Annual Report 2024 for Calendar Year 2023 | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (Updated 2/9/2024)(Expires 11/30/24)

## **Executive Branch Personnel**

## Public Financial Disclosure Report (OGE Form 278e)

## Filer's Information

Thompson, Aileen J

Assistant Director, Antitrust II Division, Bureau of Economics, Federal Trade Commission

Report Year: 2024

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/ Thompson, Aileen J [electronically signed on 05/13/2024 by Thompson, Aileen J in Integrity.gov]

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/ Pankey, Lorielle L, Certifying Official [electronically signed on 06/04/2024 by Pankey, Lorielle L in Integrity.gov]

Other review conducted by

/s/ Pankey, Lorielle L, Ethics Official [electronically signed on 06/04/2024 by Pankey, Lorielle L in Integrity.gov]

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Data Revised 06/04/2024

Data Revised 05/29/2024

## 1. Filer's Positions Held Outside United States Government

None

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA: FIDELITY 500 INDEX FUND		Yes	\$15,001 - \$50,000		None (or less than \$201)
2	Carleton University Retirement Plan. This is a hybrid pension plan, meaning that I will receive the larger of my minimum guaranteed pension and my money purchase pension. The latter is based on investments of defined contributions. See Endnote.	See Endnote	No	\$250,001 - \$500,000		None (or less than \$201)
2.1	Royal Bank of Canada		N/A	\$1,001 - \$15,000		
2.2	PH&N ENHD TOTL RTN BDN S-0 785		Yes	\$50,001 - \$100,000		
2.3	Cash and Cash Equivalents		N/A	\$1,001 - \$15,000		
2.4	Toronto Dominion Bank		N/A	\$1,001 - \$15,000		
2.5	Bank of Nova Scotia		N/A	\$1,001 - \$15,000		
2.6	Suncor Energy		N/A	\$1,001 - \$15,000		
2.7	Manulife Financial Group		N/A	\$1,001 - \$15,000		
2.8	Canadian Natural Resources Ltd		N/A	\$1,001 - \$15,000		
2.9	Canadian National Railway Co		N/A	\$1,001 - \$15,000		
2.10	Enbridge	:	N/A	\$1,001 - \$15,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.11	Nestle SA	N/A	\$1,001 - \$15,000		
2.12	Prov of Ontario	N/A	\$1,001 - \$15,000		
2.13	Thermo Fisher Scientific	N/A	\$1,001 - \$15,000		
2.14	Accenture plc	N/A	\$1,001 - \$15,000		
2.15	Rogers Communications	N/A	\$1,001 - \$15,000		
2.16	Honeywell International	N/A	\$1,001 - \$15,000		
2.17	Canadian Imperial Bank of Comm	N/A	\$1,001 - \$15,000		
2.18	Visa Inc	N/A	\$1,001 - \$15,000		
2.19	Teck Resources	N/A	\$1,001 - \$15,000		
2.20	Canfor Corporation	N/A	\$1,001 - \$15,000		
2.21	Government of Canada	N/A	\$1,001 - \$15,000		
2.22	Alimentation Couche-Tard, Inc	N/A	\$1,001 - \$15,000		
2.23	Diageo Plc	N/A	\$1,001 - \$15,000		
2.24	Medtronic Plc	N/A	\$1,001 - \$15,000		
2.25	LVMH Moet Hennessey Louis Vuitt	N/A	\$1,001 - \$15,000		
2.26	Bank of Montreal	N/A	\$1,001 - \$15,000		
2.27	Roche Holding AG	N/A	\$1,001 - \$15,000		
2.28	Canadian Tire Corp Ltd	N/A	\$1,001 - \$15,000		
2.29	Linde AG	N/A	\$1,001 - \$15,000		
2.30	CGI Group Inc	N/A	\$1,001 - \$15,000		
2.31	Schneider Electric SE	N/A	\$1,001 - \$15,000		
2.32	Power Corp Canada	N/A	\$1,001 - \$15,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.33	Prov of Quebec	N/A	\$1,001 - \$15,000		
2.34	Waste Connections	N/A	\$1,001 - \$15,000		
2.35	Province of Alberta	N/A	\$1,001 - \$15,000		
2.36	Telus Corp	N/A	\$1,001 - \$15,000		
2.37	Dollarama	N/A	\$1,001 - \$15,000		
2.38	Open Text Corporation	N/A	\$1,001 - \$15,000		
2.39	Abbott Laboratories	N/A	\$1,001 - \$15,000		
2.40	Apple, Inc	N/A	\$1,001 - \$15,000		
2.41	Fairfax Financial Holdings	N/A	\$1,001 - \$15,000		
2.42	Infrastructure	Yes	\$50,001 - \$100,000		
2.43	Nutrien	N/A	\$1,001 - \$15,000		
2.44	Comcast Corp	N/A	\$1,001 - \$15,000		
2.45	Microsoft Corp	N/A	\$1,001 - \$15,000		
2.46	Constellation Software	N/A	\$1,001 - \$15,000		
2.47	Emerging Markets	Yes	\$15,001 - \$50,000		
2.48	GLOBAL SMALL CAP	Yes	\$15,001 - \$50,000		
2.49	Bentall Kennedy Prime Canadian	Yes	\$1,001 - \$15,000		
2.50	Intact Financial Corp	N/A	\$1,001 - \$15,000		
2.51	Alphabet Inc-Cl	N/A	\$1,001 - \$15,000		
2.52	Shopify, Inc	N/A	\$1,001 - \$15,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.53	Franco-Nevada Group	N/A	\$1,001 - \$15,000		
2.54	Prov of British Columbia	N/A	\$1,001 - \$15,000		
2.55	Finning Interational	N/A	\$1,001 - \$15,000		
2.56	The Goldman Sachs Group, Inc. (GS)	N/A	\$1,001 - \$15,000		
2.57	Heineken NV	N/A	\$1,001 - \$15,000		
2.58	Magna Intl Inc	N/A	\$1,001 - \$15,000		
2.59	Transcontinental Inc	N/A	\$1,001 - \$15,000		
2.60	Imperial Oil	N/A	\$1,001 - \$15,000		
2.61	Restaurant Brands Intl Inc	N/A	\$1,001 - \$15,000		
2.62	Pernod Ricard	N/A	\$1,001 - \$15,000		
2.63	CENOVUS ENERGY INC	N/A	\$1,001 - \$15,000		
2.64	ORACLE CORP	N/A	\$1,001 - \$15,000		
2.65	WILLIS TOWERS WATSON PLC	N/A	\$1,001 - \$15,000		
2.66	CHARLES SCHWAB	N/A	\$1,001 - \$15,000		
2.67	BOSTON SCIENTIFIC CORP	N/A	\$1,001 - \$15,000		
2.68	IA FINANCIAL CORP INC	N/A	\$1,001 - \$15,000		
2.69	ATCO LTD	N/A	\$1,001 - \$15,000		
2.70	UNION PACIFIC CORP	N/A	\$1,001 - \$15,000		
2.71	CIE FINANCIERE RICHEMONT	N/A	\$1,001 - \$15,000		
2.72	SHELL PLC	N/A	\$1,001 - \$15,000		
2.73	Quebecor	N/A	\$1,001 - \$15,000		
2.74	TFI International	N/A	\$1,001 - \$15,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.75	Thomson Reuters	N/A	\$1,001 - \$15,000		
2.76	Saputo	N/A	\$1,001 - \$15,000		
2.77	CANADIAN PACIFIC KANSAS		\$1,001 - \$15,000		
2.78	WALT DISNEY CO/THE		\$1,001 - \$15,000		
2.79	UBS GROUP AG		\$1,001 - \$15,000		
2.80	AMAZON.COM INC		\$1,001 - \$15,000		
2.81	COGECO COMMUNICATIONS		\$1,001 - \$15,000		
2.82	NVIDIA CORP		\$1,001 - \$15,000		
2.83	WELLS FARGO & CO		\$1,001 - \$15,000		
2.84	MERCK KGAA	N/A	\$1,001 - \$15,000		
2.85	COCA-COLA CO	N/A	\$1,001 - \$15,000		
2.86	WATERS CORP	N/A	\$1,001 - \$15,000		
2.87	WHEATON PRECIOUS METALS CORP	N/A	\$1,001 - \$15,000		
2.88	broadcom	N/A	\$1,001 - \$15,000		
2.89	UNITEDHEALTH GROUP INC	N/A	\$1,001 - \$15,000		
2.90	AMERICAN EXPRESS CO	N/A	\$1,001 - \$15,000		
2.91	TOURMALINE OIL CORP	N/A	\$1,001 - \$15,000		
2.92	ENEL SPA	N/A	\$1,001 - \$15,000		
2.93	PROGRESSIVE CORP	N/A	\$1,001 - \$15,000		

