

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

## Filer's Information

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McCulloch, Katherine M

Director, Business Integration Office, Department of the Interior

Report Year: 2023

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Other Federal Government Positions Held During the Preceding 12 Months:

Acting Chief Of Staff for Assistant Secretary, Policy, Management and Budget, Department of the Interior (1/2022 - 6/2022)

Associate Director for Administration, USGS, Department of the Interior (3/2019 - 8/2022)

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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/ McCulloch, Katherine M [electronically signed on 05/08/2023 by McCulloch, Katherine M 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/ Genter, Constance, Certifying Official [electronically signed on 06/26/2023 by Genter, Constance in Integrity.gov]

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Other review conducted by

/s/ Smith, Sharnae, Ethics Official [electronically signed on 06/20/2023 by Smith, Sharnae in Integrity.gov]

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Data Revised 06/26/2023

Data Revised 06/23/2023

Data Revised 06/20/2023

Data Revised 06/14/2023

Data Revised 06/13/2023

Data Revised 06/02/2023

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

None

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	NFS/FMTC ROLLOVER IRA FBO #1	No			
1.1	AMCAP FUND A - AMCPX	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	FIDELITY ADV MID CAP VALUE C - FMPEX	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.3	GLOBAL FUND A - OPPAX	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	INTERMEDIATE BOND FUND OF AMERICA-A - AIBAX	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	US Brokerage Account (cash)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	Fidelity Advisor Mid Cap Value Fund Class A Shares (FMPAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

## 3. Filer's Employment Agreements and Arrangements

None

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#### 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	NFS/FMTC ROLLOVER IRA FBO #2	No			
1.1	DODGE & COX INTERNATIONAL STOCK - DODFX	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	FIDELITY CONTRAFUND FD - FCNTX	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.3	CARILLON EAGLE MIDCAP GROWTH FUND CLASS I - HAGIX	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	PRUDENTIAL TOTAL RETURN BOND CL Z - PDBZX	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.5	SCIENCE & TECH OPPS - BGSIX	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.6	US Brokerage Account (Cash)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	American Funds Strategic Bond Fund Class F2 Shares (ANBFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.8	New World Fund, Inc Class F2 Shares (NFFFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.9	SPDR S&P 500 ETF Trust (SPY)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.10	American Funds Inflation Linked Bond Fund Class F2 Shares (BFIGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.11	JPMorgan Strategic Income Opportunities Fund Class A Shares (JSOAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.12	Ivy Mid Cap Income Opportunities Fund Class I Shares (IVOIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.13	First EagleGlobal Fund Class I Shares (SGIIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.14	Columbia Balanced Fund Institutional 2 Class Shares (CLREX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.15	First Eagle Overseas Fund Class I Shares (SGOIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.16	PIMCO International Bond Fund (U.S. Dollar-Hedged) I-2 (PFBPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.17	Vanguard Equity Income Fund Admiral Shares (VEIRX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.18	Victory Sycamore Established Value Fund Class I Shares (VEVIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.19	American Century Short Duration Inflation Protection Bond Fund Class I Shares (APOHX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.20	Invesco Oppenheimer International Bond Fund Class Y Shares (OIBYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.21	MFS Mid Cap Value Fund Class I Shares (MCVIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.22	Gabelli Small Cap Growth Fund Class I Shares (GACIX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.23	ArtisanGlobal Opportunities Fund Advisor Class Shares (APDRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	Sailpoint Technologies	N/A		Salary, Bonus	

