

# Executive Branch Personnel

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

### Filer's Information

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Sandoval, Catherine

Board Member, U.S. Chemical Safety and Hazard Investigation Board

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Names of Congressional Committees Considering Nomination:

- Committee on Environment and Public Works
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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/ Sandoval, Catherine [electronically signed on 04/03/2022 by Sandoval, Catherine in Integrity.gov]

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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/ Bouziane, Michele, Certifying Official [electronically signed on 06/14/2022 by Bouziane, Michele in Integrity.gov]

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Other review conducted by

/s/ Bouziane, Michele, Ethics Official [electronically signed on 06/14/2022 by Bouziane, Michele in Integrity.gov]

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U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 06/21/2022 by Apol, David in Integrity.gov]

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Santa Clara University (School of Law)	See Endnote	Santa Clara, California	University/College	Associate Professor	8/2004	Present
2	Catherine Sandoval Advisory (expert advisory and expert witness services)		Campbell, California	Sole Proprietorship (unincorporated)	President & CEO	3/2017	Present
3	Catch the Next		West Haven, Connecticut	Non-Profit	Member, Board of Directors (uncompensated board service)	6/2019	Present
4	Amici: PG&E ratepayers in PG&E's federal criminal probation case		Santa Clara, California	University/College	Pro bono Co-counsel as Director, Insurance Law Institute at SCU Law	6/2020	1/2022
5	Santa Clara University (School of Law), Director, Broadband and Infrastructure Institute of California @ SCU Law		Santa Clara, California	University/College	Director	7/2021	Present
6	Santa Clara University (School of Law), Director, Insurance Law Institute @ SCU Law		Santa Clara, California	University/College	Director	8/2020	Present
7	Santa Clara University (School of Law), Director, SCU Summer Law Program @ Oxford University		Santa Clara, California	University/College	Director	8/2017	Present
8	Santa Clara University (School of Law), Co-Director, High Tech Law Institute		Santa Clara, California	University/College	Co-Director	5/2018	Present
9	Santa Clara University (School of Law), Co-Director, Broadband Institute of California @ SCU Law		Santa Clara, California	University/College	Co-Director	1/2017	6/2021

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Catherine Sandoval Advisory, Sole Proprietorship	See Endnote	N/A	\$1,001 - \$15,000	Consulting or expert witness fee (no retainers).	\$60,390
2	Santa Clara University School of Law		N/A		Salary and stipend	\$194,961
3	State of California Savings Plus Program, 401(k) Defined Contribution Plan		No			
3.1	Target Date Fund-2025		Yes	\$15,001 - \$50,000		None (or less than \$201)
4	Santa Clara University 401(a) Defined Contribution Plan and Tax-Deferred Annuity		No			
4.1	TIAA Traditional		N/A	\$50,001 - \$100,000		None (or less than \$201)
4.2	CREF Stock R2 (QCSTPX)		Yes	\$500,001 - \$1,000,000		None (or less than \$201)
4.3	CREF Bond Market R2 (QCBMPX)		Yes	\$15,001 - \$50,000		None (or less than \$201)
4.4	CREF Inf-Linked Bond R2 ((QCILPX)		Yes	\$15,001 - \$50,000		None (or less than \$201)
4.5	Vanguard Inflation-Protected Securities Index Fund Admiral Class Shares (VAIPX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
5	"Communications Law in the Public Interest," (co-author) Aspen Publishing (value not readily ascertainable)	See Endnote	N/A			None (or less than \$201)
6	Stanford University - October 27, 2020	See Endnote	N/A		Honorarium	\$500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7	Federal Communications Commission - October 16, 2019	See Endnote	N/A	Honorarium	\$1,000

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE	
1	Santa Clara University	Santa Clara, California	I will take an unpaid leave of absence from my tenured professor position for the duration of federal service. As a tenured professor I will retain electronic resource and library privileges.	4/2022	
2	State of California	See Endnote	Sacramento, California	I plan to continue to participate in this defined contribution plan but the plan sponsor (The State of California) no longer makes contributions after my separation from state service in January 2017.	4/2001
3	Catherine Sandoval Advisory.	Campbell, California	My sole proprietorship will be inactive during my appointment and all outstanding client fees will be fixed before I enter government service.	4/2022	
4	Santa Clara University	Santa Clara, California	I will continue to participate in Santa Clara University's defined contribution plan. The plan sponsor will not make contributions during my leave.	8/2004	

