

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Oliver Davis, Valeria Rae

Inspector General, Department of Housing and Urban Development

Other Federal Government Positions Held During the Preceding 12 Months:

Acting Assistant Inspector General HUD (2/2017 - Present)

Names of Congressional Committees Considering Nomination:

- **Committee on Banking, Housing, and Urban Affairs**
-

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/ Oliver Davis, Valeria Rae [electronically signed on 03/15/2018 by Oliver Davis, Valeria Rae 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/ CRUCIANI, LINDA M, Certifying Official [electronically signed on 06/28/2018 by CRUCIANI, LINDA M in Integrity.gov]

Other review conducted by

/s/ Cummings, Anthony W, Ethics Official [electronically signed on 06/27/2018 by Cummings, Anthony W in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 07/05/2018 by Apol, David 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	IRA	No			
1.1	Transamerica Government Money Market R2	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	State of Tennessee 401(k)	No			
2.1	Fidelity Contrafund	Yes	\$50,001 - \$100,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	State of Tennessee 401(k)	Nashville, Tennessee	Defined contribution plan. Eligible at age 59.5. I will continue to participate in this defined contribution plan. State of Tennessee has made no contributions since my departure.	4/1999

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

None

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Geowealth (investment advisory firm that provides technology platforms)	N/A		salary and bonus	
2	Geowealth 401K	No			
2.1	Vanguard FTSE All-World ex-US Index Admiral	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
2.2	ishares Government/Credit bond ETF	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
3	IRA	No			
3.1	U.S. Cash Account	See Endnote	N/A		\$15,001 - \$50,000 None (or less than \$201)
3.2	U.S. bank account (cash)	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
3.3	Alliance Holding Unt AHGPP	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.4	Armada HofferProperties REIT ORD AHH	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.5	Barclays ADR Rep BCS PRD	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.6	Bluerock Residential Growth BRG	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.7	Black Stone Minerals UNT BSM	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.8	Citigroup DS Rep	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.9	C. PRN Citigroup Inc 7.875% preferred securities	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.10	CrossAmerica Partners UNT	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.11	CinerResources Unt	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.12	Colony northstar CLA	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.13	Corecivic REIT	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.14	Envivia Partners Unt	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.15	General Electric Ord	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16	GEO Group REIT	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.17	Gaslog Partners Unt	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.18	Global Partners Unt	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.19	Golar LNG Partners Unt	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.20	Gladstone commercial REIT Ord	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.21	Hersha HospitalityCL REIT	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.22	Morgan Stanley non-cumulative Preferred stock Series F	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.23	Proshares Ultrashort Lehman 7-10 Year Treasury ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.24	Royal Bank of Scotland Preference S Series	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.25	Redwood Trust Inc.	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.26	Sabra Health Care REIT ORD	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.27	Santander holdings USA	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.28	Suburban Propane Partners Com	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.29	Texas Capital Bancshares, Inc. - Non Cumulative Preferred Perpetual Stock Series A	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.30	Whitestone REIT ORD	N/A	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Stock - General Electric	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	Janus Investors Overseas Fund B mutual fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Family Trust - beneficiary	No			
3.1	AXAS Abraxas Petroleum	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.2	Allegiant Travel Company - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	UHAL Amerco - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.4	AXP American Express Co	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.5	AVT Avnet INC	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.6	BCS-D Barclays Bank	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.7	BA Boeing Co	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.8	COF Capital One FINL	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.9	Charles Rivers Labs	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.10	CVX Chevron	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.11	CHD Church & Dwight	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.12	Citigroup Inc. DEP pfd	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.13	CXW Corecivic INC	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.14	GLW Corning Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.15	CFR Cullen Frost Bankers	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.16	EXC Exelon corp.	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.17	STAY Extended Stay amer	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.18	FMC Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.19	FIS Fidelity National Information	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.20	FISI Financial Institutions, Inc. - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.21	FE First Energy Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.22	GLOP GasLOG Partnerships LP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.23	GE General Electric	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.24	Golar LNG Partners LP - Common Units Representing Limited Partnership	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.25	Grand Canyon Education, Inc. - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.26	Interface Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.27	Jones Lang LaSalle	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.28	KNOT Offshore PTNRS	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.29	Legacy Texas Financial	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.30	M&T Bank corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.31	MacQuarie Infrastruc	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.32	Manchester UTD PLC	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.33	Medtronic PLC	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.34	Monsanto Co.	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.35	Morgan Stanley 6.875% PFD	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.36	Nestle SA	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.37	NXP Semiconductors N.V. - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.38	OIL-Dri corp of America	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.39	PACCAR Inc. - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.40	Pfizer Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.41	Phillips 66	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.42	PNC Financial Srvcs	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.43	Polaris Industries	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.44	Principal Financial Group	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.45	Quest Diagnostics	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.46	Royal Bank of Scotland	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.47	Royal Caribbean Cruises	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.48	Santander Holdings USA	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.49	SP Plus Corporation - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.50	State Street Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.51	Tapestry Inc.	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.52	TE Connectivity Ltd.	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.53	Texas Capital Bancshares, Inc. 6.5% PFD	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.54	Union Pacific Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.55	Charles Schwab US REIT ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.56	JPMorgan Diversified Return US EQ ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.57	Proshares UltraShort Lehman 7-10 Yr Treasury (ETF)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.58	Vaneck Vectors High Income MLP ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.59	Alliance Holdings LP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.60	Alliance Res Partner LP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.61	Amerigas Partners	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.62	Armada Hoffler Properties	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.63	Blackstone minerals LP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.64	Catchmark Timber TR	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.65	CITIGROUP CAP	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.66	Crossamerica Prtners LP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.67	Enviva Partners	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.68	GEO Group Inc new	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.69	Gladstone Commercial Corporation - Real Estate Investment Trust	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.70	Global partners LP	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.71	Hersha Hospity TR	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.72	Redwood Trust Inc.	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
3.73	Weyerhaeuser co.	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.74	Whitestone REIT	N/A	\$1,001 - \$15,000	Dividends	\$1,001 - \$2,500
4	U.S. bank account #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	U.S. bank account #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)

7. Transactions

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

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Granite State Management	Student Loan	\$15,001 - \$50,000	1997	5.375	13 yrs
2	US Bank	Mortgage on Personal Residence	\$15,001 - \$50,000	2015	5.375%	30 yr
3	US Bank	Mortgage on Personal Residence	\$250,001 - \$500,000	2015	4%	30 yr

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
5.	3.1	Rolled over from a prior 401(k)

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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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.

Public Burden Information

This collection of information is estimated to take an average of three 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, NW., Washington, DC 20005-3917.

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