

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT

Date of Appointment, Candidacy, Election or Nomination (Month, Day, Year)		Reporting Status (Check appropriate boxes) <input type="checkbox"/> Incumbent		Calendar Year Covered by Report		<input checked="" type="checkbox"/> New Entrant, Nominee, or Candidate		<input type="checkbox"/> Termination Filer		Termination Date (If Applicable) (Month, Day, Year)		Fee for Late Filing Any individual who is required to file this report and does so more than 30 days after the date the report is required to be filed, or, if an extension is granted, more than 30 days after the last day of the filing extension period shall be subject to a \$200 fee. Reporting Periods Incumbents: The reporting period is the preceding calendar year except Part II of Schedule C and Part I of Schedule D where you must also include the filing year up to the date you file. Part II of Schedule D is not applicable. Termination Filers: The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination. Part II of Schedule D is not applicable. Nominees, New Entrants and Candidates for President and Vice President: Schedule A-- The reporting period for 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. Schedule B-- Not applicable. 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 within 31 days of the date of filing. Schedule C, Part II (Agreements or Arrangements)-- Show any agreements or arrangements as of the date of filing. Schedule D-- The reporting period is the preceding two calendar years and the current calendar year up to the date of filing.
Reporting Individual's Name		Last Name Gould				First Name and Middle Initial William Scott						
Position for Which Filing		Title of Position Deputy Secretary				Department or Agency (If Applicable) U.S. Department of Veterans Affairs						
Location of Present Office (or forwarding address)		Address (Number, Street, City, State, and ZIP Code) IBM Corporation; 6710 Rockledge Dr.; Rm 24A194; Bethesda, MD 20817				Telephone No. (Include Area Code) (301) 803-1094						
Position(s) Held with the Federal Government During the Preceding 12 Months (If Not Same as Above)		Title of Position(s) and Date(s) Held None										
Presidential Nominees Subject to Senate Confirmation		Name of Congressional Committee Considering Nomination U.S. Senate Committee on Veterans' Affairs				Do You Intend to Create a Qualified Diversified Trust? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
Certification		Signature of Reporting Individual				Date (Month, Day, Year)						
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.						2/17/09						
Other Review (If desired by agency)		Signature of Other Reviewer				Date (Month, Day, Year)						
Agency Ethics Official's Opinion		Signature of Designated Agency Ethics Official/Reviewing Official				Date (Month, Day, Year)						
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).						3/12/09						
Office of Government Ethics Use Only		Signature				Date (Month, Day, Year)						
						3/12/09						
Comments of Reviewing Officials (If additional space is required, use the reverse side of this sheet)												
(Check box if filing extension granted & indicate number of days) <input type="checkbox"/>												
(Check box if comments are continued on the reverse side) <input type="checkbox"/>												
Agency Use Only MAR 12 2009 OGE Use Only MAR 12 2009												

Reporting Individual's Name
 Gould, William Scott

SCHEDULE A continued

(Use only if needed)

BLOCK A	BLOCK B										BLOCK C										Date (Mo., Day, Yr.) Only if Honoraria													
	Valuation of Assets at close of reporting period										Income: type and amount. If "None (or less than \$201)" is checked, no other entry is needed in Block C for that item.																							
Assets and Income	Valuation of Assets at close of reporting period										Income: type and amount. If "None (or less than \$201)" is checked, no other entry is needed in Block C for that item.																							
	None (or less than \$1,001)	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$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	Qualified Trust	Type				Amount						Other Income (Specify Type & Actual Amount)								
																Dividends	Rent and Royalties	Interest	Capital Gains	None (or less than \$201)	\$201 - \$1,000	\$1,001 - \$2,500	\$2,501 - \$5,000	\$5,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	Over \$5,000,000				
1 Aegis Capital Corp, LLC Holds no underlying assets; value based on capital contribution of		x																		x														
2 \$12k.																																		
3 Wells Fargo Mortgage Escrow		x																x			x													
4 S: TIAA CREF CSIS acct consisting of: TIAA Traditional TIAA Real Estate			x																	x		x												
5 S: TIAA CREF CNAS acct		x																		x														
6 Maryland College Investment Plan Age Based Option: Moderate Portfolio		x											x			x					x													
7 Maryland College Investment Plan Age Based Option: Moderate Portfolio		x											x			x					x													
8 AVA Partners Retirement Plan Consisting of: CD- (cash)			x															x				x												
9 CMA Account (cash)		x														x				x														

* This category applies only if the asset/income is solely that of the filer's spouse or dependent children. If the asset/income is either that of the filer or jointly held by the filer with the spouse or dependent children, mark the other higher categories of value, as appropriate.

