Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Eskin, Sandra

Deputy Under Secretary for Food Safety, Department of Agriculture

Report Year: 2022

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/ Eskin, Sandra [electronically signed on 04/21/2022 by Eskin, Sandra 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/ Segrist, Ryan, Certifying Official [electronically signed on 06/21/2022 by Segrist, Ryan in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	The Pew Charitable Trusts	Washington, District of Columbia	Non-Profit	Project Director, Safe Food	11/2009	3/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	The Pew Charitable Trusts			Salary	$52,100
2	Sandra Eskin Roth IRA	Yes	$1,001 - $15,000		
2.1	AMERICAN GLOBAL GROWTH PORTFOLIO FUND CLASS F-2	N/A	$1,001 - $15,000		None (or less than $201)
2.2	T. ROWE PRICE QM U.S. SMALL & MID CAP CORE EQUITY	N/A	$1,001 - $15,000		None (or less than $201)
2.3	WASATCH INTERNATIONAL OPPS INSTL	N/A	$1,001 - $15,000		None (or less than $201)
3	Sandra Eskin's IRA	Yes	$1,000,001 - $5,000,000		
3.1	VANGUARD MEGA CAP GROWTH ETF (MGK)	N/A	$100,001 - $250,000		None (or less than $201)
3.2	WORLD GOLD TR SPDR GOLD MINISHARES TR (GLDM)	N/A	$50,001 - $100,000		None (or less than $201)
3.3	DIAMOND HILL LARGE CAP I (DHLRX)	N/A	$100,001 - $250,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.4	FPA NEW INCOME (FPNIX)	N/A	$100,001 - $250,000		None (or less than $201)
3.5	GRANDEUR PEAK INTERNATIONAL STALWARTS FD CL I (GISYX)	N/A	$50,001 - $100,000		None (or less than $201)
3.6	GUGGENHEIM TOTAL RETURN BOND FUND INSTITUTIONAL CL (GIBIX)	N/A	$100,001 - $250,000		None (or less than $201)
3.7	HARDING LOEVNER INTERNATIONAL EQUITY INST (HLMIX)	N/A	$50,001 - $100,000		None (or less than $201)
3.8	INVESCO DEVELOPING MKTS R6 (ODVIX)	N/A	$50,001 - $100,000		None (or less than $201)
3.9	JANUS ENTERPRISE FUND I (JMGRX)	N/A	$50,001 - $100,000		None (or less than $201)
3.10	T. ROWE PRICE US SMALL CAP GROWTH EQ I (TQAIX)	N/A	$15,001 - $50,000		None (or less than $201)
3.11	THE HARTFORD INTERNATIONAL VALUE FUND CLASS I (HILIX)	N/A	$15,001 - $50,000		None (or less than $201)
3.12	VICTORY SYCAMORE ESTABLISHED VALUE FUND CLASS I (VEVIX)	N/A	$50,001 - $100,000		None (or less than $201)
3.13	WASATCH INTERNATIONAL OPPS INSTL (WIIOX)	N/A	$15,001 - $50,000		None (or less than $201)
3.14	ALLSPRING SPECIAL SMALL CAP VALUE INST	Yes	$15,001 - $50,000		None (or less than $201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY		CITY, STATE	STATUS AND TERMS	DATE
1	The Pew Charitable Trusts (Fidelity)	See Endnote	Washington, District of Columbia	401K	11/2009