# 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Carleton University Retirement Plan	Ottawa, Outside U.S.	I will receive a pension on my "normal retirement date" (7/1/2027). Carleton has not made any further contributions since my resignation and will not make any future contributions.	9/1992

# 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	B. Erard and Associates (Economic and statistical consulting)		N/A		self-employment earnings	
2	401K & IRA: Fidelity 500 Index Fund (FXAIX)	See Endnote	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
3	IRA: Fidelity International Small Cap (FISMX)		Yes	\$50,001 - \$100,000		None (or less than \$201)
4	IRA: Fidelity International Index Fund		Yes	\$50,001 - \$100,000		None (or less than \$201)
5	IRA: Fidelity International Growth Fund		Yes	\$100,001 - \$250,000		None (or less than \$201)
6	Carleton University Retirement Plan. This is a "hybrid" pension plan. My spouse will recieve the larger of the minimum guaranteed pension and the money purchase pension. The latter is based on investments of defined contributions and depends on their returns.	See Endnote	No	\$250,001 - \$500,000		None (or less than \$201)
7	401 K: Fidelity Government Cash Reserves		Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	IRA: Fidelity Growth Discovery Fund (FDSVX) See Endno	ote Yes	\$250,001 - \$500,000		None (or less than \$201)
9	IRA&401K: Fidelity Money Market Fund Premium Class (FZDXX)	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
10	401K & IRA: Fidelity Low-Priced Stock Fund (FLPSX)	Yes	\$100,001 - \$250,000		

