

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Zettler, Patricia

Deputy General Counsel (Food & Drug Administration), Office of the General Counsel, Office of the Secretary, Department of Health & Human Services

Date of Appointment: 11/13/2023

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/ Zettler, Patricia [electronically signed on 09/29/2023 by Zettler, Patricia 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/ CardMina, Mary, Certifying Official [electronically signed on 01/03/2024 by CardMina, Mary in Integrity.gov]

Other review conducted by

/s/ Shouman, Mohammad, Ethics Official [electronically signed on 11/14/2023 by Shouman, Mohammad in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 11/13/2023

Data Revised 11/11/2023

Data Revised 11/07/2023

Data Revised 11/06/2023

Data Revised 11/05/2023

Data Revised 11/04/2023

Data Revised 10/25/2023

Data Revised 10/19/2023

Data Revised 10/17/2023

Data Revised 10/06/2023

Data Revised 10/05/2023

Data Revised 10/04/2023

Data Revised 10/02/2023

Data Revised 10/01/2023

Data Revised 09/30/2023

Data Revised 09/29/2023

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(09/29/2023, Shouman, Mohammad): End Initial Review: 09/29/2023.
N/A	N/A	General	(11/13/2023, Shouman, Mohammad): Updates made after following up with the filer.

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Columbus Academy	Gahanna, Ohio	Non-Profit School	Member, Communications & Litigation Management Committee, Board of Trustees	8/2023	Present
2	Columbus Academy	Gahanna, Ohio	Non-Profit School	Member, Nominations & Governance Committee, Board of Trustees	8/2023	Present
3	Columbus Academy	Gahanna, Ohio	Non-Profit School	Member, Finance & Audit Committee, Board of Trustees	8/2022	10/2023
4	Columbus Academy	Gahanna, Ohio	Non-Profit School	Member, Board of Trustees	8/2022	Present
5	Columbus Academy	Gahanna, Ohio	Non-Profit School	Member, Alumni Board	8/2021	8/2023
6	Ohio State University	Columbus, Ohio	University/College	John W. Bricker Professor of Law, Michael E. Moritz College of Law	8/2023	Present
7	Ohio State University	Columbus, Ohio	University/College	Faculty Member, Drug Enforcement & Policy Center, Michael E. Moritz College of Law	5/2019	Present

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
8	Ohio State University		Columbus, Ohio	University/College	Researcher Member, Cancer Control Program, Ohio State University Comprehensive Cancer Center – Arthur G. James Cancer Hospital & Richard J. Solove Research Institute	5/2019	Present
9	Ohio State University	See Endnote	Columbus, Ohio	University/College	Chair, Academic Affairs Committee, Michael E. Moritz College of Law	7/2023	11/2023
10	Ohio State University	See Endnote	Columbus, Ohio	University/College	Member, Academic Affairs Committee, Michael E. Moritz College of Law	7/2023	11/2023
11	Ohio State University		Columbus, Ohio	University/College	Professor, Michael E. Moritz College of Law	5/2023	8/2023
12	Ohio State University		Columbus, Ohio	University/College	Member, Graduate Studies Committee, Michael E. Moritz College of Law	8/2022	5/2023
13	Ohio State University		Columbus, Ohio	University/College	Associate Professor, Michael E. Moritz College of Law	6/2020	5/2023

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
14	Ohio State University		Columbus, Ohio	University/College	Member, Administration Committee, Michael E. Moritz College of Law	8/2021	5/2022
15	Ohio State University	See Endnote	Columbus, Ohio	University/College	Member, Junior Lightning Rounds Committee, Michael E. Moritz College of Law	5/2021	8/2021
16	Ohio State University	See Endnote	Columbus, Ohio	University/College	Member, Appointments Committee, Michael E. Moritz College of Law	8/2020	5/2021
17	Zettler Consulting, LLC		Grandview Heights, Ohio	Limited Liability Company	Member	6/2018	Present
18	Ohio State Bar Association		Columbus, Ohio	Professional Association	Member, Administrative Agency Law Specialty Board, Administrative Law Committee	7/2023	11/2023
19	National Academies of Sciences, Engineering, & Medicine		Washington, District of Columbia	Non-Profit	Member, Board on Health Sciences Policy, Health & Medicine Division	5/2023	11/2023

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
20	National Academies of Sciences, Engineering, & Medicine		Washington, District of Columbia	Non-Profit	Member, Defining & Evaluating In-Home Drug Disposal Systems for Opioid Analgesics Committee	1/2023	6/2023
21	Food & Drug Law Institute		Washington, District of Columbia	Non-Profit	At-Large Member, Board of Directors	1/2022	11/2023
22	International Society for Cell & Gene Therapy		Vancouver, British Columbia, Canada, Outside U.S.	Non-Profit	Chair, ISCT Committee on the Ethics of Cell & Gene Therapy	1/2023	11/2023
23	International Society for Cell & Gene Therapy		Vancouver, British Columbia, Canada, Outside U.S.	Non-Profit	Chair, Expanded Access Working Group	1/2022	11/2023
24	International Society for Cell & Gene Therapy		Vancouver, British Columbia, Canada, Outside U.S.	Non-Profit	Member, Expanded Access Working Group	1/2022	11/2023
25	International Society for Cell & Gene Therapy	See Endnote	Vancouver, British Columbia, Canada, Outside U.S.	Non-Profit	Member, ISCT Committee on the Ethics of Cell & Gene Therapy	9/2020	11/2023
26	Faruqi & Faruqi, LLP - Philadelphia, Pennsylvania; Garwin Gerstein & Fisher, LLP - New York, New York; Hagens Berman Sobol Shapiro, LLP - Boston, Massachusetts	See Endnote		Law Firm	Expert Witness	7/2018	10/2023

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
27	World Health Organization	See Endnote	Geneva, Switzerland, Outside U.S.	United Nations Agency	Individual Expert / Consultant, WHO Study Group on Tobacco Product Regulation	7/2021	8/2023
28	Brilliant Corporation		Reston, Virginia	Corporation	Subject Matter Expert	9/2022	1/2023
29	Hopewell Fund		Washington, District of Columbia	Non-Profit	Consultant	6/2022	7/2022
30	Argentum Pharmaceuticals, LLC		New York, New York	Limited Liability Company	Consultant	3/2022	3/2022
31	Berger Montague, PC - Philadelphia, Pennsylvania (Law Firm); Garwin Gerstein & Fisher, LLP - New York, New York (Law Firm); Dicello Levitt, LLP - New York, New York (Law Firm); Freed Kanner London & Millen, LLC - Bannockburn, Illinois (Law Firm); Labaton Sucharow, LLP - New York, New York (Law Firm); Hangley Aronchick Segal Pudlin & Schiller, PC - Philadelphia, Pennsylvania (Law Firm); Kenny Nachwalter, PA - Miami, Florida (Law Firm); Law Offices of Eugene M. Cummings, PC - Chicago, Illinois (Law Firm); Rite Aid Corporation - Camp Hill, Pennsylvania (Corporation); Rite Aid Hdqtrs. Corp. - Camp Hill, Pennsylvania (Corporation); CVS Pharmacy, Inc. - Woonsocket, Rhode Island (Corporation); Walgreen Co. - Deerfield, Illinois (Corporation); Kroger Co. - Cincinnati, Ohio (Corporation); Safeway, Inc. - Pleasanton, California (Corporation); HEB Grocery Co., LP - San Antonio, Texas (Limited Partnership); Albertson's, LLC - Boise, Idaho (Limited Liability Company)	See Endnote		Various	Expert Witness	1/2019	3/2022

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Ohio State University	N/A		Salary and Bonus	\$366,211
2	Ohio State University, salary: cash receivable	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	Zettler Consulting, LLC (expert witness and consulting services)	No			
3.1	In re Suboxone (Buprenorphine Hydrochloride & Naloxone) Antitrust Litigation (E.D. Pa.) (Faruqi & Faruqi, LLP; Garwin Gerstein & Fisher, LLP; Hagens Berman Sobol Shapiro, LLP (law firms))	See Endnote	N/A	Expert Witness Fees	\$7,566
3.2	Brilliant Corporation (digital transformation solutions, records management solutions, and digital business process services)	N/A		Consulting Fees	\$47,860
3.3	Argentum Pharmaceuticals, LLC (generic drug company)	N/A		Consulting Fees	\$1,075

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
3.4	In re Opana ER Antitrust Litigation (N.D. Ill.) (Berger Montague, PC (law firm); Garwin Gerstein & Fisher, LLP (law firm); Dicello Levitt, LLP (law firm); Freed Kanner London & Millen, LLC (law firm); Labaton Sucharow, LLP (law firm); Hangley Aronchick Segal Pudlin & Schiller, PC (law firm); Kenny Nachwalter, PA (law firm); Law Offices of Eugene M. Cummings, PC (law firm); Rite Aid Corporation (drugstore chain); Rite Aid Hdqtrs. Corp. (drugstore chain); CVS Pharmacy, Inc. (subsidiary of CVS Health Corporation); Walgreen Co. (subsidiary of Walgreens Boots Alliance, Inc.); Kroger Co.; Safeway, Inc. (subsidiary of Albertsons Companies, Inc.); HEB Grocery Co., LP (supermarket chain); Albertson's, LLC)	See Endnote	N/A	Expert Witness Fees	\$400	
4	Hopewell Fund (social change projects support) - 06/28/2022 and 07/27/2022		N/A	Honorarium	\$1,500	
5	"Food and Drug Law," 5th ed., LEG, Inc., d/b/a West Academic (value not readily ascertainable)		N/A	Rent or Royalties	\$2,501 - \$5,000	
6	Ohio State University, State Teachers Retirement System Ohio Defined Benefit Plan		N/A		\$1,001 - \$15,000	None (or less than \$201)
7	Ohio State University, State Teachers Retirement System Ohio Defined Contribution Plan account		No			
7.1	STRS Bloomberg U.S. Universal Bond Index Choice		Yes		\$15,001 - \$50,000	None (or less than \$201)
7.2	STRS Large-Cap Core Choice		Yes		\$15,001 - \$50,000	None (or less than \$201)
7.3	STRS MSCI ACWI ex USA Index Choice		Yes		\$1,001 - \$15,000	None (or less than \$201)
7.4	STRS REIT Index Choice		Yes		\$1,001 - \$15,000	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.5	STRS Russell 1000 Index Choice	Yes	\$15,001 - \$50,000		None (or less than \$201)
7.6	STRS Russell 2000 Index Choice	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.7	STRS Russell Midcap Index Choice	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.8	STRS MSCI World ex USA Index Choice	Yes	\$1,001 - \$15,000		None (or less than \$201)
8	Filer's Traditional IRA	No			
8.1	First Trust TCW Opportunistic Fixed Income ETF (FIXD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.2	iShares Core S&P Total U.S. Stock Market ETF (ITOT)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.3	Invesco NASDAQ 100 ETF (QQQM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.4	Schwab Intermediate-Term U.S. Treasury ETF (SCHR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.5	Vanguard Total International Stock Index Fund - ETF Shares (VXUS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
8.6	FT Cboe Vest U.S. Equity Enhance & Moderate Buffer ETF - June (XJUN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
9	Filer's Roth IRA	No			
9.1	First Trust TCW Opportunistic Fixed Income ETF (FIXD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.2	First Trust BuyWrite Income ETF (FTHI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.3	iShares Core S&P Total U.S. Stock Market ETF (ITOT)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.4	Schwab Intermediate-Term U.S. Treasury ETF (SCHR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.5	Vanguard Total International Stock Index Fund - ETF Shares (VXUS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.6	FT Cboe Vest U.S. Equity Enhance & Moderate Buffer ETF - June (XJUN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.7	Health Care Select Sector SPDR Fund (XLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Ohio State University	Columbus, Ohio	I am on an unpaid leave of absence from my faculty positions as John W. Bricker Professor of Law, Michael E. Moritz College of Law; Faculty Member, Drug Enforcement & Policy Center, Michael E. Moritz College of Law; and Researcher Member, Cancer Control Program, Ohio State University Comprehensive Cancer Center – Arthur G. James Cancer Hospital and Richard J. Solove Research Institute. I will receive a single salary payment, approximately \$5,800, for the days in November 2023 when I worked at the Ohio State University before my appointment to the Department of Health and Human Services. I expect to receive this payment on November 30, 2023. For the duration of my leave of absence, I will not teach or provide services at any Ohio State University center, institute, committee, or other entity.	11/2023
2	Ohio State University	Columbus, Ohio	Pursuant to university policy for faculty and staff on unpaid leave for non-medical reasons, I continue to participate in the university's health and life insurance benefits.	5/2019
3	Ohio State University	Columbus, Ohio	I continue to retain the State Teachers Retirement System Ohio Defined Benefit Plan.	5/2019

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
4	Ohio State University	Columbus, Ohio	I continue to retain the State Teachers Retirement System Ohio Defined Contribution Plan. The university will not make further contributions during my leave.	5/2019
5	Zettler Consulting, LLC	Grandview Heights, Ohio	Zettler Consulting, LLC, was used only as a pass-through entity for funds received for expert witness and consulting fees. I have no outstanding client fees. During my appointment, the company will cease engaging in any business, including providing expert witness and consulting services to clients. Zettler Consulting, LLC, will remain dormant and will not advertise. I will not perform any services for the company, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to maintain the business while it is in an inactive status.	6/2018

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Ohio State University	Columbus, Ohio	John W. Bricker Professor of Law, Michael E. Moritz College of Law
2	Zettler Consulting, LLC	Grandview Heights, Ohio	Member
3	In re Suboxone Antitrust Litigation (E.D. Pa.) (Faruqi & Faruqi, LLP - Philadelphia, Pennsylvania; Garwin Gerstein & Fisher, LLP - New York, New York; Hagens Berman Sobol Shapiro, LLP - Boston, Massachusetts / Burlington Drug Company, Inc. - Milton, Vermont; Meijer, Inc. - Grand Rapids, Michigan; Meijer Distribution, Inc. - Grand Rapids, Michigan; Rochester Drug Co-Operative, Inc. - Rochester, New York)	See Endnote Philadelphia, Pennsylvania	Expert witness (paid through Zettler Consulting, LLC)
4	Brilliant Corporation	Reston, Virginia	Subject matter expert (paid through Zettler Consulting, LLC)

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	High Tide Foundation (climate change solutions foundation)	N/A		Salary and Bonus	
2	Rocky Mountain Institute (global clean energy transition non-profit)	N/A		Salary and Bonus	
3	Propel Clean Energy Partners, LLC (strategic advisory services for global clean energy transition)	N/A	None (or less than \$1,001)	Partnership Share	
4	Rocky Mountain Institute, 403(b) plan account	No			
4.1	Principal LifeTime Hybrid 2045 Fund - Class R-6 (PLNTX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5	One-participant 401(k) plan account	See Endnote			
5.1	Invesco Comstock Select Fund - Class R (CGRNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	Invesco Active Allocation Fund - Class R (OAANX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.3	Invesco Discovery Mid Cap Growth Fund - Class R (OEGNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	Invesco International Diversified Fund - Class R (OIDNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	Invesco Main Street All Cap Fund - Class R (OMSNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.6	Invesco Rising Dividends Fund - Class R (ONRDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.7	Invesco Core Bond Fund - Class R (OPBNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.8	Invesco Main Street Small Cap Fund - Class R (OSCNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.9	Invesco Capital Appreciation Fund - Class R (OTCNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Spouse's IRA	No			
6.1	First Trust RBA American Industrial Renaissance ETF (AIRR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	First Trust Dow 30 Equal Weight ETF (EDOW)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.3	First Trust TCW Opportunistic Fixed Income ETF (FIXD)	Yes	\$15,001 - \$50,000		None (or less than \$201)
6.4	First Trust BuyWrite Income ETF (FTHI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.5	First Trust Enhanced Short Maturity ETF (FTSM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.6	Fidelity Government Money Market Fund - Daily Money Class (FZBXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.7	FT Cboe Vest Gold Strategy Target Income ETF (IGLD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.8	Schwab Intermediate-Term U.S. Treasury ETF (SCHR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.9	SPDR Portfolio S&P 500 ETF (SPLG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.10	First Trust Merger Arbitrage Fund - Class I (VARBX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.11	Vanguard Total International Stock Index Fund - ETF Shares (VXUS)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.12	FT Cboe Vest U.S. Equity Enhance & Moderate Buffer ETF - June (XJUN)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.13	Health Care Select Sector SPDR Fund (XLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.14	iShares Core S&P Mid-Cap ETF (IJH)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.15	Lord Abbett Short Duration Income Fund - Class I (LLDYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.16	Invesco International Dividend Achievers ETF (PID)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.17	FT Cboe Vest Nasdaq-100 Buffer ETF - June (QJUN)	Yes	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	U.S. brokerage account #1	No			
2.1	BYD Co. Limited (conglomerate - industries related to electronics, automobiles, new energy, and rail transit), ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.2	Tesla, Inc. (TSLA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.3	Vanguard Total Stock Market Index Fund - ETF Shares (VTI)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	U.S. brokerage account #2	No			
3.1	Invesco Premier Portfolio - Institutional Class (IPPXX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	Allianz Life Insurance Co. of North America, Index Advantage+ Variable Annuity (registered index-linked annuity)	No			
4.1	Index Precision Strategy - EURO STOXX 50	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.2	Index Precision Strategy - iShares MSCI Emerging Markets ETF	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.3	Index Performance Strategy 3-year Term - S&P 500 Index	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.4	Index Performance Strategy 3-year Term - Russell 2000 Index	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.5	Index Performance Strategy 1-year Term - Nasdaq-100 Index	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.6	Index Precision Strategy - S&P 500 Index	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.7	Index Precision Strategy - Nasdaq-100 Index	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.8	Index Precision Strategy - Russell 2000 Index	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Ohio CollegeAdvantage Direct 529 Savings Plan account #1	No			
5.1	Vanguard Ohio Target Enrollment 2034/2035 Portfolio	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	Ohio CollegeAdvantage Direct 529 Savings Plan account #2	No			
6.1	Vanguard Ohio Target Enrollment 2036/2037 Portfolio	Yes	\$15,001 - \$50,000		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	U.S. Department of the Treasury	See Endnote	Overdue Taxes (Paid off)	\$15,001 - \$50,000	2023		Not Applicable

