

Office of Government Ethics Symposium Financial Disclosure Basics

PRESENTED BY:

Barb Mullen-Roth
Emory Rounds
Mark Stewart
Grace Clark

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Objectives

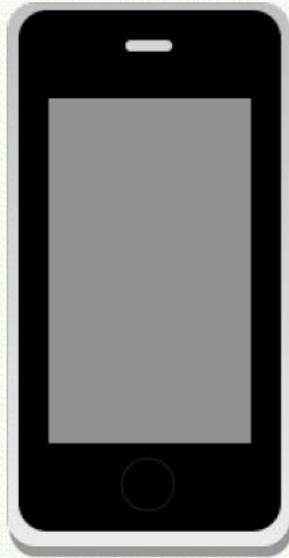
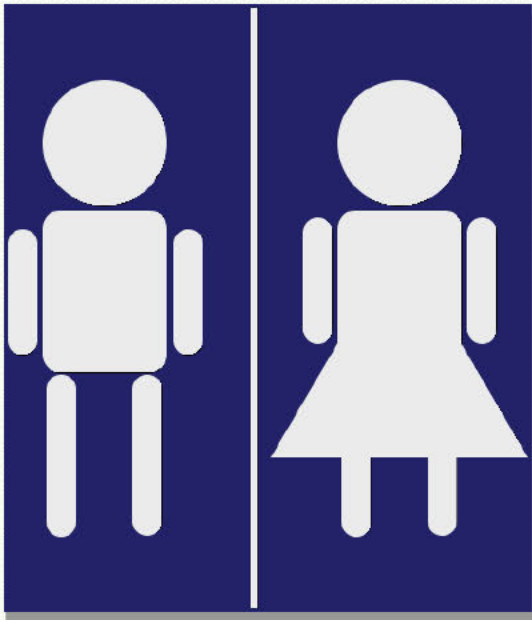
- Financial disclosure history, purpose and review process
- Provide information on reviewer resources
- Discuss the type of information required to be reported in each part of the financial disclosure report
- Discuss how to complete technical and conflict of interest reviews of reports
- Confidential Financial Disclosure STOCK Act, Periodic Transaction Reports, Integrity

Agenda

10:00 – 11:15	Intro and Background
11:15 -11:30	BREAK
11:30 – 12:45	The Real Nuts and Bolts
12:45 -1:45	LUNCH
2:00-3:15	Practical Exercise
3:15 -3:30	BREAK
3:30 -4:45	Stock Act, Transaction Reports, 450s, Integrity Questions

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Housekeeping



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Financial Disclosure Through the Years

1963 - 1975 – Confidential only

SGEs, and employees with decision-making authority (procurement, grant-making, audits)

1976 – 1977 – Push for public disclosure by
Common Cause/President Carter

1978 – **Ethics in Government Act**

1989 – **Ethics Reform Act**

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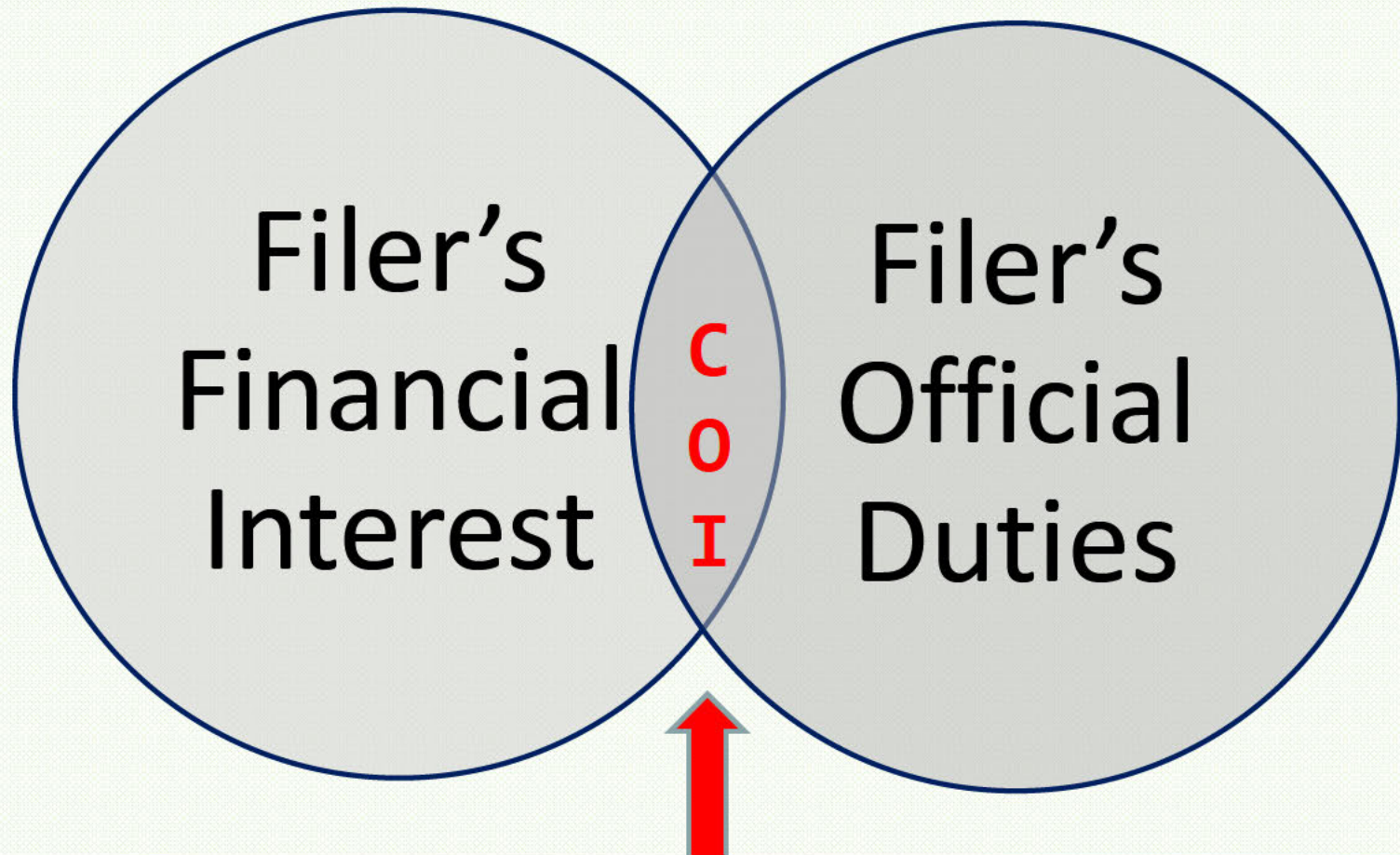
Ethics in Government Act of 1978, Ethics Reform Act of 1989

Oversight agency, promulgate regulations and give ethics advice to executive branch agencies

Each agency is responsible for its own ethics program, Designated Agency Ethics Official

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Conflict of Interest



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Legal Framework

- Criminal conflict of interest statutes,
18 U.S.C. §§ 201-209
 - **18 U.S.C. § 208 – primary conflict of interest statute**
- OGE's Standards of Conduct regulations
5 CFR § 2635 – Subpart D
- Agency Supplemental Regulations – specific prohibited holdings
- OGE's financial disclosure regulations,
5 CFR § 2640 and § 2634

Financial Disclosure Purpose

Helps employees avoid Conflicts of Interest

“potential” and “actual” conflicts

Protects the agency’s reputation and ensures confidence in the federal government

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Certification Process

- Technical review
- Conflict of interest analysis
- “COI First”
- Remedies, if warranted
- Signature
- Reviewers have 60 days to certify
- Releasable after 30 days
- Retain for 6 years
- OGE also certifies PAS and DAEO reports

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Review Guidance

- OGE website, Ethics Advisory Opinions, Listserv, MAX
- OGE Form 278e and instructions
- OGE Form 278 and instructions
- OGE Form 278e Guide – Interactive web-based
- The Internet
- The filer's position description, prior reports, EA, etc

Reviewer

- Your job?
- Review new report, based on file and other info, determine compliance with requirements
- Remedy any issues
- Certify or pass on for certification

Incomplete Information

- Check for obvious errors and independent information
- Contact the filer, research
- Annotate the form
- Tolls 60 day period
- No attorney-client relationship

OGE 278e Parts

Part 1: Filer's Outside Positions

Part 2: Filer's Employment Assets & Income

Part 3: Filer's Employment Agree & Arrange

Part 4: Filer's Compensation

Part 5: Spouse Employment Assets & Income

Part 6: Other Assets & Income

Part 7: Transactions

Part 8: Liabilities

Part 9: Gifts and Travel

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OGE Form 278 Schedules

- Instructions
- Cover Page
- Schedule A: Assets and Income
- Schedule B:
 - Pt I- Transactions
 - Pt II- Gifts and Travel
- Schedule C:
 - Pt I- Liabilities
 - Pt II- Agreements & Arrangements
- Schedule D:
 - Pt I- Outside Positions
 - Pt II- Compensation

OGE 278e v OGE Form 278

These charts map the OGE Form 278 to the new OGE Form 278e. Use these charts to help inform filers.

OGE Form 278 Sections & Schedules	OGE Form 278e Parts (<i>INTEGRITY</i>)
Cover Page	Cover Page
Schedule A: Assets and Income	Part 2: Filer's Employment Assets and Income; Part 5: Spouse's Employment Assets and Income; Part 6: Other Assets and Income
Schedule B, Part I: Transactions	Part 7: Transactions
Schedule B, Part II: Gifts, Reimbursements, and Travel Expenses	Part 9: Gifts and Travel Reimbursements
Schedule C, Part I: Liabilities	Part 8: Liabilities
Schedule C, Part II: Agreements or Arrangements	Part 3: Filer's Employment Agreements and Arrangements
Schedule D, Part I: Positions held Outside the U.S. Government	Part 1: Filer's Positions Held Outside United States Government
Schedule D, Part II: Compensation in Excess of \$5,000 Paid by One Source	Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year

OGE Form 278e Parts (<i>INTEGRITY</i>)	OGE Form 278 Sections & Schedules
Cover Page	Cover Page
Part 1: Filer's Positions Held Outside United States Government	Schedule D, Part I: Positions held Outside the U.S. Government
Part 2: Filer's Employment Assets and Income	Schedule A: Assets and Income
Part 3: Filer's Employment Agreements and Arrangements	Schedule C, Part II: Agreements or Arrangements
Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year	Schedule D, Part II: Compensation in Excess of \$5,000 Paid by One Source
Part 5: Spouse's Employment Assets and Income	Schedule A: Assets and Income
Part 6: Other Assets and Income	Schedule A: Assets and Income
Part 7: Transactions	Schedule B, Part I: Transactions
Part 8: Liabilities	Schedule C, Part I: Liabilities
Part 9: Gifts and Travel Reimbursements	Schedule B, Part II: Gifts, Reimbursements, and Travel Expenses

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OGE 278e Instructions

General Instructions for Completing the OGE Form 278e

Should I Use This Form?

Candidate: Yes, you should file your report using this form.

Other Category of Filer: In most cases, individuals will file their public financial disclosure reports through an electronic financial disclosure system. Do not use this form if you plan to file using an electronic financial disclosure system.

When Must I File?

