Annual Report 2019 for Calendar Year 2018 | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (Updated Jan. 2019)

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

### Filer's Information

Gustafson, Peggy E

Inspector General, Department of Commerce

Report Year: 2019

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/ Gustafson, Peggy E [electronically signed on 07/26/2019 by Gustafson, Peggy E 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).

/s/ Maggi, David, Certifying Official [electronically signed on 07/26/2019 by Maggi, David in Integrity.gov]

Other review conducted by

/s/ Jacobi, Will, Ethics Official [electronically signed on 07/26/2019 by Jacobi, Will in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 08/26/2019 by Granahan, Megan in Integrity.gov]

### 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	State of Missouri, defined benefit plan (value not readily ascertainable) eligible for approximately \$967 a month at age 62.	N/A			None (or less than \$201)
2	Jackson County, defined benefit plan (value not readily ascertainable) eligible for approximately \$245 a month at age 65.	N/A			None (or less than \$201)

# 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	State of Missouri	Jefferson City, Missouri	I did not, and could not, continue to contribute to this defined contribution plan after my separation.	1/1999
2	State of Missouri	Jefferson City, Missouri	This is a vested traditional pension. No party has contributed to the plan since my separation from employment with the State of Missouri.	5/1992
3	Jackson County	Kansas City, Missouri	This is a traditional, vested pension plan. Neither party has contributed to the plan since my separation from employment with Jackson County, Missouri.	10/1993

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Pepco Holdings LLC, an Exelon Company	N/A		salary, bonus.	
2	State of Missouri, defined benefit plan (value not readily ascertainable)	N/A			None (or less than \$201)
3	Exelon Corporation stock	No	\$1,001 - \$15,000		None (or less than \$201)
4	BlackRock US Equity Index	Yes	\$15,001 - \$50,000		None (or less than \$201)
5	Blackrock US Debt index Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	Blackrock Mid Cap Equity	Yes	\$15,001 - \$50,000		None (or less than \$201)
7	Blackrock Developed Intl Eq	Yes	\$15,001 - \$50,000		None (or less than \$201)
8	Vanguard Emerging markets idx	Yes	\$1,001 - \$15,000		None (or less than \$201)
9	Blackrock All Ctry World Index	Yes	\$15,001 - \$50,000		None (or less than \$201)
10	Blackrock Dev Real Estate ldx	Yes	\$15,001 - \$50,000		None (or less than \$201)

### 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank account	N/A	\$50,001 - \$100,000		None (or less than \$201)
2	Maryland 529 plan Portfolio 2025	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	Maryland 529 plan Portfolio 2025	Yes	\$15,001 - \$50,000		None (or less than \$201)

# 7. Transactions

DESCRIPTION		TYPE	DATE	AMOUNT
Vanguard Ins Index Fund	See Endnote	Sale	06/30/2018	\$50,001 - \$100,000
Vanguard Extended Mkt Index Inst	See Endnote	Sale	06/30/2018	\$15,001 - \$50,000
Vanguard Total Bond Mkt index	See Endnote	Sale	06/30/2018	\$15,001 - \$50,000
Vanguard Target Retire 2030	See Endnote	Sale	06/30/2018	\$50,001 - \$100,000
Vanguard Total International Stock Index (VGTSX)	See Endnote	Sale	06/30/2018	\$15,001 - \$50,000
Blackrock US Equity Index	See Endnote	Purchase	06/30/2018	\$15,001 - \$50,000
Blackrock US Debt index Fund	See Endnote	Purchase	06/30/2018	\$50,001 - \$100,000
Blackrock Mid Cap Equity	See Endnote	Purchase	06/30/2018	\$15,001 - \$50,000
Blackrock Developed Intl Eq	See Endnote	Purchase	06/30/2018	\$15,001 - \$50,000
	Vanguard Ins Index Fund  Vanguard Extended Mkt Index Inst  Vanguard Total Bond Mkt index  Vanguard Target Retire 2030  Vanguard Total International Stock Index (VGTSX)  Blackrock US Equity Index  Blackrock US Debt index Fund  Blackrock Mid Cap Equity	Vanguard Ins Index Fund  Vanguard Extended Mkt Index Inst  Vanguard Total Bond Mkt index  Vanguard Target Retire 2030  See Endnote  Vanguard Total International Stock Index (VGTSX)  Blackrock US Equity Index  Blackrock US Debt index Fund  See Endnote  Blackrock Mid Cap Equity  See Endnote	Vanguard Ins Index FundSee EndnoteSaleVanguard Extended Mkt Index InstSee EndnoteSaleVanguard Total Bond Mkt indexSee EndnoteSaleVanguard Target Retire 2030See EndnoteSaleVanguard Total International Stock Index (VGTSX)See EndnoteSaleBlackrock US Equity IndexSee EndnotePurchaseBlackrock US Debt index FundSee EndnotePurchaseBlackrock Mid Cap EquitySee EndnotePurchase	Vanguard Ins Index FundSee EndnoteSale06/30/2018Vanguard Extended Mkt Index InstSee EndnoteSale06/30/2018Vanguard Total Bond Mkt indexSee EndnoteSale06/30/2018Vanguard Target Retire 2030See EndnoteSale06/30/2018Vanguard Total International Stock Index (VGTSX)See EndnoteSale06/30/2018Blackrock US Equity IndexSee EndnotePurchase06/30/2018Blackrock US Debt index FundSee EndnotePurchase06/30/2018Blackrock Mid Cap EquitySee EndnotePurchase06/30/2018

#	DESCRIPTION	_	TYPE	DATE	AMOUNT
10	Vanguard Emerging Markets Idx	See Endnote	Purchase	06/30/2018	\$1,001 - \$15,000
11	Blackrock All Ctry World Index	See Endnote	Purchase	06/30/2018	\$15,001 - \$50,000
12	Black rock Dev Real Estate ldx	See Endnote	Purchase	06/30/2018	\$15,001 - \$50,000
13	Vanguard Target Retirement 2025 (VTTVX)	See Endnote	Sale	06/30/2018	\$1,001 - \$15,000

# 8. Liabilities

#	CREDITOR NAME	ТҮРЕ	AMOUNT	YEAR INCURRED	RATE	TERM
1	Freedom Mortgage	Mortgage on Personal Residence	\$250,001 - \$500,000	2009	3.5	30 yr fixed rate
2	Chase	Credit Card	\$15,001 - \$50,000	2004	7.99	revolving
3	pepco Cedit Union	HELOC	\$50,001 - \$100,000	2018	5.45	10 years

# 9. Gifts and Travel Reimbursements

None

### **Endnotes**

PART	#	ENDNOTE
7.	1	Spouse's retirement plan was transferred from pepco to Exelon plan as a result of Exelon purchasing pepco.
7.	2	Spouse's retirement plan was transferred from pepco to Exelon plan as a result of Exelon purchasing pepco.
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### **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 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 \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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. 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 another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another: (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

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