

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

## Filer's Information

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**Froman, Michael B**

United States Trade Representative/Ambassador, Office of the U.S. Trade Representative

Date of Termination: 01/19/2017

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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/ Froman, Michael B [electronically signed on 01/05/2017 by Froman, Michael B 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/ Kaye, Janice A, Certifying Official [electronically signed on 01/06/2017 by Kaye, Janice A in Integrity.gov]**

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Other review conducted by

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U.S. Office of Government Ethics Certification

**/s/ Skalla, Daniel L, Certifying Official [electronically signed on 01/27/2017 by Skalla, Daniel L in Integrity.gov]**

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Data Revised 01/06/2017

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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	Morgan Stanley Bank Deposit Program (cash)		\$100,001 - \$250,000		None (or less than \$201)
2	Artisan Mid Cap Value Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Baron Growth Institutional Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	Cambiar International Equity Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
5	Cambiar Opportunity Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Ivy Mid Cap Growth Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7	Janus Forty Fund	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
8	Lazard Emerging Markets Equity Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
9	Royce Total Return Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
10	Citigroup, cash balance pension plan	N/A	\$100,001 - \$250,000		None (or less than \$201)
11	Council on Foreign Relations Retirement Plan invested in TIAA/CREF Equity Index Fund	Yes	\$1,001 - \$15,000		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	Citigroup	New York, New York	I will continue to participate in this cash balance pension plan, but the plan sponsor no longer makes contributions.	12/1999
2	TIAA/CREF (Council on Foreign Relations)	New York, New York	I will continue to participate in this cash balance pension plan, but the plan sponsor no longer makes contributions.	7/1999

### 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	American Century Growth Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	American Europacific Growth Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Davis New York Venture Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)