Candidate: Within 30 days of becoming a candidate for nomination or election to the office of President or Vice President, or by May 15 of that calendar year, whichever is later, but at least 30 days before the election, and on or before May 15 of each succeeding year you continue to be a candidate

Nominee: No later than 5 days after nomination by the President

New Entrant: Within 30 days of assuming a covered position

Annual: No later than May 15 annually

Termination: Within 30 days of leaving a covered position

Extensions

The employing agency may grant you an extension of up to 45 days for good cause shown with the possibility of one additional extension of up to 45 days. Extensions for Candidates are granted by the Federal Election Commission.

Late Filing

You will be subject to a \$200 late filing fee if you file your report more than 30 days after the due date (including any extensions). A report is considered to be filed when it is received by the agency. Agencies may waive this fee if the delay was caused by extraordinary circumstances. Unless waived, the agency will collect the fee for deposit with the United States Treasury.

Warnings

Knowing and willful falsification of information, or failure to file or report information required to be reported by section 102 of the Ethics in Government Act of 1978, as amended (the Act), may subject you to a civil monetary penalty and to disciplinary action by your employing agency or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

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OGE Form 278 Instructions

OGE Form 278
Executive Branch Personnel
PUBLIC FINANCIAL
DISCLOSURE REPORT

Instructions for Completing OGE Form 278

I. Introduction

Reporting Periods

Incumbents: Complete Schedules A, B, C, and Part I of D. The reporting period is the preceding calendar year, except Part II of Schedule C and Part I of Schedule D where you must also include any positions held and agreements or arrangements made from the beginning of the filing year until the date you file. Schedule B need not include transactions made, or gifts or reimbursements received, during a period when the filer was not a Federal employee.

Termination Filers: Complete Schedules A, B, C, and Part I of D. The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination of Government employment in the position.

Nominees, New Entrants and Candidates for President and Vice President: Complete Schedules A, C, and D (candidates do not file Part II of Schedule D), as follows:

- **Schedule A** - The reporting period for income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets in BLOCK B as of any date you choose that is less than 31 days before the date of filing.
- **Schedule C, Part I** (Liabilities) - The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is less than 31 days before the date of filing.

- **Schedule C, Part II** (Agreements of Arrangements) - Show any agreements or arrangements as of the date of filing.

- **Schedule D** - The reporting period is the preceding two calendar years and the current calendar year up to the date of filing.

Scope of Disclosure

The extent of the reporting requirement is noted in each schedule. The various schedules of this form require reporting of your financial interests and activities, both in the U.S. and abroad, except as otherwise noted. In addition to your individual financial information, you are required to report information concerning your spouse and dependent children in several schedules of the form. However, no report is required with respect to your spouse if he or she is living separate and apart from you with the intention of terminating the marriage or providing for permanent separation. In addition, no report is required with respect to any income or obligations of an individual arising from the dissolution of marriage or permanent separation from a spouse. There are other exceptions to the reporting of assets and income, transactions, and liabilities of a spouse or dependent child which are discussed in the instructions applicable to those subjects.

A basic premise of the statutory financial disclosure requirements is that those having responsibility for review of reports filed pursuant to the Ethics in Government Act or permitted public access to reports must be given sufficient information by reporting individuals concerning the nature of their outside interests and activities so that an informed judgment can be made with respect to compliance with applicable conflict of interest laws and standards of conduct regulations. Therefore, it is important that you carefully complete the attached form. This report is a safeguard for you as well as the Government, in that it provides a mechanism for determining actual

or potential conflicts between your public responsibilities and your private interests and activities and allows you and your agency to fashion appropriate protections against such conflicts when they first appear. A Presidential nominee to a position requiring the advice and consent of the Senate shall file with the Senate committee considering the nomination an amendment to the initial report, which shall update all items of earned income and honoraria through the period ending no earlier than 5 days before the scheduled date of the Senate committee hearing on the nomination. This update shall be provided in the manner requested by the Senate committee considering the nomination. Copies shall be provided to OGE and your agency ethics official.

Definition of Terms

- **Category of Amount**

Reportable financial interests are disclosed either by actual amount or by category of amount, depending on the interest, as specified by the form. You may, but you are not required to, indicate an actual amount where the form provides for a category of amount or value.

- **Dependent Child**

The term "dependent child" means your son, daughter, stepson, or stepdaughter if such person is either: (1) unmarried, under age 21, and living in your household, or (2) a "dependent" of yours within the meaning of section 152 of the Internal Revenue Code of 1986.

- **Excepted Investment Fund**

An excepted investment fund is a mutual fund, common trust fund of a bank, pension or deferred compensation plan, or any other investment fund, which is widely held; publicly traded (or available) or widely diversified; and under circumstances where

Filing Deadlines

- New Entrants- Within 30 days of assuming
- Incumbents- May 15th
- Termination- Within 30 days after leaving
- Extensions- Agency discretion, NTE 90 days
- Army handout

OGE 278e Cover Sheet

OGE Form 278e (March 2014)
 U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type:	
Year (Annual Report only):	
Date of Appointment/Termination:	

UNITED STATES OFFICE OF
GOVERNMENT ETHICS
 ★
 Preventing Conflicts of Interest
 in the Executive Branch

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

Filer's Information				
Last Name	First Name	MI	Position	Agency
Other Federal Government Positions Held During the Preceding 12 Months:				
Name of Congressional Committee Considering Nomination (Nominees only):				
Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:				
Signature:			Date:	
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)				
Signature:			Date:	
Other Review Conducted By:				
Signature:			Date:	
U.S. Office of Government Ethics Certification (if required):				
Signature:			Date:	
Comments of Reviewing Officials:				

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OGE Form 278 Cover Sheet

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT

Help

Form Approved:
OMB No. 3209 - 0001

Date of Appointment, Candidacy, Election, or Nomination (Month, Day, Year)	Reporting Status (Check Appropriate Boxes)	Incumbent <input type="checkbox"/>	Calendar Year Covered by Report	New Entrant, Nominee, or Candidate <input type="checkbox"/>	Termination Filer <input type="checkbox"/>	Termination Date (If Applicable) (Month, Day, Year)	<p>Fee for Late Filing Any individual who is required to file this report and does so more than 30 days after the date the report is required to be filed, or, if an extension is granted, more than 30 days after the last day of the filing extension period, shall be subject to a \$200 fee.</p> <p>Reporting Periods Incumbents: The reporting period is the preceding calendar year except Part II of Schedule C and Part I of Schedule D where you must also include the filing year up to the date you file. Part II of Schedule D is not applicable.</p> <p>Termination Filers: The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination. Part II of Schedule D is not applicable.</p> <p>Nominees, New Entrants and Candidates for President and Vice President:</p> <p>Schedule A—The reporting period for income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets as of any date you choose that is within 31 days of the date of filing.</p> <p>Schedule B—Not applicable.</p> <p>Schedule C, Part I (Liabilities)—The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is within 31 days of the date of filing.</p> <p>Schedule C, Part II (Agreements or Arrangements)—Show any agreements or arrangements as of the date of filing.</p> <p>Schedule D—The reporting period is the preceding two calendar years and the current calendar year up to the date of filing.</p>
Reporting Individual's Name	Last Name		First Name and Middle Initial				
Position for Which Filing	Title of Position		Department or Agency (If Applicable)				
Location of Present Office (or forwarding address)	Address (Number, Street, City, State, and ZIP Code)			Telephone No. (Include Area Code)			
Position(s) Held with the Federal Government During the Preceding 12 Months (If Not Same as Above)	Title of Position(s) and Date(s) Held						
Presidential Nominees Subject to Senate Confirmation	Name of Congressional Committee Considering Nomination		Do You Intend to Create a Qualified Diversified Trust?				
	Not Applicable		<input type="checkbox"/> Yes <input type="checkbox"/> No				
Certification	Signature of Reporting Individual			Date (Month, Day, Year)			
ICERTIFY that the statements I have made on this form and all attached schedules are true, complete and correct to the best of my knowledge.	Signature of Other Reviewer (If desired by agency)			Date (Month, Day, Year)			
Agency Ethics Official's Opinion	Signature of Designated Agency Ethics Official/Reviewing Official			Date (Month, Day, Year)			
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 in the box below).	Signature			Date (Month, Day, Year)			
Office of Government Ethics Use Only	Comments of Reviewing Officials (If additional space is required, use the reverse side of this sheet)						
(Check box if filing extension granted & indicate number of days _____) <input type="checkbox"/>							
(Check box if comments are continued on the reverse side) <input type="checkbox"/>							
Agency Use Only							
OGE Use Only							

Supersedes SF 278 Editions.

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278e Part 1 – Filer's Outside Positions

Filer must report:

Compensated/uncompensated outside positions

Officer

Proprietor

Director

Representative

Trustee

Employee

General Partner

Consultant

Positions with for-profit, non-profit organizations

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Positions not required to be reported

Do not report positions held:

- By spouse or dependent children
- In an official capacity
- In religious, social, fraternal, or political organizations
- Of an honorary nature
- Mere membership in an organization

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278e Part 1 – Filer's Outside Positions

OGE Form 278e (March 2014)

Instructions for Part 1

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name					Page Number	
Part 1: Filer's Positions Held Outside United States Government						
#	Organization Name	City/State	Organization Type	Position Held	From	To
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
17.						
18.						
19.						
20.						

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OGE Form 278 - Schedule D Part II

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name .	SCHEDULE D	Page Number of	
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Part I: Positions Held Outside U.S. Government

Report any positions held during the applicable reporting period, whether compensated or not. Positions include but are not limited to those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise or any non-profit organization or educational institution. **Exclude** positions with religious, social, fraternal, or political entities and those solely of an honorary nature. None

Examples	Organization (Name and Address)	Type of Organization	Position Held	From (Mo., Yr.)	To (Mo., Yr.)
		Non-profit education	President	6/92	Present
	Doe Jones & Smith, Hometown, State	Law firm	Partner	7/85	1/00
1					
2					
3					
4					
5					
6					

Part II: Compensation in Excess of \$5,000 Paid by One Source

Report sources of more than \$5,000 compensation received by you or your business affiliation for services provided directly by you during any one year of the reporting period. This includes the names of clients and customers of any corporation, firm, partnership, or other business enterprise, or any other non-profit organization when you directly provided the services generating a fee or payment of more than \$5,000. You need not report the U.S. Government as a source. None

Examples	Source (Name and Address)	Brief Description of Duties
	Doe Jones & Smith, Hometown, State	Legal services
	Metro University (client of Doe Jones & Smith), Moneytown, State	Legal services in connection with university construction
1		
2		
3		
4		
5		
6		

Add Page

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Technical Review

- Is all required information reported?
- Is more information disclosed than required?
- Is prior approval required?
- If so, was prior approval obtained?
- If income over \$200, was it reported on Part 2?

Conflicts Analysis

- Does any listed organization have matters before or interests with the agency?
- Do the filer's official duties impact this organization?
- What service does the employee provide to the organization?

278e Part 2 – Filer's Employment Assets and Income

Filer must report:

Employment Assets :

- o With market value $>$ \$1,000 at end of period, or
- o That accrue $>$ \$200 in investment income during period

Employment Income of $>$ \$200

278e Part 2 – Filer's Employment Assets and Income

OGE Form 278e (March 2014)

Instructions for Part 2

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name						Page Number
Part 2: Filer's Employment Assets and Income						
#	Description	EIF	Value	Income Type	Income Amount	
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
17.						
18.						
19.						
20.						

