November 9, 2026

Hon. Jeanine Pirro
U.S. Attorney for the District of Columbia
Department of Justice
601 D Street, N.W.
Washington, D.C. 20530

Darren B. Cox
Assistant Director in Charge
Washington Office
Federal Bureau of Investigation
601 4th Street NW
Washington, DC 20535

RE: *Request for Conflict of Interest Investigation into Bo Hines, Former Executive Director for the Presidential Council of Advisors for Digital Assets*

Dear U.S. Attorney Pirro and Assistant Director in Charge Cox:

Democracy Defenders Fund (DDF) is writing to request that your offices open an investigation to determine whether Robert "Bo" Hines, former Executive Director for the Presidential Council of Advisors for Digital Assets, willfully and knowingly omitted information on his termination financial disclosure report required to be disclosed under the Ethics in Government Act (EIGA) related to his financial and employment relationship with Tether; whether Mr. Hines participated in particular matters affecting the financial interests of Tether that may have violated the financial conflict of interest law, 18 U.S.C. § 208(a), while he was in government; and whether Mr. Hines received money for acting as an agent of Tether while in government in violation of 18 U.S.C. § 203(a).

On October 20, 2026, DDF received a copy of Mr. Hines' termination financial disclosure report.[1] That report, which has not been certified by either the White House ethics office or the U.S. Office of Government Ethics (OGE), was filed on June 24, 2026, more than ten months after he left government service. Mr. Hines' termination report contains no information concerning his financial and employment relationship with Tether. The lack of any disclosure on that subject raises serious questions. Public reporting indicates that Mr. Hines joined Tether ten days after leaving government service. It seems unlikely that Mr. Hines had no agreement or arrangement with Tether for future employment at the time he left government. How early he entered into an agreement with Tether is imperative to understand his recusal obligations. Yet, he has reported no information at all. That omission is troubling.

[1] DDF originally requested Mr. Hines' report on July 27, 2026. The White House took four months to respond to our request, notwithstanding that Mr. Hines report was immediately releasable at the time of our request as it had been pending with the agency for over 30 days. 5 U.S.C. § 13107(b)(1).

Recent reporting further indicates that Mr. Hines was advocating for legislative changes to the draft GENIUS bill at the same time that Tether had engaged the company he founded with his father, Nxum Group, LLC, for a lucrative multi-million-dollar contract[2] and at a time when Mr. Hines may have been negotiating for future employment with Tether. If true, his participation in these particular matters may have violated the financial conflict of interest law 18 U.S.C. § 208(a). Federal employees who violate 18 U.S.C. § 208(a) can be subject to both civil and criminal sanctions, including felony charges for willful violation.[3]

It was likewise recently reported that the first payment that Tether purportedly made to Nxum Group, LLC, for a "Tether Comprehensive Brand Plan" that included "full scale public relations and media awareness" was made to a cryptocurrency wallet associated with Nxum and subsequently split three ways. Nxum Group, LLC, appears to have only three owners: Todd Hines, Gary Dennis, and Bo Hines. If Mr. Hines received a portion of this payment for any representational services on behalf of Tether while he was in government, doing so may implicate 18 U.S.C. § 203(a).

Given recent reporting, it is imperative for your office to investigate whether Mr. Hines provided Tether with favorable treatment because of either his financial interest in the company or employment negotiations with the company. That begins with an understanding of whether he was truthful on his financial disclosure report.

Background

Bo Hines joined the White House on March 23, 2025, as the Executive Director of the Presidential Council of Advisors for Digital Assets. Prior to entering government service, Mr. Hines founded Nxum Group, LLC, a small consulting firm started with his father, Todd Hines, and Gary Dennis, a marketing executive.[4] Mr. Hines held a position with Nxum until January 2025 and continued to hold his one-third interest in the company through his time with the White House.

