

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

## Filer's Information

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Pomeranz, Cody

Director of Speechwriting, Department of Health & Human Services

Date of Termination: 08/05/2022

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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/ Pomeranz, Cody [electronically signed on 08/03/2022 by Pomeranz, Cody in Integrity.gov] - Filer received a 90 day filing extension.

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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/ CardMina, Mary, Certifying Official [electronically signed on 10/03/2022 by CardMina, Mary in Integrity.gov]

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Other review conducted by

/s/ McBurney, Molly, Ethics Official [electronically signed on 09/15/2022 by McBurney, Molly in Integrity.gov]

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U.S. Office of Government Ethics Certification

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Data Revised 09/01/2022

Data Revised 08/30/2022

Data Revised 08/18/2022

Data Revised 08/03/2022

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(08/03/2022, Pomeranz, Cody): The filer agreed to update the reported information if it changes before or on the indicated termination date.
N/A	N/A	General	(08/30/2022, McBurney, Molly): Filer reported 63 stock sales in an OGE Form 278-T report filed on September 2, 2021.
2.	1.5	First Trust Small Cap Core AlphaDEX Fund (FYX)	(08/30/2022, McBurney, Molly): This fund was reported in the New Entrant report with the correct ticker symbol but incorrect fund name.

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Democratic National Committee	Washington, District of Columbia	Political Committee	Director of Speechwriting	4/2017	3/2021
2	States United Democracy Center	Washington, District of Columbia	Non-Profit	Consultant	3/2021	4/2021

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Traditional IRA	No			
1.1	First Trust Morningstar Dividend Leaders Index Fund (FDL)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	First Trust Europe AlphaDEX Fund (FEP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	First Trust Large Cap Core AlphaDEX Fund (FEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	First Trust Value Line Dividend Index Fund (FVD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	First Trust Small Cap Core AlphaDEX Fund (FYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	First Trust NASDAQ-100 Equal Weighted Index Fund (QQEW)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	Roth IRA	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.1	Morgan Stanley Pathway Funds Core Fixed Income Fund (TIIUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	Morgan Stanley Pathway Funds Large Cap Equity Fund (TLGUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	Morgan Stanley Pathway Funds International Equity Fund (TIEUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	Morgan Stanley Pathway Funds Small-Mid Cap Equity Fund (TSGUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	Morgan Stanley Pathway Funds Emerging Markets Equity Fund (TEMUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	Morgan Stanley Pathway Funds Ultra-Short Fixed Income Fund (TSDUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Democratic National Committee 401(k) plan	No			
3.1	Vanguard Target Retirement 2055 Fund (VFFVX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	Center for American Progress 401(k) plan	No			
4.1	BlackRock LifePath Index 2055 K (LIVIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	States United Democracy Center	N/A		Consulting fee	\$18,750
6	Democratic National Committee	N/A		Salary	\$12,000

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Democratic National Committee 401(k) plan	Washington, District of Columbia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	4/2017

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
2	Center for American Progress 401(k) plan	Washington, District of Columbia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	2/2016