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OGE Form 278 – Schedule A

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name		SCHEDULE A													Page Number																				
															of																				
Assets and Income		Valuation of Assets at close of reporting period											Income: type and amount. If "None (or less than \$201)" is checked, no other entry is needed in Block C for that item.																						
BLOCK A		BLOCK B											BLOCK C																						
For you, your spouse, and dependent children, report each asset held for investment or the production of income which had a fair market value exceeding \$1,000 at the close of the reporting period, or which generated more than \$200 in income during the reporting period, together with such income. For yourself, also report the source and actual amount of earned income exceeding \$200 (other than from the U.S. Government). For your spouse, report the source but not the amount of earned income of more than \$1,000 (except report the actual amount of any honoraria over \$200 of your spouse). None <input type="checkbox"/>		None (or less than \$1,001)	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Excepted Investment Fund	Excepted Trust	Qualified Trust	Type		Amount					Date (Mo., Day, Yr.)											
																Dividends	Rent and Royalties	Interest	Capital Gains	None (or less than \$201)	\$201 - \$1,000	\$1,001 - \$2,500	\$2,501 - \$5,000	\$5,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	Over \$5,000,000	Other Income (Specify Type & Actual Amount)	Only if Honoraria			
Examples																																			
Central Airlines Common																x																			
Doe Jones & Smith, Hometown, State			x																																
Kempstone Equity Fund					x									x																					
IRA: Heartland 500 Index Fund							x						x																						
1																																			
2																																			
3																																			
4																																			
5																																			
6																																			
		* This category applies only if the asset/income is solely that of the filer's spouse or dependent children. If the asset/income is either that of the filer or jointly held by the filer with the spouse or dependent children, mark the other higher categories of value, as appropriate.																																	

Technical Review

- Is each entry complete?
- Can you determine the type of asset or income?
- Are underlying assets reported when needed?
- Look for inconsistencies in reporting from last year's 278

Conflicts Analysis

Conflicts issues include:

- Continued financial connection with former employer
 - Continued payments
 - Continued participation in retirement programs
- Financial connection to current outside employer

OGE 278e Part 3 – Filer's Employment Agreements and Arrangements

Filer must report their agreements and arrangements with:

- Former employer, if
 - o continuing payments
 - o continuing participation in welfare or retirement plans
- Current employer, if leave of absence
- Future employer

OGE 278e Part 3 – Filer's Employment Agreements and Arrangements

OGE Form 278e (March 2014)

Instructions for Part 3

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name				Page Number
Part 3: Filer's Employment Agreements and Arrangements				
#	Employer or Party	City/State	Status and Terms	Date
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				

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OGE Form 278 - Schedule C Part II

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name ,		SCHEDULE C					Page Number of										
Part I: Liabilities		<p>Report liabilities over \$10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent children. Check the highest amount owed during the reporting period. Exclude a mortgage on your personal residence unless it is rented out; loans secured by automobiles, household furniture or appliances; and liabilities owed to certain relatives listed in instructions. See instructions for revolving charge accounts.</p> <p style="text-align: right;">None <input type="checkbox"/></p>															
		Category of Amount or Value (x)															
						\$10,000 - \$15,000	\$15,000 - \$50,000	\$50,000 - \$100,000	\$100,000 - \$250,000	\$250,000 - \$500,000	\$500,000 - \$1,000,000	Over: \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over: \$50,000,000	
Creditors (Name and Address)		Type of Liability				Date Incurred	Interest Rate	Term if applicable									
Examples	First District Bank, Washington, DC John Jones, Washington, DC	Mortgage on rental property, Delaware Promissory note				1991 1999	8% 10%	25 yrs. on demand		x		x					
1																	
2																	
3																	
4																	
5																	
*This category applies only if the liability is solely that of the filer's spouse or dependent children. If the liability is that of the filer or a joint liability of the filer with the spouse or dependent children, mark the other higher categories, as appropriate.																	
Part II: Agreements or Arrangements		<p>Report your agreements or arrangements for: (1) continuing participation in an employee benefit plan (e.g. pension, 401k, deferred compensation); (2) continuation of payment by a former employer (including severance payments); (3) leaves of absence; and (4) future employment. See instructions regarding the reporting of negotiations for any of these arrangements or benefits.</p> <p style="text-align: right;">None <input type="checkbox"/></p>															
Status and Terms of any Agreement or Arrangement		Parties					Date										
Example	Pursuant to partnership agreement, will receive lump sum payment of capital account & partnership share calculated on service performed through 1/00.	Doe Jones & Smith, Hometown, State					7/85										
1																	
2																	
3																	
4																	
5																	
6																	

Add Page

Technical Review

- What type of agreement is in place?
- What are the terms of the agreement?
- What is the current status of the agreement?
- What is the name and location of the parties involved?
- What is the date of the agreement?
- Are assets or incomes also reported on Part 2?

Conflicts Analysis

- Is the filer in a position to take an action that benefits a former, current, or future employer?

OGE 278e Part 4 – Compensation in Excess of \$5000

New Entrant Filer reports:

- Sources of compensation received by filer or business affiliation for services provided directly by filer
- In excess of \$5,000 paid by one source
- Report source, but not amount
- Include Part 2 salaries, etc.

OGE 278e Part 4 – Compensation in Excess of \$5000

Do not report:

- Any information covered by a confidentiality agreement
- Court seal, ongoing investigation, etc.
- Federal government
- DO-06-011

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OGE 278e Part 4 – Compensation in Excess of \$5000

OGE Form 278e (March 2014)

Instructions for Part 4

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name		Page Number	
Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year			
#	Source Name	City/State	Brief Description of Duties
1.			
2.			
3.			
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SYMPOSIUM

OGE 278 – Schedule D Part II

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name .	SCHEDULE D	Page Number of			
Part I: Positions Held Outside U.S. Government					
Report any positions held during the applicable reporting period, whether compensated or not. Positions include but are not limited to those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise or any non-profit organization or educational institution. Exclude positions with religious, social, fraternal, or political entities and those solely of an honorary nature. None <input type="checkbox"/>					
	<i>Organization (Name and Address)</i>	<i>Type of Organization</i>	<i>Position Held</i>	<i>From (Mo., Yr.)</i>	<i>To (Mo., Yr.)</i>
Examples	Nat'l Assn. of Rock Collectors, NY, NY ----- Doe Jones & Smith, Hometown, State	Non-profit education ----- Law firm	President ----- Partner	6/92 ----- 7/85	Present ----- 1/00
1					
2					
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6					
Part II: Compensation in Excess of \$5,000 Paid by One Source					
Report sources of more than \$5,000 compensation received by you or your business affiliation for services provided directly by you during any one year of the reporting period. This includes the names of clients and customers of any corporation, firm, partnership, or other business enterprise, or any other non-profit organization when you directly provided the services generating a fee or payment of more than \$5,000. You need not report the U.S. Government as a source. None <input type="checkbox"/>					
	<i>Source (Name and Address)</i>	<i>Brief Description of Duties</i>			
Examples	Doe Jones & Smith, Hometown, State ----- Metro University (client of Doe Jones & Smith), Moneytown, State	Legal services ----- Legal services in connection with university construction			
1					
2					
3					
4					
5					
6					

Add Page

SYMPOSIUM

Technical Review

- Is all required information reported?
- Is more information disclosed than required?

Conflicts Analysis

- Do any listed clients have matters before or interests with the agency?
- Will the filer's official duties impact that client?
- What service did the employee provide to the client?

OGE 278e Part 5 – Spouse’s Employment, Assets, Income and Retirement Accounts

OGE Form 278e (March 2014)

Instructions for Part 5

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name				Page Number	
Part 5: Spouse's Employment Assets and Income					
#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
4.					
5.					
6.					
7.					
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OGE 278e Part 6 - Other Assets and Income

OGE Form 278e (March 2014)

Instructions for Part 6

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name					Page Number
Part 6: Other Assets and Income					
#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
4.					
5.					
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SYMPOSIUM

OGE Form 278 – Schedule A

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name		SCHEDULE A															Page Number											
																	of											
Assets and Income		Valuation of Assets at close of reporting period								Income: type and amount. If "None (or less than \$201)" is checked, no other entry is needed in Block C for that item.																		
BLOCK A		BLOCK B								BLOCK C																		
For you, your spouse, and dependent children, report each asset held for investment or the production of income which had a fair market value exceeding \$1,000 at the close of the reporting period, or which generated more than \$200 in income during the reporting period, together with such income. For yourself, also report the source and actual amount of earned income exceeding \$200 (other than from the U.S. Government). For your spouse, report the source but not the amount of earned income of more than \$1,000 (except report the actual amount of any honoraria over \$200 of your spouse). None <input type="checkbox"/>		None (or less than \$1,001)	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Excepted Investment Fund	Excepted Trust	Qualified Trust	Type				Amount					Date (Mo., Day, Yr.) Only if Honoraria		
																	Dividends	Rent and Royalties	Interest	Capital Gains	None (or less than \$201)	\$201 - \$1,000	\$1,001 - \$2,500	\$2,501 - \$5,000	\$5,001 - \$15,000		\$15,001 - \$50,000	\$50,001 - \$100,000
Examples	Central Airlines Common																											
	Doe Jones & Smith, Hometown, State			x																								
	Kempstone Equity Fund					x																						
	IRA: Heartland 500 Index Fund							x																				
1																												
2																												
3																												
4																												
5																												
6																												
<p>* This category applies only if the asset/income is solely that of the filer's spouse or dependent children. If the asset/income is either that of the filer or jointly held by the filer with the spouse or dependent children, mark the other higher categories of value, as appropriate.</p>																												

Assets and Income

Filer must report:

- Assets of filer, spouse, and dependent children:
 - With market value $>$ \$1,000 at end of period, or
 - That accrue $>$ \$200 in investment income during period
- Earned Income of filer $>$ \$200
- Earned Income of spouse $>$ \$1,000
- Non-reportable interests

Examples of Assets/Income

- Stocks
- Bonds
- Mutual Funds
- Limited Partnerships
- Pension Interests
- Trusts
- Personal Bank Accounts
- Real Estate
- Commercial Crops
- Livestock
- Accounts or other funds receivable
- Collectible items held for resale or investment (e.g. art)
- Stock options
- Annuities
- Education savings accounts (529 plans)
- Investment Life Insurance policies

Non-Reportable Assets and Income

Filers do NOT report:

Personal Residence

Government Salary

Government Retirement Benefits

Other Government Benefits

Assets no longer held after the dissolution
of marriage

DC earned income

SYMPOSIUM

Investment Vehicles

Common Investment Vehicles

- IRAs
- 401(k)s
- TIAA-CREF
- 529 Plans (Education Savings Accounts)
- Variable Annuities

Must break out underlying assets

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Excepted Investment Funds(EIF) and Mutual Funds

- Excepted Investment Fund (2634.310(c))
An Investment Vehicle that is:
 1. widely held
 2. publicly traded or widely diversified
 3. independently managed
- Mutual Fund (2640.102(a), (k), (q))
An entity which is registered as a management company under the Investment Company Act of 1940, as amended (15 U.S.C. § 80a-1 et seq.)
- **Underlying assets need not be reported**

Retirement Plans

- Defined Benefit Plans: Employer guarantees payments upon retirement of employee, underlying assets are not reportable
- Defined Contribution Plans: Employer and Employee contribute to a fund, upon retirement, employee receives the fund's earnings, underlying assets are reportable

OGE 278e Part 7 - Transactions

Filers must report:

- Purchase, sale or exchange:
 - Stocks, bonds, mutual funds and other securities
 - Real property
- > \$1,000
- Filer, Spouse, Dependent Child
- Not for New Entrants

SYMPOSIUM

Non-Reportable Transactions

- Purchase or sale of personal residence
- Transactions on cash accounts
- Interest in federal retirement systems
- Treasury bills, bonds, and notes

OGE 278e Part 7 - Transactions

OGE Form 278e (March 2014)

Instructions for Part 7

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name		Page Number		
Part 7: Transactions				
#	Description	Type	Date	Amount
1.				
2.				
3.				
4.				
5.				
6.				
7.				
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SYMPOSIUM

OGE Form 278 Schedule B Part I

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Do not complete Schedule B if you are a new entrant, nominee, or Vice Presidential or Presidential Candidate

Reporting Individual's Name .	SCHEDULE B	Page Number of
----------------------------------	-------------------	-------------------

Part I: Transactions

Report any purchase, sale, or exchange by you, your spouse, or dependent children during the reporting period of any real property, stocks, bonds, commodity futures, and other securities when the amount of the transaction exceeded \$1,000. Include transactions that resulted in a loss.