# 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE INCOME TYP	INCOME AMOUNT
1	U.S. bank account #1	N/A	\$50,001 - \$100,000	None (or less than \$201)
2	U.S. Bank Account #1b	N/A	\$1,001 - \$15,000	None (or less than \$201)
3	U.S. Bank Account #3	N/A	\$100,001 - Interest \$250,000	\$1,001 - \$2,500
4	Virginia 529 InVEST: Intl Stock Index	Yes	\$1,001 - \$15,000	None (or less than \$201)
5	Scotiabank (Ottawa, Canada) Account	N/A	\$1,001 - \$15,000	None (or less than \$201)
6	U.S. bank account #4	N/A	\$15,001 - \$50,000	None (or less than \$201)
7	Virginia 529 InVEST: Total Stock Market Index	Yes	\$15,001 - \$50,000	None (or less than \$201)
8	U.S. Bank Account #2	N/A	\$1,001 - \$15,000	None (or less than \$201)
9	U.S. Bank Account 2b	N/A	\$250,001 - Interest \$500,000	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
10	U.S. Bank Account #4b	N/A	\$1,001 - \$15,000		None (or less than \$201)
11	Corebridge, fixed annuity	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500

## 7. Transactions

#	DESCRIPTION	_	TYPE	DATE	AMOUNT
1	Fidelity Contrafund (FCNTX)	See Endnote	Sale	01/03/2023	\$100,001 - \$250,000
2	Fidelity Growth Discovery Fund (FDSVX)		Purchase	01/03/2023	\$50,001 - \$100,000
3	Fidelity 500 Index Fund (FXAIX)	See Endnote	Purchase	01/03/2023	\$100,001 - \$250,000
4	Fidelity Blue Chip Growth Fund (FBGRX)		Sale	01/03/2023	\$50,001 - \$100,000
5	Fidelity Blue Chip Growth Fund (FBGRX)	See Endnote	Sale	01/06/2023	\$100,001 - \$250,000
6	Fidelity Low-Priced Stock Fund (FLPSX)	See Endnote	Purchase	01/06/2023	\$100,001 - \$250,000
7	Bank of Montreal RRSP Mutual Fund: Resource Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000
8	Bank of Montreal RRSP Mutual Fund: Mortgage & Short Term Inc Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000
9	Bank of Montreal RRSP Mutual Fund: Canadian Equity ETF Fund	See Endnote	Sale	10/23/2023	\$15,001 - \$50,000
10	Bank of Montreal RRSP Mutual Fund: Asset Allocation Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
11	Bank of Montreal RRSP Mutual Fund: U.S. Equity Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000
12	Bank of Montreal RRSP Mutual Fund: Canadian Small Cap Equity Fund	See Endnote	Sale	10/23/2023	\$15,001 - \$50,000
13	Bank of Montreal RRSP Mutual Fund: Mortgage & Short Term Inc Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000
14	Bank of Montreal RRSP Mutual Fund: Canadian Equity ETF Fund	See Endnote	Sale	10/23/2023	\$50,001 - \$100,000
15	Bank of Montreal RRSP Mutual Fund: Asset Allocation Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000
16	Bank of Montreal RRSP Mutual Fund: Bond Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000
17	Bank of Montreal RRSP Mutual Fund: U.S. Equity Fund	See Endnote	Sale	10/23/2023	\$1,001 - \$15,000

# 8. Liabilities

None

# 9. Gifts and Travel Reimbursements

None

## Endnotes

PART	#	ENDNOTE
2.	2	The asset values listed for the underlying assets of this fund represent the estimated market values for the collective interest of myself and my spouse. They are based on the market value of each asset within the fund multiplied by the collective interest of myself and my spouse in the Retirement Fund (approximately 0.048%). The values have also been converted from Canadian \$ to US \$ using December 2023 exchange rate.
5.	2	The reported value represents holdings in 401K, Roth IRA, SEP IRA and rollover IRA.
5.	6	The underlying assets are reported in Section 2. See Endnote for Carleton University Retirement Plan for Section 2.
5.	8	Includes holdings in SEP IRA and Roth IRA
7.	1	This includes sale from both 401K and IRA accounts.
7.	3	This includes both 401K and IRA holdings.
7.	5	This includes sales from both 401K and IRA.
7.	6	This includes holdings in both 401K and IRA.
7.	7	Calculated based on Canadian \$ exchange rate = 1.3717
7.	8	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	9	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	10	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	11	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	12	Calculated based on Canadian \$ exchange rate = 1.3717.
7.	13	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	14	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	15	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	16	Calculated based on Canadian \$ Exchange Rate = 1.3717.
7.	17	Calculated based on Canadian \$ Exchange Rate = 1.3717.

## **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 (limitations apply for PAS filers); (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).