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	Adjunct Professor, The George Washington University Law School	N/A		Salary	
2	Adjunct Professor, Stanford University (The Bing Stanford in Washington Program)	N/A		Salary	
3	Andrew Eskin's IRA	Yes	$1,000,001 - $5,000,000		
3.1	HIGHLANDS REIT INC (PER431522)	N/A	$1,001 - $15,000		None (or less than $201)
3.2	INVENTRUST PROPERTIES CORP (PER461883)	N/A	$15,001 - $50,000		None (or less than $201)
3.3	VANGUARD MEGA CAP GROWTH ETF (MGK)	N/A	$250,001 - $500,000		None (or less than $201)
3.4	WORLD GOLD TR SPDR GOLD MINISHARES TR (GLDM)	N/A	$100,001 - $250,000		None (or less than $201)
3.5	DIAMOND HILL LARGE CAP I (DHLRX)	N/A	$500,001 - $1,000,000		None (or less than $201)
3.6	FPA NEW INCOME (FPNIX)	N/A	$250,001 - $500,000		None (or less than $201)
3.7	GRANDEUR PEAK INTERNATIONAL STALWARTS FD CL I (GISYX)	N/A	$100,001 - $250,000		None (or less than $201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.8	GUGGENHEIM TOTAL RETURN BOND FUND INSTITUTIONAL CL (GIBIX)	N/A	$250,001 - $500,000		None (or less than $201)
3.9	HARDING LOEVNER INTERNATIONAL EQUITY INST (HLMIX)	N/A	$100,001 - $250,000		None (or less than $201)
3.10	INVESCO DEVELOPING MKTS R6 (ODVIX)	N/A	$100,001 - $250,000		None (or less than $201)
3.11	JANUS ENTERPRISE FUND I (JMGRX)	N/A	$100,001 - $250,000		None (or less than $201)
3.12	T. ROWE PRICE US SMALL CAP GROWTH EQ I (TQAIX)	N/A	$50,001 - $100,000		None (or less than $201)
3.13	THE HARTFORD INTERNATIONAL VALUE FUND CLASS I (HILIX)	N/A	$50,001 - $100,000		None (or less than $201)
3.14	VICTORY SYCAMORE ESTABLISHED VALUE FUND CLASS I (VEVIX)	N/A	$100,001 - $250,000		None (or less than $201)
3.15	WASATCH INTERNATIONAL OPPS INSTL (WIIOX)	N/A	$50,001 - $100,000		None (or less than $201)
3.16	ALLSPRING SPECIAL SMALL CAP VALUE INST	N/A	$50,001 - $100,000		None (or less than $201)
4	Andrew Eskin's Roth IRA	Yes	$100,001 - $250,000		
4.1	Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)	N/A	$15,001 - $50,000		None (or less than $201)
4.2	WORLD GOLD TR SPDR GOLD MINISHARES TR	N/A	$1,001 - $15,000		None (or less than $201)
4.3	ALLSPRING SPECIAL SMALL CAP VALUE INST	N/A	$1,001 - $15,000		None (or less than $201)
4.4	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	N/A	$15,001 - $50,000		None (or less than $201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.5	FPA New Income, Inc (FPNIX)		N/A	$15,001 - $50,000		None (or less than $201)
4.6	GRANDEUR PEAK INTERNATIONAL STALWARTS FD CL I		N/A	$1,001 - $15,000		None (or less than $201)
4.7	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)		N/A	$15,001 - $50,000		None (or less than $201)
4.8	HARDING LOEVNER INTERNATIONAL EQUITY INST		N/A	$1,001 - $15,000		None (or less than $201)
4.9	INVESCO DEVELOPING MKTS R6		N/A	$1,001 - $15,000		None (or less than $201)
4.10	Janus Henderson Enterprise Fund Class I Shares (JMGRX)		N/A	$1,001 - $15,000		None (or less than $201)
4.11	T. ROWE PRICE US SMALL CAP GROWTH EQ I		N/A	$1,001 - $15,000		None (or less than $201)
4.12	Hartford International Value Fund Class I Shares (HILIX)		N/A	$1,001 - $15,000		None (or less than $201)
4.13	Victory Sycamore Established Value Fund Class I Shares (VEVIX)		N/A	$1,001 - $15,000		None (or less than $201)
4.14	WASATCH INTERNATIONAL OPPS INSTL		N/A	$1,001 - $15,000		None (or less than $201)

