

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

## Filer's Information

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**Pruitt, Edward Scott**

Administrator, Environmental Protection Agency

Report Year: 2018

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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/ Minoli, Kevin S, Certifying Official [electronically signed on 09/12/2018 by Minoli, Kevin S in Integrity.gov]

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Other review conducted by

/s/ Fugh, Justina, Ethics Official [electronically signed on 09/12/2018 by Fugh, Justina in Integrity.gov]

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U.S. Office of Government Ethics Certification

**Certification Declined on 3/20/19 by Apol, David.**

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Data Revised 03/20/2019

Data Revised 09/12/2018

Data Revised 09/06/2018

Data Revised 09/05/2018

Data Revised 09/04/2018

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(09/12/2018, Minoli, Kevin S): Prior to receiving the filer's report, EPA Ethics provided guidance to him and his designee. Among the issues covered in that guidance was the need to report gifts, including gifts from subordinates, if any, excluding anything of value for which the filer had paid. As set forth at 5 C.F.R. Â§ 2634.605(b), the Office of Government Ethics has established the required standard of review for an official reviewing a financial disclosure report. Those regulations define the reviewing official's authority as follows: "The reviewing official need not audit the report to ascertain whether the disclosures are correct. Disclosures shall be taken at 'face value' as correct, unless there is a patent omission or ambiguity or the official has independent knowledge of matters outside the report. However, a report which is signed by a reviewing official certifies that the filer's agency has reviewed the report, and that the reviewing official has concluded that each required item has been completed and that on the basis of information contained in such report the filer is in compliance with applicable laws and regulations noted in paragraph (b)(1)(ii) of this section." As such, the EPA signatures on this report represent only the conclusion that each required item has been completed and that based on the "information contained in the report," the filer is in compliance with the relevant requirements referenced by the regulation.
N/A	N/A	General	(03/20/2019, Apol, David): Line 9.1 OGE was unable to determine whether or not Mr. Pruitt received a reportable gift related to his rental of a Capitol Hill apartment. The IG inquiry into the matter was closed without resolution. Therefore, OGE declines to certify.

PART	#	REFERENCE	COMMENT
9.	1	None	(09/12/2018, Minoli, Kevin S): Prior to receiving the filer's report, EPA Ethics provided guidance to him and his designee. Among the issues covered in that guidance was the need to report gifts, including gifts from subordinates, if any, excluding anything of value for which the filer had paid. As set forth at 5 C.F.R. § 2634.605(b), the Office of Government Ethics has established the required standard of review for an official reviewing a financial disclosure report. Those regulations define the reviewing official's authority as follows: "The reviewing official need not audit the report to ascertain whether the disclosures are correct. Disclosures shall be taken at 'face value' as correct, unless there is a patent omission or ambiguity or the official has independent knowledge of matters outside the report. However, a report which is signed by a reviewing official certifies that the filer's agency has reviewed the report, and that the reviewing official has concluded that each required item has been completed and that on the basis of information contained in such report the filer is in compliance with applicable laws and regulations noted in paragraph (b)(1)(ii) of this section." As such, the EPA signatures on this report represent only the conclusion that each required item has been completed and that based on "the information contained in the report," the filer is in compliance with the relevant requirements referenced by the regulation.

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	State of Oklahoma	Oklahoma City, Oklahoma	Government	Attorney General	1/2011	2/2017
2	Southern Baptist Theological Seminary	Louisville, Kentucky	University/College	Member Board of Trustees	11/2012	1/2017
3	The Windows Ministry	Oklahoma City, Oklahoma	Non-Profit	Board of Directors	12/2009	1/2017

## 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)
2	State of Oklahoma Salary	N/A		salary	\$15,957

## 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

#### 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	MP Strategies LLC (Personal Services Consulting )	See Endnote	N/A	\$15,001 - \$50,000	All income was business income; no other compensation type or benefits	

#### 6. Other Assets and Income

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. brokerage money market account (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)
2	Investment Account	See Endnote	Yes	\$250,001 - \$500,000		\$100,001 - \$1,000,000
2.1	American Beacon Small Cap Value CL Y (ABSXX)	See Endnote	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
2.2	MFS Value CL I (MEIIX)	See Endnote	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000
2.3	Artisan Mid Cap Advisor CL (APDMX)	See Endnote	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
2.4	John Hancock Disciplined Val MID Cap Cl I (JVMIX)	See Endnote	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.5	Oppenheimer Discovery CL Y (ODIYX)	See Endnote	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
2.6	Morgan Stanley Instl U S Real Estate CL I (MSUSX)	See Endnote	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
2.7	Oakmark Intl CL I (OAKIX)	See Endnote	Yes	\$15,001 - \$50,000		\$5,001 - \$15,000
2.8	Wasatch Emerging Markets Small Cap Investor CI (WAEMX)	See Endnote	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000
2.9	Lord Abbett Short Duration Income (LDLFX)	See Endnote	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.10	Mainstay High Yield Corp Bond CL I (MHYIX)		Yes	\$15,001 - \$50,000		None (or less than \$201)
2.11	Harbor Cap Apprec Instl CL (HACAX)	See Endnote	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000

