

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

Filer's Information

Culver, Nada

Principal Deputy Director, Bureau of Land Management, Department of the Interior

Report Year: 2022

Other Federal Government Positions Held During the Preceding 12 Months:

Senior Counselor to the Secretary (3/2021 - 4/2021)

Deputy Director, Policy and Programs (4/2021 - 4/2022)

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/ Culver, Nada [electronically signed on 05/31/2022 by Culver, Nada in Integrity.gov] - Filer received a 30 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/ Genter, Constance, Certifying Official [electronically signed on 07/20/2022 by Genter, Constance in Integrity.gov]

Other review conducted by

/s/ Gaddy, Kelsey D, Ethics Official [electronically signed on 07/20/2022 by Gaddy, Kelsey D in Integrity.gov]

Data Revised 07/20/2022

Data Revised 07/19/2022

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	National Audubon Society	Denver, Colorado	Non-Profit	Vice President, Public Lands and Senior Policy Counsel	7/2019	2/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	National Audubon Society	N/A		Salary	\$33,862
2	IRA #1	No			
2.1	AMCAP Fund Class A Shares (AMCPX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.2	American Balanced Fund Class A Shares (ABALX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.3	American Funds Bond Fund of America A (ABNDX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.4	American Funds Capital Income Builder Class A (CAIBX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.5	EuroPacific Growth Fund Class A Shares (AEPGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.6	American Funds Fundamental Investors Class A Shares (ANCFX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.7	Growth Fund of America Class A Shares (AGTHX)	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.8	Income Fund of America Class A Shares (AMECX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.9	American Funds Inflation Linked Bond Fund Class A Shares (BFIAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.10	Investment Company of America Class A Shares (AIVSX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.11	American Mutual Fund Class A Shares (AMRMX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.12	New Perspective Fund Class A Shares (ANWPX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.13	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.14	TouchstoneGlobal ESG Equity Fund Class A Shares (TEQAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Roth IRA #1	No			
3.1	Capital World Growth & Income Fund Class A Shares (CWGIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	New World Fund, Inc Class A Shares (NEWFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	National Audubon Society defined contribution plan #1	No			
4.1	Blackrock Total Return K	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.2	Fidelity Contrafund	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.3	John Hancock Funds III Disciplined Value Fund Class R6 Shares (JDVWX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.4	MassMutual Select Mid Cap Growth I	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.5	American Funds Europacific GRR6	Yes	\$1,001 - \$15,000		None (or less than \$201)
4.6	Fidelity Freedom 2030	Yes	None (or less than \$1,001)		None (or less than \$201)
5	National Audubon Society defined contribution plan #2	No			
5.1	Blackrock Total Return K	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.2	Fidelity Contrafund	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.3	John Hancock Funds III Disciplined Value Fund Class R6 Shares (JDVWX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.4	MassMutual Select Mid Cap Growth I	Yes	\$1,001 - \$15,000		None (or less than \$201)
5.5	EuroPacific Growth Fund Class R6 Shares (RERGX)	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	National Audubon Society	New York, New York	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	7/2019
2	National Audubon Society	New York, New York	I will not participate in this defined contribution plan after my separation.	6/2019