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	SailPoint Technologies Holdings, Inc. (SAIL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	Sailpoint Technologies (401K)	No			
4.1	Fidelity Small Cap Growth K6 Fund (FOCSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	Fidelity 500 Index Fund (FXAIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	MFS Value Fund Class R6 Shares (MEIKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	MFS Mid Cap Growth Fund Class R6 Shares (OTCKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.5	JPMorgan Large Cap Growth Fund Class R6 Shares (JLGMX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	EuroPacific Growth Fund Class R6 Shares (RERGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.7	Fidelity US Bond Index Fund (FXNAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.8	Fidelity Freedom Index 2040 Fund Institutional Premium Class Shares (FFIZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	LIFE INSURANCE #1 - AMERITAS LIFE INSURANCE CORP (variable life)	No			
1.1	CALVERT VP S&P 500 INDEX	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	LIFE INSURANCE - #2- AMERITAS LIFE INSURANCE CORP (variable life)	No			
2.1	CALVERT VP S&P 500 INDEX	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	Virginia College Savings Plan /COLLEGEAMERICA #1	No			
3.1	American Funds EuroPacific Gr 529A - CEUAX	Yes	None (or less than \$1,001)		None (or less than \$201)
3.2	AMERICAN FUNDS FUNDAMENTL INVS 529A - CFNAX	Yes	None (or less than \$1,001)		None (or less than \$201)
3.3	AMERICAN FUNDS GR FND OF AMERICA 529A - CGFAX	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.4	American Funds New World 529A - CNWAX	Yes	None (or less than \$1,001)		None (or less than \$201)
3.5	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	Virginia College Savings Plan/COLLEGEAMERICA #2	No			
4.1	American Funds EuroPacific Gr 529A - CEUAX	Yes	None (or less than \$1,001)		None (or less than \$201)
4.2	AMERICAN FUNDS FUNDAMENTL INVS 529A - CFNAX	Yes	None (or less than \$1,001)		None (or less than \$201)
4.3	AMERICAN FUNDS GR FND OF AMER 529A - CGFAX	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	American Funds New World 529A - CNWAX	Yes	None (or less than \$1,001)		None (or less than \$201)
4.5	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	Virginia College Savings Plan/COLLEGEAMERICA #3	No			
5.1	American Funds EuroPacific Gr 529A - CEUAX	Yes	None (or less than \$1,001)		None (or less than \$201)
5.2	AMERICAN FUNDS FUNDAMENTL INVS 529A - CFNAX	Yes	None (or less than \$1,001)		None (or less than \$201)
5.3	AMERICAN FUNDS GR FND OF AMER 529A - CGFAX	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	American Funds New World 529A - CNWAX	Yes	None (or less than \$1,001)		None (or less than \$201)
5.5	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Virginia College Savings Plan/COLLEGEAMERICA	No			
6.1	American Funds EuroPacific Gr 529A - CEUAX	Yes	None (or less than \$1,001)		None (or less than \$201)
6.2	AMERICAN FUNDS FUNDAMENTL INVS 529A - CFNAX	Yes	None (or less than \$1,001)		None (or less than \$201)
6.3	AMERICAN FUNDS GR FND OF AMER 529A - CGFAX	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.4	American Funds New World 529A - CNWAX	Yes	None (or less than \$1,001)		None (or less than \$201)
6.5	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX) #4	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	JOINT INVESTMENTS	No			
7.1	AMERICAN FUNDS GR FND OF AMER A - AGTHX	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7.2	APPLE INC COM - AAPL	N/A	\$15,001 - \$50,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.3	GABELLI SMALL CAP GROWTH FUND-CLASS A - GCASX	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.4	ORACLE CORP COM - ORCL	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