Do not report a transaction involving property used solely as your personal residence, or a transaction solely between you, your spouse, or dependent child. Check the "Certificate of divestiture" block to indicate sales made pursuant to a certificate of divestiture from OGE.

None

	Identification of Assets		Transaction Type (x)			Date (Mo., Day, Yr.)	Amount of Transaction (x)														
			Purchase	Sale	Exchange		\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Certificate of divestiture			
1	Example	Central Airlines Common	x			2/1/99				x											
2																					
3																					
4																					
5																					

*This category applies only if the underlying asset is solely that of the filer's spouse or dependent children. If the underlying asset is either held by the filer or jointly held by the filer with the spouse or dependent children, use the other higher categories of value, as appropriate.

Part II: Gifts, Reimbursements, and Travel Expenses

For you, your spouse and dependent children, report the source, a brief description, and the value of: (1) gifts (such as tangible items, transportation, lodging, food, or entertainment) received from one source totaling more than \$335 and (2) travel-related cash reimbursements received from one source totaling more than \$335. For conflicts analysis, it is helpful to indicate a basis for receipt, such as personal friend, agency approval under 5 U.S.C. § 4111 or other statutory authority, etc. For travel-related gifts and reimbursements, include travel itinerary, dates, and the nature of expenses provided. Exclude anything given to you by

the U.S. Government; given to your agency in connection with official travel; received from relatives; received by your spouse or dependent child totally independent of their relationship to you; or provided as personal hospitality at the donor's residence. Also, for purposes of aggregating gifts to determine the total value from one source, exclude items worth \$134 or less. See instructions for other exclusions.

Add Page None

	Source (Name and Address)	Brief Description	Value
Examples	Nat'l Assn. of Rock Collectors, NY, NY	Airline ticket, hotel room & meals incident to national conference 6/15/99 (personal activity unrelated to duty)	\$500
	Frank Jones, San Francisco, CA	Leather briefcase (personal friend)	\$350
1			
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4			
5			

SYMPOSIUM

Technical Review

- Is the asset identified sufficiently?
- Is the transaction type, date and amount reported for each asset?
- Are purchases reported on Part 7 also listed on Parts 5 or 6, if required?

Conflicts Analysis

- Did the filer purchase any assets prohibited by agency statute, regulation, or other requirement?
- Did the filer purchase a financial interest in:
 - Agency contractors, grantees, licensees
 - Prohibited sources
- Did the filer sell any assets as directed by the agency?

OGE 278e Part 8 - Liabilities

Filer reports liabilities:

- Exceeding \$10,000 **during** the reporting period
- For filer, spouse, and dependent children

Non-Reportable Liabilities

Filers need not report:

- Intra-family debt
- Loan secured by vehicle, furniture, etc.
- Revolving charge accounts of under \$10,000 at the **end** of the reporting period

OGE 278e Part 8 - Liabilities

OGE Form 278e (March 2014)

Instructions for Part 8

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Part 8: Liabilities							Page Number
#	Creditor Name	Type	Amount	Year Incurred	Rate	Term	
1.							
2.							
3.							
4.							
5.							
6.							
7.							
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SYMPOSIUM

OGE Form 278 – Schedule C Part I

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name		SCHEDULE C										Page Number _____ of _____											
Part I: Liabilities		Report liabilities over \$10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent children. Check the highest amount owed during the reporting period. Exclude a mortgage on your personal residence unless it is rented out; loans secured by automobiles, household furniture or appliances; and liabilities owed to certain relatives listed in instructions. See instructions for revolving charge accounts.										None <input type="checkbox"/>											
		Category of Amount or Value (x)																					
Creditors (Name and Address)		Type of Liability			Date Incurred	Interest Rate	Term if applicable	\$10,001 - 100,010	100,011 - 100,015	100,016 - 100,020	100,021 - 100,025	100,026 - 100,030	100,031 - 100,035	100,036 - 100,040	Over \$1,000,000*	\$1,000,001 - 1,000,005	1,000,006 - 1,000,010	1,000,011 - 1,000,015	1,000,016 - 1,000,020	Over \$50,000,000			
Examples		First District Bank, Washington, DC			1991	8%	25 yrs.				x												
		John Jones, Washington, DC			1999	10%	on demand					x											
1																							
2																							
3																							
4																							
5																							
*This category applies only if the liability is solely that of the filer's spouse or dependent children. If the liability is that of the filer or a joint liability of the filer with the spouse or dependent children, mark the other higher categories, as appropriate.																							
Part II: Agreements or Arrangements																							
Report your agreements or arrangements for: (1) continuing participation in an employee benefit plan (e.g. pension, 401k, deferred compensation); (2) continuation of payment by a former employer (including severance payments); (3) leaves										of absence; and (4) future employment. See instructions regarding the reporting of negotiations for any of these arrangements or benefits.												None <input type="checkbox"/>	
Status and Terms of any Agreement or Arrangement										Parties										Date			
Example										Pursuant to partnership agreement, will receive lump sum payment of capital account & partnership share calculated on service performed through 1/00.										Doe Jones & Smith, Hometown, State		7/85	
1																							
2																							
3																							
4																							
5																							
6																							

Add Page

Technical Review

- Is each liability completely disclosed?
- Do certain liabilities have corresponding assets on Part 6, e.g., mortgages on rental property?
- Do the liabilities differ from previous reports?

Conflicts Analysis

- Are there liabilities with other employees?
- Are the terms generally available to the public?

OGE 278e Part 9 – Gifts and Travel Reimbursements

Filers must report gifts and travel reimbursements:

- That exceed \$375
- From a single source
- Received by employee, spouse, or dependent children
- LA-14-03

Non-Reportable Gifts and Travel Reimbursements

- Received from relatives
- Fair market value paid
- Accepted by government
- Given to filer's spouse or dependent child independent of their relationship to the filer
- Bequests and other forms of inheritance

OGE 278e Part 9 – Gifts and Travel Reimbursements

OGE Form 278e (March 2014)

Instructions for Part 9

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name			Page Number	
Part 9: Gifts and Travel Reimbursements				
#	Source Name	City/State	Brief Description	Value
1.				
2.				
3.				
4.				
5.				
6.				
7.				
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SYMPOSIUM

OGE Form 278 Schedule B Part II

OGE Form 278 (Rev. 09/2010)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Do not complete Schedule B if you are a new entrant, nominee, or Vice Presidential or Presidential Candidate

Reporting Individual's Name	SCHEDULE B	Page Number	of	
-----------------------------	-------------------	-------------	----	--

Part I: Transactions

Report any purchase, sale, or exchange by you, your spouse, or dependent children during the reporting period of any real property, stocks, bonds, commodity futures, and other securities when the amount of the transaction exceeded \$1,000. Include transactions that resulted in a loss.

Do not report a transaction involving property used solely as your personal residence, or a transaction solely between you, your spouse, or dependent child. Check the "Certificate of divestiture" block to indicate sales made pursuant to a certificate of divestiture from OGE.

None

	Identification of Assets	Transaction Type (x)			Date (Mo., Day, Yr.)	Amount of Transaction (x)												
		Purchase	Sale	Exchange		\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Certificate of divestiture	
Example	Central Airlines Common	x			2/1/99			x										
1																		
2																		
3																		
4																		
5																		

*This category applies only if the underlying asset is solely that of the filer's spouse or dependent children. If the underlying asset is either held by the filer or jointly held by the filer with the spouse or dependent children, use the other higher categories of value, as appropriate.

Part II: Gifts, Reimbursements, and Travel Expenses

For you, your spouse and dependent children, report the source, a brief description, and the value of: (1) gifts (such as tangible items, transportation, lodging, food, or entertainment) received from one source totaling more than \$335 and (2) travel-related cash reimbursements received from one source totaling more than \$335. For conflicts analysis, it is helpful to indicate a basis for receipt, such as personal friend, agency approval under 5 U.S.C. § 4111 or other statutory authority, etc. For travel-related gifts and reimbursements, include travel itinerary, dates, and the nature of expenses provided. Exclude anything given to you by

the U.S. Government; given to your agency in connection with official travel; received from relatives; received by your spouse or dependent child totally independent of their relationship to you; or provided as personal hospitality at the donor's residence. Also, for purposes of aggregating gifts to determine the total value from one source, exclude items worth \$134 or less. See instructions for other exclusions.

Add Page None

	Source (Name and Address)	Brief Description	Value
Examples	Nat'l Assn. of Rock Collectors, NY, NY	Airline ticket, hotel room & meals incident to national conference 6/15/99 (personal activity unrelated to duty)	\$500
	Frank Jones, San Francisco, CA	Leather briefcase (personal friend)	\$350
1			
2			
3			
4			
5			

Technical Review

- Is disclosure complete, i.e., the source, description and value of each gift?
- Travel requires itinerary and date
- Must the filer report each item disclosed?

Conflicts Analysis

- Is there a bribery or supplementation of salary issue?
- Was the gift given because of the filer's official position, or is the donor a prohibited source?

Exercise

OGE Form 278e (March 2014)
 U.S. Office of Government Ethics, 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type:	Annual
Year (Annual Report only):	
Date of Appointment/Termination:	3/7/2013



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

Filer's Information				
Last Name	First Name	MI	Position	Agency
Nikolic	James		Assistant Secretary for Procurement	ABC Agency
Other Federal Government Positions Held During the Preceding 12 Months:				
Name of Congressional Committee Considering Nomination (Nominees only):				
Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:				
Signature:			Date:	
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)				
Signature:			Date:	
Other Review Conducted By:				
Signature:			Date:	
U.S. Office of Government Ethics Certification (if required):				
Signature:			Date:	
Comments of Reviewing Officials:				

SYMPOSIUM

Exercise

CGF Form 276 (March 2014)

Instructions for Part 1

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name					Page Number	
Part 1: Filer's Positions Held Outside United States Government						
#	Organization Name	City/State	Organization Type	Position Held	From	To
1.	Valley Park Condo Association	Scotts, NY	Homeowners Association	Vice Pres.	1989	Present
2.	Electric Coalition of America		Trade Association	Consultant	2015	Present
3.						
4.						

