

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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Richardson, Erin

Chief of Staff, Office of the Administrator, Centers for Medicare & Medicaid Services, Department of Health & Human Services

Report Year: 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/ Richardson, Erin [electronically signed on 05/09/2022 by Richardson, Erin in Integrity.gov]

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ CardMina, Mary, Certifying Official [electronically signed on 07/07/2022 by CardMina, Mary in Integrity.gov]

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Other review conducted by

/s/ Shouman, Mohammad, Ethics Official [electronically signed on 07/07/2022 by Shouman, Mohammad in Integrity.gov]

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U.S. Office of Government Ethics Certification

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Data Revised 07/07/2022

Data Revised 06/17/2022

Data Revised 05/17/2022

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Comments of Reviewing Officials (public annotations):

| PART | #   | REFERENCE | COMMENT  |
|------|-----|-----------|--|
| N/A  | N/A | General   | (05/17/2022, Shouman, Mohammad): End Initial Review: 05/17/2022.                 |
| N/A  | N/A | General   | (07/07/2022, Shouman, Mohammad): Updates made after following up with the filer. |

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

| # | ORGANIZATION NAME  | CITY, STATE                      | ORGANIZATION TYPE       | POSITION HELD   | FROM   | TO      |
|---|--|----------------------------------|-------------------------|---|--------|---------|
| 1 | Family trust (revocable trust for the benefit of a relative) | Washington, District of Columbia | Trust                   | Trustee   | 9/2018 | Present |
| 2 | 1331 Condominium Association                                 | Washington, District of Columbia | Condominium Association | President   | 7/2012 | Present |
| 3 | Federation of American Hospitals                             | Washington, District of Columbia | Non-Profit              | Senior Vice President, Government Affairs and Counsel | 6/2020 | 6/2021  |
| 4 | David A. Winston Health Policy Fellowship                    | Washington, District of Columbia | Non-Profit              | Director  | 1/2020 | 6/2021  |
| 5 | National Youth Science Foundation                            | Charleston, West Virginia        | Non-Profit              | Trustee   | 4/2018 | 6/2021  |

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

| # | DESCRIPTION   | EIF | VALUE | INCOME TYPE       | INCOME AMOUNT |
|---|---|-----|-------|-------------------|---------------|
| 1 | Federation of American Hospitals (trade association for tax-paying hospitals & health care systems) | N/A |       | Salary            | \$200,140     |
| 2 | Federation of American Hospitals, 457(b) plan, no remaining assets                                  | N/A |       | Cash Distribution | \$7,379       |
| 3 | Association of University Programs in Health Administration, 403(b) plan                            | No  |       |                   |               |

| #   | DESCRIPTION  | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|-----|--|-----|-----------------------|-------------|---------------------------|
| 3.1 | TIAA Traditional   | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 4   | Filer's IRA #1 (Roth)  | No  |                       |             |                           |
| 4.1 | Federated Hermes Kaufmann Small Cap Fund, Institutional Shares (FKAIX)         | Yes | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 4.2 | First Trust NASDAQ Technology Dividend Index Fund (TDIV)                       | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 5   | Filer's IRA #2 (Traditional)   | No  |                       |             |                           |
| 5.1 | Lazard International Strategic Equity Portfolio - Institutional Shares (LISIX) | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 5.2 | Mirae Asset Emerging Markets Great Consumer Fund - Class A (MECGX)             | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 5.3 | Amplify Online Retail ETF (IBUY)   | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 5.4 | First Trust Dorsey Wright People's Portfolio ETF (DWPP)                        | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 5.5 | First Trust Small Cap Core AlphaDEX Fund (FYX)                                 | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 5.6 | First Trust NASDAQ Technology Dividend Index Fund (TDIV)                       | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 5.7 | Impact Shares YWCA Women's Empowerment ETF (WOMN)                              | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 6   | Filer's IRA #3 (Traditional)   | N/A |                       |             |                           |
| 6.1 | Federated Hermes Max-Cap Index Fund - Service Shares (FMXSX)                   | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 6.2 | American Funds Income Fund of America - Class F-2 (AMEFX)                      | Yes | \$100,001 - \$250,000 |             | None (or less than \$201) |

| #   | DESCRIPTION                                       | EIF | VALUE               | INCOME TYPE | INCOME AMOUNT             |
|-----|---|-----|---------------------|-------------|---------------------------|
| 6.3 | American Funds New World Fund - Class F-2 (NFFFX) | Yes | \$15,001 - \$50,000 |             | None (or less than \$201) |