#### 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

None

#### 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Brokerage Account	No	\$50,001 - \$100,000		
1.1	First Trust Europe AlphaDEX Fund (FEP)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.2	First Trust Value Line Dividend Index Fund (FVD)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.3	First Trust NASDAQ-100 Equal Weighted Index Fund (QQEW)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	First Trust Morningstar Dividend Leaders Index Fund (FDL)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.5	First Trust Large Cap Core AlphaDEX Fund (FEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.6	First Trust Small Cap Core AlphaDEX Fund (FYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	Sweep account #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.8	The Goldman Sachs Group, Inc. (GS)	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
1.9	JPMorgan Chase & Co. (JPM)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
1.10	Visa, Inc. (V)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
1.11	ZoomInfo Technologies, Inc. (ZI)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
2	US bank account #1 (cash account)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	US bank account #2 (cash account)	N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
4	Personal Loan to Stuffed, LLC	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
5	Family Trust	No			
5.1	Sweep Account #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.2	iShares Russell Mid-Cap Value ETF (IWS)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
5.3	Vanguard S&P Small-Cap 600 Value Index Fund ETF Shares (VIOV)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.4	Vanguard Russell 1000 Growth Index Fund ETF Shares (VONG)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.5	First Trust Rising Dividend Achievers ETF (RDVY)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.6	iShares MSCI BRIC ETF (BKF)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
5.7	Baron Discovery Fund Institutional Class Shares (BDFIX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
5.8	MFS International Diversification Fund Class I Shares (MDIJX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
5.9	BlackRock Mid-Cap Growth Equity Portfolio Institutional Shares (CMGIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5.10	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
5.11	Fidelity Advisor International Small Cap Fund Class I Shares (FIXIX)	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
5.12	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Yes	\$15,001 - \$50,000		\$5,001 - \$15,000
5.13	PIMCO Enhanced Short Maturity Active Exchange-Traded Fund (MINT)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5.14	American Express Co. (AXP)	No	\$1,001 - \$15,000		None (or less than \$201)
5.15	BlackRock, Inc. (BLK)	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
5.16	Caterpillar, Inc. (CAT)	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
5.17	The Goldman Sachs Group, Inc. (GS)	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
5.18	The Home Depot, Inc. (HD)	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
5.19	JPMorgan Chase & Co. (JPM)	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
5.20	Mastercard, Inc. (MA)	No	\$15,001 - \$50,000		None (or less than \$201)
5.21	Visa, Inc. (V)	No	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.22	Cisco Systems, Inc. (CSCO)	N/A	None (or less than \$1,001)	Dividends	\$201 - \$1,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Morgan Stanley Pathway Funds International Equity Fund (TIEUX)	Purchase	04/20/2022	\$1,001 - \$15,000
2	Morgan Stanley Pathway Funds Large Cap Equity Fund (TLGUX)	Purchase	04/20/2022	\$1,001 - \$15,000
3	Morgan Stanley Pathway Funds Core Fixed Income Fund (TIIUX)	Purchase	04/20/2022	\$1,001 - \$15,000
4	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Purchase	12/14/2021	\$1,001 - \$15,000
5	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Purchase	12/13/2021	\$1,001 - \$15,000
6	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Purchase	12/13/2021	\$1,001 - \$15,000
7	Baron Discovery Fund Institutional Class Shares (BDFIX)	Purchase	11/23/2021	\$1,001 - \$15,000
8	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Purchase	10/07/2021	\$1,001 - \$15,000
9	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Purchase	10/07/2021	\$1,001 - \$15,000
10	BlackRock Mid-Cap Growth Equity Portfolio Institutional Shares (CMGIX)	Purchase	10/07/2021	\$1,001 - \$15,000
11	MFS International Diversification Fund Class I Shares (MDIJX)	Purchase	10/07/2021	\$1,001 - \$15,000