7.5	VANGUARD HIGH YIELD TAX EXEMPT FUND ADMIRAL SHARES - VWALX	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.6	Vanguard Strategic Small-Cap Equity - VSTCX	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.7	SYCAMORE ESTABLISHED VALUE A - VETAX	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.8	CARILLON EAGLE MID CAP GROWTH FUND CLASS I - HAGIX	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.9	AMERICAN FUNDS THE INCOME FUND OF AMERICA-A - AMECX	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
7.10	Ivy Mid Cap Income Opportunities Fund Class I Shares (IVOIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.11	US Brokerage Account (cash)	Yes	\$50,001 - \$100,000		None (or less than \$201)
7.12	Victory Sycamore Established Value Fund Class I Shares (VEVIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.13	Gabelli Small Cap Growth Fund Class I Shares (GACIX)	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
7.14	Costco Wholesale Corp. (COST)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.15	Alphabet, Inc. (GOOG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.16	Microsoft Corp. (MSFT)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.17	FedEx Corp. (FDX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.18	Okta, Inc. (OKTA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	U.S. bank #1 (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Okta, Inc. (OKTA)	Purchase	09/20/2022	\$1,001 - \$15,000
2	FedEx Corp. (FDX)	Purchase	09/20/2022	\$1,001 - \$15,000
3	Microsoft Corp. (MSFT)	Purchase	08/08/2022	\$1,001 - \$15,000
4	Alphabet, Inc. (GOOG)	Purchase	07/19/2022	\$1,001 - \$15,000
5	Costco Wholesale Corp. (COST)	Purchase	05/19/2022	\$1,001 - \$15,000
6	American Century Short Duration Inflation Protection Bond Fund Class I Shares (APOHX)	Purchase	04/18/2022	\$15,001 - \$50,000
7	JPMorgan Strategic Income Opportunities Fund Class A Shares (JSOAX)	Sale	04/18/2022	\$15,001 - \$50,000
8	First Eagle Overseas Fund Class I Shares (SGOIX)	Purchase	03/07/2022	\$1,001 - \$15,000
9	PIMCO International Bond Fund (U.S. Dollar-Hedged) I-2 (PFBPX)	Purchase	03/07/2022	\$15,001 - \$50,000
10	Columbia Balanced Fund Institutional 2 Class Shares (CLREX)	Purchase	03/07/2022	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
11	Vanguard Equity Income Fund Admiral Shares (VEIRX) See Endnote	Purchase	03/07/2022	\$15,001 - \$50,000
12	Victory Sycamore Established Value Fund Class I Shares (VEVIX)	Purchase	03/07/2022	\$1,001 - \$15,000
13	American Century Short Duration Inflation Protection Bond Fund Class I Shares (APOHX)	Purchase	04/19/2022	\$15,001 - \$50,000
14	Invesco Oppenheimer International Bond Fund Class Y Shares (OIBYX)	Purchase	05/03/2022	\$1,001 - \$15,000
15	MFS Mid Cap Value Fund Class I Shares (MCVIX)	Purchase	05/03/2022	\$15,001 - \$50,000
16	Gabelli Small Cap Growth Fund Class I Shares (GACIX)	Purchase	05/03/2022	\$15,001 - \$50,000
17	ArtisanGlobal Opportunities Fund Advisor Class Shares (APDRX)	Purchase	05/03/2022	\$15,001 - \$50,000
18	Fidelity Small Cap Growth K6 Fund (FOCSX)	Purchase	03/15/2022	\$1,001 - \$15,000
19	Fidelity 500 Index Fund (FXAIX)	Purchase	03/15/2022	\$1,001 - \$15,000
20	MFS Value Fund Class R6 Shares (MEIKX)	Purchase	03/15/2022	\$1,001 - \$15,000
21	MFS Mid Cap Growth Fund Class R6 Shares (OTCKX)	Purchase	03/15/2022	\$1,001 - \$15,000
22	JPMorgan Large Cap Growth Fund Class R6 Shares (JLGMX)	Purchase	03/15/2022	\$1,001 - \$15,000
23	EuroPacific Growth Fund Class R6 Shares (RERGX)	Purchase	03/15/2022	\$1,001 - \$15,000
24	Fidelity US Bond Index Fund (FXNAX)	Purchase	03/15/2022	\$1,001 - \$15,000
25	Fidelity Freedom Index 2040 Fund Institutional Premium Class Shares (FFIZX)	Purchase	03/15/2022	\$1,001 - \$15,000
