

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Neugeboren, Steven

Associate General Counsel, Environmental Protection Agency

---

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/ Neugeboren, Steven [electronically signed on 12/31/2021 by Neugeboren, Steven 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/ Clarke, Victoria K, Certifying Official [electronically signed on 01/31/2022 by Clarke, Victoria K in Integrity.gov]

---

Other review conducted by

---

U.S. Office of Government Ethics Certification

---

#### Transactions

#	DESCRIPTION		TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	MINT - PIMCO Enhanced Short Mat		Sale	11/30/2021	No	\$15,001 - \$50,000
2	SPDW - SPDR Developed World Ex US		Sale	11/26/2021	No	\$1,001 - \$15,000
3	SPYV - SPDR S&P 500 Value ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
4	SPYG - SPDR S&P 500 Growth ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
5	PTNQ - Pacer Trendpilot 100 ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
6	PTLC - Pacer Trendpilot US Large Cap ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
7	SPGP - Invesco S&P 500 GARP ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
8	RDVY - First Trust Rising Dividend ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
9	CFO - Victory Shares US 500 Enhanced Vol ETF	See Endnote	Purchase	11/26/2021	No	
10	VB - Vanguard Small Cap ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
11	SPYV - SPDR S&P 500 Value ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
12	SPYG - SPDR S&P 500 Growth ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
13	PTLC - Pacer Trendpilot US Large Cap ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
14	OUSA - O'Shares US Quality Dividend ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
15	SPGP - Invesco S&P 500 GARP ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
16	RDVY - First Trust Rising Dividend ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
17	TGT - Target Corp		Purchase	11/30/2021	No	\$1,001 - \$15,000
18	MDT - Medtronic PLC	See Endnote	Purchase	11/30/2021	No	
19	LMT - Lockheed Martin		Purchase	11/30/2021	No	\$1,001 - \$15,000
20	LLY - Lilly Eli & Co		Purchase	11/30/2021	No	\$1,001 - \$15,000
21	LRCX - Lam Research Corp		Purchase	11/30/2021	No	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
22	DG - Dollar General		Purchase	11/30/2021	No	\$1,001 - \$15,000
23	CHTR - Charter Communications		Purchase	11/30/2021	No	\$1,001 - \$15,000
24	CDNS - Cadence Design System		Purchase	11/30/2021	No	\$1,001 - \$15,000
25	AAPL - Apple		Purchase	11/30/2021	No	\$1,001 - \$15,000
26	AMAT - Applied Materials		Purchase	11/30/2021	No	\$1,001 - \$15,000
27	CMCSA - Comcast		Purchase	11/30/2021	No	\$1,001 - \$15,000
28	MINT - PIMCO Enhanced Short Mat ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
29	OSTK - Overstock.com		Purchase	11/26/2021	No	\$1,001 - \$15,000
30	ORLY - O'Reilly Automotive		Purchase	11/26/2021	No	\$1,001 - \$15,000
31	MCO - Moody's Corp		Purchase	11/26/2021	No	\$1,001 - \$15,000
32	MSFT - Microsoft		Purchase	11/26/2021	No	\$1,001 - \$15,000
33	IEI - iShares 3-7 Year Treasury Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
34	IGSB - iShares 1-5 Year Inv't Grade Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