#	DESCRIPTION	TYPE	DATE	AMOUNT
12	Baron Discovery Fund Institutional Class Shares (BDFIX)	Purchase	10/07/2021	\$1,001 - \$15,000
13	PIMCO Enhanced Short Maturity Active Exchange-Traded Fund (MINT)	Purchase	10/07/2021	\$15,001 - \$50,000
14	Vanguard Russell 1000 Growth Index Fund ETF Shares (VONG)	Purchase	10/07/2021	\$1,001 - \$15,000
15	Vanguard S&P Small-Cap 600 Value Index Fund ETF Shares (VIOV)	Purchase	10/07/2021	\$1,001 - \$15,000
16	iShares Russell Mid-Cap Value ETF (IWS)	Purchase	10/07/2021	\$1,001 - \$15,000
17	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Purchase	09/24/2021	\$15,001 - \$50,000
18	BlackRock Mid-Cap Growth Equity Portfolio Institutional Shares (CMGIX)	Purchase	09/24/2021	\$1,001 - \$15,000
19	Baron Discovery Fund Institutional Class Shares (BDFIX)	Purchase	09/24/2021	\$15,001 - \$50,000
20	First Trust Rising Dividend Achievers ETF (RDVY)	Purchase	09/24/2021	\$15,001 - \$50,000
21	Vanguard Russell 1000 Growth Index Fund ETF Shares (VONG)	Purchase	09/24/2021	\$15,001 - \$50,000
22	Vanguard S&P Small-Cap 600 Value Index Fund ETF Shares (VIOV)	Purchase	09/24/2021	\$15,001 - \$50,000
23	iShares Russell Mid-Cap Value ETF (IWS)	Purchase	09/24/2021	\$15,001 - \$50,000
24	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Purchase	09/21/2021	\$1,001 - \$15,000
25	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Purchase	09/21/2021	\$15,001 - \$50,000
26	BlackRock Mid-Cap Growth Equity Portfolio Institutional Shares (CMGIX)	Purchase	09/21/2021	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
27	MFS International Diversification Fund Class I Shares (MDIJX)	Purchase	09/21/2021	\$15,001 - \$50,000
28	Baron Discovery Fund Institutional Class Shares (BDFIX)	Purchase	09/21/2021	\$1,001 - \$15,000
29	PIMCO Enhanced Short Maturity Active Exchange-Traded Fund (MINT)	Purchase	09/21/2021	\$15,001 - \$50,000
30	iShares MSCI BRIC ETF (BKF)	Purchase	09/21/2021	\$1,001 - \$15,000
31	First Trust Rising Dividend Achievers ETF (RDVY)	Purchase	09/21/2021	\$15,001 - \$50,000
32	Vanguard S&P Small-Cap 600 Value Index Fund ETF Shares (VIOV)	Purchase	09/21/2021	\$1,001 - \$15,000
33	iShares Russell Mid-Cap Value ETF (IWS)	Purchase	09/21/2021	\$15,001 - \$50,000
34	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Purchase	09/17/2021	\$15,001 - \$50,000
35	Fidelity Advisor International Small Cap Fund Class I Shares (FIXIX)	Purchase	09/17/2021	\$1,001 - \$15,000
36	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Purchase	09/17/2021	\$1,001 - \$15,000
37	BlackRock Mid-Cap Growth Equity Portfolio Institutional Shares (CMGIX)	Purchase	09/17/2021	\$1,001 - \$15,000
38	MFS International Diversification Fund Class I Shares (MDIJX)	Purchase	09/17/2021	\$15,001 - \$50,000
39	Baron Discovery Fund Institutional Class Shares (BDFIX)	Purchase	09/17/2021	\$15,001 - \$50,000
40	PIMCO Enhanced Short Maturity Active Exchange-Traded Fund (MINT)	Purchase	09/17/2021	\$15,001 - \$50,000
41	iShares MSCI BRIC ETF (BKF)	Purchase	09/17/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
42	First Trust Rising Dividend Achievers ETF (RDVY)	Purchase	09/17/2021	\$15,001 - \$50,000
43	Vanguard Russell 1000 Growth Index Fund ETF Shares (VONG)	Purchase	09/17/2021	\$15,001 - \$50,000
44	Vanguard S&P Small-Cap 600 Value Index Fund ETF Shares (VIOV)	Purchase	09/17/2021	\$1,001 - \$15,000
45	iShares Russell Mid-Cap Value ETF (IWS)	Purchase	09/17/2021	\$15,001 - \$50,000
46	Morgan Stanley Institutional Fund Trust Discovery Portfolio Class I Shares (MPEGX)	Purchase	09/02/2021	\$1,001 - \$15,000
47	Fidelity Advisor International Small Cap Fund Class I Shares (FIXIX)	Purchase	09/02/2021	\$1,001 - \$15,000
48	T Rowe Price Blue Chip Growth Fund, Inc (TRBCX)	Purchase	09/02/2021	\$1,001 - \$15,000
49	BlackRock Mid-Cap Growth Equity Portfolio Institutional Shares (CMGIX)	Purchase	09/02/2021	\$1,001 - \$15,000
50	MFS International Diversification Fund Class I Shares (MDIJX)	Purchase	09/02/2021	\$1,001 - \$15,000
51	Baron Discovery Fund Institutional Class Shares (BDFIX)	Purchase	09/02/2021	\$1,001 - \$15,000
52	iShares MSCI BRIC ETF (BKF)	Purchase	09/02/2021	\$1,001 - \$15,000
53	First Trust Rising Dividend Achievers ETF (RDVY)	Purchase	09/02/2021	\$1,001 - \$15,000
54	Vanguard Russell 1000 Growth Index Fund ETF Shares (VONG)	Purchase	09/02/2021	\$1,001 - \$15,000
55	Vanguard S&P Small-Cap 600 Value Index Fund ETF Shares (VIOV)	Purchase	09/02/2021	\$1,001 - \$15,000
56	iShares Russell Mid-Cap Value ETF (IWS)	Purchase	09/02/2021	\$1,001 - \$15,000
57	First Trust Europe AlphaDEX Fund (FEP)	Purchase	09/01/2021	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
58	First Trust Value Line Dividend Index Fund (FVD)	Purchase	09/01/2021	\$1,001 - \$15,000
59	First Trust NASDAQ-100 Equal Weighted Index Fund (QQEW)	Purchase	09/01/2021	\$1,001 - \$15,000
60	First Trust Morningstar Dividend Leaders Index Fund (FDL)	Purchase	09/01/2021	\$1,001 - \$15,000
61	First Trust Large Cap Core AlphaDEX Fund (FEX)	Purchase	09/01/2021	\$1,001 - \$15,000
62	First Trust Small Cap Core AlphaDEX Fund (FYX)	Purchase	09/01/2021	\$1,001 - \$15,000

## 8. Liabilities

None

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## 9. Gifts and Travel Reimbursements

None

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## Endnotes

# 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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