### 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Citibank checking account	No	\$100,001 - \$250,000	Interest	\$201 - \$1,000
2	Citibank savings account	No	\$1,001 - \$15,000	Interest	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Morgan Stanley Bank Deposit Program (cash)	No	\$1,000,001 - \$5,000,000	Interest	\$1,001 - \$2,500
4	New York General Obligation Series C-1 Municipal Bond, 1/1/26	No	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
5	New York General Obligation Series H-1 Municipal Bond, 3/1/23	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
6	New York General Obligation Series B Municipal Bond, 8/1/24	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
7	New York General Obligation Series I Municipal Bond, 4/1/25	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
8	New York General Obligation Series A Municipal Bond, 8/15/28	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
9	New York General Obligation Series J Municipal Bond, 5/15/29	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
10	New York General Obligation Series D-1 Municipal Bond, 12/1/29	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
11	New York General Obligation Series J Municipal Bond, 5/15/30	No	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000
12	New York Municipal Water Series A Municipal Bond, 6/15/30	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
13	New York General Obligation Series I-1 Municipal Bond, 3/1/33	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
14	New York General Obligation Series J Municipal Bond, 5/15/33	No	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000
15	New York Municipal Water Series DD Municipal Bond, 6/15/35	No	\$50,001 - \$100,000	Interest	\$1,001 - \$2,500
16	New York Municipal Water Rev-DD Municipal Bond, 6/15/36	No	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
17	New York Municipal Water Rev-BB Municipal Bond, 6/15/47	No	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
18	Lord Abbett Short Duration Tax Free Fund	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	Morgan Stanley Bank Deposit program (cash)	No	\$15,001 - \$50,000	Interest	None (or less than \$201)
20	Allianz Small Cap Blend Fund	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
21	American Funds Growth Fund of America	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
22	AMG Managers Brandywine Fund	Yes	\$50,001 - \$100,000		None (or less than \$201)
23	Morgan Stanley Bank Deposit Program (cash)	No	\$500,001 - \$1,000,000	Interest	None (or less than \$201)
24	Alger Small Cap Growth Fund	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
25	Artisan International Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
26	Artisan Mid Cap Value Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
27	Davis New York Venture Fund	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
28	Ivy Mid Cap Growth Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
29	Janus Forty Fund	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
30	Lazard Emerging Markets Equity Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
31	Royce Premier Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
32	Morgan Stanley Private Bank Deposit Program (cash)	No	\$50,001 - \$100,000	Interest	None (or less than \$201)
33	Morgan Stanley Private Bank Deposit Program (cash)	No	\$15,001 - \$50,000	Interest	None (or less than \$201)
34	Residential real estate New York NY	No	\$5,000,001 - \$25,000,000	Rent or Royalties Dividends	\$100,001 - \$1,000,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
35	San Anselmo LLC (share of gross rent for partial ownership in commercial real estate in CA)	No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$100,001 - \$1,000,000
36	Carlos Drive LLC (share of gross rent for partial ownership in commercial real estate in CA)	No	\$500,001 - \$1,000,000	Rent or Royalties	\$50,001 - \$100,000
37	NY 529 College Savings Plan invested in Vanguard Aggressive Growth Fund	Yes	\$100,001 - \$250,000		None (or less than \$201)
38	Cambiar International Equity Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)
39	Eaton Vance Income Fund of Boston	Yes	\$1,001 - \$15,000		None (or less than \$201)
40	PIMCO Real Return Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
41	BlackRock Low Duration Bond Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
42	Western Asset Core Plus Bond Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
43	Matthews Asia Japan Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Janus Forty Fund	Sale	01/22/16	\$1,001 - \$15,000
2	Janus Forty Fund	Sale	04/22/16	\$1,001 - \$15,000
3	Davis New York Venture Fund	Sale	04/22/16	\$1,001 - \$15,000
4	Davis New York Venture Fund	Sale	07/15/16	\$1,001 - \$15,000
5	Western Asset Core Plus Bond Fund	Sale	07/15/16	\$1,001 - \$15,000
6	Artisan International Fund	Sale	04/22/16	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
7	Artisan Mid Cap Value Fund	Sale	04/22/16	\$1,001 - \$15,000
8	Lazard Emerging Markets Equity Portfolio	Sale	04/22/16	\$1,001 - \$15,000
9	Cambiar International Equity Fund	Sale	04/22/16	\$1,001 - \$15,000
10	Cambiar Opportunity Fund	Sale	04/22/16	\$1,001 - \$15,000
11	Lazard Emerging Markets Equity Portfolio	Purchase	07/15/16	\$1,001 - \$15,000
12	Eaton Vance Income Fund of Boston	Purchase	04/22/16	\$1,001 - \$15,000
13	Eaton Vance Income Fund of Boston	Purchase	07/15/16	\$1,001 - \$15,000
14	PIMCO Real Return Fund	Purchase	07/15/16	\$1,001 - \$15,000
15	BlackRock Low Duration Bond Portfolio	Purchase	04/22/16	\$1,001 - \$15,000
16	Western Asset Core Plus Bond Fund	Purchase	04/22/16	\$1,001 - \$15,000
17	Artisan International Fund	Purchase	01/22/16	\$1,001 - \$15,000
18	Cambiar International Equity Fund	Purchase	01/22/16	\$1,001 - \$15,000
19	BlackRock Low Duration Bond Portfolio	Sale	07/15/16	\$1,001 - \$15,000
20	Royce Premier Fund	Sale	04/22/16	\$1,001 - \$15,000
21	Matthews Asia Japan Fund	Purchase	01/22/16	\$1,001 - \$15,000

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Morgan Stanley	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2012	2.850	7 years

## 9. Gifts and Travel Reimbursements

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION	VALUE
1	Bloomberg	Washington, District of Columbia	My wife and I were Bloomberg's guests at the White House Correspondents' Dinner on April 30, 2016. (2 x \$300)	\$600
2	Aspen Institute	Aspen, Colorado	I participated in the Aspen Ideas Festival and was reimbursed for two nights lodging, July 1-3, 2016. (2 x \$450)	\$900

## 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 \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 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.

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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