tiered investment vehicles or business with complex sub-holdings, complex trust arrangements, ongoing business deals or investments that need to be unwound, etc.). These reports usually present unusual or novel legal issues related to conflicts of interest. The ethics review cannot be completed without the direct involvement of OGE's managers or leadership. [Note: In very rare cases, a Level 4 report will be identified as a "Level 5" report, meaning that the report rates among the most complex Level 4 reports. In any such case, the resolution of ethics issues necessitates the direct involvement of the General Counsel, the Director, and/or DOJ's Office of Legal Counsel. The filers are usually represented by teams of attorneys and other representatives. In addition, sometimes attorneys for outside organizations (e.g., an employer) are involved as interested third parties. In addition, these reports are typically between 50 and 500 pages in length.]