35	TIP - iShares TIPS Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
36	SHY - iShares 1-3 Year Treasury Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
37	CHTR - Charter Communications		Purchase	11/26/2021	No	\$1,001 - \$15,000
38	CMCSA - Comcast		Purchase	11/26/2021	No	\$1,001 - \$15,000
39	WMT - Walmart	See Endnote	Purchase	11/30/2021	No	
40	V - Visa		Purchase	11/30/2021	No	\$1,001 - \$15,000
41	UNH - United Health Group		Purchase	11/30/2021	No	\$1,001 - \$15,000
42	GLD - SPDR Gold ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
43	SPGI - S&P Global Inc	See Endnote	Purchase	11/30/2021	No	
44	ACN - Accenture PLC		Purchase	11/30/2021	No	\$1,001 - \$15,000
45	TROW - T. Rowe Price	See Endnote	Purchase	11/30/2021	No	
46	ORLY - Oreilly Automotive		Purchase	11/30/2021	No	\$1,001 - \$15,000
47	MSFT - Microsoft		Purchase	11/30/2021	No	\$1,001 - \$15,000
48	MA - Mastercard		Purchase	11/30/2021	No	\$1,001 - \$15,000
49	LLY - Lilly Eli & Co		Purchase	11/30/2021	No	\$1,001 - \$15,000
50	DIS - Walt Disney	See Endnote	Purchase	11/30/2021	No	
51	KO - Coca Cola	See Endnote	Purchase	11/30/2021	No	
52	AMT - American Tower REIT		Purchase	11/30/2021	No	\$1,001 - \$15,000
53	AAPL - Apple		Purchase	11/30/2021	No	\$1,001 - \$15,000
54	CMCSA - Comcast	See Endnote	Purchase	11/30/2021	No	
55	AWK - American Water Works		Purchase	11/30/2021	No	\$1,001 - \$15,000
56	BSV - Vanguard Short Term Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
57	MINT - PIMCO Enhanced Short Mat		Purchase	11/26/2021	No	\$15,001 - \$50,000
58	IEI - iShares 3-7 Year Treasury Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
59	IGSB - iShares 1-5 Year Invt Grade Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
60	TIP - iShares TIPS Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
61	SHY - iShares 1-3 Year Treasury Bond ETF		Purchase	11/26/2021	No	\$15,001 - \$50,000
62	DIS - Walt Disney		Purchase	11/26/2021	No	\$1,001 - \$15,000
63	AMT - American Tower REIT		Purchase	11/26/2021	No	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
64	CMCSA - Comcast		Purchase	11/26/2021	No	\$1,001 - \$15,000
65	AWK - American Water Works	See Endnote	Purchase	11/26/2021	No	
66	AEP - American Electric Power Co		Purchase	11/26/2021	No	\$1,001 - \$15,000
67	PTNQ - Pacer Trendpilot 100 ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
68	PTLC - Pacer Trendpilot US Large Cap ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
69	SPGP - Invesco S&P 500 GARP ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
70	QQQ - Invesco QQQ ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
71	IWM - iShares Russell 2000 ETF	See Endnote	Purchase	11/30/2021	No	
72	RDVY - First Trust Rising Dividend ETF		Purchase	11/30/2021	No	\$1,001 - \$15,000
73	IEI - iShares 3-7 Year Treasury Bond ETF		Sale	11/30/2021	No	\$1,001 - \$15,000
74	AGG - iShares Core US Agg Bond ETF		Sale	11/30/2021	No	\$1,001 - \$15,000
75	SHY - iShares 1-3 Year Treasury Bond ETF		Sale	11/30/2021	No	\$1,001 - \$15,000
76	SPYV - SPDR S&P 500 Value ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
77	SPYG - SPDR S&P 500 Growth ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
78	PTNQ - Pacer Trendpilot 100 ETF		Purchase	11/26/2021	No	\$1,001 - \$15,000
79	SPGP - Invesco S&P 500 GARP ETF	See Endnote	Purchase	11/26/2021	No	
80	RDVY - First Trust Rising Dividend ETF	See Endnote	Purchase	11/26/2021	No	
81	SHY - iShares 1-3 Year Treasury Bond ETF		Sale	11/26/2021	No	\$1,001 - \$15,000
82	CFO - Victory Shares US 500 Enhanced Vol ETF		Purchase	12/03/2021	No	\$1,001 - \$15,000
83	SPYV - SPDR S&P 500 Value ETF		Purchase	12/03/2021	No	\$1,001 - \$15,000
84	SPYG - SPDR S&P 500 Growth ETF		Purchase	12/03/2021	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
85	PTNQ - Pacer Trendpilot 100 ETF	Purchase	12/03/2021	No	\$1,001 - \$15,000
86	RDVY - First Trust Rising Dividend ETF	Purchase	12/03/2021	No	\$1,001 - \$15,000
87	MINT - PIMCO Enhanced Short Mat ETF	Sale	12/03/2021	No	\$1,001 - \$15,000
88	SHY - iShares 1-3 Year Treasury Bond ETF	Sale	12/03/2021	No	\$1,001 - \$15,000
89	MDT - Medtronic PLC	Purchase	12/03/2021	No	\$1,001 - \$15,000
90	MSFT - Microsoft	Purchase	12/03/2021	No	\$1,001 - \$15,000
91	GOOG - Alphabet Inc	Purchase	12/03/2021	No	\$1,001 - \$15,000
92	CDNS - Cadence Design System	Purchase	12/03/2021	No	\$1,001 - \$15,000
93	AAPL - Apple	Purchase	12/03/2021	No	\$1,001 - \$15,000
94	CMCSA - Comcast	Purchase	12/03/2021	No	\$1,001 - \$15,000
95	ADBE - Adobe Inc	Purchase	12/03/2021	No	\$1,001 - \$15,000
96	WMT - Walmart	Purchase	12/03/2021	No	\$1,001 - \$15,000
97	V - Visa	Purchase	12/03/2021	No	\$1,001 - \$15,000
98	UNH - United Health Group	Purchase	12/03/2021	No	\$1,001 - \$15,000
99	GLD - SPDR Gold ETF	Purchase	12/03/2021	No	\$1,001 - \$15,000
100	SPGI - S&P Global Inc	Purchase	12/03/2021	No	\$1,001 - \$15,000
101	ORLY - O'Reilly Automotive	Purchase	12/03/2021	No	\$1,001 - \$15,000
102	MA - Mastercard	Purchase	12/03/2021	No	\$1,001 - \$15,000
103	LRCX - Lam Research Corp	Purchase	12/03/2021	No	\$1,001 - \$15,000
104	AAPL - Apple	Purchase	12/03/2021	No	\$1,001 - \$15,000
105	CMCSA - Comcast	Purchase	12/03/2021	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
106	BSV - Vanguard Short Term Bond ETF	Sale	12/03/2021	No	\$15,001 - \$50,000
107	TSCO - Tractor Supply Company	Purchase	12/20/2021	No	\$1,001 - \$15,000
108	HON - Honeywell	Purchase	12/20/2021	No	\$1,001 - \$15,000
109	GOOG - Alphabet Inc	Purchase	12/20/2021	No	\$1,001 - \$15,000
110	COST - Costco	Purchase	12/20/2021	No	\$1,001 - \$15,000
111	AMAT - Applied Materials	Purchase	12/20/2021	No	\$1,001 - \$15,000
112	SHY - iShares 1-3 Year Treasury Bond ETF	Sale	12/20/2021	No	\$1,001 - \$15,000
113	WMT - Walmart	Purchase	12/20/2021	No	\$1,001 - \$15,000
114	TMO - Thermo Fisher Scientific	Purchase	12/20/2021	No	\$1,001 - \$15,000
115	NEE - Nextera Energy	Purchase	12/20/2021	No	\$1,001 - \$15,000
116	DHR - Danaher	Purchase	12/20/2021	No	\$1,001 - \$15,000
117	COST - Costco	Purchase	12/20/2021	No	\$1,001 - \$15,000
118	MINT - PIMCO Enhanced Short Mat ETF	Sale	12/20/2021	No	\$1,001 - \$15,000

## Endnotes

PART	#	ENDNOTE
Transactions	9	Under \$1,000
Transactions	18	Under \$1,000
Transactions	39	Under \$1,000
Transactions	43	Under \$1,000
Transactions	45	Under \$1,000

PART	#	ENDNOTE
Transactions	50	Under \$1,000
Transactions	51	Under \$1,000
Transactions	54	Under \$1,000
Transactions	65	Under \$1,000
Transactions	71	Under \$1,000
Transactions	79	Under \$1,000
Transactions	80	Under \$1,000

## 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. 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.

---