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

| # | EMPLOYER OR PARTY   | CITY, STATE                      | STATUS AND TERMS   | DATE   |
|---|---|----------------------------------|--|--------|
| 1 | Federation of American Hospitals                            | Washington, District of Columbia | I no longer retain this 401(k) plan.   | 2/2017 |
| 2 | Federation of American Hospitals                            | Washington, District of Columbia | I no longer retain this 457(b) plan.   | 7/2020 |
| 3 | Federation of American Hospitals                            | Washington, District of Columbia | I received a final paycheck after resigning due to this former employer's payment cycle, including salary and accrued vacation.  | 2/2017 |
| 4 | Federation of American Hospitals                            | Washington, District of Columbia | As is standard for all departing employees at my former employer, I remained enrolled in my previous employer's health insurance through the end of the month in which I ended my employment (i.e., on July 1, 2021, I no longer had that health insurance). | 2/2017 |
| 5 | Association of University Programs in Health Administration | Washington, District of Columbia | I continue to retain this 403(b) plan. The plan sponsor no longer makes contributions.   | 6/2010 |

### 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    | PricewaterhouseCoopers LLP, d/b/a PwC (consulting & accounting services)                                     | N/A |                       | Partnership Share                      |                           |
| 2    | PricewaterhouseCoopers LLP   | N/A |                       | Bonus                                  |                           |
| 3    | PricewaterhouseCoopers LLP   | N/A |                       | Wellness Allowance                     |                           |
| 4    | PricewaterhouseCoopers LLP   | N/A |                       | Interest<br>Dividends<br>Capital Gains | \$5,001 - \$15,000        |
| 5    | PricewaterhouseCoopers LLP, deposit capital account (cash)   | N/A | \$100,001 - \$250,000 | Interest                               | \$5,001 - \$15,000        |
| 6    | PricewaterhouseCoopers LLP accrual capital account - deferred compensation (cash)                            | N/A | \$100,001 - \$250,000 | Interest                               | \$5,001 - \$15,000        |
| 7    | PricewaterhouseCoopers LLP, Partner Deposit Program account (cash)   | N/A | Over \$1,000,000      | Interest                               | \$50,001 - \$100,000      |
| 8    | PricewaterhouseCoopers LLP, Partner Retirement Plan (defined benefit plan) (value not readily ascertainable) | N/A |                       |  | None (or less than \$201) |
| 9    | PricewaterhouseCoopers LLP, Retirement Accumulation Plan for Partners (cash balance pension plan)            | N/A | \$250,001 - \$500,000 |  | None (or less than \$201) |
| 10   | PricewaterhouseCoopers LLP, 401(k) Savings Plan  | No  |                       |  |                           |
| 10.1 | Morningstar Lifetime Moderate 2040 Index Fund N1 (MLFAX)   | Yes | \$100,001 - \$250,000 |  | None (or less than \$201) |
| 10.2 | Northern Trust S&P 500 (NOSIX)   | Yes | \$100,001 - \$250,000 |  | None (or less than \$201) |
| 11   | PricewaterhouseCoopers LLP Retirement Wealth Builder Plan  | No  |                       |  |                           |