As Executive Director of the Presidential Council of Advisors for Digital Assets, Mr. Hines was in charge of shaping the Administration's policies on cryptocurrency and digital assets, including stablecoins. Mr. Hines worked alongside the members of the President's Working Group on Digital Asset Markets to prepare the President's comprehensive cryptocurrency framework "Strengthening American Leadership in Digital Financial Technology."[5] Bo Hines was also one the Administration's principal proponents of the GENIUS Act,[6] which created the first nationwide regulatory framework for "payment stablecoins." During

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[2] Sam Kessler, *He Crafted a Crypto Law for Trump—as His Company Got Millions From a Crypto Giant,* Wall St. J. (Oct. 14, 2026), https://www.wsj.com/politics/policy/crypto-law-trump-tether-bo-hines-45bcd95d.
[3] 18 U.S.C. § 216.
[4] *Kessler, Supra* note 2.
[5] The White House, *Strengthening American Leadership in Digital Financial Technology* (Jan. 23, 2025) https://www.whitehouse.gov/wp-content/uploads/2025/07/Digital-Assets-Report-EO14178.pdf.
[6] Pub. L. No. 119-27, 139 Stat. 419 (July 18, 2025).

negotiations, it has been reported that Hines took actions that directly benefited Tether, including pursuing a three-year grace period that Tether had been seeking.[7]

On October 14, the *Wall Street Journal* reported that Tether entered a multi-million-dollar agreement with Nxum Group, LLC, in April 2025 to pay the company $415,000 per month through an intermediary company, Notorious, owned by Peter Vincer.[8] The arrangement was purportedly for a "Tether Comprehensive Brand Plan." Drafts of the plan provided that Nxum would provide "strategic lobbying and a full scale public relations and media awareness campaign" for Tether, although the final version apparently did not provide for "lobbying" services.[9] The *Journal* reports that those payments were paid in three installments of $2.49 million. Those payments reportedly started on May 11, 2025, and $2 million was made to a cryptocurrency wallet controlled by Nxum, after Vincer kept $498,000 for himself. The $2 million payment was then split three ways. Subsequent payments made in December 2025 and April 2026 were purportedly made directly to Nxum.

This reported arrangement occurred during the period that Hines was negotiating with Congress over the GENIUS Act and working on the President's Working Group. The *Journal* also reported that Signal chats from the same time period show that Bo Hines was sharing information concerning the GENIUS Act negotiations with his partners at Nxum.[10] The final bill included two provisions that Tether had been advocating for: the so-called "Tether loophole" which permits foreign stablecoin issuers to operate in the U.S. without meeting certain safeguards that apply to U.S. issuers, and a three-year delayed effective date. In August of this year, Nxum apparently offered Vincer $311,000 plus 21% of the next Tether payment if he agreed to never discuss his dealings with Nxum, Tether, Bo Hines, his father, or Gary Dennis.[11]

On August 9, 2025, three weeks after the GENIUS Act passed on July 18, Bo Hines left the Administration. Ten days later he joined Tether as a special advisor and was subsequently appointed to be Chief Executive of Tether's US stablecoin, USAT.[12]

Request for Investigation

As a senior member of the White House, Bo Hines was expected to abide by the Federal ethics laws, including the financial disclosure and conflict of interest laws. A review of his termination financial disclosure report raises serious questions, however, about his compliance with the EIGA. Recent reporting about his White House negotiations related to Tether, and payments Tether made to Nxum, furthermore raise serious questions about whether Hines may have violated the conflict of interest laws. As described below, it is imperative that your office investigate these discrepancies and take appropriate action.

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[7] Anthony Cormier et. al, *How Tether Benefited as Trump Insiders Shaped First US Crypto Law,* Bloomberg (Jul. 22, 2025), https://www.bloomberg.com/features/2026-howard-lutnick-bo-hines-trump-tether-crypto-law/.
[8] *Kessler, Supra* note 2.
[9] *Id.* Nxum has denied that it had a contract with Tether while Mr. Hines was in office. *Id.*
[10] *Id.* Nxum has denied any wrongdoing.
[11] *Id.*
[12] Cormier, *Supra* note 7.