## 7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT
1	Lord Abbett Short Duration Income (LDLFX)	Sale	01/05/2017	\$1,001 - \$15,000
2	Lord Abbett Short Duration Income (LDLFX)	Sale	01/25/2017	\$1,001 - \$15,000
3	Lod Abbett Short Duration Income (LDLFX)	Sale	02/16/2017	\$1,001 - \$15,000
4	Wasatch Emerging Markets Small Cap (WAEMX)	Sale	02/24/2017	\$1,001 - \$15,000
5	Morgan Stanley US Real Estate (MSUSX)	Sale	02/24/2017	\$1,001 - \$15,000
6	MFS Value (MEIIX)	Sale	02/24/2017	\$15,001 - \$50,000
7	Harbor Capital Appreciation (HACAX)	Sale	02/24/2017	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	AMOUNT
8	Lord Abbett Short Duration Income (LDLFX)	Purchase	02/27/2017	\$50,001 - \$100,000
9	Lord Abbett Short Duration Income (LDLFX)	Sale	03/27/2017	\$1,001 - \$15,000
10	Lord Abbett Short Duration Income (LDLFX)	Sale	03/27/2017	\$1,001 - \$15,000
11	Lord Abbett Short Duration Income (LDLFX)	Sale	04/11/2017	\$1,001 - \$15,000
12	Oakmark International (OAKIX)	Sale	04/18/2017	\$1,001 - \$15,000
13	Lord Abbett Short Duration Income (LDLFX)	Sale	06/27/2017	\$1,001 - \$15,000
14	MFS Value (MEIIX)	Sale	07/17/2017	\$1,001 - \$15,000
15	Harbor Capital Appreciation (HACAX)	Sale	07/17/2017	\$1,001 - \$15,000
16	Lord Abbett Short Duration Income (LDLFX)	Sale	09/06/2017	\$1,001 - \$15,000
17	Wasatch Emerging Markets Small Cap (WAEMX)	Sale	09/26/2017	\$1,001 - \$15,000
18	Artisan Mid Cap (APDMX)	Sale	11/16/2017	\$1,001 - \$15,000
19	John Hancock Disciplined Value Mid Cap (JVMIX)	Sale	11/17/2017	\$1,001 - \$15,000
20	American Beacon Small Cap Value (ABSYX)	Sale	11/17/2017	\$1,001 - \$15,000
21	Oppenheimer Discovery (ODIYX)	Sale	11/17/2017	\$1,001 - \$15,000

## 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

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
3	Chase	Credit Card	\$10,001 - \$15,000	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	None	See Endnote	N/A, District of Columbia	

## 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.	2.2	Sales within EIF generated capital gains
6.	2.3	Sales within EIF generated capital gains
6.	2.4	Sales within EIF generated capital gains
6.	2.5	Sales within EIF generated capital gains



PART	#	ENDNOTE
6.	2.6	Sales within EIF generated capital gains
6.	2.7	Sales within EIF generated capital gains
6.	2.8	Sales within EIF generated capital gains
6.	2.9	Sales within EIF generated capital gains
6.	2.11	Sales within EIF generated capital gains
9.	1	<p>During my tenure I was presented with various items as part of events, meetings, or otherwise, as an extension of and in conjunction with my position, which were received by the advance staff and scheduling personnel and then delivered to EPA Ethics personnel to inventory, review and process to determine whether said items constituted gifts, and if so, whether I could receive said items. To the best of my knowledge the inventory of these items, and the items themselves, are still physically at EPA and I have not taken possession of permissible items, nor am I personally aware of all the items inventoried, but by reference, I hereby incorporate those items for consideration. In addition, I am aware that there is correspondence to the EPA Office of General Counsel's Ethics Officer and/or the Office of Government Ethics asserting that certain actions or activities during 2017 may constitute 'gifts' to me that require inclusion on this report. To the extent that I am aware of specific allegations, I dispute the facts asserted and, accordingly, am not aware of reportable gifts. In the event that there are any future findings to the contrary, I will address the issue at that time and amend this report as directed and/or as necessary.</p>

# 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.

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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