Periodic Transaction Report | U.S. Office of Government Ethics; 5 C.F.R. part 2634 (Updated Jan. 2019)

Executive Branch Personnel Public Financial Disclosure Report: Periodic Transaction Report (OGE Form 278-T)

Filer's Information

Goulding, Michael

Deputy Associate General Counsel for PFI, GLD, OGC, Department of Health & Human Services

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/ Goulding, Michael [electronically signed on 04/02/2019 by Goulding, Michael 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/ Hall, Randall, Certifying Official [electronically signed on 04/05/2019 by Hall, Randall in Integrity.gov]

Other review conducted by /s/ Hall, Randall, Ethics Official [electronically signed on 04/05/2019 by Hall, Randall in Integrity.gov]

U.S. Office of Government Ethics Certification

Transactions

2 AT& Inc See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 3 AMN Elec Power Co See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 4 Arngen Inc Common Stock See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 5 Consolidated Edison Inc See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 6 Coca Cola European Partners PLC SHS See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 7 Coca Cola Com See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 8 Colgate Palmolive See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 9 Duke Energy Corp New See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 10 General Mills See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 11 Johnson and Johnson Com See Endnote Sale 03/14/1919 No	#	DESCRIPTION		TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
3 AMN Elec Power Co See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 4 Amgen Inc Common Stock See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 5 Consolidated Edison Inc See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 6 Coca Cola European Partners PLC SHS See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 7 Coca Cola Com See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 8 Colgate Palmolive See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 9 Duke Energy Corp New See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 10 General Mills See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 11 Johnson and Johnson Com See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 12 Mondelez International Inc See Endnote Sale 03/14/1919	1	AmerisourceBergen Corp	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
4Amgen Inc Common StockSee EndnoteSale03/14/1919No\$1,001 - \$15,0005Consolidated Edison IncSee EndnoteSale03/14/1919No\$1,001 - \$15,0006Coca Cola European Partners PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,0007Coca Cola ComSee EndnoteSale03/14/1919No\$1,001 - \$15,0008Colgate PalmoliveSee EndnoteSale03/14/1919No\$1,001 - \$15,0009Duke Energy Corp NewSee EndnoteSale03/14/1919No\$1,001 - \$15,00010General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale0	2	AT& Inc	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
5Consolidated Edison IncSee EndnoteSale03/14/1919No\$1,001 - \$15,0006Coca Cola European Partners PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,0007Coca Cola ComSee EndnoteSale03/14/1919No\$1,001 - \$15,0008Colgate PalmoliveSee EndnoteSale03/14/1919No\$1,001 - \$15,0009Duke Energy Corp NewSee EndnoteSale03/14/1919No\$1,001 - \$15,00010General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee Endnote <t< td=""><td>3</td><td>AMN Elec Power Co</td><td>See Endnote</td><td>Sale</td><td>03/14/1919</td><td>No</td><td>\$1,001 - \$15,000</td></t<>	3	AMN Elec Power Co	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
6Coca Cola European Partners PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,0007Coca Cola ComSee EndnoteSale03/14/1919No\$1,001 - \$15,0008Colgate PalmoliveSee EndnoteSale03/14/1919No\$1,001 - \$15,0009Duke Energy Corp NewSee EndnoteSale03/14/1919No\$1,001 - \$15,00010General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay Mackay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee E	4	Amgen Inc Common Stock	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
7Coca Cola ComSee EndnoteSale03/14/1919No\$1,001 - \$15,0008Colgate PalmoliveSee EndnoteSale03/14/1919No\$1,001 - \$15,0009Duke Energy Corp NewSee EndnoteSale03/14/1919No\$1,001 - \$15,00010General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay Mackay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	5	Consolidated Edison Inc	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
8Colgate PalmoliveSee EndnoteSale03/14/1919No\$1,001 - \$15,0009Duke Energy Corp NewSee EndnoteSale03/14/1919No\$1,001 - \$15,00010General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay Mackay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	6	Coca Cola European Partners PLC SHS	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
