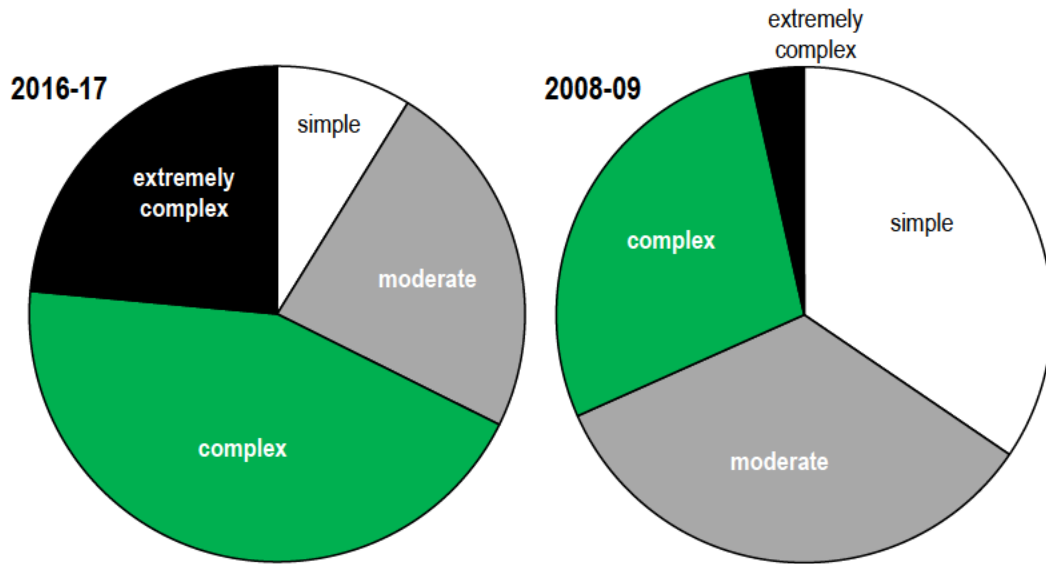
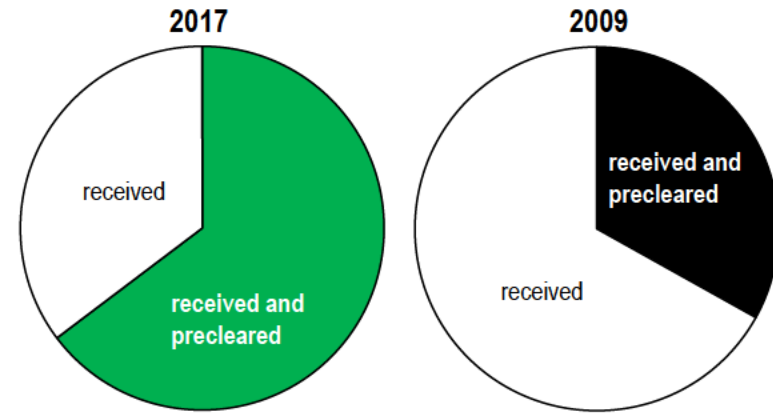