6. Other Assets and Income

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Checking Account	See Endnote	N/A	$50,001 - $100,000	Interest	None (or less than $201)
2	Bank Account	See Endnote	N/A	$250,001 - $500,000	Interest	None (or less than $201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Bank Account (2)	See Endnote	N/A	$250,001 - $500,000	Interest	$1,001 - $2,500
4	Eskin Living Trust		Yes	$500,001 - $1,000,000		
4.1	VANGUARD MEGA CAP GROWTH ETF (MGK)		N/A	$50,001 - $100,000	Dividends	$201 - $1,000
4.2	WORLD GOLD TR SPDR GOLD MINISHARES TR (GLDM)		N/A	$15,001 - $50,000		None (or less than $201)
4.3	DIAMOND HILL LARGE CAP I (DHLRX)		N/A	$50,001 - $100,000	Capital Gains Dividends	$5,001 - $15,000
4.4	FPA NEW INCOME (FPNIX)		N/A	$50,001 - $100,000	Dividends	$201 - $1,000
4.5	GRANDEUR PEAK INTERNATIONAL STALWARTS FD CL I (GISYX)		N/A	$15,001 - $50,000	Capital Gains Dividends	$1,001 - $2,500
4.6	GUGGENHEIM TOTAL RETURN BOND FUND INSTITUTIONAL CL (GIBIX)		N/A	$50,001 - $100,000	Capital Gains Dividends	$2,501 - $5,000
4.7	HARDING LOEVNER INTERNATIONAL EQUITY INST (HLMIX)		N/A	$15,001 - $50,000	Capital Gains Dividends	$201 - $1,000
4.8	INVESCO DEVELOPING MKTS R6 (ODVIX)		N/A	$15,001 - $50,000	Capital Gains Dividends	$1,001 - $2,500
4.9	JANUS ENTERPRISE FUND I (JMGRX)		N/A	$15,001 - $50,000	Capital Gains Dividends	$2,501 - $5,000
4.10	T. ROWE PRICE US SMALL CAP GROWTH EQ I (TQAIX)		N/A	$1,001 - $15,000	Capital Gains	$1,001 - $2,500
4.11	THE HARTFORD INTERNATIONAL VALUE FUND CLASS I (HILIX)		N/A	$1,001 - $15,000	Dividends	$201 - $1,000
4.12	VICTORY SYCAMORE ESTABLISHED VALUE FUND CLASS I (VEVIX)		N/A	$15,001 - $50,000	Capital Gains Dividends	$1,001 - $2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.13	WASATCH INTERNATIONAL OPPS INSTL (WIIOX)	N/A	$15,001 - $50,000	Capital Gains	$1,001 - $2,500
4.14	iShares Russell Mid-Cap Growth ETF (IWP)	N/A	$1,001 - $15,000		None (or less than $201)
4.15	iShares Russell Mid-Cap Value ETF (IWS)	N/A	$1,001 - $15,000		None (or less than $201)
4.16	ISHARES RUSSELL SMALL-CAP GROWTH (IWO)	N/A	$1,001 - $15,000		None (or less than $201)
4.17	ALLSPRING SPECIAL SMALL CAP VALUE INST	N/A	$1,001 - $15,000	Capital Gains Dividends	$201 - $1,000