9Duke Energy Corp NewSee EndnoteSale03/14/1919No\$1,001 - \$15,00010General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	7	Coca Cola Com	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
10General MillsSee EndnoteSale03/14/1919No\$1,001 - \$15,00011Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	8	Colgate Palmolive	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
11Johnson and Johnson ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00012Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	9	Duke Energy Corp New	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
12Mondelez International IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00013Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	10	General Mills	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
13Medtronic PLC SHSSee EndnoteSale03/14/1919No\$1,001 - \$15,00014Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	11	Johnson and Johnson Com	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
14Pfizer IncSee EndnoteSale03/14/1919No\$1,001 - \$15,00015Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	12	Mondelez International Inc	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
15Sector SPDR EnergySee EndnoteSale03/14/1919No\$1,001 - \$15,00016Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	13	Medtronic PLC SHS	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
16Verizon Communications ComSee EndnoteSale03/14/1919No\$1,001 - \$15,00017Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	14	Pfizer Inc	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
17Mainstay Mackay Tax Free Bond Fund CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00018Mainstay MacKay High Yield Muni Bond FD CL ISee EndnoteSale03/14/1919No\$1,001 - \$15,00019Invesco High Yield Municipal Fund YSee EndnoteSale03/14/1919No\$1,001 - \$15,000	15	Sector SPDR Energy	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
18 Mainstay MacKay High Yield Muni Bond FD CL I See Endnote Sale 03/14/1919 No \$1,001 - \$15,000 19 Invesco High Yield Municipal Fund Y See Endnote Sale 03/14/1919 No \$1,001 - \$15,000	16	Verizon Communications Com	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
19 Invesco High Yield Municipal Fund Y See Endnote Sale 03/14/1919 No \$1,001 - \$15,000	17	Mainstay Mackay Tax Free Bond Fund CL I	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
	18	Mainstay MacKay High Yield Muni Bond FD CL I	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
20 Columbia Strategic Municipal Incme FD INSTL See Endnote Sale 03/14/1919 No \$1,001 - \$15,000	19	Invesco High Yield Municipal Fund Y	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
	20	Columbia Strategic Municipal Incme FD INSTL	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000
21 Victory RS Global Nat Resources FD CL Y See Endnote Sale 03/14/1919 No \$1,001 - \$15,000	21	Victory RS Global Nat Resources FD CL Y	See Endnote	Sale	03/14/1919	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
22	Ishares 20+ Year Treasury Bond ETF	Purchase	03/14/1919	No	\$1,001 - \$15,000
23	Ishares National Muni Bon ETF	Purchase	03/14/1919	No	\$1,001 - \$15,000
24	Legg Mason ETF Invst TR Legg Mason Low VLTLTY High DVD ETF	Purchase	03/14/1919	No	\$15,001 - \$50,000
25	Vaneck Vectors High-Yield Municipal Index ETF	Purchase	03/14/1919	No	\$1,001 - \$15,000
26	Vaneck Vectors AMT-Free Long Municipal I	Purchase	03/14/1919	No	\$1,001 - \$15,000
27	SPDR Nuveen S and P High Yield Municipal	Purchase	03/14/1919	No	\$1,001 - \$15,000
28	Sector SPDR Utilities	Purchase	03/14/1919	No	\$15,001 - \$50,000

Endnotes

PART	#	ENDNOTE
Transactions	1	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	2	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	3	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	4	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	5	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	6	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	7	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.

PART	#	ENDNOTE
Transactions	8	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	9	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	10	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	11	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	12	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	13	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	14	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	15	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	16	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	17	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	18	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	19	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	20	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.
Transactions	21	Part of IRA Inherited on July 13, 2018. Randall Hall, HHS OGC Ethics, advised that I was not required to file a Form 278 at the time of inheritance, but upon sale.

Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

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.