I. Financial Disclosure (5 U.S.C. Chapter 131)

The EIGA requires that certain high-level officials, including White House officials who are either commissioned by the President or receive pay in excess of the statutory threshold set out in 5 U.S.C. § 13103(f)(3), file public financial disclosure reports.[13] Mr. Hines was a public financial disclosure filer and was therefore required by law to submit financial disclosure reports upon entering government service, annually each year he stayed with the government, and upon termination of government service.[14] Among other things, Mr. Hines was required to report on his financial disclosure reports his assets, income, and agreements and arrangements with former and future employers.

Mr. Hines entered government service in March of 2025 and filed his initial "new entrant" public financial disclosure report on June 24, 2025. Mr. Hines reported a single IRA, salary from his time with Today is America, LLC (which he reported ended in 2024), and an interest in Nxum Group, LLC, which was described as a media consulting group. Mr. Hines reported having a position with Nxum up until January 1, 2025. He also reported a financial interest in the fund valued at $25-$50 million. In an endnote, Mr. Hines disclosed that Nxum held four companies: Kiwi Bot; Intersect Technologies; Today is America, LLS; and Kapsul. Mr. Hines did not individualize the value or income derived from these underlying holdings.

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Nxum Group, LLC	See Endnote	Dover, Delaware	Corporation	Owner/Member	1/2023	1/2025
2	Today Is America, LLC		Cramerton, North Carolina	Corporation	CEO	2/2023	12/2024

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA #1:		No			
1.1	Goldman Sachs Access Treasury 0-1 Year ETF (GBIL)		Yes	$100,001 - $250,000		None (or less than $201)
2	Today is America, LLC (media)		N/A		Salary	$200,000
3	Nxum Group, LLC (media consulting)	See Endnote	N/A	$25,000,001 - $50,000,000	Distributions	$1,200,000

Endnotes

PART	#	ENDNOTE
1.	1	I no longer hold a position with this entity. I retain a passive investment interest.
2.	3	Entity holds an interest in four companies: Kiwi Bot, Intersect Technologies, Today is America, LLC, and Kapsul.

Hines New Entrant Report (2025).

Mr. Hines left the government on August 9, 2025. Pursuant to the EIGA, he was required to file a termination financial disclosure by September 8, 2025. The White House provided him

[13] 5 U.S.C.§ 13103(f).

[14] 5 U.S.C. § 13103(a), (d)-(e). Mr. Hines was also required to file periodic transaction reports disclosing any purchases, sales, or exchanges of securities. 5 U.S.C. § 13105(I).

with the maximum extension of time, 90 days, which meant that his report was due no later than December 7, 2025. Mr. Hines did not file his financial disclosure report until June 24, 2026, over six months after the extension ended.

Notwithstanding that the reporting periods for new entrant reports and termination reports are completely different, the information on Mr. Hines' financial disclosure report is nearly identical to the information that he filed on his new entrant report a year previously. Limited changes were made. Mr. Hines removed his bank accounts. He also moved his interest in Nxum from Part 2 (Employment Related Assets) to Part 6 (Other Assets and Income). Mr. Hines does not appear to have updated the valuation and income amounts he received. In addition, he did not disclose any underlying holdings, including the four companies he previously reported in the endnote to his new entrant financial disclosure report.

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Nxum Group, LLC	See Endnote	Dover, Delaware	Corporation	Owner/Member	1/2023	1/2025
2	Today Is America, LLC		Cramerton, North Carolina	Corporation	CEO	2/2023	12/2024

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Nxum Group, LLC	No	$25,000,001 - $50,000,000	Distributions	$1,200,000

Hines Termination Disclosure Report (2026).

More troubling, Mr. Hines' report does not include any information concerning any agreement or arrangement for future employment with Tether, notwithstanding that he joined the company ten days after he left government service in August 2025.

3. Filer's Employment Agreements and Arrangements

None

Hines Termination Disclosure Report (2026).