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

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Santa Clara University		Santa Clara, California	Teach courses and conduct research on Energy, Communications, Contract, and Antitrust Law. Director, Center for Insurance Law and Regulation @ SCU Law, fall 2020-present. Served as Pro bono Co-counsel in PG&E's federal Criminal Probation case representing PG&E ratepayers as Amici from June 2020 to January 2022 when PG&E's federal criminal probation ended. Director, Tutor, and Lecturer, SCU Law Summer Law Program @ Oxford University, fall 2017 to present. Director, Broadband & Infrastructure Institute of California (BBIC) (Summer 2021 to present). Co-Director, Broadband Institute of California, Spring 2017-Spring 2021. Co-Director, SCU Law High-Tech Law Institute, May 2018 to present
2	Catherine Sandoval Advisory		Campbell, California	Provide short-term advisory and expert witness services on utility and antitrust issues
3	Friedman & Springwater LLP	See Endnote	San Francisco, California	Expert witness for California state regulatory hearing (Client of Catherine Sandoval Advisory).
4	Stoell Rives LLP	See Endnote	Sacramento, California	Expert witness for state court tort case (Client of Catherine Sandoval Advisory).
5	State of Wisconsin	See Endnote	Madison, Wisconsin	Expert witness for state plaintiffs in federal antitrust trial (Client of Catherine Sandoval Advisory).
6	Manatt, Phelps & Phillips, LLP	See Endnote	Los Angeles, California	Expert witness for California state eminent domain case (Client of Catherine Sandoval Advisory).

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Comerica Bank	N/A		Salary and bonus	
2	Spouse IRA #1	No			
2.1	Transamerica Asset Allocation Moderate Growth Port CL	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	401K, Comerica Bank	No			
3.1	FIAM Inx TD 2025 T (Fidelity Index Asset Management), Commingled Pool Class T	Yes	\$50,001 - \$100,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Bank Account #1 cash	N/A	\$100,001 - \$250,000		None (or less than \$201)
2	U.S. Bank Account #2 cash	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	U.S. Bank Account #3 cash	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	IRA # 1	No			
4.1	Enterprise Financial Services Corp	N/A	\$15,001 - \$50,000		None (or less than \$201)
5	IRA #2	No			
5.1	U.S. brokerage account (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
5.2	Fidelity Blue Chip Growth Fund Class K Shares (FBGKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	Fidelity Fund (FFIDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	Fidelity Growth Strategies Fund (FDEGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Honeywell Stock	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500

## 7. Transactions

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

## 8. Liabilities

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Wells Fargo Home Mortgage		Mortgage on Personal Residence	\$250,001 - \$500,000	2021	3.00	30 year fixed
2	Wells Fargo Home Mortgage	See Endnote	Mortgage on Personal Residence	\$250,001 - \$500,000	2013	3.625	30 year fixed

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	1	Tenured faculty member at Santa Clara University School of Law. If confirmed I will take a leave of absence from my position as a Professor and the Institutes and Programs at Santa Clara University that I direct or co-direct.
2.	1	This sole proprietorship has no assets independent of income received.
2.	5	Anticipated book royalties. No advance or royalties received to date.



PART	#	ENDNOTE
2.	6	Honorarium paid in 2021 for speaking at Stanford Digital Society conferences in fall 2020.
2.	7	Honorarium of \$1,000 paid by the FCC in 2021 for October 2019 speech at the FCC's invitation for the FCC Hispanic Heritage Month Celebration.
3.	2	I began participating in the California State defined contribution plan in April 2001-April 2004. The State of California resumed contributions to my plan in January 2011-January 2017. The State's contributed ended after my state service concluded in January 2017.
4.	3	Friedman & Springwater LLP's client for the expert witness services provided is Foley Investments, L.P. Revenues for service provided in 2021 were collected. Revenues for service provided in 2022 are anticipated and will be collected or fixed prior to federal service.
4.	4	Stoell Rives' client for the expert witness services provided was California Resources Production Corporation. Revenues for service provided in 2021 were collected.
4.	5	Expert witness in federal antitrust trial for state plaintiffs: State of New York; State of California; State of Connecticut; District of Columbia; State of Maryland; State of Michigan; Commonwealth of Virginia; State of Wisconsin; State of Hawaii; Commonwealth of Massachusetts; State of Minnesota; State of Oregon; State of Illinois; and Commonwealth of Pennsylvania Services v. Deutsche Telekom Ag; T-Mobile US, Inc.; Sprint Corporation; and Softbank Group Corp. State of Wisconsin was the payor for my expert witness services which ended in December 2019. Revenues for expert witness services were collected in 2020.
4.	6	Manatt, Phelps & Phillip's client was Liberty Utilities. Revenue for services provided from August 2019 to January 2020 were collected in 2020.
8.	2	This mortgage was paid off and refinanced through new mortgage with Wells Fargo listed in item 1.

# 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 \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 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 \$166 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

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), 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 sections 105 and 402(b)(1) of the Act 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 13770 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), Suite 500, 1201 New York Avenue, N.W., Washington, DC 20005-3917.

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