| #     | DESCRIPTION   | EIF | VALUE                   | INCOME TYPE | INCOME AMOUNT             |
|-------|---|-----|-------------------------|-------------|---------------------------|
| 11.1  | Morningstar Lifetime Moderate 2040 Index Fund N1 (MLFAX)  | Yes | \$100,001 - \$250,000   |             | None (or less than \$201) |
| 12    | PricewaterhouseCoopers LLP, Alternative Allocation Plan (nonqualified retirement plan) (notional defined contribution plan) | No  |                         |             |                           |
| 12.1  | Notional Plan Account   | N/A | \$500,001 - \$1,000,000 |             | None (or less than \$201) |
| 13    | Spouse's IRA #1 (Traditional)   | No  |                         |             |                           |
| 13.1  | U.S. brokerage account (cash)   | N/A | \$15,001 - \$50,000     |             | None (or less than \$201) |
| 13.2  | Lazard International Strategic Equity Portfolio - Institutional Shares (LISIX)  | Yes | \$15,001 - \$50,000     |             | None (or less than \$201) |
| 13.3  | Mirae Asset Emerging Markets Great Consumer Fund - Class A (MECGX)  | Yes | \$15,001 - \$50,000     |             | None (or less than \$201) |
| 13.4  | Amplify Online Retail ETF (IBUY)  | Yes | \$100,001 - \$250,000   |             | None (or less than \$201) |
| 13.5  | First Trust Dorsey Wright People's Portfolio ETF (DWPP)   | Yes | \$15,001 - \$50,000     |             | None (or less than \$201) |
| 13.6  | First Trust Small Cap Core AlphaDEX Fund (FYX)  | Yes | \$50,001 - \$100,000    |             | None (or less than \$201) |
| 13.7  | WisdomTree U.S. MidCap Dividend Fund (DON)  | Yes | \$50,001 - \$100,000    |             | None (or less than \$201) |
| 13.8  | Jensen Quality Growth Fund - Class J (JENSX)  | Yes | \$50,001 - \$100,000    |             | None (or less than \$201) |
| 13.9  | Pax US Sustainable Economy Fund - Institutional Shares (PWGIX)  | Yes | \$50,001 - \$100,000    |             | None (or less than \$201) |
| 13.10 | Pax High Yield Bond Fund - Institutional Class (PXHIX)  | Yes | \$50,001 - \$100,000    |             | None (or less than \$201) |

| #     | DESCRIPTION  | EIF | VALUE                | INCOME TYPE | INCOME AMOUNT             |
|-------|--|-----|----------------------|-------------|---------------------------|
| 13.11 | AXS Change Finance ESG ETF (CHGX)  | Yes | \$15,001 - \$50,000  |             | None (or less than \$201) |
| 13.12 | First Trust Dow Jones Global Select Dividend Index Fund (FGD)  | Yes | \$50,001 - \$100,000 |             | None (or less than \$201) |
| 13.13 | First Trust EIP Carbon Impact ETF (ECLN)   | Yes | \$50,001 - \$100,000 |             | None (or less than \$201) |
| 13.14 | First Trust Multi-Asset Diversified Income Index Fund (MDIV)   | Yes | \$50,001 - \$100,000 |             | None (or less than \$201) |
| 13.15 | First Trust Strategic Income ETF (FDIV)  | Yes | \$50,001 - \$100,000 |             | None (or less than \$201) |
| 13.16 | Bitwise 10 Crypto Index Fund (pooled investment fund that tracks the Bitwise 10 Large Cap Crypto Index) (BITW) | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 13.17 | Grayscale Bitcoin Trust (pooled investment fund in Bitcoin) (GBTC)   | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 13.18 | Grayscale Ethereum Trust (pooled investment fund in Ethereum) (ETHE)   | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 14    | Spouse's IRA #2 (Roth)   | No  |                      |             |                           |
| 14.1  | Federated Hermes Kaufmann Small Cap Fund, Institutional Shares (FKAIX)   | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 14.2  | First Trust NASDAQ Technology Dividend Index Fund (TDIV)   | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |

## 6. Other Assets and Income

| # | DESCRIPTION       | EIF | VALUE | INCOME TYPE | INCOME AMOUNT |
|---|-------------------|-----|-------|-------------|---------------|
| 1 | Brokerage account | No  |       |             |               |



| #   | DESCRIPTION   | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|-----|---|-----|-----------------------|-------------|---------------------------|
| 1.1 | U.S. brokerage account (cash)   | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 1.2 | Buffalo Early Stage Growth Fund - Investor Class (BUFOX)                  | Yes | \$50,001 - \$100,000  |             | \$5,001 - \$15,000        |
| 1.3 | Calamos Evolving World Growth Fund - Class A (CNWGX)                      | Yes | \$50,001 - \$100,000  |             | \$201 - \$1,000           |
| 1.4 | Matthew 25 Fund (MXXVX)   | Yes | \$50,001 - \$100,000  |             | \$5,001 - \$15,000        |
| 1.5 | Pax Ellevest Global Women's Leadership Fund - Institutional Class (PXWIX) | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 1.6 | Pax Sustainable Allocation Fund - Institutional Class (PAXIX)             | Yes | \$15,001 - \$50,000   |             | \$1,001 - \$2,500         |
| 1.7 | First Trust Rising Dividend Achievers ETF (RDVY)                          | Yes | \$100,001 - \$250,000 |             | \$1,001 - \$2,500         |
| 2   | U.S. bank #1 (cash)   | N/A | \$100,001 - \$250,000 | Interest    | \$201 - \$1,000           |
| 3   | U.S. bank #2 (cash)   | N/A | \$50,001 - \$100,000  | Interest    | \$201 - \$1,000           |

