SF278 (Rev. 03/2000)

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Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT

U.S. Office of Government Ethics						
Date of Appointment, Candidacy. Election or Nomination (<i>Month, Day, Year</i>)	Reporting Status (Check Incumb	Calendar Year Covered by Report	New Entrant, Nominee,	Termination	Termination Date (If Appli- cable) (Month, Day, Year)	Fee for Late Filing Any individual who is required to
1/21/09	appropriate boxes)		or Candidate	Filer		file this report and does so more than
17701	Last Name		Direct Nicercons I N C A II			30 days after the date the report is
Reporting Individual's Name			First Name and Middle	Initial		required to be filed, or, if an extension is granted, more than 30 days after the
1 0	Rhodes		Benjamin, J			last day of the filing extension period
	Title of Position		Department or Agency	(If Applicable)		shall be subject to a \$200 fee.
Position for Which Filing	Special Assistant to the P	President	WH Communicatio	ons / NSC		Reporting Periods
	Address (Number, Street, City, S	State, and ZIP Code)		Telephone No. (Inc	clude Area Code)	Incumbents: The reporting period is
Location of Present Office (or forwarding address)	1600 Pennsyl	sonia Ase, we	esh DC	202-	456-1414	the preceding calendar year except Part II of Schedule C and Part I of Schedule D where you must also
Position(s) Held with the Federal	Title of Position(s) and Date(s) I	Held				include the filing year up to the date
Government During the Preceding 12 Months (If Not Same as Above)	Speechwriter, Presidentia	I Transition Team				you file. Part II of Schedule D is not applicable.
Presidential Nominees Subject to	Name of Congressional Commit	tee Considering Nomination	Do You Intend to Create	e a Qualified Diversi	fied Trust?	Termination Filers: The reporting period begins at the end of the period
Senate Confirmation			Yes	No		covered by your previous filing and ends at the date of termination. Part II
Certification				Date (Month, Day,	Y20F1	of Schedule D is not applicable.
I CERTIFY that the statements I have made on this form and all attached schedules are true, complete and correct to the best of my knowledge.	Signature of Reporting Individua	1		2/23/	109	Nominees, New Entrants and Candidates for President and Vice President:
						Schedule AThe reporting period for
Other Review (If desired by agency)	Signature of Other Reviewer	Alton		Date (Month. 1Day, 2/25	Year)	income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets as of any date you choose that is within 31 days of the date of filing.
Agency Ethics Official's Opinion	Signature of Designated Agency	Ethics Official/Reviewing Offic	ial	Date (Month, Day,	Year)	Schedule BNot applicable.
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 in the box below).	Vy-K.	CA		3/11/09		Schedule C. Part I (Liabilities) The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is
Office of Government Ethics	Signature /			Date (Month. Day.	Year)	within 31 days of the date of filing.
Use Only						Schedule C. Part II (Agreements or
Comments of Reviewing Officials (If addit	ional space is required, use the re-	verse side of this sheet)				Arrangements) Show any agreements or arrangements as of the date of
			filing extension granted &	indicate number of a		filing.
		(Check box I)	jiling extension grantea &	inaicaie number of a	uys / 	Schedule DThe reporting period is the preceding two calendar years and the current calendar year up to the date of filing.
						Agency Use Only
			(Check hor if comme	ents are continued on	the reverse side)	OGE Use Only
			Circle box if comme			

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U.S. Office of Government Ethics Reporting Individual's Name Rholes, Benjamin