SYMPOSIUM

Exercise

CGF Form 276 (March 2014)

Instructions for Part 2

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name					Page Number
Instructions for Part 2					
Part 2: Filer's Employment Assets and Income					
#	Description	EIF	Value	Income Type	Income Amount
1.	Electric Coalition of America			Salary	\$5000
2.					
3.					

SYMPOSIUM

Exercise

OGE Form 278e (March 2014)

[Instructions for Part 3](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name				Page Number
Part 3: Filer's Employment Agreements and Arrangements				
#	Employer or Party	City/State	Status and Terms	Date
1.	E & E Engineering	Albany, NY	Upon reaching age 65, I will receive \$10,000 a month for life	7/1976
2.				
3.				

SYMPOSIUM

Exercise

CGF Form 278a (March 2014)

[Instructions for Part 4](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name			Page Number
Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year			
#	Source Name	City/State	Brief Description of Duties
1.			
2.			
3.			
4.			

SYMPOSIUM

Exercise

CGR Form 278a (March 2014)

[Instructions for Part 5](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name					Page Number
Part 5: Spouse's Employment Assets and Income					
#	Description	EIF	Value	Income Type	Income Amount
1.	Clark, Inc			Salary	
2.	401(k)	Y	\$1,001 - \$15,000		None (or less than \$201)
3.					
4.					
5.					

SYMPOSIUM

Exercise

OGE Form 278e (March 2014)

Instructions for Part 6

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name					Page Number
Part 6: Other Assets and Income					
#	Description	EIF	Value	Income Type	Income Amount
1.	IBM Stock		\$50,001 - \$100,000	Dividends	\$2,501 - \$5,000
2.	Fidelity Puritan Fund	Y	\$15,001 - \$50,000		\$201 - \$1,000
3.	ING Pioneer Growth Opportunities		\$1,001 - \$15,000		None (or less than \$201)
4.	Nationwide Managed Account	Y	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
5.	IRA	N	\$50,001 - \$100,000		None (or less than \$201)
6.	Virginia 529 plan		\$15,001 - \$50,000		None (or less than \$201)
7.	NYSE: LUV		\$15,001 - \$50,000		None (or less than \$201)
8.	Savings account		\$1,001 - \$15,000		None (or less than \$201)
9.					

SYMPOSIUM

Exercise

OGE Form 278e (March 2014)

Instructions for Part 7

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name		Page Number		
Part 7: Transactions				
#	Description	Type	Date	Amount
1.	IBM	sale	6/15/2015	\$1,001 - \$15,000
2.	GE	purchase	8/10/2015	\$15,001 - \$50,000
3.	Vanguard Standard & Poor's 500 Index Fund	purchase	9/18/2015	\$1,001 - \$15,000
4.				
5.				
6.				
7.				

SYMPOSIUM

Exercise

CGF Form 276a (March 2014)

[Instructions for Part 8](#)

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name						Page Number
Part 8: Liabilities						
#	Creditor Name	Type	Amount	Year Incurred	Rate	Term
1.	Bank of Albany, Albany NY	Mortgage	\$250,001 - \$500,000	2003	4.8%	30 year
2.	Bank of Scotia, Scotia NY	Mortgage on Rental Condo	\$100,001 - \$250,000	2015	3.5%	15 year
3.	American Express	Revolving Charge	\$10,001 - \$15,000	2015	15%	On Demand
4.						
5.						
6.						
7.						

SYMPOSIUM

Exercise

CGR Form 278e (March 2014)

Instructions for Part 9

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name			Page Number	
Part 9: Gifts and Travel Reimbursements				
#	Source Name	City/State	Brief Description	Value
	Castle Associates	Albany, NY	14 karat gold pen and pencil set and paperweight	\$300
2.	Electrical Energy Institute	Albany, NY	Conference in San Francisco, CA	\$1795
3.				
4.				
5.				
6.				

SYMPOSIUM

Remedies

- Recusal
- Divestiture
- Resignation
- Change of assignment
- Waiver
- Qualified trust (blind or diversified)

Recap

- What is financial disclosure
- How to review 278e for:
 - Technical accuracy and
 - Conflicts analysis
- Resources for review

Confidential Financial Disclosure

OGE Form 450, 5 CFR Part 2634, Subpart I
 U.S. Office of Government Ethics (June 2015)
 (Replaces January 2014 edition)

Form Approved
 OMB No. 3209-0008

Date Received by Agency

Page Number

CONFIDENTIAL FINANCIAL DISCLOSURE REPORT Executive Branch

Employee's Name (<i>Print last, first, middle initial</i>)		E-mail Address
Position/Title		Grade
Agency		Branch/Unit and Address
Work Phone	Reporting Status New Entrant <input type="checkbox"/> Annual <input type="checkbox"/>	If New Entrant, Date of Appointment to Position (mm/dd/yy)
Check box if Special Government Employee (SGE) <input type="checkbox"/>	An SGE is an executive branch officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for a period not to exceed 130 days during any consecutive 365-day period.	
If an SGE, Mailing Address (Number, Street, City, State, ZIP Code)		

Step 1: Read the instructions for Parts I through V on the following pages.

Step 2: For each statement below, check Yes or No to describe your situation.

I. I have reportable assets or sources of income for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
II. I have reportable liabilities (debts) for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
III. I have reportable outside positions for myself.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
IV. I have reportable agreements or arrangements for myself.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
NOTE: Statement V is for <u>annual</u> filers only. It does not apply to new entrants and SGEs.		
V. I have reportable gifts or travel reimbursements for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Step 3: If you selected Yes for any statement, you must describe the reportable interests that you have in the corresponding Part (I, II, III, IV, or V) of the form.

Step 4: Sign and date the form.

Step 5: Submit the completed form to your ethics office.

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

Signature of Employee	Date (mm/dd/yy)
-----------------------	-----------------

FOR REVIEWERS' USE ONLY:

On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations, except as noted in the "comments" box below.

Signature and Title of Supervisor/Other Intermediate Reviewer (if required by the agency)

Date (mm/dd/yy)

E-mail Address

Phone Number

Signature and Title of Agency's Final Reviewing Official

Date (mm/dd/yy)

Comments of Reviewing Officials

(Check box if continued on additional page)

SYMPOSIUM

Confidential Financial Disclosure

- **Who?** Based upon duties/responsibilities of position
- **What?** Less info than a 278 (e.g., no diversified mutual funds, most rental mortgages, student loans, credit card debts: unless agency ethics rules require)
- **Where?** Ethics Official review (some agencies – a supervisor will review/sign first)
- **Why?** Avoid real or apparent COIs between official duties and private interests
- **See:** 450 Review Guide and Guidance on who should file on OGE's website

Stock Act – Periodic Transaction reports

Stop Trading on Congressional Knowledge Act of 2012 (the “**Stock Act**”) signed 4-4-2013

- 278 filers disclose employee/spouse/dependent child purchases, sales, or exchanges over \$1000 of stocks, bonds, commodities futures or other forms of securities
- Need not report transactions of EIFs; underlying holdings of an EIF, a qualified blind or diversified trust, or an excepted trust; real property; Treasuries; life insurance and annuities; cash accounts

Stock Act and Periodic Transaction Reports

- Filers satisfy annual/termination reporting requirements by way of periodic transaction reports
- Disclose by the earlier of 45 days after the transaction or 30 days after notification of the transaction
- No need to file a negative report reflecting that no transactions occurred
- Reasonable extensions for filing but limit length to 90 calendar days (for good cause shown)
- See: OGE Legal Advisories LA-12-04 & LA-13-01

SYMPOSIUM

278T Instructions

OGE Form 278-T (June 2015)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT: Periodic Transaction Report

Instructions for Completing the OGE Form 278-T

Who Must File

You must file a periodic transaction report if:

- you are in a position that requires you to file an annual or termination public financial disclosure report (OGE Form 278), and
- you have a reportable transaction as discussed below.

You are not required to file a negative report if you have no reportable transactions.

What to Report

Report any purchase, sale, or exchange by you, your spouse, or dependent child of stocks, bonds, commodity futures, and other securities if the amount of the transaction exceeded \$1,000. You do not need to report: (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between you, your spouse, or dependent child.

For each reported transaction:

- Identify the security (e.g., "Central Airlines Co.)."
- Mark a column to indicate the type of transaction.
- Provide the date that the transaction occurred.
- If you received notification of the transaction more than 30 days ago, mark the column labeled "Notification Received More Than 30 Days Ago." (Extensions of the due date should be noted in the "Notice of Extension" section.)
- Mark a column to indicate the amount of the transaction.

Voluntary Reporting of Annual/Termination Information

You do not need to report a transaction in an annual or termination report (OGE Form 278) if you have already reported the transaction in a periodic transaction report (OGE Form 278-T). Annual and termination reports, however, also require you to report purchases, sales, or exchanges of: (1) mutual funds and other excepted investment funds; and (2) real property (excluding your personal residence). If you prefer to report such transactions in your periodic transaction report(s) rather than in an annual or termination report, you may do so, unless your agency requires duplicate reporting.

When to File

Periodic transaction reporting is subject to two different deadlines. Under the Ethics in Government Act, you need to file a report:

- within 30 days of receiving notification of a transaction, but
- not later than 45 days after the transaction.

Which deadline applies depends on when you receive notification of the transaction. Normally, you need to disclose a transaction within 30 days of receiving the notification. For example, if you receive online confirmation of a transaction that you ordered earlier today, you will file your report within 30 days.

Sometimes, you might not receive notification right away. In that case, the 45-day deadline can shorten the period for filing your report. For example, if today you receive notification of a transaction that occurred early last month, you will need to be sure to file your report no later than 45 days after the transaction occurred. The 45-day period might end sooner than 30 days from today.

Example 1: You purchase a stock on July 1 and receive notification the same day. You need to report the purchase on or before July 31.

Example 2: You receive a statement on August 10 regarding a purchase that occurred on July 31. You need to report the purchase on or before September 9 because September 9 is 30 days after you received notification of the transaction.

Example 3: You receive a statement on August 10 regarding a purchase that occurred on July 1. You need to report the purchase on or before August 15. Although the 30-day period from notification ends September 9, the 45-day period from the date of the transaction ends earlier.

Note: These deadlines do not apply to any voluntary disclosures of annual and termination report information that you choose to make.

Extensions and Late Filing Fees

Your agency may grant an extension of up to 45 days for good cause shown with the possibility of one additional extension of up to 45 days. If your report is filed more than 30 days after the date the report is required to be filed, or, if an extension was granted, more than 30 days after the last day of the filing extension period, you shall be subject to a \$200 late filing fee. A report is considered to be filed when it is received by your agency. Unless waived by your agency, your agency will collect the fee for deposit with the U.S. Treasury.