Do not Complete Schedule B if you are a new entrant, nominee, Vice Presidential or Presidential Candidate

Reporting Individual's Name	SCHEDULE B	Page Number 7
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Part I: Transactions

None

Report any purchase, sale, or exchange by you, your spouse, or dependent children during the reporting period of any real property, stocks, bonds, commodity futures, and other securities when the amount of the transaction exceeded \$1,000. Include transactions that resulted in a loss. Do not

report a transaction involving property used solely as your personal residence, or a transaction solely between you, your spouse, or dependent child. Check the "Certificate of divestiture" block to indicate sales made pursuant to a certificate of divestiture from OGE.

		Identification of Assets	Transaction Type (x)			Date (Mo., Day, Yr.)	Amount of Transaction (x)													
			Purchase	Sale	Exchange		\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$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	Certificate of divestiture
	Example:	Central Airlines Common	x			2/1/99				x										
1																				
2																				
3																				
4																				
5																				

* This category applies only if the underlying asset is solely that of the filer's spouse or dependent children. If the underlying asset is either held by the filer or jointly held by the filer with the spouse or dependent children, use the other higher categories of value, as appropriate.

Part II: Gifts, Reimbursements, and Travel Expenses

For you, your spouse and dependent children, report the source, a brief description, and the value of: (1) gifts (such as tangible items, transportation, lodging, food, or entertainment) received from one source totaling more than \$260; and (2) travel-related cash reimbursements received from one source totaling more than \$260. For conflicts analysis, it is helpful to indicate a basis for receipt, such as personal friend, agency approval under 5 U.S.C. § 4111 or other statutory authority, etc. For travel-related gifts and reimbursements, include travel itinerary, dates, and the nature of expenses provided. **Exclude** anything given to you by

the U.S. Government: given to your agency in connection with official travel; received from relatives; received by your spouse or dependent child totally independent of their relationship to you; or provided as personal hospitality at the donor's residence. Also, for purposes of aggregating gifts to determine the total value from one source, exclude items worth \$104 or less. See instructions for other exclusions.

None

		Source (Name and Address)	Brief Description	Value
	Examples:	Nat'l Assn. of Rock Collectors, NY, NY	Airline ticket, hotel room & meals incident to national conference 6/15/99 (personal activity unrelated to duty)	\$500
		Frank Jones, San Francisco, CA	Leather briefcase (personal friend)	\$300
1				
2				
3				
4				
5				

Reporting Individual's Name
 Gould, William Scott

SCHEDULE C

Page Number
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Part I: Liabilities

Report liabilities over \$10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent children. Check the highest amount owed during the reporting period. **Exclude** a mortgage on your

personal residence unless it is rented out; loans secured by automobiles, household furniture or appliances; and liabilities owed to certain relatives listed in instructions. See instructions for revolving charge accounts.

None

Category of Amount or Value (x)

Date Incurred	Interest Rate	Term if applicable	Category of Amount or Value (x)																
			\$10,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$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						
Creditors (Name and Address)			Type of Liability																
Examples:	First District Bank, Washington, DC John Jones, 123 J St., Washington, DC		Mortgage on rental property, Delaware Promissory note																
1991	8%	25 yrs.																	
1999	10%	on demand			x						x								
1																			
2																			
3																			
4																			
5																			

* This category applies only if the liability is solely that of the filer's spouse or dependent children. If the liability is that of the filer or a joint liability of the filer with the spouse or dependent children, mark the other higher categories, as appropriate.

Part II: Agreements or Arrangements

Report your agreements or arrangements for: continuing participation in an employee benefit plan (e.g. 401k, deferred compensation); (2) continuation payment by a former employer (including severance payments); (3) leaves

of absence; and (4) future employment. See instructions regarding the reporting of negotiations for any of these arrangements or benefits

None

Status and Terms of any Agreement or Arrangement	Parties	Date
Example: Pursuant to partnership agreement, will receive lump sum payment of capital account & partnership share calculated on service performed through 1/00.	Doe Jones & Smith, Hometown, State	7/85
1 AVA Partners - retirement plan. Holdings listed on Sched. A. Partnership with my spouse. Firm will be dormant during my VA appointment.	AVA Partners	1/1/04
2 IBM 401K I will divest holdings in 401K to comply with my spouse's Senate Ethics Requirement for a DoD PAS position. VA will also require divestiture of any IBM equities in this plan.	IBM	1/10/04
3 IBM Options/RSUs Upon confirmation, I will divest vested assets and forfeit unvested assets described on Schedule A	IBM	10/04
4		
5		
6		