7. Transactions

#	DESCRIPTION		TYPE	DATE	AMOUNT
1	Sandra's Fidelity 401(k)	See Endnote			
2	Vanguard Short-Term Investment-Grade Fund Investor Shares (VFSTX)		Sale	08/19/2021	$1,001 - $15,000
3	Vanguard PRIMECAP Fund Admiral Shares (VPMAX)		Sale	08/19/2021	$50,001 - $100,000
4	Vanguard Equity Income Fund Admiral Shares (VEIRX)		Sale	08/19/2021	$50,001 - $100,000
5	Northern Funds Small Cap Value Fund (NOSGX)		Sale	08/19/2021	$15,001 - $50,000
6	METLIFE STBL VAL OPT		Sale	08/19/2021	$15,001 - $50,000
7	JPMorgan Mid Cap Value Fund Class L Shares (FLMVX)		Sale	08/19/2021	$50,001 - $100,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
8	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)		Sale	08/19/2021	$50,001 - $100,000
9	Hartford MidCap Fund Class R6 Shares (HFMVX)		Sale	08/19/2021	$15,001 - $50,000
10	Harbor Capital Appreciation Fund Institutional Class Shares (HACAX)		Sale	08/19/2021	$1,001 - $15,000
11	Goldman Sachs Small Cap Growth Insights Fund Class R6 Shares (GINUX)		Sale	08/19/2021	$15,001 - $50,000
12	Fidelity US Bond Index Fund (FXNAX)		Sale	08/19/2021	$50,001 - $100,000
13	Fidelity Small Cap Index Fund (FSSNX)		Sale	08/19/2021	$100,001 - $250,000
14	Calvert Bond Fund Class I Shares (CBDIX)		Sale	08/19/2021	$1,001 - $15,000
15	BLACKROCK MSCI ACWI EX-US INDEX R		Sale	08/19/2021	$1,001 - $15,000
16	Wells Fargo Special Small Cap Value Fund Institutional Class Shares (ESPNX)		Sale	09/02/2021	$15,001 - $50,000
17	American FundsGlobal Growth Portfolio Class F2 Shares (PGWFX)		Purchase	07/22/2021	$15,001 - $50,000
18	American FundsGlobal Growth Portfolio Class F2 Shares (PGWFX)		Sale	09/07/2021	$15,001 - $50,000
19	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	See Endnote	Purchase	03/09/2021	$50,001 - $100,000
20	Diamond Hill Large Cap Fund Class I Shares (DHLRX)		Sale	07/19/2021	$1,001 - $15,000
21	FPA New Income, Inc (FPNIX)	See Endnote	Purchase	01/15/2021	$50,001 - $100,000
22	Grandeur Peak International Stalwarts Fund Institutional Class Shares (GISYX)		Purchase	01/15/2021	$15,001 - $50,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
23	Grandeur Peak International Stalwarts Fund Institutional Class Shares (GISYX)	See Endnote	Purchase	09/24/2021	$1,001 - $15,000
24	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)	See Endnote	Purchase	01/15/2021	$100,001 - $250,000
25	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)		Sale	03/09/2021	$50,001 - $100,000
26	International Equity Portfolio Institutional Class Shares (HLMIX)		Sale	01/15/2021	$15,001 - $50,000
27	International Equity Portfolio Institutional Class Shares (HLMIX)	See Endnote	Purchase	09/24/2021	$1,001 - $15,000
28	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)		Sale	01/15/2021	$15,001 - $50,000
29	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)	See Endnote	Purchase	09/07/2021	$1,001 - $15,000
30	46513CE85	See Endnote	Sale	08/19/2021	$15,001 - $50,000
31	Janus Henderson Enterprise Fund Class I Shares (JMGRX)	See Endnote	Sale	01/15/2021	$50,001 - $100,000
32	Janus Henderson Enterprise Fund Class I Shares (JMGRX)	See Endnote	Purchase	09/07/2021	$1,001 - $15,000
33	T Rowe Price QM US Small & Mid-Cap Core Equity Fund (TQSMX)		Purchase	07/22/2021	$1,001 - $15,000
34	T Rowe Price QM US Small & Mid-Cap Core Equity Fund (TQSMX)	See Endnote	Sale	09/07/2021	$1,001 - $15,000
35	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)	See Endnote	Sale	01/15/2021	$15,001 - $50,000
36	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)		Purchase	12/03/2021	$1,001 - $15,000
37	Hartford International Value Fund Class I Shares (HILIX)		Sale	01/15/2021	$1,001 - $15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
38	Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)		Sale	11/30/2021	$50,001 - $100,000
39	Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)	See Endnote	Purchase	09/07/2021	$1,001 - $15,000
40	Victory Sycamore Established Value Fund Class I Shares (VEVIX)	See Endnote	Sale	09/02/2021	$50,001 - $100,000
41	Victory Sycamore Established Value Fund Class I Shares (VEVIX)	See Endnote	Purchase	09/07/2021	$1,001 - $15,000
42	Wasatch International Opportunities Fund Institutional Class Shares (WIIOX)	See Endnote	Purchase	07/22/2021	$1,001 - $15,000
43	Wasatch International Opportunities Fund Institutional Class Shares (WIIOX)	See Endnote	Sale	01/15/2021	$15,001 - $50,000
44	SPDR Gold MiniShares Trust (GLDM)	See Endnote	Purchase	08/20/2021	$50,001 - $100,000