SYMPOSIUM

OGE Form 278T – General Information

OGE Form 278-T (January 2013)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT: Periodic Transaction Report

Filer's Name (<i>Print Last, First, and Middle Initial</i>)	Title of Position for Which Filing	Department or Agency	
Best, Brit	Commissioner	Department of Missions	
Certification: I CERTIFY that the statements I have made on this form and any attachments are true, complete, and correct to the best of my knowledge.	Signature of the Filer	Date (<i>Month, Day, Year</i>)	Notice of Extension
	GRACE CLARK <small>Digitally signed by GRACE CLARK DN: cn=US, o=U.S. Government, ou=Office of Government Ethics, ou=GRACE CLARK, email=GRACE.CLARK@EOPSS.GOV Date: 2016.01.15 12:29:45Z</small>	01/15/2016	<input type="checkbox"/> Check if granted Indicate number of days:
Signature of Intermediate Reviewing Official (<i>if required by agency</i>)	Date (<i>Month, Day, Year</i>)	Agency Use Only	OGE Use Only
GRACE CLARK <small>Digitally signed by GRACE CLARK DN: cn=US, o=U.S. Government, ou=Office of Government Ethics, ou=GRACE CLARK, email=GRACE.CLARK@EOPSS.GOV Date: 2016.01.15 12:34:45Z</small>	02/12/2016		
Signature of Agency's Final Reviewing Official	Date (<i>Month, Day, Year</i>)	Comments of Reviewing Officials	
GRACE CLARK <small>Digitally signed by GRACE CLARK DN: cn=US, o=U.S. Government, ou=Office of Government Ethics, ou=GRACE CLARK, email=GRACE.CLARK@EOPSS.GOV Date: 2016.01.15 12:35:45Z</small>	02/12/2016		
Signature of Reviewing Official at U.S. Office of Government Ethics (<i>if required</i>)	Date (<i>Month, Day, Year</i>)		

Transactions

SYMPOSIUM

OGE Form 278 T Transactions

Transactions

Report any purchase, sale, or exchange by you, your spouse, or dependent child of stocks, bonds, commodity futures, and other securities if the amount of the transaction exceeded \$1,000. You do not need to report: (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between you, your spouse, or dependent child.

Deadlines

You must file your report within 30 days of when you receive notification of a transaction but not later than 45 days after the transaction. These deadlines do not apply to any voluntary additional disclosures you make. See the instructions.

Identification of Assets	Transaction Date (Mo./Day/Tr.)	Notification Received More Than 30 Days Ago*	Transaction Type (x)			Amount of Transaction (x)												
			Purchase	Sale	Exchange	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000**	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000		
Ex. Central Airlines Co.	10/1/12		X					X										
Ex. BMSI Propulsion, Inc.	9/4/12	X	X				X											
1 COMCAST CLA	12/30/15		X			X												
2 American Express (AXP)	01/05/16			X		X												
3 Fidelity Balanced (FBLX)	01/05/16		X			X												
4																		
5																		
6																		
7																		

* Extensions of the due date should be noted in the "Notice of Extension" section of this form.

** This category applies only if the underlying asset is solely that of your spouse or dependent child. If the underlying asset is either held by you or jointly held by you with your spouse or dependent children, use the other higher categories of value, as appropriate.

SYMPOSIUM

OGE Form 278 T

OGE Form 278-T (January 2013)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT: Periodic Transaction Report

Filer's Name (Print Last, First, and Middle Initial)	Title of Position for Which Filing	Department or Agency	
Best, Brit	Commissioner	Department of Missions	
Certification: I CERTIFY that the statements I have made on this form and any attachments are true, complete, and correct to the best of my knowledge.	Signature of the Filer	Date (Month, Day, Year)	Notice of Extension
	GRACE CLARK	01/15/2016	<input type="checkbox"/> Check if granted Indicate number of days:
Signature of Intermediate Reviewing Official (if required by agency)	Date (Month, Day, Year)	Agency Use Only	OGE Use Only
GRACE CLARK	02/12/2016		
Signature of Agency's Final Reviewing Official	Date (Month, Day, Year)	Comments of Reviewing Officials	
GRACE CLARK	02/12/2016		
Signature of Reviewing Official at U.S. Office of Government Ethics (if required)	Date (Month, Day, Year)		
Transactions			
Report any purchase, sale, or exchange by you, your spouse, or dependent child of stocks, bonds, commodity futures, and other securities if the amount of the transaction exceeded \$1,000. You do not need to report: (1) mutual funds and other exempt investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between you, your spouse, or dependent child.			
Deadlines You must file your report within 30 days of when you receive notification of a transaction but not later than 45 days after the transaction. These deadlines do not apply to any voluntary additional disclosures you make. See the instructions.	Transaction Date (Mo./Day/Yr.)	Notification Received More Than 30 Days Ago*	Transaction Type (x) Purchase Sale Exchange
Identification of Assets			Amount of Transaction (x)
Ex. Central Airlines Co.	10/1/12	X	\$1,001 - \$15,000
Ex. BMSI Propulsion, Inc.	9/4/12	X	\$15,001 - \$50,000
1 COMCAST CLA	12/30/15		\$50,001 - \$100,000
2 American Express (AXP)	01/05/16		\$100,001 - \$250,000
3 Fidelity Balanced (FABLX)	01/05/16		\$250,001 - \$500,000
4			\$500,001 - \$1,000,000
5			Over \$1,000,000**
6			\$1,000,001 - \$5,000,000
7			\$5,000,001 - \$25,000,000
			\$25,000,001 - \$50,000,000
			Over \$50,000,000
* Extensions of the due date should be noted in the "Notice of Extension" section of this form. ** This category applies only if the underlying asset is solely that of your spouse or dependent child. If the underlying asset is either held by you or jointly held by you with your spouse or dependent children, use the other higher categories of value, as appropriate.			

SYMPOSIUM

Technical Review and Conflicts Analysis

- Was the report submitted timely by the filer?
- Did the filer adequately describe the transaction?
- Did the filer purchase a conflicting asset?
- Does the agency require the reporting of the same asset on the annual 278e?
- PAS and DAEO reports are also reviewed by OGE

Integrity



Status: Normal.

NOTE: Integrity will perform weekly server restarts on Sundays from 3:00 - 3:15 am ET. Please logoff and save your work before this time. In addition, Integrity users may experience intermittent login issues from 2:00 am - 8:00 am Sundays during MAX.gov's weekly maintenance window.

Please report any issues to integrity@oge.gov.

Click on the [Help](#) link at the bottom of the screen for login assistance information.

Integrity is the U.S. Office of Government Ethics system for electronically filing and reviewing Public Financial Disclosures (OGE Forms 278e and 278-T).



Using Integrity to Review the 278e

The screenshot shows the website for the Office of Government Ethics - External, specifically the 'Information for Reviewers' page. The page features a navigation menu with options like 'Home', 'For Filers', 'For Reviewers', 'For Administrators', 'Integrity User Guide', and 'Dates and Deadlines'. The main content area is titled 'Integrity Information for Reviewers' and includes a welcome message, a note about the resources provided, and a section for 'Reviewer Resources'. A green arrow points to the 'Reviewer Resources' section, which lists several links: 'Integrity User Guide', 'Computer Requirements', 'How to Log In to Integrity', 'Reviewer Features', 'Reviewing the 278e', and 'Reviewing the 278-T'. On the right side of the page, there are two boxes: one for 'INTEGRITY 2.0 Play your part. A conflicts-prevention instrument.' and another for the 'UNITED STATES OFFICE OF GOVERNMENT ETHICS' logo with the tagline 'Preventing Conflicts of Interest in the Executive Branch'.

Home Find Help Contact Us PERMISSIONS COLLABORATION SPECIFIC Search The MAX Community Welcome Barbara Log Out

Dashboard > Office of Home > About Integrity > Information for Reviewers (0)

OFFICE OF GOVERNMENT ETHICS-EXTERNAL
Information for Reviewers

Edited By Brandon Dunderson(OGE) on Jun 04, 2015 at 05:06 PM

Home For Filers For Reviewers For Administrators Integrity User Guide Dates and Deadlines

Integrity Information for Reviewers

Welcome to the *Integrity* Reviewer resource page. The resources listed below provide information for users who will use *Integrity* to review executive branch public financial disclosure reports. OGE and agency ethics officials use *Integrity* to review financial disclosure reports for conflicts of interest and manage the executive branch financial disclosure program.

Please note: These resources do **not** provide instructions concerning the substantive requirements for filing public financial disclosure reports, reviewing those reports, or administering a financial disclosure program at the Agency level. Please see [Helpful Resources for Public Financial Disclosure](#) and the [Nominee & New Entrant 278 Guide](#) on OGE's website for guidance on the substantive filing requirements.

Reviewer Resources

- [Integrity User Guide](#)
- [Computer Requirements](#)
- [How to Log In to Integrity](#)
- [Reviewer Features](#)
- [Reviewing the 278e](#)
- [Reviewing the 278-T](#)

INTEGRITY^{2.0}
Play your part.
A conflicts-prevention instrument.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS
Preventing Conflicts of Interest
in the Executive Branch

SYMPOSIUM

The End!

QUESTIONS?

SYMPOSIUM



MARCH 7 2016
SYMPOSIUM
ON FINANCIAL DISCLOSURE

Financial Disclosure and Conflicts Issues for Attorneys

Heather Jones

Positions

The filer's position with the firm will drive the types of questions you need to ask about the types of assets and income held by the nominee.

Equity Interest in a Firm

- Determine the type of equity interest held by the filer, usually it is a capital account or stock
- A filer needs to work with the firm to determine how the capital will be returned or stock will be repurchased

Reporting Equity Interests

Part 2

Description	EIF	Value	Income Type	Income Amount
Faraday, Maxwell & Franklin, capital account	N/A	\$50,001 - \$100,000		None (or less than \$201)

Part 3

Employer or Party	City/State	Status and Terms	Date
Faraday, Maxwell & Franklin	NY, NY	Pursuant to the partnership agreement, following my withdrawal from the firm, I will receive a lump sum payment of my capital account. This payment will be calculated as of the date of my withdrawal.	4/93

Partnership Share

- Look for both a reported share and a reported receivable. Determine the covered period.
- Determine how the outstanding distribution works:
 - Is the payment negotiated or standard (is there a written policy)?
 - Is there a reference point if the amount will be calculated?
 - When and how will the payment be made?

Reporting the Partnership Share

Part 2

Description	EIF	Value	Income Type	Income Amount
Faraday, Maxwell & Franklin (law firm)	N/A		partnership share	\$287,539
Faraday, Maxwell & Franklin, anticipated partnership share	N/A	\$100,001 - \$250,000		None (or less than \$201)

Part 3

Employer or Party	City/State	Status and Terms	Date
Faraday, Maxwell & Franklin	Washington, DC	Pursuant to the partnership agreement, following my withdrawal from the firm, I will receive my final partnership share distribution in four quarterly payments. The total amount of the payments will be calculated as of the date of my withdrawal.	4/93

Legal Questions with Outstanding Partnership Share

- **503** - extraordinary payments
- **209** - compensation from an outside source for performing official duties
- **203** - Representing third parties before the government for compensation
- **205(a)(1)** - Receiving compensation while an employee for prosecuting a claim against the US
- **Emoluments Clause** - Compensation from a foreign Government

503 or 209 Concern?

Is there an extraordinary payment (503) or compensation from an outside source for performing official duties (209)?

- When the payment is made will drive determination.
- Is there a policy or objective formula for the payment?
- Is the amount based on past services?

203 or 205(a)(1)

Did the filer or filer's firm represent a third party in a claim against the government or in particular matter and receive compensation?

- Determine the timing of the representation.
- Determine when will the filer get their share of the fees if it is a claim against the U.S.

Emoluments Clause

- The clause prohibits compensation from a foreign government while serving in an office of profit or trust, without the consent of Congress.
- Does the filer or the firm have foreign government clients?
- When will the payment be made?

Outstanding Partnership Share

OGE encourages all payments to be made before a filer assumes the duties of the position to resolve most of the legal issues.