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	9	The reported month in which I started the position of Chair of the Academic Affairs Committee at the Ohio State University Michael E. Moritz College of Law is approximate.
1.	10	The reported month in which I started the position of member of the Academic Affairs Committee at the Ohio State University Michael E. Moritz College of Law is approximate.
1.	15	The reported dates in which I started and ended the position of member of the Junior Lightning Rounds Committee at the Ohio State University Michael E. Moritz College of Law are approximate.
1.	16	The reported month in which I started the position of member of the Appointments Committee at the Ohio State University Michael E. Moritz College of Law is approximate.
1.	25	The reported date in which I started my membership on the ISCT Committee on the Ethics of Cell & Gene Therapy is approximate.

PART	#	ENDNOTE
1.	26	I was an expert witness in In re Suboxone (Buprenorphine Hydrochloride & Naloxone) Antitrust Litigation (E.D. Pa.). The co-lead counsels for the case were Faruqi & Faruqi, LLP; Garwin Gerstein & Fisher, LLP; and Hagens Berman Sobol Shapiro, LLP, and I was retained by Odom & Des Roches, LLC, a law firm in New Orleans, Louisiana.
1.	27	The reported date in which I started my position with the World Health Organization is approximate.
1.	31	I was an expert witness in In re Opana ER Antitrust Litigation (N.D. Ill.). In 2018, Albertson's, LLC, merged with and into Albertsons Companies, Inc., with Albertsons Companies, Inc., as the surviving corporation.
2.	3.1	The fees that I received for my expert witness testimony in In re Suboxone (Buprenorphine Hydrochloride & Naloxone) Antitrust Litigation were administered by Odom & Des Roches, LLC (law firm).
2.	3.4	In 2018, Albertson's, LLC, merged with and into Albertsons Companies, Inc., with Albertsons Companies, Inc., as the surviving corporation.
4.	3	To the best of my knowledge, the following law firms contributed to my expert witness fees: Garwin Gerstein & Fisher, LLP - New York, New York; Hagens Berman Sobol Shapiro LLP - Boston, Massachusetts; Faruqi & Faruqi LLP - Philadelphia, Pennsylvania; Odom & Des Roches, LLP - New Orleans, Louisiana; Smith Segura Raphael & Leger, LLP - Alexandria, Louisiana; Taus, Cebulash & Landau, LLP - New York, New York; and Berger Montague, PC - Philadelphia, Pennsylvania. The payments that I received for my expert testimony were administered by Odom & Des Roches, LLC.
5.	5	The one-participant 401(k) plan was established when my spouse used to co-own Propel Clean Energy Partners, LLC.
8.	1	Underpayment of taxes following a miscommunication with accountant; taxes paid as soon as error was realized. The Internal Revenue Services' notice did not specify an interest rate, but it listed \$163.46 as the amount of interest due.

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 \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 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 \$192 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).
