

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Palm, Andrea

Deputy Secretary, Department of Health & Human Services

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/ Palm, Andrea [electronically signed on 06/29/2022 by Palm, Andrea in Integrity.gov] - Filer received a 45 day filing extension.

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

/s/ Hall, Randall, Certifying Official [electronically signed on 08/11/2022 by Hall, Randall in Integrity.gov]

Other review conducted by

/s/ CardMina, Mary, Ethics Official [electronically signed on 08/08/2022 by CardMina, Mary in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 10/17/2022 by Granahan, Megan in Integrity.gov]

Data Revised 07/22/2022

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Wisconsin Department of Health Services	Madison, Wisconsin	State Government	Secretary-Designee	1/2019	1/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Wisconsin Department of Health Services	N/A		Salary	\$13,219
2	IRA	No			
2.1	AIG Government Money Market Fund - Class A (SMAXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Volunteers of America, 403(b) plan	No			
3.1	American Funds EuroPacific Growth Fund - Class R6 (RERGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	BNY Mellon Midcap Index Fund - Investor Class (PESPX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	ClearBridge Large Cap Growth Fund - Institutional Shares (LSITX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.4	Delaware Value Fund - Institutional Shares (DDVIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.5	American Funds American Balanced Fund - Class R6 (RLBGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	City of Phoenix, 457(b) plan	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.1	American Funds EuroPacific Growth Fund - Class R6 (RERGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	Phoenix Stable Income Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	City of Phoenix U.S. Large Cap Stock Portfolio	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.4	City of Phoenix U.S. Mid Cap Stock Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	Wisconsin Retirement System, 401(a) plan	No			
5.1	The Core Fund	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	City of Phoenix, 457(b) plan	Phoenix, Arizona	I retain this retirement plan. The plan sponsor has not made any contributions since my separation.	6/1997
2	Volunteers of America, 403(b) plan	Alexandria, Virginia	I retain this retirement plan. The plan sponsor has not made any contributions since my separation.	10/1998
3	State of Wisconsin, 401(a) plan	Madison, Wisconsin	I retain this retirement plan. The plan sponsor has not made any contributions since my separation.	1/2019

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	IRA #1	No			
1.1	Vanguard 500 Index Fund ETF (VOO)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	SPDR S&P 500 ETF Trust (SPY)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2	IRA #2	No			
2.1	Vanguard 500 Index Fund ETF (VOO)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.2	U.S. brokerage account (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	Consulting business (self-employed), sole proprietorship (policy development advice to non-government organizations)	See Endnote	N/A	None (or less than \$1,001)	Consulting Fees