Public financial disclosure filers are required to report "the date, parties to, and terms of any agreement or arrangement with respect to . . . future employment."[15] OGE has advised that the term "any agreement or arrangement" is to be read broadly and would reach "any sort of arrangement for prospective future employment, formal or otherwise."[16] So long as an "actual agreement or arrangement for future employment" existed, a filer must report that information on their termination financial disclosure report.[17]

[15] 5 U.S.C. § 13104(a)(7)(A).
[16] U.S. Office of Government Ethics, *Appendix B: Frequently Asked Questions*, https://www.oge.gov/web/278eGuide.nsf/FAQs#_FAQs:Future_Employment_Arrangement.
[17] OGE Inf. Adv. 04x13 at 5 (Sep. 20, 2004).

Mr. Hines reportedly became a senior advisor for Tether a mere ten days after he left government service. It is implausible to believe that he did not have an agreement or arrangement "formal or otherwise" with Tether before he left government service.[18]

In addition, as reported in the *Journal*, the May 2025 payment that Tether made pursuant to the "Tether Comprehensive Brand Plan" was subsequently split three ways. If Mr. Hines received any portion of that payment, it would have to be reported on his termination financial disclosure report as income he received during his period of government service.[19]

II. Financial Conflicts of Interest (18 U.S.C. § 208)

Pursuant to 18 U.S.C. § 208(a), it is unlawful for any employee of the Executive Branch to "participate[] personally and substantially" in any particular matter "in which, to his or her knowledge, the employee, or certain persons and organizations including "any person or organization with whom he is negotiating or has any arrangement concerning prospective employment," have a financial interest.[20] Mr. Hines appears to have had a possible financial interest in Tether through two distinct channels: first, through potential employment negotiations with Tether; second, through his investment in Nxum Group, LLC. Further investigation is necessary to understand when these financial interests first arose and whether Mr. Hines participated in any government action in which he had a disqualifying financial interest in violation of 18 U.S.C. § 208(a).

Employment Negotiations

Government employees are prohibited from participating in any "particular matter" that would affect a company with whom they are "negotiating or ha[ve] any arrangement concerning prospective employment."[21] The U.S. Office of Government Ethics (OGE) has advised through its regulation that:

> [For purposes of] 18 U.S.C. 208(a) . . . the term negotiations means discussion or communication with another person, or such person's agent or intermediary, mutually conducted with a view toward reaching an agreement regarding possible employment with that person. The term is not limited to discussions of specific terms and conditions of employment in a specific position.[22]

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[18] In addition, Mr. Hines should have filed a notification with the White House ethics office pursuant to section 17 of the STOCK Act and 5 C.F.R. § 2635.607 at the time that he began negotiations with Tether.
[19] 5 U.S.C. § 13104(a)(1)(A); 5 C.F.R. § 2634.302(a).
[20] 18 U.S.C. § 208(a); 5 C.F.R. § 2640.201(a).
[21] 18 U.S.C. § 208(a). OGE has further supplemented the statutory restriction with additional regulatory limitations preventing employees from participating in decisions affecting any person with whom they are "seeking employment." 5 C.F.R. § 2635 subpart F. Likewise, Section 101(j) of Executive Order 12674 provides that "Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities."
[22] 5 C.F.R. § 2635.603(b)(1)(i).

As the Eleventh Circuit explained in *U.S. v. Schaltenbrand,* the terms "'negotiating' and 'arrangement' are not exotic or abstruse words requiring detailed etymological study or judicial analysis. They are common words of universal usage" that are to be "broadly construed."[23] It is not necessary to show "specific acts of negotiating" or "specific bilateral arrangements or acts of arrangement."[24] Rather, so long as both parties are engaged in discussions that "indicate active interest" concerning future employment an individual is considered to be "negotiating" for employment for purposes of 18 U.S.C. § 208.[25] OGE's regulations also indicate that once an employee has begun seeking or negotiating for employment they cannot simply defer or "pause" those conversations until later.[26]

OGE and the Department of Justice have long advised that a person is negotiating for "employment" regardless of whether they will be an employee or not.[27] Under longstanding executive branch guidance, the term is broad enough to cover both common law employment and independent contractor relationships.[28]

Given the timeline, it is more than likely that Mr. Hines was negotiating with Tether for employment at some point in time prior to the date on which he left government. Because he has not reported that information on his termination financial disclosure report, however, it is currently impossible to know when those negotiations began.

