

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

### Filer's Information

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Garbow, Avi

General Counsel, Environmental Protection Agency

Date of Termination: 01/20/2017

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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/ Garbow, Avi [electronically signed on 05/21/2017 by Garbow, Avi 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/ Fugh, Justina, Certifying Official [electronically signed on 08/01/2017 by Fugh, Justina in Integrity.gov]

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Other review conducted by

/s/ Fugh, Justina, Ethics Official [electronically signed on 08/01/2017 by Fugh, Justina in Integrity.gov]

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U.S. Office of Government Ethics Certification

Data Revised 08/01/2017

Data Revised 07/31/2017

Data Revised 07/28/2017

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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	General Electric Co	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2	McGraw Hill Financial Inc	No	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
3	SunTrust Banks Inc (STI)	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
4	Zimmer Holdings Inc (ZMH)	No	\$1,001 - \$15,000		None (or less than \$201)
5	BlackRock US Opportunities Svc (BMCSX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6	Invesco Balanced-Risk Allc C (ABRCX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
7	iShares Russell 1000 Growth Index (IWF)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
8	iShares Russell 1000 Value Index (IWD)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
9	iShares Russell Midcap Growth Index (IWP)	Yes	\$1,001 - \$15,000		None (or less than \$201)
10	iShares Russell Mid Cap Val (IWS)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
11	iShares Russell 2000 Growth Index (IWO)	Yes	\$1,001 - \$15,000		None (or less than \$201)

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#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12	iShares Russell 2000 Value Index (IWM)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
13	Vanguard Total Bond Market Index Admiral Shares (BND)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
14	Vanguard Short-Term Bond Index Admiral Shares (BSV)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
15	Aetna Inc	No	\$15,001 - \$50,000		\$201 - \$1,000
16	BlackRock US Opportunities Instl (BMCIX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
17	Neuberger Berman ABS Ret. Multi Mgr. I (NABIX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
18	RS Select Gr Y (RSSYX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
19	Invesco Intl Growth Equity Y (AIYYX)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
20	Vanguard Global Equity (VHGEX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
21	Vanguard Growth Index Admiral Shares (VIGEX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
22	Vanguard REIT Index Admiral Shares (VGSIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
23	Vanguard Small-Cap Index Admiral Shares (VSMAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
24	Vanguard Small Cap index Investor shares (NAESX)	Yes	None (or less than \$1,001)		None (or less than \$201)
25	Vanguard Windsor II (VWNFX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
26	Vanguard dividend growth (VDIGX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
27	Vanguard total institutional stock index (VGTSX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
28	Vanguard Total Stock Market Index Admiral Shares (VTSMX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
29	Vanguard 500 Index Admiral Shares (VFINX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
30	Blackrock GLB Long/Short EQ 1 (BDMIX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
31	Blackrock Inflat Prot Bond I (BPRIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
32	Cullen Intl High Dividend I (CIHIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
33	Deutsche X-trackers MSCI EAFE (DBEF)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
34	iShares Core MSCI EAFE ETF (IEFA)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
35	iShares Core MSCI Emerging Markets ETF (IEMG)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
36	iShares iBoxx \$ High Yield Corporate Bd (HYG)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
37	iShares Tips Bond ETF (TIP)	Yes	\$15,001 - \$50,000		None (or less than \$201)
38	Virtus insight emerging mkts I (HIEMX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
39	Oppenheimer Intl Growth A (OIGAX)	Yes	\$50,001 - \$100,000		\$201 - \$1,000
40	Cullen Emerg Mrkts High Div I (CEMFX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
41	Vanguard Lg Cap ETF (VV)	Yes	\$50,001 - \$100,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
42	Cullen High Div Equity I (CHDVX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
43	Wisdomtree Trust Japan Hedge (DXJ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
44	Diamond Hill Long Short Fund Class I (DHLSX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
45	Cullen High Dividend Equity FUND	Yes	\$15,001 - \$50,000		\$201 - \$1,000

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Gibson Dunn & Crutcher	Washington, District of Columbia	I planned to join this law firm as a partner - and began employment there on March 6, 2017.	3/2017

### 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	Lawyer's Committee for Civil Rights Under Law	N/A		salary	

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Oppenheimer intl growth A (OIGAX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3	Ridgeworth Mid Cap Val Equity A (SAMVX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	American Funds Washington Mutual R3	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
5	Clearbridge Agg Growth R (LMRG)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
6	Western Asset Core Plus Bond IS	Yes	\$15,001 - \$50,000		\$201 - \$1,000

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Wells Fargo cash account	No	\$50,001 - \$100,000		\$201 - \$1,000
2	USAA cash account	No	\$50,001 - \$100,000		\$201 - \$1,000
3	Virginia 529 College Savings Plan (Potomac)	Yes	\$100,001 - \$250,000		None (or less than \$201)
4	Virginia 529 College Savings Plan (Chesapeake)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	Virginia 529 College Savings Plan (Allegheny)	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	Woodlake Associates, Ltd. (owns residential property in Grapevine, TX)	N/A	\$15,001 - \$50,000	Rent or Royalties	\$2,501 - \$5,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Diamond Hill Long Short Fund Class I (DHLSX)	Purchase	12/09/16	\$15,001 - \$50,000
2	Cullen Emerging Markets High Dividend Fund Class I (CEMFY)	Purchase	12/09/16	\$15,001 - \$50,000
3	Vanguard Large-Cap ETF (VV)	Purchase	10/18/16	\$15,001 - \$50,000
4	Cullen High Dividend Equity Fund (CHDEX)	Purchase	05/29/16	\$15,001 - \$50,000
5	Cullen High Dividend Equity Fund (CHDEX)	Purchase	10/18/16	\$15,001 - \$50,000
6	WisdomTree Japan Hedged Equity Fund (DXJ)	Purchase	07/15/16	\$1,001 - \$15,000
7	Invesco Real Estate Y	Sale	01/13/16	\$15,001 - \$50,000
8	Invesco Real Estate Y	Sale	10/18/16	\$15,001 - \$50,000
9	Vanguard Total International Bond ETF	Sale	04/22/16	\$1,001 - \$15,000
10	Columbia select lg cap Gr (UMLGX)	Sale	04/22/16	\$15,001 - \$50,000

## 8. Liabilities

None



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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 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 \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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. 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 another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. 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 three 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, NW., Washington, DC 20005-3917.

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