## 7. Transactions

| # | DESCRIPTION  | TYPE | DATE       | AMOUNT               |
|---|--|------|------------|----------------------|
| 1 | Brokerage account: Eventide Healthcare & Life Sciences Fund Class I Shares (ETIHX) | Sale | 07/14/2021 | \$15,001 - \$50,000  |
| 2 | Brokerage account: Fidelity MSCI Materials Index ETF (FMAT)                        | Sale | 07/15/2021 | \$50,001 - \$100,000 |
| 3 | Brokerage account: Fidelity MSCI Industrials Index ETF (FIDU)                      | Sale | 07/15/2021 | \$50,001 - \$100,000 |

| #  | DESCRIPTION  | TYPE     | DATE       | AMOUNT                |
|----|--|----------|------------|-----------------------|
| 4  | Brokerage account: First Trust Rising Dividend Achievers ETF (RDVY)  | Purchase | 07/15/2021 | \$100,001 - \$250,000 |
| 5  | Brokerage account: Pax EllevestGlobal Women's Leadership Fund Institutional Class Shares (PXWIX)           | Purchase | 08/24/2021 | \$1,001 - \$15,000    |
| 6  | Brokerage account: Pax Sustainable Allocation Fund Institutional Class Shares (PAXIX)                      | Purchase | 08/24/2021 | \$1,001 - \$15,000    |
| 7  | Filer's IRA #1 (Roth): First Trust NASDAQ Technology Dividend Index Fund (TDIV)                            | Purchase | 07/15/2021 | \$1,001 - \$15,000    |
| 8  | Filer's IRA #2 (Traditional): First Trust NASDAQ Technology Dividend Index Fund (TDIV)                     | Purchase | 07/15/2021 | \$50,001 - \$100,000  |
| 9  | Filer's IRA #2 (Traditional): Parnassus Endeavor Fund Investor Class Shares (PARWX)                        | Sale     | 09/30/2021 | \$50,001 - \$100,000  |
| 10 | Filer's IRA #2 (Traditional): Parnassus Mid Cap Fund Investor Class Shares (PARMX)                         | Sale     | 09/30/2021 | \$15,001 - \$50,000   |
| 11 | Filer's IRA #2 (Traditional): Emerging Markets Great Consumer Fund Class A Shares (MECGX)                  | Purchase | 12/01/2021 | \$1,001 - \$15,000    |
| 12 | Filer's IRA #2 (Traditional): Lazard International Strategic Equity Portfolio Institutional Shares (LISIX) | Purchase | 09/30/2021 | \$1,001 - \$15,000    |
| 13 | Filer's IRA #2 (Traditional): Impact Shares YWCA Women's Empowerment ETF (WOMN)                            | Purchase | 12/02/2021 | \$50,001 - \$100,000  |
| 14 | Filer's IRA #3 (Traditional): Federated Hermes Max-Cap Index Fund - Service Shares (FMXSX)                 | Purchase | 09/20/2021 | \$50,001 - \$100,000  |
| 15 | Filer's IRA #3 (Traditional): American Funds Income Fund of America - Class F-2 (AMEFX)                    | Purchase | 09/21/2021 | \$100,001 - \$250,000 |

