



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-0500

OFFICE OF GENERAL COUNSEL

Emory A. Rounds, III  
Director  
U.S. Office of Government Ethics  
1201 New York Avenue, N.W., Suite 500  
Washington DC 20005-3917

Dear Mr. Rounds:

I am enclosing an amendment to Alanna McCargo's nominee public financial disclosure report, signed on August 2, 2021, and a supplement to her ethics agreement, signed on September 21, 2021. Based on my review of this additional information, I continue to believe that Ms. McCargo is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**GAYLE**  
**BOHLING**

Digitally signed by  
GAYLE BOHLING  
Date: 2021.09.27  
19:45:40 -04'00'

Gayle E. Bohling  
Deputy General Counsel for Operations

Enclosures

9/27/21

Gayle Bohling  
Deputy General Counsel for Operations  
Alternate Designated Agency Ethics Official  
451 7th Street SW  
Room 10240  
Washington D.C. 20410

**Re: Amendment to Financial Disclosure Report of Alanna McCargo**

Dear Ms. Bohling:

The purpose of this document is to amend my financial disclosure report by correcting inadvertent errors to Part 2 and Part 6. In Part 2, I double reported assets which were correctly reported in Part 6. Part 2 entries 2.6, 2.7, 2.8, 2.10, and 2.11 should be deleted from Part 2 and are correctly reported in Part 6. In addition, Part 2 entry 2.9, Rocket Companies Inc., should be deleted from Part 2 and added to Part 6 as shown below.

**Part 6**

<b>Description</b>	<b>EIF</b>	<b>Value</b>	<b>Income Type</b>	<b>Income Amount</b>
Rocket Companies Inc.	N/A	\$1,001 - \$15,000		None (or less than \$201)

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,

*Alanna McCargo*

Alanna McCargo

## Executive Branch Personnel

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

#### Filer's Information

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MCCARGO, ALANNA

President, Government National Mortgage Association, Department of Housing and Urban Development

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Other Federal Government Positions Held During the Preceding 12 Months:

Senior Advisor - Housing Finance, Department of Housing and Urban Development (1/2021 - Present)

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Names of Congressional Committees Considering Nomination:

- Committee on Banking, Housing, and Urban Affairs
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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ MCCARGO, ALANNA [electronically signed on 08/02/2021 by MCCARGO, ALANNA in Integrity.gov]

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Bohling, Gayle E, Certifying Official [electronically signed on 09/21/2021 by Bohling, Gayle E in Integrity.gov]

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Other review conducted by

/s/ BELL, KEISHA, Ethics Official [electronically signed on 09/21/2021 by BELL, KEISHA in Integrity.gov]

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U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 09/21/2021 by Apol, David in Integrity.gov]

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Urban Institute	Washington, DC, District of Columbia	Non-Profit	Vice President	6/2016	1/2021
2	National Community Stabilization Trust (NCST)	Washington, District of Columbia	Non-Profit	Board Member	6/2020	1/2021
3	Doorways	Arlington, Virginia	Non-Profit	Board Member	5/2016	1/2021
4	National Foundation for Credit Counseling	Washington, District of Columbia	Non-Profit	Advisory Council Member	1/2020	12/2020
5	Aspen Institute, Expanding Prosperity Impact Collaborative	Washington, District of Columbia	Non-Profit	Board Member	10/2019	6/2020
6	Family Trust	Falls Church, Virginia	Trust	Trustee	12/2017	Present
7	Family Revocable Trust	Falls Church, Virginia	Trust	Trustee	3/2012	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Urban Institute	N/A		Salary/Bonus, includes Annual Bonus of \$2000	\$206,106

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Rollover IRA	No			
2.1	Dodge & Cox Income Fund (DODIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.2	T. Rowe Price Retirement 2040 TRRDY	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	T. Rowe Price Retirement 2035 TRRJX	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.4	U.S. brokerage account (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
2.5	U.S. brokerage account (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.6	APPL Apple	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.7	Invesco Ultra Short Duration ETF (GSY)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.8	NIKE, Inc. (NKE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.9	Rocket Companies Inc.	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.10	Starbucks Corp. (SBUX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.11	Two Harbors Investment Corp. (TWO)	N/A	\$50,001 - \$100,000		None (or less than \$201)
3	Urban Institute 403(b)	No			
3.1	T Rowe Price Retirement 2040 I	Yes	\$100,001 - \$250,000		None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Urban Institute	Washington, District of Columbia	I intend to rollover my defined contribution plan to an individual retirement account. My former employer no longer makes contributions to the plan.	6/2016

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Urban Institute	Washington, DC, District of Columbia	Vice President

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	ARServices Limited (Government Contracting Firm))	N/A	Over \$1,000,000	salary	
2	Individual Roth IRA	No			
2.1	Voya Intermediate Bond Fund CI (iicix)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	Brown Advisory Small Cap Growth Fund CI	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	Brown Advisory Sustainable Growth Fund CI Inst	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Rollover IRA	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1	First American Gov't Obligations Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	iShares TIPS Bond ETF (TIP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	Voya Intermediate Bond CI iicix	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.4	Brown Advisory Small-Cap Growth Fund CI Inv (biasx)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.5	Brown Advisory Small-Cap Fundamental Value Fund CI Inv(biaux)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.6	Brown Advisory Sustainable Growth Fund CI Inst (bafwx)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.7	Brown Advisory Beutel Goodman Large Cap Value Fund CI INST (bvalx)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.8	Brown Advisory Global Leaders Fund CI Inst (baflx)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.9	ishares MSCI All Country Asia ex-Japan ETF aaxji	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.10	Brown Advisory Global Leaders Fund CI Inst	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	AT&T Retirement, defined benefit plan (value not readily ascertainable)	N/A		Retirement Payments - monthly	
5	Roth IRA	No			
5.1	Voya intermediate bond fund CI (iicix)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	Brown Advisory Small-Cap Growth Fund Investor Class Shares (BIASX)	Yes	\$1,001 - \$15,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.3	Brown Advisory Sustainable Growth Fund Institutional Class Shares (BAFWX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	Brown Advisory Global Leaders Fund Institutional Shares (BAFLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	ARS Services 401(k)	No			
6.1	Fidelity Freedom 2035 FFTHX	Yes	\$250,001 - \$500,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. brokerage account (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
2	U.S. brokerage account	No			
2.1	U.S. brokerage account (cash)	N/A	\$1,001 - \$15,000	Interest	\$1,001 - \$2,500
2.2	Apple, Inc. (AAPL)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$2,501 - \$5,000
2.3	Invesco Ultra Short Duration ETF (GSY)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.4	NIKE, Inc. (NKE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.5	Starbucks Corp. (SBUX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.6	Two Harbors Investment Corp. (TWO)	N/A	None (or less than \$1,001)		None (or less than \$201)
3	U.S. bank #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	U.S. bank #2 (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
5	The Federal National Mortgage Association (FNMA)	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	Rocket Mortgage		Mortgage on Personal Residence	\$250,001 - \$500,000	2020	2.25	15 yrs
2	Caliber Home Loans	See Endnote	Mortgage on Personal Residence	\$250,001 - \$500,000	2016	3.625	30 years

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
8.	2	Mortgage was paid off during CY 2020

# 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).

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