45	Wells Fargo Special Small Cap Value Fund Institutional Class Shares (ESPNX)		Purchase	08/26/2021	$1,001 - $15,000
46	Wells Fargo Special Small Cap Value Fund Institutional Class Shares (ESPNX)		Sale	09/02/2021	$1,001 - $15,000
47	American FundsGlobal Growth Portfolio Class F2 Shares (PGWFX)		Purchase	07/22/2021	$1,001 - $15,000
48	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	See Endnote	Purchase	03/09/2021	$100,001 - $250,000
49	Diamond Hill Large Cap Fund Class I Shares (DHLRX)		Sale	07/19/2021	$1,001 - $15,000
50	FPA New Income, Inc (FPNIX)	See Endnote	Purchase	01/15/2021	$100,001 - $250,000
51	Grandeur Peak International Stalwarts Fund Institutional Class Shares (GISYX)		Purchase	08/26/2021	$15,001 - $50,000
52	Grandeur Peak International Stalwarts Fund Institutional Class Shares (GISYX)		Sale	01/15/2021	$1,001 - $15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
53	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)	See Endnote	Purchase	01/15/2021	$100,001 - $250,000
54	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)		Sale	03/09/2021	$1,001 - $15,000
55	International Equity Portfolio Institutional Class Shares (HLMIX)		Purchase	08/26/2021	$15,001 - $50,000
56	International Equity Portfolio Institutional Class Shares (HLMIX)		Sale	01/15/2021	$1,001 - $15,000
57	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)		Purchase	08/26/2021	$50,001 - $100,000
58	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)		Sale	01/15/2021	$1,001 - $15,000
59	Janus Henderson Enterprise Fund Class I Shares (JMGRX)		Purchase	08/26/2021	$15,001 - $50,000
60	Janus Henderson Enterprise Fund Class I Shares (JMGRX)	See Endnote	Sale	01/15/2021	$15,001 - $50,000
61	T Rowe Price QM US Small & Mid-Cap Core Equity Fund (TQSMX)		Purchase	07/22/2021	$1,001 - $15,000
62	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)		Purchase	08/26/2021	$15,001 - $50,000
63	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)	See Endnote	Sale	01/15/2021	$15,001 - $50,000
64	Hartford International Value Fund Class I Shares (HILIX)		Purchase	08/26/2021	$1,001 - $15,000
65	Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)		Purchase	08/26/2021	$50,001 - $100,000
66	Victory Sycamore Established Value Fund Class I Shares (VEVIX)		Purchase	08/26/2021	$15,001 - $50,000
67	Victory Sycamore Established Value Fund Class I Shares (VEVIX)	See Endnote	Sale	07/19/2021	$15,001 - $50,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
68	Wasatch International Opportunities Fund Institutional Class Shares (WIIOX)		Sale	01/15/2021	$1,001 - $15,000
69	Wasatch International Opportunities Fund Institutional Class Shares (WIIOX)	See Endnote	Purchase	07/22/2021	$15,001 - $50,000
70	SPDR Gold MiniShares Trust (GLDM)	See Endnote	Purchase	08/26/2021	$50,001 - $100,000
71	Wells Fargo Special Small Cap Value Fund Institutional Class Shares (ESPNX)		Sale	09/13/2021	$1,001 - $15,000
72	Diamond Hill Large Cap Fund Class I Shares (DHLRX)	See Endnote	Purchase	03/09/2021	$15,001 - $50,000
73	FPA New Income, Inc (FPNIX)	See Endnote	Purchase	01/06/2021	$15,001 - $50,000
74	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)		Sale	03/09/2021	$1,001 - $15,000
75	Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX)	See Endnote	Purchase	02/08/2021	$15,001 - $50,000
76	International Equity Portfolio Institutional Class Shares (HLMIX)		Purchase	12/01/2021	$1,001 - $15,000
77	Invesco Oppenheimer Developing Markets Fund Class R6 Shares (ODVIX)	See Endnote	Purchase	09/13/2021	$1,001 - $15,000
78	iShares Russell Mid-Cap Growth ETF (IWP)		Purchase	12/01/2021	$1,001 - $15,000
79	iShares Russell Mid-Cap Value ETF (IWS)		Purchase	12/01/2021	$1,001 - $15,000
80	iShares Russell 2000 Growth ETF (IWO)		Purchase	12/07/2021	$1,001 - $15,000
81	Janus Henderson Enterprise Fund Class I Shares (JMGRX)		Sale	09/13/2021	$1,001 - $15,000
82	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)		Sale	09/13/2021	$1,001 - $15,000
83	Hartford International Value Fund Class I Shares (HILIX)		Purchase	12/01/2021	$1,001 - $15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
84	Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)		Purchase	12/07/2021	$1,001 - $15,000
85	Victory Sycamore Established Value Fund Class I Shares (VEVIX)		Sale	09/13/2021	$1,001 - $15,000
86	Wasatch International Opportunities Fund Institutional Class Shares (WIIOX)		Purchase	12/01/2021	$1,001 - $15,000
87	SPDR Gold MiniShares Trust (GLDM)	See Endnote	Purchase	03/08/2021	$15,001 - $50,000