| #  | DESCRIPTION   | TYPE     | DATE       | AMOUNT                |
|----|---|----------|------------|-----------------------|
| 16 | Filer's IRA #3 (Traditional): American Funds New World Fund - Class F-2 (NFFFX)   | Purchase | 09/21/2021 | \$15,001 - \$50,000   |
| 17 | Federation of American Hospitals, 401(k) plan: See Endnote Federated Hermes Max-Cap Index Fund - Service Shares (FMXSX)                       | Sale     | 07/08/2021 | \$50,001 - \$100,000  |
| 18 | Federation of American Hospitals, 401(k) plan: See Endnote Income Fund of America Class R4 Shares (RIDEX)                                     | Sale     | 07/08/2021 | \$100,001 - \$250,000 |
| 19 | Federation of American Hospitals, 401(k) plan: See Endnote New World Fund, Inc Class R4 Shares (RNWEX)  | Sale     | 07/08/2021 | \$50,001 - \$100,000  |
| 20 | Spouse's IRA #1 (Traditional): Parnassus Endeavor Fund Investor Class Shares (PARWX)  | Sale     | 09/30/2021 | \$100,001 - \$250,000 |
| 21 | Spouse's IRA #1 (Traditional): Parnassus Mid Cap Fund Investor Class Shares (PARMX)   | Sale     | 09/30/2021 | \$100,001 - \$250,000 |
| 22 | Spouse's IRA #1 (Traditional): Bitwise 10 Crypto Index Fund (pooled investment fund that tracks the Bitwise 10 Large Cap Crypto Index) (BITW) | Purchase | 10/01/2021 | \$1,001 - \$15,000    |
| 23 | Spouse's IRA #1 (Traditional): First Trust Dow Jones Global Select Dividend Index Fund (FGD)  | Purchase | 10/01/2021 | \$50,001 - \$100,000  |
| 24 | Spouse's IRA #1 (Traditional): First Trust Multi-Asset Diversified Income Index Fund (MDIV)   | Purchase | 10/01/2021 | \$50,001 - \$100,000  |
| 25 | Spouse's IRA #1 (Traditional): First Trust Strategic Income ETF (FDIV)  | Purchase | 10/01/2021 | \$50,001 - \$100,000  |
| 26 | Spouse's IRA #1 (Traditional): Grayscale Bitcoin Trust (pooled investment fund in Bitcoin) (GBTC)   | Purchase | 10/01/2021 | \$1,001 - \$15,000    |

| #  | DESCRIPTION   | TYPE        | DATE       | AMOUNT               |
|----|---|-------------|------------|----------------------|
| 27 | Spouse's IRA #1 (Traditional): Grayscale Ethereum Trust (pooled investment fund in Ethereum) (ETHE)       | Purchase    | 10/01/2021 | \$1,001 - \$15,000   |
| 28 | Spouse's IRA #1 (Traditional): Jensen Quality Growth Fund - Class J (JENSX)                               | Purchase    | 12/01/2021 | \$50,001 - \$100,000 |
| 29 | Spouse's IRA #1 (Traditional): Pax US Sustainable Economy Fund - Institutional Shares (PWGIX)             | Purchase    | 12/01/2021 | \$50,001 - \$100,000 |
| 30 | Spouse's IRA #1 (Traditional): Pax High Yield Bond Fund - Institutional Class (PXHIX)                     | Purchase    | 12/01/2021 | \$50,001 - \$100,000 |
| 31 | Spouse's IRA #1 (Traditional): AXS Change Finance ESG ETF (CHGX)  | Purchase    | 12/02/2021 | \$15,001 - \$50,000  |
| 32 | Spouse's IRA #1 (Traditional): First Trust EIP Carbon Impact ETF (ECLN)                                   | Purchase    | 12/02/2021 | \$50,001 - \$100,000 |
| 33 | Spouse's IRA #2 (Roth): First Trust NASDAQ Technology Dividend Index Fund (TDIV)                          | Purchase    | 07/15/2021 | \$1,001 - \$15,000   |
| 34 | PricewaterhouseCoopers LLP, 401(k) Savings Plan: Morningstar Lifetime Moderate 2040 Index Fund N1 (MLFAX) | See Endnote | Purchase   | \$1,001 - \$15,000   |
| 35 | PricewaterhouseCoopers LLP, 401(k) Savings Plan: Northern Trust S&P 500 (NOSIX)                           | See Endnote | Purchase   | \$1,001 - \$15,000   |

## 8. Liabilities

| # | CREDITOR NAME               | TYPE                             | AMOUNT                | YEAR INCURRED | RATE          | TERM      |
|---|-----------------------------|----------------------------------|-----------------------|---------------|---------------|-----------|
| 1 | PricewaterhouseCoopers, LLP | Loan for Partner Capital Deposit | \$100,001 - \$250,000 | 2015          | LIBOR + 1.25% | 10 years  |
| 2 | JPMorgan Chase Bank, N.A.   | Credit Card                      | \$15,001 - \$50,000   | 2021          | 15.24%        | Revolving |

9. Gifts and Travel Reimbursements

None

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Endnotes

| PART | #  | ENDNOTE             |
|------|----|---------------------|
| 7.   | 17 | Rolled over 401(k). |
| 7.   | 18 | Rolled over 401(k). |
| 7.   | 19 | Rolled over 401(k). |
| 7.   | 34 | Monthly.            |
| 7.   | 35 | Monthly.            |

# 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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