Reporting Individual's Name Gould, William Scott	SCHEDULE D	Page Number 9
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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 Dashed line Doe Jones & Smith, Hometown, State	Non-profit education Dashed line Law firm	President Dashed line Partner	6/92 Dashed line 7/85	Present Dashed line 1/00
1	National Academy of Public Administration IBM Global Business Services	Non-profit Corporation	Fellow Executive (VP)	1/05 10/04	present present
2	The Roxbury Latin School Annual Fund	Educational	Class Agent	1/87	present
3	AVA Partners Kennedy School of Government, Harvard University	Consulting firm Educational	Managing Director Guest Lecturer	1/03 1/03	present present
4	UNITECH	Corporation	Member, Board of Directors and C	1/03	12/08
5	Time Domain Corporation	Corporation	Board member	1/04	present
6	W. Scott Gould and Michele Flournoy Revocable Trusts Retirement Jobs.com	Revocable trust Corporation	Co-Trustee Advisor	2006 8/08	present present

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
Examples:	Doe Jones & Smith, Hometown, State Dashed line Metro University (client of Doe Jones & Smith), Moneytown, State	Legal services Dashed line Legal services in connection with university construction
1	IBM Global Business Services	Salary; VP Public Sector Strategy and Director Global Leadership Initiative
2	S: Lockheed Martin Corp (through AVA Partners)	Consulting fees
3	S: BAE Systems North America (through AVA Partners)	Consulting fees
4	S: MPRI (through AVA Partners)	Speaking fees
5	S: SAIC (through AVA Partners)	Consulting fees
6		

Reporting Individual's Name Gould, William Scott	SCHEDULE D	Page Number 10
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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 Doe Jones & Smith, Hometown, State	Non-profit educat Law firm	President Partner	6/92 7/85	Present 1/00
1	Dolores C. Gould Irrevocable Trust	Trust	Trustee	1/87	present
2	Veterans Agency Review Team, Presidential Transition Team Veterans Agency, Agency Team	Non-profit Non-profit	Co-chair Member	11/08 9/08	1/09 10/08
3	Department of Homeland Security Agency Team Office of Personnel Management Agency Team	Non-profit Non-profit	Member Member	9/08 9/08	10/08 10/08
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 organization when you directly provided the service of more than \$5,000. You need not report the U.S.

None

Do not complete this part if you are an Incumbent, Termination Filer, or Vice Presidential or Presidential Candidate

	Source (Name and Address)	Brief Description of Duties
Examples	Doe Jones & Smith, Hometown, State Metro University (client of Doe Jones & Smith), Hometown, S	Legal services Legal services in connection with university construction
1	UNITECH Corporation	Board Member and chair of Audit Committee
2		
3		
4		
5		
6		

Attachment to Form 278 for William Scott Gould (page 1 of 2)

IBM Stock Options, page 3, line 3

A total of 1413 stock options comprised of:

1059 vested stock options with strike price of \$101.33; and,

354 unvested stock options with strike price of \$101.33.

Date	Type	Units Granted	Units Unvested	Units Vested	Stock Price at Grant (\$US)	Unvested Value (\$US)
08 Mar 2005	Stock Option	1,413	354	1,059	101.33	0
Total			354	1,059		

All 354 of the unvested units will vest in March 2009.

Stock options expire 10 years from date of issue. Since the date of issue for all 1413 options listed above was March 8, 2005, all of the options will expire on March 7, 2015.

IBM Restricted Stock Units, page 3, line 4

A total of 2,145 restricted stock units comprised of:

1,288 vested restricted stock units @ \$93 per share or \$119,784; and,

857 unvested restricted stock units @ \$93 per share or \$79,701.

Date	Type	Units Granted	Units Unvested	Units Vested	Stock Price at Grant (\$US)	Unvested Value* (\$US)
08 May 2008	RSU	468	468	0	124.46	44,424
08 May 2007	RSU	264	268	0	102.80	25,824
08 May 2006	RSU	250	125	125	82.76	11,625
01 Oct 2004	RSU	1,163	0	1,163	86.44	0
Total			857	1,288		

- values based on \$93/share as of Feb 20, 2009

Attachment to Form 278 for William Scott Gould (Continued) (page 2 of 2)

The 857 unvested RSUs vest on different dates as follows:

491 vest in May 2009;
132 vest in May 2010; and,
234 vest in May 2011.

Once vested, restricted stock units do not expire.