

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

### Filer's Information

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**Pruitt, Edward Scott**

Administrator, United States Environmental Protection Agency, Environmental Protection Agency

Date of Termination: 07/05/2018

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Other Federal Government Positions Held During the Preceding 12 Months:

EPA Administrator (2/2017 - 7/2018)

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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/ Pruitt, Scott [electronically signed on 11/05/2018 by Pruitt, Scott in Integrity.gov] - Filer received a 91 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 12/06/2018 by Fugh, Justina in Integrity.gov]**

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Other review conducted by

**/s/ Fugh, Justina, Ethics Official [electronically signed on 12/06/2018 by Fugh, Justina in Integrity.gov]**

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U.S. Office of Government Ethics Certification

Data Revised 04/05/2019

Data Revised 12/06/2018

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
5.	1	MP Strategies LLC (Personal Services Consulting )	(12/06/2018, Fugh, Justina): NOTE FROM EPA: Filer has voluntarily disclosed the actual amount of spousal compensation.
9.	1	Diane Hendricks	(04/05/2019, Fugh, Justina): NOTE FROM EPA: Filer did not seek ethics advice from EPA before accepting this gift to pay for legal expenses. EPA ethics officials did not know of this monetary contribution until they received the termination report.  UPDATED NOTE FROM EPA: In March 2019, EPA posted this list of gifts given to Mr. Pruitt in his official EPA capacity to clarify information referenced by him in his previous report: <a href="https://www.epa.gov/foia/administrator-scott-pruitts-gift-list">https://www.epa.gov/foia/administrator-scott-pruitts-gift-list</a> .

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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	Oklahoma Public Employees Retirement Plan for Elected Officials, Defined Benefit Plan	See Endnote	N/A	\$100,001 - \$250,000		None (or less than \$201)

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## 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	State of Oklahoma	Oklahoma City, Oklahoma	Defined benefit plan. Neither I nor the State of Oklahoma made any further contributions upon my resignation as Attorney General.	1/2011

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

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

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	MP Strategies LLC (Personal Services Consulting )	See Endnote	N/A	\$50,001 - \$100,000	All income was business income; no other compensation type or benefits	\$54,166

## 6. Other Assets and Income

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. brokerage money market account (cash)		N/A	\$15,001 - \$50,000		None (or less than \$201)
2	Investment Account	See Endnote	Yes	\$250,001 - \$500,000		\$100,001 - \$1,000,000
2.1	MFS Value CL I (MEIIX)	See Endnote	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000
2.2	Artisan Mid Cap Advisor CL (APDMX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	John Hancock Disciplined Val MID Cap CL I (JVMIX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	Oppenheimer Discovery CL Y (ODIYX)		Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	Morgan Stanley Instl U S Real Estate CL I (MSUSX)	See Endnote	Yes	None (or less than \$1,001)		\$5,001 - \$15,000
2.6	Oakmark Intl CL I (OAKIX)		Yes	\$15,001 - \$50,000		None (or less than \$201)
2.7	Wasatch Emerging Markets Small Cap Investor CL (WAEMX)		Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.8	Lord Abbett Short Duration Income (LDLFX)	See Endnote	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000
2.9	Mainstay High Yield Corp Bond CL I (MHYIX)	See Endnote	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000
2.10	Harbor Cap Apprec Instl CL (HACAX)	See Endnote	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000
2.11	American Beacon Small Cap Value CL (ABSYX)		Yes	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Lord Abbett Short Duration Income	Sale	01/24/2018	\$1,001 - \$15,000
2	Mainstay Mackay High Yield Corp Bond (MHYIX)	Sale	03/28/2018	\$1,001 - \$15,000
3	Mainstay Mackay High Yield Corp Bond (MHYIX)	Sale	04/09/2018	\$15,001 - \$50,000
4	Lord Abbett Short Duration Income	Sale	04/24/2018	\$1,001 - \$15,000
5	Morgan Stanley US Real Estate	Sale	02/23/2018	\$1,001 - \$15,000
6	MFS Value	Sale	05/09/2018	\$15,001 - \$50,000
7	Harbor Capital Appreciation Inv	Sale	05/09/2018	\$15,001 - \$50,000

## 8. Liabilities

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Crowe & Dunlevy		Legal Fees	\$100,001 - \$250,000	2017	0.0%	Open Ended Account
2	Riggs Abney Neal Turpen		Legal Fees	\$15,001 - \$50,000	2017	1.5% after 60 days	Open Ended Account
3	Chase	See Endnote	Credit Card	\$15,001 - \$50,000	2017	16.99%	Revolving
4	Bank of Oklahoma		Mortgage on Personal Residence	\$500,001 - \$1,000,000	2012	3.885	10 years

## 9. Gifts and Travel Reimbursements

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION	VALUE
1	Diane Hendricks	Beloit, Wisconsin	Contribution to Scott Pruitt Legal Expenses Trust	\$50,000

## Endnotes

PART	#	ENDNOTE
2.	1	Neither I nor the State of Oklahoma made any additional contributions after my resignation as Attorney General of Oklahoma
5.	1	This is an LLC that is owned and operated solely by my wife. None of the income was for any appearance, speech or article, but rather for the performance of personal services for entities and persons not subject to regulation by the EPA and not from any prohibited source(s)
6.	2	My investments are held in Excepted Investment Funds managed and controlled by a firm, held in one overall account: "Investment Account Strategic Asset Management II".
6.	2.1	Sales within EIF generated capital gains
6.	2.5	Sale of EIF generated capital gains

<b>PART</b>	<b>#</b>	<b>ENDNOTE</b>
6.	2.8	Sales within EIF generated capital gains
6.	2.9	Sales within EIF generated capital gains
6.	2.10	Sales within EIF generated capital gains
8.	3	As of Reporting Date, this liability has been paid

# 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.

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