Pursuant to 18 U.S.C. § 208(a), once an employee has begun negotiating for employment or has an arrangement with an entity for future employment, they must recuse themselves from any "particular matter" that could affect the financial interests of that entity.[29] A "particular matter" includes any government matter that "is focused on the interests of a discrete and identifiable class of persons" or that involves "a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties."[30] Legislation and policy recommendations that focus on a specific industry, such as the cryptocurrency industry, are considered particular matters for purposes of 18 U.S.C. § 208(a).[31]

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[23] *United States v. Schaltenbrand,* 930 F.2d 1554, 1559 (11th Cir., 1991) (quoting *United States v. Hedges*, 912 F.2d 1397, 1403 (11th Cir., 1990)).
[24] *United States v. Conlon*, 628 F.2d 150, 154 (D.C. Cir., 1980), *cert. denied*, 454 U.S. 1149 (1982).
[25] *Schaltenbrand*, 930 F.2d at 1559.
[26] 5 C.F.R. § 2635.603(b)(3); *See also* OGE DAEOgram DO-04-029 (Sep. 20, 2004).
[27] *See* OGE Inf. Adv. Op. 94 x 16 (1994).
[28] *See Id*.
[29] 18 U.S.C. § 208(a). Employees are required recuse even before negotiations begin under the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. 2635.604. Because Mr. Hines is no longer a government employee, he is not subject to administrative or disciplinary action based on failure to comply with the Standards of Conduct.
[30] 5 C.F.R. § 2640.102(l)-(m).
[31] *See, e,g.,* OGE Inf. Adv. Op. 06 x 9 (Oct. 4, 2006) (stating that the term "particular matter" can "include legislation and policymaking, as long as it is narrowly focused on a discrete and identifiable class"); OGE Inf. Adv. Op. 05 x 1 (Feb. 10, 2005) (finding that broad tax legislation is not a particular matter, but that "numerous provisions . . . if considered alone, might have constituted separate particular matters, such as specific tax provisions for the oil, gas and pharmaceutical industries"); OGE Inf. Adv. 81 x 1 (Jan. 9, 1981) (explaining that "this Office concluded early on that legislation does constitute a 'particular matter' for purposes of" a now removed provision of the post-employment laws at 18 U.S.C. § 207).

Mr. Hines' position at the White House appears to have been exclusively focused on matters involving the cryptocurrency industry. That includes negotiating on the GENIUS bill, working on the President's Working Group on Digital Asset Markets, and meeting with cryptocurrency lobbyists and executives.

Given the immense overlap of Mr. Hines' duties and his future employer, a full investigation is necessary to determine whether Mr. Hines participated in particular matters that could have had a financial impact on Tether at a time when he was negotiating with the firm. Among other things, DDF implores you to determine whether and when Mr. Hines notified the ethics office that he was seeking employment with Tether and whether he received (and abided by) any ethics guidance. In addition, it is important that you investigate what matters he worked on while in government that involved or could affect the finances of Tether, what forms of compensation he is entitled to receive under his contract with Tether, and whether he received any payments or promises of payments to influence actions he took in his White House role.

Financial Interest in Tether Through Nxum

As noted above, Mr. Hines continued to hold a stake in Nxum Group, LLC, throughout his time in government. During that time, his stake was valued at between $25 million and $50 million. It has also been reported that Tether had secured a contract with Nxum during that period of time. Accordingly, Mr. Hines was prohibited from participating personally and substantially in any particular matter that he knew could affect Tether's ability or willingness to undertake its contractual obligations.[32] Given the unique nature of Mr. Hines' role, it is possible that the matters he worked on—including the GENIUS Act—could have had an impact on both Tether's *ability* to make the payments as well as their *willingness* to make such payments. It is therefore necessary for your office to investigate the potential that Mr. Hines' actions might have violated 18 U.S.C. § 208(a) as a result of the Tether-Nxum arrangement.