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. credit union (cash)	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
2	CMFG Life Insurance Company, flexible premium variable universal life insurance policy (hybrid product)	No			
2.1	Ultra Series Fund - Large Cap Value Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	Ultra Series Fund - Mid Cap Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.3	T. Rowe Price International Stock Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	U.S. brokerage account #1	No			
3.1	SPDR S&P 500 ETF Trust (SPY)	Yes	Over \$1,000,000		\$15,001 - \$50,000
3.2	Vanguard 500 Index Fund ETF (VOO)	Yes	Over \$1,000,000		\$5,001 - \$15,000
3.3	U.S. brokerage money market account (cash)	N/A	Over \$1,000,000	Interest	\$1,001 - \$2,500
4	U.S. brokerage account #2	No			
4.1	3M Company (MMM)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.2	Amazon.com, Inc. (AMZN)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.3	Arcor PLC (AMCR)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.4	American Express Company (AXP)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.5	Ameriprise Financial, Inc. (AMP)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.6	Anglo American Platinum Limited (AGPPF) (platinum group metals, base metals, and precious metals mining company)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$5,001 - \$15,000
4.7	Anglo American PLC (XCGNF) (base metals, precious metals, and minerals global mining company)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$5,001 - \$15,000
4.8	Apple, Inc. (AAPL)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
4.9	Boeing Company (BA)	N/A	None (or less than \$1,001)	Capital Gains	\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.10	Comcast Corporation (CMCSA)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.11	Constellation Brands, Inc. (STZ)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.12	Corning, Inc. (GLW)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.13	CSX Corporation (CSX)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
4.14	Diebold Nixdorf, Inc. (DBD)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.15	Donaldson Company, Inc. (DCI)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$5,001 - \$15,000
4.16	Facebook, Inc. (FB)	See Endnote	N/A	Capital Gains	\$1,001 - \$2,500
4.17	Fluor Corporation (FLR)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.18	Fortune Brands Home & Security, Inc. (FBHS)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.19	Hamilton Beach Brands Holding Co. (HBB)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.20	Honeywell International, Inc. (HON)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.21	Hyster-Yale Materials Handling, Inc. - Class A common stock (HY)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.22	Hyster-Yale Materials Handling, Inc. - Class B common stock (material handling equipment company)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.23	Ingredion Incorporated (INGR)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.24	International Business Machines Corporation (IBM)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.25	Linde PLC (LIN)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.26	Louisiana Pacific Corporation (LPX)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.27	Mondi PLC (MONDF) (packaging and paper services)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.28	MTN Group Limited (MTNOF) (network information technology services)	N/A	None (or less than \$1,001)	Capital Gains	\$2,501 - \$5,000
4.29	Naspers Limited (NAPRF) (consumer internet company)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.30	New Germany Fund, Inc. (GF)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$2,501 - \$5,000
4.31	Paychex, Inc. (PAYX)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$15,001 - \$50,000
4.32	Prosus N.V. (PROSF) (internet based services)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
4.33	Qualcomm, Inc. (QCOM)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.34	Stanley Black & Decker, Inc. (SWK)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$1,001 - \$2,500
4.35	Starbucks Corporation (SBUX)	N/A	None (or less than \$1,001)	Capital Gains Dividends	\$201 - \$1,000
4.36	Walt Disney Company (DIS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
4.37	BlackRock Health Sciences Opportunities Portfolio - Institutional Shares (SHSSX)	Yes	None (or less than \$1,001)		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.38	BlackRock Technology Opportunities Fund - Institutional Shares (BGSIX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
4.39	Goldman Sachs Capital Growth Fund - Institutional Shares (GSPIX)	Yes	None (or less than \$1,001)		\$2,501 - \$5,000