26	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)	Purchase	12/19/2022	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
27	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)		Purchase	12/19/2022	\$1,001 - \$15,000
28	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)		Purchase	12/19/2022	\$1,001 - \$15,000
29	American Funds Inflation Linked Bond Fund Class 529-C Shares (CNLCX)		Purchase	12/19/2022	\$1,001 - \$15,000
30	Victory Sycamore Established Value Fund Class I Shares (VEVIX)		Purchase	03/07/2022	\$1,001 - \$15,000
31	Gabelli Small Cap Growth Fund Class I Shares (GACIX)		Purchase	05/03/2022	\$1,001 - \$15,000
32	Vanguard Equity Income Fund Admiral Shares (VEIRX)		Purchase	12/16/2022	\$1,001 - \$15,000
33	Columbia Balanced Fund Class A Shares (CBLAX)	See Endnote	Sale	03/07/2022	\$15,001 - \$50,000
34	First Eagle Overseas Fund Class A Shares (SGOVX)	See Endnote	Sale	03/07/2022	\$1,001 - \$15,000
35	PIMCO International Bond Fund (U.S. Dollar-Hedged) I-3 (PFONX)	See Endnote	Sale	03/07/2022	\$15,001 - \$50,000
36	Vanguard Equity Income Fund Investor Shares (VEIPX)	See Endnote	Sale	03/07/2022	\$15,001 - \$50,000
37	Columbia Balanced Fund Institutional 2 Class Shares (CLREX)	See Endnote	Sale	12/08/2022	\$1,001 - \$15,000
38	Gabelli Small Cap Growth Fund Class I Shares (GACIX)	See Endnote	Sale	11/28/2022	\$1,001 - \$15,000
39	Vanguard Equity Income Fund Admiral Shares (VEIRX)	See Endnote	Purchase	12/16/2022	\$1,001 - \$15,000
40	Fidelity Contrafund (FCNTX)	See Endnote	Purchase	12/09/2022	\$1,001 - \$15,000
41	Invesco Oppenheimer International Bond Fund Class A Shares (OIBAX)	See Endnote	Purchase	05/03/2022	\$1,001 - \$15,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
42	Victory Sycamore Established Value Fund Class A Shares (VETAX)	See Endnote	Sale	03/07/2022	\$1,001 - \$15,000
43	ArtisanGlobal Opportunities Fund Investor Shares (ARTRX)	See Endnote	Sale	05/03/2022	\$15,001 - \$50,000
44	MFS Mid Cap Value Fund Class A Shares (MVCAX)	See Endnote	Sale	05/03/2022	\$15,001 - \$50,000
45	American Century Short Duration Inflation Protection Bond Fund Class I Shares (APOHX)		Sale	04/19/2022	\$15,001 - \$50,000
46	Gabelli Small Cap Growth Fund Class A Shares (GCASX)	See Endnote	Sale	05/03/2022	\$15,001 - \$50,000
47	Eaton Vance Atlanta Capital SMID-Cap Fund Class I Shares (EISMX)	See Endnote	Sale		\$15,001 - \$50,000
48	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	See Endnote	Sale		\$15,001 - \$50,000
49	Target Retirement 2040 Trust II	See Endnote	Sale		\$100,001 - \$250,000
50	Hartford International Opportunities Fund Class Y Shares (HAOYX)	See Endnote	Sale		\$15,001 - \$50,000
51	State Street Russell Small/Mid Cap Index Securities - Lending Series Fund Class II	See Endnote	Sale		\$1,001 - \$15,000
52	State Street S&P 500 Index Securities Lending Series Fund Class II	See Endnote	Sale		\$15,001 - \$50,000

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

None

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### Endnotes

PART	#	ENDNOTE
7.	11	Multiple
7.	33	No longer held.
7.	34	No longer held.
7.	35	No longer held.
7.	36	No longer held.
7.	37	Re-investment.
7.	38	Re-investment.
7.	39	Re-investment.
7.	40	Re-investment.
7.	41	No longer held.
7.	42	No longer held.
7.	43	No longer held.
7.	44	No longer held.
7.	46	No longer held.
7.	47	Underlying asset of Arrow Electronics 401k. Account rolled over.
7.	48	Underlying asset of Arrow Electronics 401k. Account rolled over.

PART	#	ENDNOTE
7.	49	Underlying asset of Arrow Electronics 401k. Account rolled over.
7.	50	Underlying asset of Arrow Electronics 401k. Account rolled over.
7.	51	Underlying asset of Arrow Electronics 401k. Account rolled over.
7.	52	Underlying asset of Arrow Electronics 401k. Account rolled over.

# 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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