III. Receipt of Compensation for Representational Services (18 U.S.C. § 203)

Pursuant to 18 U.S.C. § 203(a) "whoever . . . demands, seeks, receives, accepts, or agrees to receive or accept any compensation for any representational services . . . rendered or to be rendered *either personally or by another* . . . at a time when such person is an officer or employee . . . in relation to any . . . particular matter in which the United States is a party or has a direct and substantial interest" is subject to criminal and civil penalties. The statute likewise has a payor offense that makes it illegal for a person to "knowingly give[], promise[], or offer[] any compensation for any such representational services rendered or to be rendered at a time when the person to whom the compensation is given, promised, or offered, is or was such a . . . . officer, or employee."[33]

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[32] *Cf. Ethics Issues Raised by the Retention and Use of Flight Privileges by Employees of the FAA,* 28 Op. O.L.C. 237, 240 (2004) (stating that an employee who has a contractual right to flight privileges with an airline normally only has a financial interest in matters affecting the ability or willingness of the company to perform its obligations under the contract).

[33] 18 U.S.C. § 203(a)(2).

The act therefore precludes any government employee from taking a financial stake in any representational services provided before the United States, whether they are carrying out those services or not. The U.S. Office of Government Ethics has advised that the term "representational services" refers to communications or appearances made with the intent to influence a government employee on behalf of another person.[34] Section 203 "applies to compensation received for 'representational services' that are provided while the individual is an employee of the Federal Government, *regardless of who provides the services* or when the individual receives the compensation."[35]

If Mr. Hines received any portion of the May 2025 Tether-Nxum payment, it is imperative that your office investigate whether it was related to any representational services provided by either Mr. Hines himself, Nxum, or any agent of Nxum before the United States. If so, those payments could trigger 18 U.S.C. § 203.

Conclusion

Mr. Hines left the government fourteen months ago. After delaying filing his financial disclosure report for ten months, the eventual filing does not contain information concerning his relationship with Tether. Those omissions raise serious questions, particularly in light of recent reports that Mr. Hines' former company entered into a multi-million-dollar contract with Tether while he was still in office and that Mr. Hines joined Tether shortly after leaving the White House. These facts do not have the indicia of coincidence. Rather, they appear to suggest the potential for financial interests barred under the conflict of interest laws. A full investigation is necessary to determine whether Mr. Hines' activities may have violated federal law.

Sincerely,

/s/
Amb. Norman L. Eisen (ret.)
Executive Chair and Co-Founder
Democracy Defenders Fund

/s/
Virginia Canter
Chief Counsel and Director for Ethics
and Anti-Corruption
Democracy Defenders Fund

/s/
Christopher Swartz
Senior Counsel and Deputy Director for
Ethics and Anti-Corruption
Democracy Defenders Fund

Enclosures

[34] OGE Legal Advisory LA-24-12 (Oct. 17, 2024).
[35] *Id*. (Emphasis added.)

OGE Form 278e (Updated 08/2024) (Expires 08/31/2027)
U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type: Termination Report
Year (Annual Report only):
Date of Appointment: 03/2025
Date of Termination: 08/2025
Appointment Type: Non-Career

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

Filer's Information

Hines, Robert N

Executive Director for the Presidential Council of Advisors for Digital Assets, Trump-Vance (2025) - White House

Date of Termination: 08/09/2025

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/ Hines, Robert N [electronically signed on 06/24/2026 by Hines, Robert N in Integrity.gov] - Filer received a 90 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).