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	Benezra and Culver, PC (law firm)	N/A		salary, bonus, partnership share	
2	University of Denver Sturm College of Law (Law School)	N/A		salary	
3	Benezra and Culver, PC (capital account)	N/A	None (or less than \$1,001)		None (or less than \$201)
4	SEP IRA #1	No			
4.1	Alphabet, Inc. (GOOGL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4.2	Amazon.com, Inc. (AMZN)	N/A	\$50,001 - \$100,000		None (or less than \$201)
4.3	Caterpillar, Inc. (CAT)	N/A	\$50,001 - \$100,000		None (or less than \$201)
4.4	Citigroup, Inc. (C)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.5	FedEx Corp. (FDX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.6	General Dynamics Corp. (GD)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4.7	Johnson Controls International Plc (JCI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.8	Mastercard, Inc. (MA)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.9	McCormick & Co., Inc. (MKC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.10	Merck & Co., Inc. (MRK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.11	Microsoft Corp. (MSFT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4.12	Snap-On, Inc. (SNA)	N/A	\$15,001 - \$50,000		None (or less than \$201)
4.13	Starbucks Corp. (SBUX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.14	Truist Financial (TFC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.15	Visa, Inc. (V)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.16	The Walt Disney Co. (DIS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4.17	American Balanced Fund Class A Shares (ABALX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.18	Capital Income Builder Class A Shares (CAIBX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.19	Capital World Growth & Income Fund Class A Shares (CWGIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.20	Growth Fund of America Class A Shares (AGTHX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.21	Income Fund of America Class A Shares (AMECX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
4.22	International Growth & Income Fund Class A Shares (IGAAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.23	New Perspective Fund Class A Shares (ANWPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.24	New World Fund, Inc Class A Shares (NEWFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.25	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.26	Washington Mutual Investors Fund Class A Shares (AWSHX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5	IRA #1	No			
5.1	3M Co. (MMM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.2	Alphabet, Inc. (GOOG)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5.3	Alphabet, Inc. (GOOGL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5.4	Johnson & Johnson (JNJ)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5.5	Medtronic Plc (MDT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.6	Proctor & Gamble (PG)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5.7	Synchrony Financial (SYF)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.8	Invesco Water Resources ETF (PHO)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.9	American Balanced Fund Class A Shares (ABALX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.10	Capital Income Builder Class A Shares (CAIBX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.11	Income Fund of America Class A Shares (AMECX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.12	Alum Rock, California Union Elementary School 022171AR3 Bond	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.13	Growth Fund of America Class A Shares (AGTHX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.14	American Funds Inflation Linked Bond Fund Class A Shares (BFIAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.15	Cisco Systems Corporate 17275RAD4 Bond	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Roth IRA #1	No			
6.1	Capital World Growth & Income Fund Class A Shares (CWGIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	New World Fund, Inc Class A Shares (NEWFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Condominium, residential (New York, NY)	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
2	Joint Account #2 (U.S. Bank Account, Cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	Joint Account #1 (Brokerage Account)	No			
3.1	Capital World Growth & Income Fund Class A Shares (CWGIX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.2	New Perspective Fund Class A Shares (ANWPX)	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
3.3	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
3.4	Tax-Exempt Bond Fund of America Class A Shares (AFTEX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.5	Alcon (ALC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.6	Deere & Co. (DE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.7	JPMorgan Chase & Co. (JPM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.8	Lowe's Companies (LOW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.9	Microsoft Corp. (MSFT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
3.10	Novartis AG (NVS)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
3.11	Growth Fund of America Class A Shares (AGTHX)	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
3.12	Vanguard 500 Index Fund ETF Shares (VOO)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.13	AT&T (T)	See Endnote	N/A	Capital Gains Dividends	\$201 - \$1,000
3.14	Fortis, Inc. (FTS)	See Endnote	N/A	Capital Gains Dividends	\$5,001 - \$15,000
3.15	Berkshire Hathaway Inc. (BRKB)	See Endnote	N/A	Capital Gains	\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.16	Union Pacific Corp. (UNP) See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