SCHEDULE A

Page Number

	Assets and Income		Valuation of Assets at close of reporting period												com er er												n \$2	01)'	" is checked, no				
	BLOCK A						BLO	CK E	3																BI	.OCI	<u>C</u>						
rer provai ing in wi Fo am that rer inc act	r you, your spouse, and dependent children, bort each asset held for investment or the oduction of income which had a fair market lue exceeding \$1,000 at the close of the report- g period, or which generated more than \$200 income during the reporting period, together th such income. r yourself, also report the source and actual nount of earned income exceeding \$200 (other an from the U.S. Government). For your spouse, bort the source but not the amount of earned come of more than \$1,000 (except report the tual acount of any honoraria over \$200 of ur spouse).	None (or less than \$1,001)	\$1,001 - \$15,000	S15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$\$\$00,001 - \$1,000,000	Over \$1,000.000 *	\$1,000,001 - \$ 5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Excepted Investment Fund	Excepted Trust	M Qualified Trust	Dividends	Rent and Royalties		Capital Gains	None (or less than \$201)	\$201 - \$1,000	\$1,001 - \$2,500	\$2,501 - \$5,000	\$5,001 - \$15,000	AII - 250,000 - 850,000	S50,001 - S100,000	100,001 - S1,000,000	Over \$1,000,000*	S1,000,001 - S5,000,000	9		Date (Mo., Da Yr.) Only if Honorar
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E:	Central Airlines Common xamples Doe Jones & Smith, Hometown, State Kempstone Equity Fund			<u>×</u>		 			_					 X			<u>×</u>		-+				_×									Law Partnership Income \$130,000	
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2	Baron Growth Fund		Х			$T_{1} = T_{1}$						10		X	r					:	×												
3	Goldman Sachs Large Cap Value Fund		Х					South State				N.		X	*					د. بر	x									1 ¹ 1 1 1 1			
4	Mutual Discovery Fund		Х	5.95.		2 2				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			-	X	*					~	X							Vn		1			
5	Smith Barney Bank Deposit Program			X				a survey and		A. B. S.								and the second second			x			- - - - -									
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None	None (or less than \$1,001)	51,001 - \$15,000	\$15,001 - \$50,000	SS0,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	SS00,001 ~ 51,000,000	Over S1,000.000 +	\$1,000,001 - \$ 5,000,000	S5,000,001 - 525,000,000	\$25,000,001 - \$50,000,000	Over 550,000,000	Excepted lavestment Kund	Excepted Trust	Qualified Trust	Dividends	Rent and Royalties	Interest	Capital Gains	None (or less than \$201)	5201 - 51,000	S1,001 - S2,500	\$2,501 - \$5,000	\$5,001 - \$15,000	\$15,001 - \$50,000	SS0,001 - \$100,000	\$100,001 - \$1,000.000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	Over \$5,000,000	Other Income (Specify Type & Actual Arnount)	Date (Mo., Dav, Yr.) Onlv if Honoraria
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None	None (or less than \$1.001)	\$1.001 - \$15.000	\$15,001 - \$50,000	\$50,001 - \$100,000	s100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000.000 *	01,000,001 - 3 3,000,000 66 000 001 - 675 000 000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Excepted Investment Fund	Excepted Trust	Qualified Trust	Dividends	Rent and Royalties	Interest	e Capital Gains	None (or less than \$201)	S201 - S1,000	S1,001 - S2,500	\$2,501-\$5,000	S5,001 - S15,000	S15,001 - S50,000	\$\$0,001 - \$100,000	\$\$100,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	Over \$5,000,000	Other Income (Specify Type & Actual Amount)	Date (Mo., Dav Yr.) Only if Honoraria
Thornburg International Value Fund		×					10.0		+	+-	+	-	**		$\left - \right $			-	x	ta) Priz		2	-		-						
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Presidential Transition Team		+	+			$\left \right $	-+	+	+	+-	+	\vdash						-		-+	+		×		-	-			\$11,	500 in 2008 / \$12	000 in 2009
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Reporting Individual's Name

SCHEDULE D

Page Number

Part I: Positions Held Outside U.S. Government

Report any positions held during the applicable reporting period, whether compensated or not. Positions include but are not limited to those of an officer, director, trustee, general partner, proprietor, representative, employee, or

consultant of any corporation, firm, partnership, or other business enterprise or any non-profit organization or educational institution. **Exclude** positions with religious, social, fraternal, or political entities and those solely of an honorary nature.

			None	
Organization (Name and Address)	Type of Organization	Position Held	From (Mo., Yr.)	To (Mo., Yr.)
Examples: Nat'l Assn. of Rock Collectors, NY, NY	Non-profit education	President	6/92	Present
Doe Jones & Smith, Hometown, State	Law firm	Partner	7/85	1/00
1 Woodrow Wilson International Center for Scholars	Education	Special Assistant to the President	6/02	8/07
2 Obama for America	Political Campaign	Senior Speechwriter	7/07	11/08
3				
4				
5		,		
6				

Part II: Compensation In Excess Of \$5,000 Paid by One Source

Report sources of more than \$5,000 compensation received by you or your business affiliation for services provided directly by you during any one year of the reporting period. This includes the names of clients and customers of any

corporation, firm, partnership, or other business enterprise, or any other non-profit organization when you directly provided the services generating a fee or payment of more than \$5,000. You need not report the U.S. Government as a source.

Do not complete this part if you are an Incumbent, Termination Filer, or Vice Presidential or Presidential Candidate None

	Source (Name and Address)	Brief Description of Duties
Examp	Doe Jones & Smith, Hometown, State	Legal services
· · ·	Metro University (client of Doe Jones & Smith), Moneytown, State	Legal services in connection with university construction
1 V	loodrow Wilson Wilson International Center for Scholars	Provided speechwriting and policy support for the director of the Wilson Center
2 C	bama for America	Wrote speeches and advised on foreign policy for presidential candidate
3 P	residential Transition Team	Wrote speeches and advised on foreign policy for presidential transition
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