Other review conducted by

U.S. Office of Government Ethics Certification

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Nxum Group, LLC	See Endnote	Dover, Delaware	Corporation	Owner/Member	1/2023	1/2025
2	Today Is America, LLC		Cramerton, North Carolina	Corporation	CEO	2/2023	12/2024

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA #1:	No			
1.1	Goldman Sachs Access Treasury 0-1 Year ETF (GBIL)	Yes	$100,001 - $250,000		None (or less than $201)
2	Today is America, LLC (media)	N/A		Salary	$200,000

3. Filer's Employment Agreements and Arrangements

None

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Bryson Morgan Automotive Group (Car Dealerships)	N/A		salary	

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Nxum Group, LLC	No	$25,000,001 - $50,000,000	Distributions	$1,200,000

7. Transactions

None

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
1.	1	I no longer hold a position with this entity. I retain a passive investment interest.

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 (1) that ended the reporting period with a value greater than $1,000 or (2) from which more than $200 in income was received 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 (1) that ended the reporting period with a value greater than $1,000 or (2) from which more than $200 in income was received 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, (1) that ended the reporting period with a value greater than $1,000 or (2) from which more than $200 in investment income was received 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 in income was received). 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 the 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 (note: certain PAS nominees and appointees are required to report all mortgages); (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 $480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than $480 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 $192 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

5 U.S.C.§ 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. 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 5 U.S.C. §§ 13107 and § 13122(b)(1) 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 a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) 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 this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. 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 ten 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) 250 E Street, S.W., Suite 750, Washington, DC 20024-3249.

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 (that control number 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

OGE Form 278e (Updated 08/2024) (Expires 08/31/2027)
U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type: New Entrant Report
Year (Annual Report only):
Date of Appointment: 03/2025
Date of Termination:
Appointment Type: Non-Career

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

Filer's Information

Hines, Robert N

Executive Director for the Presidential Council of Advisors for Digital Assets, Trump-Vance (2025) - White House

Date of Appointment: 03/23/2025

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/ Hines, Robert N [electronically signed on 06/24/2025 by Hines, Robert N in Integrity.gov] - Filer received a 65 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/ Gast, Scott F, Certifying Official [electronically signed on 12/12/2025 by Gast, Scott F in Integrity.gov]

Other review conducted by
/s/ Riggs, Benjamin H, Ethics Official [electronically signed on 12/12/2025 by Riggs, Benjamin H in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised

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Data Revised

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Nxum Group, LLC	See Endnote	Dover, Delaware	Corporation	Owner/Member	1/2023	1/2025
2	Today Is America, LLC		Cramerton, North Carolina	Corporation	CEO	2/2023	12/2024

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA #1:		No			
1.1	Goldman Sachs Access Treasury 0-1 Year ETF (GBIL)		Yes	$100,001 - $250,000		None (or less than $201)
2	Today is America, LLC (media)		N/A		Salary	$200,000
3	Nxum Group, LLC (media consulting)	See Endnote	N/A	$25,000,001 - $50,000,000	Distributions	$1,200,000

3. Filer's Employment Agreements and Arrangements

None

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Today Is America, LLC	Cramerton, North Carolina	Services as CEO
2	Nxum Group, LLC	Dover, Delaware	Services as General Partner

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Bryson Morgan Automotive Group (Car Dealerships)	N/A		salary	

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US Bank #1 (Cash)	N/A	$100,001 - $250,000		None (or less than $201)
2	US Bank #2 (Cash)	N/A	$15,001 - $50,000		None (or less than $201)

7. Transactions

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

8. Liabilities

None

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	1	I no longer hold a position with this entity. I retain a passive investment interest.
2.	3	Entity holds an interest in four companies: Kiwi Bot, Intersect Technologies, Today is America, LLC, and Kapsul.

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 (1) that ended the reporting period with a value greater than $1,000 or (2) from which more than $200 in income was received 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 (1) that ended the reporting period with a value greater than $1,000 or (2) from which more than $200 in income was received 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, (1) that ended the reporting period with a value greater than $1,000 or (2) from which more than $200 in investment income was received 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.

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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 the reporting period.

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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.

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9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than $480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than $480 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 $192 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.

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