Distribution of Reports by Complexity Level

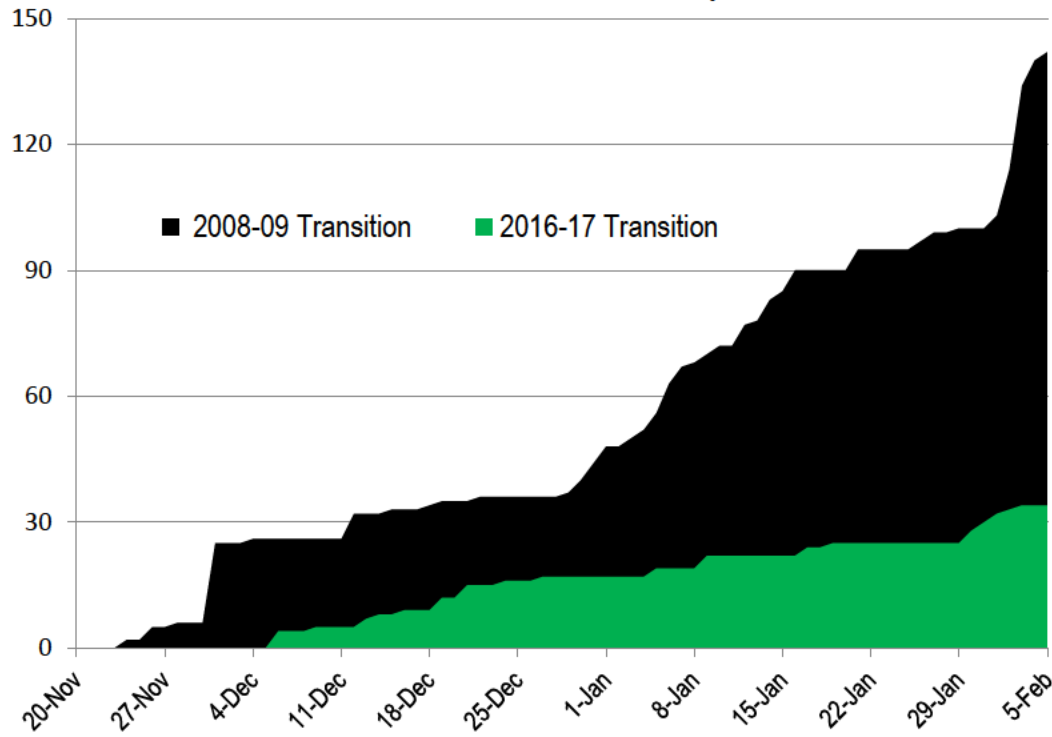


Percentage of Received Reports Precleared* as of February 5

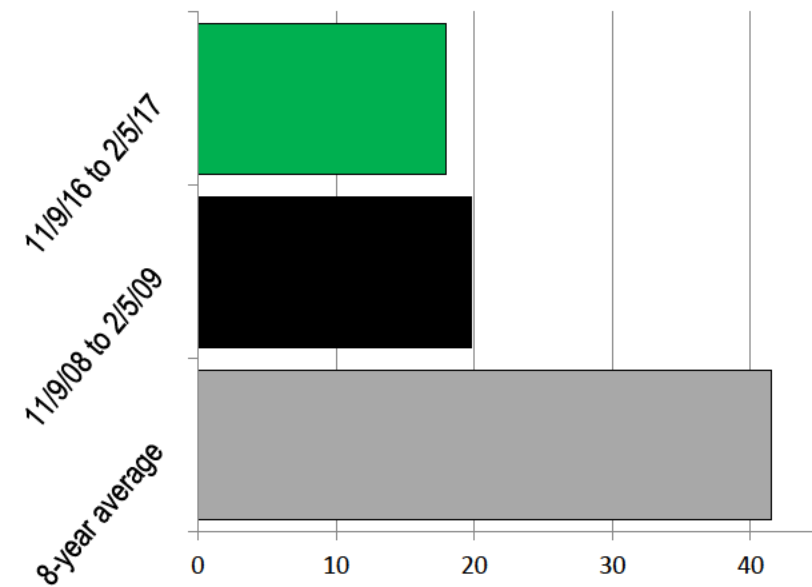


*Note: A nominee's ethics package is "precleared" when all substantive ethics work has been completed (i.e., all information has been received and corrected, the financial disclosure report has been reviewed, and all identified conflicts of interest are addressed in an ethics agreement). Thereafter,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

Cumulative Total Number of Nominee Reports Received



Mean Average Days From Receipt to Preclearance*



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 is moderately wealthy and has a variety of assets of different types.
- **Complex (Level 3):** Filer is wealthy and has complicated financial interests. Filer has a wide range of financial interests (e.g., stock options, restricted stock, stock appreciation rights, 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 or private equity funds. The typical filer may be a high-level corporate executive, business owner, or senior law firm partner, etc.
- **Extremely Complex (Level 4):** 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.]*

Distribution of reports by complexity level 2009-2014:

