

January 31, 2023

Mr. Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear. Mr. Rounds:


The purpose of this letter is to forward the attached supplement to Ms. Kalpana Kotagal's her Public Financial Disclosure Report (278e) dated January 5, 2023. Ms. Kotagal explains in her letter dated January 30, 2023 the reasons for the supplement are that it was an inadvertent omission.

As the Designed Agency Ethics official of the Equal Employment Opportunity Commission, I have reviewed the updated information contained in the supplement and based upon my review of it and the prior commitments made by Ms. Kotagal in her previously transmitted Ethics Agreement, I continue to believe that Ms. Kotagal is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**KATHLEEN
ORAM**

Kathleen Oram
ADAEO

 Digitally signed by
KATHLEEN ORAM
Date: 2023.01.31 15:04:54
-05'00'

January 30, 2023

Carol R. Miaskoff
Designated Agency Ethics Official
Equal Employment Opportunity Commission
131 M Street, N.E.
Washington, D.C. 20507

Re: Supplement to Financial Disclosure Report of Kalpana Kotagal

Dear Ms. Miaskoff

The purpose of this document is to supplement my financial disclosure report by reporting an additional underlying holding in my Cohen Milstein Sellers & Toll defined contribution plan that was inadvertently omitted from the financial disclosure report that I signed on January 5, 2023.

Part 2

#	Description	EIF	Value	Income Type	Income Amount
3.8	Putnam Stable Value Fund	Yes	\$1,000 - \$15,000		None (or less than \$201)

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,



Kalpana Kotagal

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

Filer's Information

Kotagal, Kalpana

Commissioner, Equal Employment Opportunity Commission

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Committee on Health, Education, Labor, and Pensions
-

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/ Kotagal, Kalpana [electronically signed on 01/05/2023 by Kotagal, Kalpana 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/ Oram, Kathleen, Certifying Official [electronically signed on 01/19/2023 by Oram, Kathleen in Integrity.gov]

Other review conducted by

/s/ Oram, Kathleen, Ethics Official [electronically signed on 01/19/2023 by Oram, Kathleen in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 01/20/2023 by Apol, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Cohen Milstein Sellers & Toll PLLC		Washington, District of Columbia	Law Firm	Partner	1/2014	Present
2	Public Justice Foundation		Washington, District of Columbia	Non-Profit	Board of Directors	7/2019	Present
3	A Better Balance		New York, New York	Non-Profit	Board of Directors	11/2018	Present
4	American Constitution Society		Washington, District of Columbia	Non-Profit	Task Force member	10/2018	Present
5	Artificial Intelligence-Technical Advisory Committee	See Endnote	Washington, District of Columbia	Advisory Committee	Member	11/2021	Present
6	Vanderbilt Law School		Nashville, Tennessee	University/College	Adjunct Professor	8/2020	5/2021
7	Vanderbilt Law School		Nashville, Tennessee	University/College	Barrett Distinguished Practitioner in Residence	9/2022	9/2022

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Brokerage Traditional IRA	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.1	Ark Fintech Innovation ETF (ARKF)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	Ark Genomic Revolution ETF (ARKG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	Ark Autonomous Tech ETF (ARKQ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	Ark Next Gen Internet ETF (ARKW)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	Fidelity Government Money Market Fund (SPAXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	U.S. Brokerage Roth IRA	No			
2.1	Ark Innovation ETF (ARKK)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	First Trust NASDAQ Clean Edge Green Energy ETF (QCLN)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Cohen Milstein Sellers & Toll defined contribution plan	No			
3.1	JPMorgan Large Cap Growth Fund Class R6 Shares (JLGMX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.2	MassMutual Select Mid Cap Growth Fund Class I Shares (MEFZX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.3	MFS Value Fund Class R6 Shares (MEIKX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.4	T Rowe Price QM US Sm-Cap Growth Eqty Fd, Incl Cl Sh (TQAIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.5	EuroPacific Growth Fund Class R6 Shares (RERGX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.6	PIMCO Total Return Fund Institutional Class Shares (PTTRX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.7	Lincoln Stable Value Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	Cohen Milstein Sellers & Toll PLLC (law firm) anticipated bonus	N/A	\$15,001 - \$50,000		None (or less than \$201)
5	Cohen Milstein Sellers & Toll PLLC (law firm)	N/A		Salary/Bonus	\$460,000
6	Vanderbilt Law School - Vanderbilt University Law School - 9/7-9/2022	N/A		Honorarium	\$2,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Cohen Milstein Sellers & Toll PLLC	Washington, District of Columbia	I will continue to participate in the defined contribution retirement plan (401k), but the firm will cease making contributions upon my separation.	11/2006
2	Cohen Milstein Sellers & Toll PLLC	Washington, District of Columbia	Pursuant to firm policy, the Case Generation Committee has given me credit for certain client matters. I will receive one or more bonuses for generating those matters, the amount of which will be based on work performed for those clients. I will receive any outstanding bonus amounts before I assume the duties of the position.	11/2006
3	Cohen Milstein Sellers & Toll PLLC	Washington, District of Columbia	I am currently involved in nine contingency fee cases, and one contingency fee case which will be filed shortly. Upon my departure from the firm, I will forfeit any interest I have in the fees or recoveries from those cases.	11/2006

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Cohen Milstein Sellers & Toll	Washington, District of Columbia	Attorney, Partner (non-equity)
2	Color Of Change	New York, New York	Legal Services
3	The Sierra Club	Washington, District of Columbia	Legal Services
4	Pearl Street Films	Los Angeles, California	Legal Services
5	Nancy Menusan, Cora Brna	New York, New York	Legal Services
6	Meredith Horton	Laurel, Maryland	Legal Services
7	Swathi Shanmugasundaram	Los Angeles, California	Legal Services
8	Kathryn Sadasivan	Chappaqua, New York	Legal Services
9	Ellen Giarratana	Aurora, Colorado	Legal Services
10	Natalie Lyons	Indianapolis, Indiana	Legal Services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Brokerage Traditional IRA	No			
1.1	Fidelity Govt Cash Reserves (FDRXX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	U.S. Brokerage Roth IRA	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.1	Fidelity Govt Cash Reserves (FDRXX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
2.2	Etsy Inc. (ETSY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.3	CrowdStrike Holdings, Inc. (CRWD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.4	Upstart Holdings, Inc. (UPST)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	U.S. Brokerage Rollover IRA	No			
3.1	Fidelity Govt Money Market (SPAXX)	Yes	\$250,001 - \$500,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank 1 - cash	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	U.S. bank 2 - cash	N/A	\$250,001 - \$500,000		None (or less than \$201)
3	U.S. bank 3 - cash	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	U.S. bank 4 - cash	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Combined Brokerage Accounts	No			
5.1	U.S. Brokerage - cash account 1	N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.2	U.S. Brokerage - cash account 2	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.3	Caterpillar, Inc. (CAT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.4	Chubb Ltd. (CB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.5	Costco Wholesale Corp. (COST)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.6	United Rentals, Inc. (URI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6	U.S. bank 5 - cash	N/A	\$15,001 - \$50,000		None (or less than \$201)
7	Green Builder Media, LLC (Trade publication, online and in print, covering the residential green building industry.)	See Endnote	\$100,001 - \$250,000		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	US Bank National Association	Mortgage on Personal Residence	\$500,001 - \$1,000,000	2021	2.875	30 years (fixed)

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	5	This is a group of experts convened by DCI Consulting and former EEOC Chair Lipnic
6.	7	Approx 2% equity stake in this non-publicly traded company

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).