4.40	iShares MSCI ACWI ex U.S. ETF (ACWX)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.41	iShares U.S. Home Construction ETF (ITB)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.42	John Hancock Financial Opportunities Fund (BTO)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.43	Lord Abbett Mid Cap Stock Fund - Class F (LMCFX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
4.44	MFS Research Fund - Class I (MRFIX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
4.45	ProShares Russell 2000 Dividend Growers ETF (SMDV)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.46	SPDR S&P 400 Mid Cap Value ETF (MDYV)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.47	SPDR S&P Aerospace & Defense ETF (XAR)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.48	SPDR S&P Regional Banking ETF (KRE)	Yes	None (or less than \$1,001)		\$201 - \$1,000
4.49	Vanguard 500 Index Fund ETF (VOO)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Goldman Sachs Capital Growth Fund - Institutional Share Class (GSPIX)	Sale	06/29/2021	\$1,001 - \$15,000
2	Hyster-Yale Materials Handling, Inc. - Class B common stock (material handling equipment company)	Sale	11/17/2021	\$1,001 - \$15,000
3	3M Co. (MMM)	Sale	06/29/2021	\$1,001 - \$15,000
4	Anglo American Platinum Limited (AGPPF)	Sale	06/29/2021	\$1,001 - \$15,000
5	Amazon.com, Inc. (AMZN)	Sale	06/29/2021	\$1,001 - \$15,000
6	American Express Co. (AXP)	Sale	06/29/2021	\$1,001 - \$15,000
7	Anglo American, PLC	Sale	06/29/2021	\$1,001 - \$15,000
8	Arcor, PLC (AMCR)	Sale	06/29/2021	\$1,001 - \$15,000
9	AngloGold Ashanti Limited (AULGF)	Sale	06/29/2021	\$1,001 - \$15,000
10	Apple, Inc. (AAPL)	Sale	06/29/2021	\$1,001 - \$15,000
11	BlackRock Technology Opportunities Fund - Institutional Shares (BGSIX)	Sale	06/29/2021	\$1,001 - \$15,000
12	BlackRock Health Sciences Opportunities Fund (SHSSX)	Sale	06/29/2021	\$1,001 - \$15,000
13	Boeing Co. (BA)	Sale	06/29/2021	\$15,001 - \$50,000
14	Comcast Corporation (CMCSA)	Sale	06/29/2021	\$1,001 - \$15,000
15	Constellation Brands, Inc. (STZ)	Sale	06/29/2021	\$1,001 - \$15,000
16	Corning, Inc. (GLW)	Sale	06/29/2021	\$1,001 - \$15,000
17	CSX Corporation (CSX)	Sale	06/29/2021	\$1,001 - \$15,000
18	Donaldson Co., Inc. (DCI)	Sale	06/29/2021	\$15,001 - \$50,000
19	Fortune Brands Home & Security, Inc. (FBHS)	Sale	06/29/2021	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
20	Facebook, Inc. (FB)	See Endnote	Sale	06/29/2021	\$1,001 - \$15,000
21	Hamilton Beach Brands Holding Co. (HBB)		Sale	06/29/2021	\$1,001 - \$15,000
22	Hyster-Yale Materials Handling, Inc. - Class A (HY)		Sale	06/29/2021	\$1,001 - \$15,000
23	Honeywell International, Inc. (HON)		Sale	06/29/2021	\$1,001 - \$15,000
24	Ingredion Incorporated (INGR)		Sale	06/29/2021	\$1,001 - \$15,000
25	Intel Corporation (INTC)		Sale	06/29/2021	\$15,001 - \$50,000
26	International Business Machines Corporation (IBM)		Sale	06/29/2021	\$1,001 - \$15,000
27	iShares U.S. Home Construction ETF (ITB)		Sale	06/29/2021	\$1,001 - \$15,000
28	Linde, PLC (LIN)		Sale	06/29/2021	\$1,001 - \$15,000
29	Lord Abbett Mid Cap Stock Fund - Class A (LAVLX)		Sale	06/29/2021	\$1,001 - \$15,000
30	MFS Research Fund - Class A		Sale	06/29/2021	\$1,001 - \$15,000
31	Mondi, PLC (MONDF)		Sale	06/29/2021	\$1,001 - \$15,000
32	MTN Group Limited (MTNOF)		Sale	06/29/2021	\$1,001 - \$15,000
33	Paychex, Inc. (PAYX)		Sale	06/29/2021	\$50,001 - \$100,000
34	New Germany Fund, Inc. (GF)		Sale	06/29/2021	\$1,001 - \$15,000
35	Naspers Limited (NAPRF)		Sale	06/29/2021	\$1,001 - \$15,000
36	ProShares Russell 2000 Dividend Growers ETF (SMDV)		Sale	06/29/2021	\$1,001 - \$15,000
37	Prosus N.V. (PROSF)		Sale	06/29/2021	\$1,001 - \$15,000
38	Qualcomm, Inc. (QCOM)		Sale	06/29/2021	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
39	SPDR S&P 400 Mid Cap Value ETF (MDYV)		Sale	06/29/2021	\$1,001 - \$15,000
40	Stanley Black and Decker, Inc. (SWK)		Sale	06/29/2021	\$1,001 - \$15,000
41	SPDR S&P Aerospace & Defense ETF (XAR)		Sale	06/29/2021	\$1,001 - \$15,000
42	Starbucks Corporation (SBUX)		Sale	06/29/2021	\$1,001 - \$15,000
43	Vanguard S&P 500 ETF (VOO)		Sale	06/29/2021	\$1,001 - \$15,000
44	Verizon Communications, Inc. (VZ)		Sale	06/29/2021	\$1,001 - \$15,000
45	Walt Disney Co. (DIS)		Sale	06/29/2021	\$1,001 - \$15,000
46	AngloGold Ashanti Limited (AU)	See Endnote	Sale	06/29/2021	
47	Ameriprise Financial, Inc. (AMP)	See Endnote	Sale	06/29/2021	
48	AT&T, Inc. (T)	See Endnote	Sale	06/29/2021	
49	Diebold Nixdorf, Inc. (DBD)	See Endnote	Sale	06/29/2021	
50	Fluor Corporation (FLR)	See Endnote	Sale	06/29/2021	
51	iShares MSCI ACWI ex U.S. ETF (ACWX)	See Endnote	Sale	06/29/2021	
52	iShares MSCI Japan ETF (EWJ)	See Endnote	Sale	06/29/2021	
53	John Hancock Financial Opportunities Fund (BTO)	See Endnote	Sale	06/29/2021	
54	Louisiana Pacific Corporation (LPX)	See Endnote	Sale	06/29/2021	
55	Magellan Midstream Partners, LP (MMP)	See Endnote	Sale	06/29/2021	
56	Mitsubishi Chemical Holdings Corporation (MTLHF)	See Endnote	Sale	06/29/2021	
57	NCR Corporation (NCR)	See Endnote	Sale	06/29/2021	
58	MultiChoice Group Limited (MCOIF)	See Endnote	Sale	06/29/2021	
59	New Germany Fund, Inc. (GF)	See Endnote	Sale	06/29/2021	