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
3.	1	SANDY'S 401(K) WAS ROLLED INTO HER CASSADAY & COMPANY IRA IN 2021
6.	1	U.S. Depository Institution
6.	2	U.S. Depository Institution
6.	3	U.S. Depository Institution
7.	1	SANDY'S 401(K) WAS ROLLED INTO HER CASSADAY & COMPANY IRA IN 2021

PART	#	ENDNOTE
7.	19	Three separate purchases on 3/9, 9/7 and 12/3/2021
7.	21	Four separate purchases on 1/15, 8/20, 9/7 and 12/3/2021
7.	23	Two purchases on 9/24 and 12/3/21
7.	24	5 separate purchases on 1/15, 9/2, 9/7, 9/24 and 12/3/21
7.	27	Purchases on 9/24 and 12/3/2021
7.	29	Purchases on 9/7 and 12/3/21
7.	30	Full sale of Israel Bond on 8/19/21. Item Description is the bond's cusip.
7.	31	Partial Sales on 1/15 and 9/2/21
7.	32	Purchases on 9/7 and 12/3/21
7.	34	full sale - not held as of 12/31/21
7.	35	partial sales on 1/15 and 9/2/21
7.	39	purchases on 9/7 and 12/3/21
7.	40	partial sales on 7/19 and 9/2/21
7.	41	purchases on 9/7 and 12/3/21
7.	42	purchases on 7/22 and 12/3/21
7.	43	partial sales on 1/15 and 9/24/21
7.	44	purchases on 8/20, 9/2, 9/7 and 12/3/21
7.	48	purchases on 3/9 and 8/26/21
7.	50	purchases on 1/15, 8/26 and 9/2/21
7.	53	purchases on 1/15, 8/26 and 9/2/21
7.	60	partial sales on 1/15 and 9/2/21
7.	63	partial sales on 1/15 and 9/2/21

PART	#	ENDNOTE
7.	67	partial sales on 7/19 and 9/2/21
7.	69	purchases on 7/22 and 8/26/21
7.	70	purchases on 8/26 and 9/2/21
7.	72	purchases on 3/9, 10/6 and 12/1/21
7.	73	purchases on 1/6, 4/6, 5/6, 6/8, 9/13, 12/1 and 12/7/21
7.	75	purchases on 2/8, 7/7, 9/8, 9/13, 11/8 and 12/1/21
7.	77	purchases on 9/13 and 12/1/21
7.	87	purchases on 3/8, 8/9, 9/13 and 12/1/21

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.

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 control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).