3.17	Vanguard S&P 500 Growth Index Fund ETF Shares (VOOG)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	Ute Distribution Corp. Stock (value not readily ascertainable)	No		Rent or Royalties	\$15,001 - \$50,000
5	Joint Account #3 (Brokerage Account)	No			
5.1	American Balanced Fund Class A Shares (ABALX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Joint #1 - Berkshire Hathaway Class B	Sale	04/23/2021	\$50,001 - \$100,000
2	IRA#1 - Berkshire Hathaway Class B	Sale	04/23/2021	\$50,001 - \$100,000
3	BlackRock Total Return Fund Class K Shares (MPHQX)	Sale	08/10/2021	\$1,001 - \$15,000
4	Fidelity Contrafund (FCNTX)	Sale	08/10/2021	\$1,001 - \$15,000
5	JHancock Disciplined Value R6	Sale	08/10/2021	\$1,001 - \$15,000
6	MassMutual Select Mid Cap Growth Fund Class R3 Shares (MEFNX)	Sale	08/10/2021	\$1,001 - \$15,000
7	American Funds Europacific GRR6	Sale	08/10/2021	\$1,001 - \$15,000
8	SMCWX	Purchase	08/17/2021	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
9	SEP IRA #1 - Berkshire Hathaway Class B	Sale	04/23/2021	\$15,001 - \$50,000
10	Joint #1 - Enbridge	Sale	04/23/2021	\$1,001 - \$15,000
11	SEP IRA #1 - Washington Mutual Investors Fund (AWSHX)	Purchase	04/23/2021	\$15,001 - \$50,000
12	Joint #1 - Growth Fund of America (AGTHX)	Purchase	04/23/2021	\$50,001 - \$100,000
13	IRA#1 - American Balanced Fund (ABALX)	Sale	04/23/2021	\$50,001 - \$100,000
14	Joint #3 - American Balanced Fund Class A Shares (ABALX)	Purchase	05/18/2021	\$15,001 - \$50,000
15	AT&T 00206RAS1 Bond	Sale	08/16/2021	\$1,001 - \$15,000
16	Conoco Phillips 20825CAQ7	Sale	08/16/2021	\$1,001 - \$15,000
17	Berkshire Hathaway Inc. (BRKB) Bond	Sale	08/16/2021	\$1,001 - \$15,000
18	Verizon Bond	Sale	08/16/2021	\$1,001 - \$15,000
19	AT&T	Sale	08/16/2021	\$1,001 - \$15,000
20	Fortis, Inc.	Sale	08/16/2021	\$15,001 - \$50,000
21	Union Pacific Corp. (UNP)	Sale	08/16/2021	\$1,001 - \$15,000
22	Growth Fund of America Class A Shares (AGTHX)	Purchase	08/17/2021	\$50,001 - \$100,000
23	American Balanced Fund Class A Shares (ABALX)	Purchase	09/15/2021	\$50,001 - \$100,000
24	E-470 Highway Authority Bond	Sale	09/01/2021	\$50,001 - \$100,000
25	New Perspective Fund Class A Shares (ANWPX)	Purchase	09/01/2021	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
26	Growth Fund of America Class A Shares (AGTHX)	Purchase	09/01/2021	\$15,001 - \$50,000
27	Vanguard 500 Index Fund ETF Shares (VOO)	Purchase	08/17/2021	\$15,001 - \$50,000
28	Vanguard S&P 500 Growth Index Fund ETF Shares (VOOG)	Purchase	12/13/2021	\$1,001 - \$15,000
29	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Purchase	01/06/2022	\$15,001 - \$50,000
30	Capital Income Builder Class A Shares (CAIBX)	Purchase	12/20/2021	\$1,001 - \$15,000
31	American Funds Inflation Linked Bond Fund Class A Shares (BFIAAX)	Purchase	12/21/2021	\$1,001 - \$15,000
32	Growth Fund of America Class A Shares (AGTHX)	Purchase	12/20/2021	\$1,001 - \$15,000
33	American Balanced Fund Class A Shares (ABALX)	Purchase	12/15/2021	\$1,001 - \$15,000
34	Income Fund of America Class A Shares (AMECX)	Purchase	12/15/2021	\$1,001 - \$15,000
35	International Growth & Income Fund Class A Shares (IGAAX)	Purchase	12/22/2021	\$1,001 - \$15,000
36	Capital Income Builder Class A Shares (CAIBX)	Purchase	12/20/2021	\$1,001 - \$15,000
37	Growth Fund of America Class A Shares (AGTHX)	Purchase	12/20/2021	\$1,001 - \$15,000
38	Washington Mutual Investors Fund Class A Shares (AWSHX)	Purchase	12/20/2021	\$1,001 - \$15,000
39	New Perspective Fund Class A Shares (ANWPX)	Purchase	12/17/2021	\$1,001 - \$15,000
40	New World Fund, Inc Class A Shares (NEWFX)	Purchase	12/17/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
41	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Purchase	12/17/2021	\$1,001 - \$15,000
42	Capital World Growth & Income Fund Class A Shares (CWGIX)	Purchase	12/15/2021	\$1,001 - \$15,000
43	Income Fund of America Class A Shares (AMECX)	Purchase	12/15/2021	\$1,001 - \$15,000
44	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Purchase	12/17/2021	\$1,001 - \$15,000
45	New Perspective Fund Class A Shares (ANWPX)	Purchase	12/17/2021	\$1,001 - \$15,000
46	Growth Fund of America Class A Shares (AGTHX)	Purchase	12/20/2021	\$1,001 - \$15,000
47	Capital World Growth & Income Fund Class A Shares (CWGIX)	Purchase	12/15/2021	\$1,001 - \$15,000
48	American Balanced Fund Class A Shares (ABALX)	Purchase	12/15/2021	\$1,001 - \$15,000
49	American Funds Inflation Linked Bond Fund Class A Shares (BFIAX)	Purchase	12/21/2021	\$1,001 - \$15,000
50	American Funds Fundamental Investors Class A Shares (ANCFX)	Purchase	12/20/2021	\$1,001 - \$15,000
51	Growth Fund of America Class A Shares (AGTHX)	Purchase	12/20/2021	\$1,001 - \$15,000
52	EuroPacific Growth Fund Class A Shares (AEPGX)	Purchase	12/17/2021	\$1,001 - \$15,000
53	New Perspective Fund Class A Shares (ANWPX)	Purchase	12/17/2021	\$1,001 - \$15,000
54	American SMALLCAP World Fund, Inc Class A Shares (SMCWX)	Purchase	12/17/2021	\$1,001 - \$15,000
55	Capital Income Builder Class A Shares (CAIBX)	Purchase	12/16/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
56	American Mutual Fund Class A Shares (AMRMX)	Purchase	12/16/2021	\$1,001 - \$15,000
57	Investment Company of America Class A Shares (AIVSX)	Purchase	12/15/2021	\$1,001 - \$15,000
58	American Balanced Fund Class A Shares (ABALX)	Purchase	12/15/2021	\$1,001 - \$15,000
59	Income Fund of America Class A Shares (AMECX)	Purchase	12/15/2021	\$1,001 - \$15,000
60	TouchstoneGlobal ESG Equity Fund Class A Shares (TEQAX)	Purchase	12/10/2021	\$1,001 - \$15,000
61	Vanguard S&P 500 Growth Index Fund ETF Shares (VOOG)	Purchase	08/16/2021	\$15,001 - \$50,000

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
6.	3.13	Sold.
6.	3.14	Sold.

PART	#	ENDNOTE
6.	3.15	Sold.
6.	3.16	Sold.

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).