#	DESCRIPTION		TYPE	DATE	AMOUNT
60	Northrop Grumman Corporation (NOC)	See Endnote	Sale	06/29/2021	
61	ODP Corporation (ODP)	See Endnote	Sale	06/29/2021	
62	Resideo Technologies, Inc. (REZI)	See Endnote	Sale	06/29/2021	
63	SPDR KBW Regional Banking ETF (KRE)	See Endnote	Sale	06/29/2021	
64	TE Connectivity Limited (TEL)	See Endnote	Sale	06/29/2021	
65	Teradata Corporation (TDC)	See Endnote	Sale	06/29/2021	
66	Xerox Holdings Corporation (XRX)	See Endnote	Sale	06/29/2021	
67	Harmony Gold Mining Co. Limited (HGMCF)	See Endnote	Sale	06/30/2021	
68	Vanguard 500 Index Fund ETF Shares (VOO)		Purchase	08/24/2021	\$250,001 - \$500,000
69	New Germany Fund, Inc. (GF)	See Endnote	Purchase	06/28/2021	
70	Thungela Resources Limited (mining)	See Endnote	Sale	06/30/2021	

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
5.	3	My spouse is not continuing this consulting business.
6.	4.16	On October 28, 2021, Facebook, Inc., changed its corporate name to Meta Platforms, Inc.
7.	20	On October 28, 2021, Facebook, Inc., changed its corporate name to Meta Platforms, Inc.
7.	46	The amount of the transaction was not more than \$1,000.
7.	47	The amount of the transaction was not more than \$1,000.
7.	48	The amount of the transaction was not more than \$1,000.
7.	49	The amount of the transaction was not more than \$1,000.
7.	50	The amount of the transaction was not more than \$1,000.
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7.	64	The amount of the transaction was not more than \$1,000.

PART	#	ENDNOTE
7.	65	The amount of the transaction was not more than \$1,000.
7.	66	The amount of the transaction was not more than \$1,000.
7.	67	The amount of the transaction was not more than \$1,000.
7.	69	The amount of the transaction was not more than \$1,000.
7.	70	The amount of the transaction was not more than \$1,000.

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).