Contingency Fee Cases

Is the U.S. government a party or does it have a direct and substantial interest in the case?

- If yes, then prior to assuming the duties of the position, the filer must find a way to dispense with the interest in a contingency fee case.
- OGE recommends coming to an agreement on a sum certain to be paid before assuming the duties of the position.



Reporting Contingency Fee Cases

Part 2

Description	EIF	Value	Income Type	Income Amount
Faraday, Maxwell & Franklin, contingency fee cases (value not readily ascertainable)	N/A			None (or less than \$201)

Part 3

Employer or Party	City/State	Status and Terms	Date
Faraday, Maxwell & Franklin	NY, NY	Upon confirmation, I will transfer to Faraday, Maxwell & Franklin several cases in which I have a contingency fee interest. I will retain an interest in those fees, as stated in my agreement with that firm.	5/14


Filer's Name Part of the Law Firm Name

5 U.S. C. app. § 502(a)(2) and 5 CFR §2636.305 prohibit covered non-career employees from having their name as a part of the name of a business that provides fiduciary services, like a law firm.

Firm will not Remove the Name

Take the following steps:

1 (b) (5)



Other Unusual Assets and Agreements from Employment

- Supplemental Retirement Plans
- Funds in Retirement Account that are just available to firm employees
- Special Investment Funds for Partners, often involving equity in clients
- Tax Preparation Services

Reporting of Client Names

Report

- Each person
- Paid more than \$5,000 for the
- Filer's personal services
- In a calendar year
- Include both payment to the filer directly and to filer's employer/business

Confidential Clients

Filers are not required to report information that is confidential as a result of a **privileged relationship** established by law.

When is a Client Confidential?

1. Does a privileged relationship exist?
2. Ensure that the client's identity has not been released to the public.
3. If a privileged relationship exists, the filer does not need to report a client's identity if:
 - client's identity is protected by a statute, court order, or is under seal
 - client is the subject of a pending grand jury proceeding or other non-public investigation
 - disclosure is prohibited by a rule of professional conduct
 - a written confidentiality agreement was entered into with the client when the filer was retained and it expressly prohibits release of the identity

Reporting Confidential Clients

Source Name	City/State	Brief Description of Duties
Faraday, Maxwell & Franklin	Washington, DC	Associate attorney at this firm.
Widgets Unlimited	Grand Rapids, MI	Legal services (client of Faraday, Maxwell & Franklin)
5 confidential clients (1 corporation and 4 individuals)		Client's names are confidential under DC Rule of Professional Conduct 1.6



Special Considerations for Sole and Small Practice

- Determine if there is a legal entity
- Will the firm be dissolved, rendered inactive, sold
- Resolve all fee issues (Contingency, Referral, and Outstanding Fees)
- Make sure advertising with the filer's name has ceased
- Determine if the filer is personally responsible for any firm liabilities

THANK YOU

MARCH 7 2016

SYMPOSIUM

ON FINANCIAL DISCLOSURE

Executives and Bankers
Lorna Syme

Stock

RESTRICTED STOCK/RESTRICTED
STOCK UNITS

STOCK OPTIONS

DEFERRED COMPENSATION



Executives/Bankers

SALARY

BONUS

278e

Parts 2 and 3 for the filer

Part 5 for spouse

NOT Part 6

278e

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation	N/A		Salary	\$185,000

SALARY

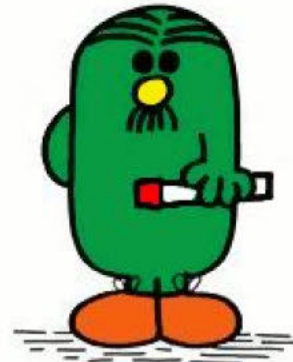
Exact amounts.

Confirm amount is for the entire reporting period.

No estimates!
No rounding!
No annual
figure!

MR. ~~X~~ PEDANTIC

By Roger Hargreaves



SALARY

When you see salary,
always ask about:

- bonus received
- anticipated bonus.

BONUS

A bonus already received should be an exact amount.

An anticipated bonus should be a category value.

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation	N/A		bonus	\$155,500
Eyewear Technologies Corporation, anticipated bonus	N/A	\$1,001 - \$15,000		None (or less than \$201)

Anticipated Bonus

When will the bonus be paid? Before or after the filer enters the government?

What if the filer leaves before the bonus is paid out? Will the filer still receive the bonus?

- If so, does the company always pay bonuses to people who leave before the bonus is paid out or is this a departure from the standard policy?



Anticipated Bonus – Part 3

Employer or Party	City/State	Status and Terms	Date
Eyewear Technologies Corp.	Potomac, MD	Pursuant to my employment agreement, I will receive a performance-based bonus prior to entering the government for services rendered in 2014 up to the date of my departure from the firm.	3/02

True or False?

Lisa is a salaried employee of a corporation. She may *combine* the salary and bonus she received from her employer in a single line entry in the financial disclosure report. She does not need to report these types of income on separate lines, provided that she indicates that the nature of the income is both “salary & bonus.

TRUE

Salary & Bonus

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation	N/A		Salary and bonus	\$210,000

Cash Payment Severance

What is the filer getting?

A severance payment already received should be an exact amount.

An anticipated payment should be a category value.

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation	N/A		Severance payment	\$155,500
Eyewear Technologies Corporation, anticipated severance	N/A	\$1,001 - \$15,000		None (or less than \$201)

Severance payments

Part 3

When is the filer getting?

Is it written/standard policy?

How is the severance payment being calculated?

Employer or Party	City/State	Status and Terms	Date
Eyewear Technologies Corp.	Potomac, MD	Pursuant to my employment agreement, I will receive a lump sum severance payment within 90 days of my separation from the firm.	5/07

Stock Options – What are they?

With Executives we are usually looking at incentive stock options. See our description on the website in the Public Financial Disclosure Guide.

Stock Options

Stock options: An equity interest that allows the employee to buy stock in the company at a discount or at a stated fixed price.

The strike price is defined as the **price** at which the holder of an **option** can buy the underlying security when the **option** is exercised. (Also known as **exercise price**).

Underwater - ???

Stock Options –

Which of the following is the best description of an underwater stock option?

- A. An option that has not been granted
- b. An option whose market price is lower than its strike price
- c. An unvested option
- d. An option that has expired
- e. An option that is worthless

Stock Options

Value > \$1,000 or Income > \$200

Filers are required to report:

- Name of the stock,
- Value and type/amount of income for the stock option,
- Terms of the options:
 - Will they retain vested/exercise vested options
 - Forfeit unvested/receive acceleration of vesting

Value: What if the value is.....

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation, stock options	N/A	\$15,001 - \$50,000		None (or less than \$201)
Eyewear Technologies Corporation, stock options	N/A	None (or less than \$1000)		None (or less than \$201)

ASK ABOUT UNVESTED OPTIONS

Value not readily ascertainable

- (1) the name of the stock for which the option was issued;
- (2) the number of shares of the stock for which the option was issued;
- (3) the strike price;
- (4) the expiration date;
- (5) an indication as to whether the option is vested;
- (6) the date on which the option will vest, if the option is unvested.

Correct reporting

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation, stock options	N/A	\$15,001 - \$50,000		None (or less than \$201)
Eyewear Technologies Corporation, stock options (value not readily ascertainable): 50 vested shares, strike \$16, exp. 1/2020	N/A			None (or less than \$201)

Part 3: Agreements and Arrangements

What will happen to the stock options?

Retain vested options

Exercise vested options

Forfeit unvested options,

Receive accelerated vesting of unvested options,

Receive more grants of stock options.

Is this part of a written/standard policy?

208 interest but
2640 Exemptions
DO NOT APPLY!

Restricted Stock

Exact name of the stock and write “restricted stock.”

Report the value of the stock by marking the appropriate column. Value shares of unvested restricted stock as equivalent in value to the same number of shares of stock.

Report the total amount of income produced during the reporting period by marking the appropriate “Amount” column and the type (if applicable).

Restricted Stock Units

You may need to report the stock units and any cash or stock payments from the plan.

Exact name of the stock and write “restricted stock units.”

Report the value of the stock unit by marking the appropriate column. Value shares of unvested restricted stock units as equivalent in value to the same number of shares of stock.

Report the total amount of income produced during the reporting period by marking the appropriate “Amount” column and the type (if applicable).

Restricted Stock –vs- Restricted Stock Units

Only one can use the 2640 exemption.
Which one?

Part 3: Agreements and Arrangements

What will happen to the restricted stock/units?

Forfeit unvested restricted stock/units?

Receive accelerated vesting of unvested stock/units?

Receive more grants of restricted stock/units?

Is this part of a written/standard policy?

Employer or Party	City/State	Status and Terms	Date
Eyewear Technologies Corp.	Potomac, MD	I will forfeit my unvested restricted stock upon my separation.	5/05

Restricted Stock

Jules Amthor has disclosed “restricted stock” that he holds in his employer, and he indicates that the value is \$15,001-\$50,000. Which of the following questions should you be sure to ask?

- a. Is the restricted stock vested?
- b. Do you have stock options?
- c. What is the strike price of the restricted stock?
- d. When was the restricted stock granted?
- e. How many shares of restricted stock do you have?
- f. What is the restriction on the stock?

Equity in the Company

Always ask Executives/Bankers if they have stock, stock options, restricted stock/stock units, or any other equity in the company.

Often we will want it stated in the ethics agreement that they have/don't have certain equity.

Deferred Compensation

Can take many forms:

Already Received Lump Sum Cash Payment

Future Lump Sum Cash Payment That is Fixed

Payments in the Form of Assets – Received or Anticipated

Deferred Compensation Plan with Underlying Assets

Deferred Compensation Plan Linked to an Index or Other Benchmark

Deferred Compensation

Already Received Lump Sum Cash Payment of more than \$200 (\$1,000 for your spouse).

Write “deferred compensation: cash payment received” in the entry.

In the “Other Income” column, provide the exact amount of the lump sum payment. Do not provide the amount of the spouse’s lump sum payment.

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation deferred compensation: received	N/A		cash payment	\$97,850

Deferred Compensation

Future Lump Sum Cash Payment That is Fixed

Write “deferred compensation: cash receivable”.

Mark the value column that corresponds to the value of the fixed lump sum payment that is owed.

Mark the column labeled “None (or less than \$201)” because it has not yet been received.

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corp. deferred comp: cash receivable	N/A	\$50,001 - \$100,000		None (or less than \$201)

Deferred Compensation

Payments in the Form of Assets – Received or Anticipated

Provide the name of the employer and write “deferred compensation receivable”.

Report the assets using the guidance appropriate for that type of asset (e.g., stock, stock options, restricted stock, restricted stock units, etc.).

Deferred Compensation – tracked items

The amount of a future lump sum payment may depend on the performance of something tracked, such as an index, a mutual fund, or some other benchmark. However, **you do not**, through the deferred compensation plan, **own the thing that is being tracked**.

Example of Tracked items

Filer has a fund invested in the performance of the S&P 500 or the performance of a mutual fund that mirrors the S&P 500.

Filer does not hold, through the deferred compensation plan, shares of the companies listed on the S&P 500 or shares of the mutual fund.

Employer owes the filer a cash payment, and the employer may pay more money if the S&P 500 performs well or may pay less money if the S&P 500 performs poorly.

Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation, deferred compensation: tracks S&P 500	N/A	\$50,001 - \$100,000		None (or less than \$201)

Tracked items

Tracks diversified index or diversified mutual fund – not a problem.

Tracks sector index or sector mutual fund – could present a problem.

Be Careful... they look alike



Description	EIF	Value	Income Type	Income Amount
Eyewear Technologies Corporation, deferred compensation: Alerian MLP Index	Yes	\$50,001 - \$100,000		None (or less than \$201)

Part 3-

Agreements/Arrangements

Identify the plan as a deferred compensation plan and describe its terms in detail.

What will the filer receive and when?

Disclose any deviations from the normal terms of the plan that the employer will make for the filer (including any acceleration of payment, any waiving of vesting requirements, and any change in the form or timing of payment or eligibility).

Part 3-

Agreements/Arrangements

Miscellaneous benefits:

Health or life insurance;

Estate, tax or financial planning services;

Health club or country club membership;

Use of a company car, car service or plane;

Use of a residence or office;

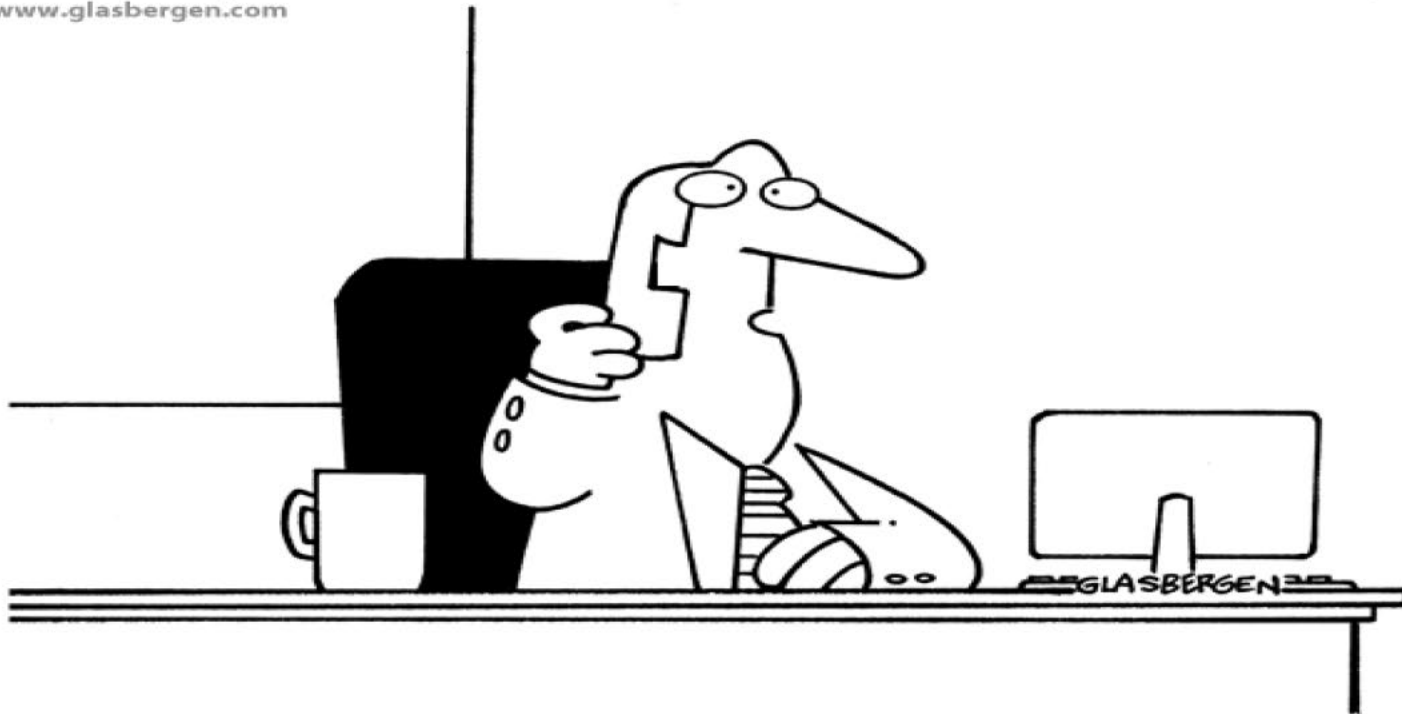
Use of secretarial or IT support;

Relocation or travel planning services;

Housing or mortgage subsidy; ETC.

Executive Compensation

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www.glasbergen.com



“Salary, stock options and bonuses are nice, but I’d also like permission to put a tip jar on my desk. ”

THANK YOU



MARCH 7 2016

SYMPOSIUM

ON FINANCIAL DISCLOSURE

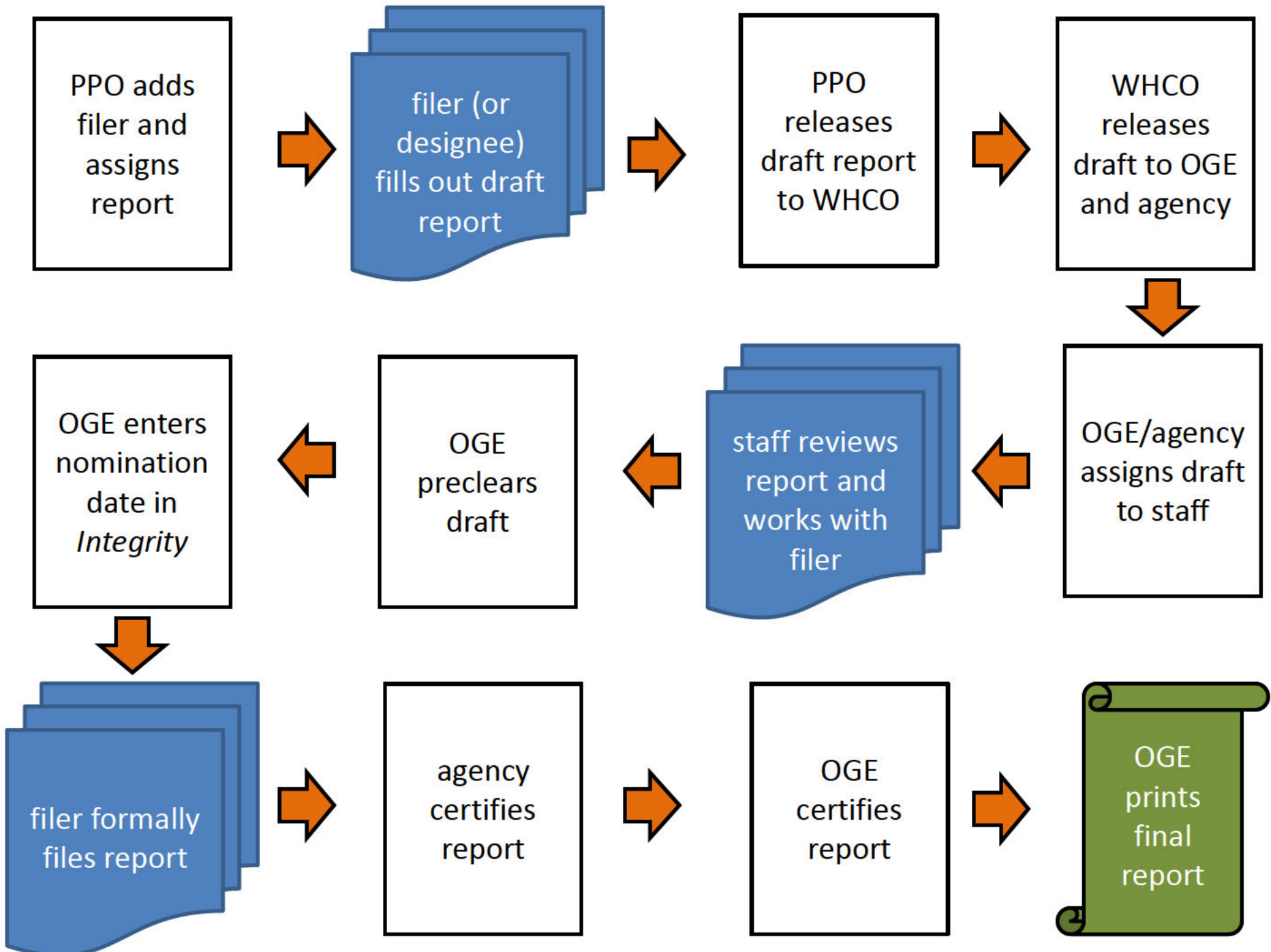
Integrity Nominee Functionality

Keith Labeledz

Agenda

1. Overview of the Nominee workflow
2. Assigning a Nominee Report
3. Completing the initial draft
4. Releasing the initial draft
5. OGE and agency review of the draft
6. Preclearance to certification
7. After certification

Nominee workflow



Assigning a report

Assignment steps

PPO adds the Nominee as a filer to the PPO Group.

- If the filer is an existing *Integrity* user, the Nominee is added using the filer's existing MAX ID.
- If the filer is not an existing *Integrity* user, the Nominee is added using a cloaked ID.

PPO then makes the assignment through the Manage Assigned Reports page.

- Only the filer and PPO can see the draft report at this point.

Completing the initial draft

Login

Existing *Integrity* user:

- Filer logs in using his/her existing MAX ID and password.

Cloaked ID:

- Filer will receive an email notice with the cloaked ID.
- To set a password for this ID, filer should:
 - Click the link in this email notice from *Integrity*.
 - On the MAX.gov password page, click the request reset button.
 - Wait for an email from MAX.gov.
 - Click the link in this email notice from MAX.gov.
 - On the password page, enter a password.

The Presidential Personnel Office (PPO) has registered you in Integrity, which is the electronic filing system that you will use to file your public financial disclosure report.

Before you can use Integrity, you will need to create a password. This email provides you with instructions for creating your password. It is very important that you create a strong password.

In the near future, you will receive another email from this address. That email will advise you that the Presidential Personnel Office has set up a blank financial disclosure report for you. It is very important that you begin working on your financial disclosure report as soon as possible, in order to avoid delaying your nomination.

INSTRUCTIONS:

1. USER ID: To ensure the security of the nominations process, your identity will be "cloaked" in Integrity in order to limit the number of individuals who know that you are participating. Your unique User ID is listed immediately below. You must use this User ID each time you log into Integrity.

User ID: F94BA480-3737-4BF8-966A-30044186948F@oge.tcg.com

2. PASSWORD: To set up your password, click on the link immediately below, which will take you to Integrity's password reset page:

<https://test.max.gov/maxportal/resetPasswordForm.action?email=F94BA480-3737-4BF8-966A-30044186948F@oge.tcg.com>

3. LOGGING INTO INTEGRITY: Be sure to make a note of your User ID and password. You will need them each time you log into Integrity. To log into Integrity, type the following URL into your browser:

<https://integrity.gov>

4. NEXT STEPS: As indicated above, the Presidential Personnel Office will set up a blank form for you in Integrity. You will receive an email notice letting you know when to file your report as soon as possible. Please contact the Presidential Personnel Office if you have any questions along the way.

5. PROVIDING ACCESS TO AN ATTORNEY OR OTHER ASSISTANT: After you have set up your own password, you can log into Integrity if you also want to register your designee on the "Manage My Designees" link (under the header "MY TOOLS" in the middle of the page) to register your designee by providing your designee's contact information. You must provide your designee a copy of this same email with one important difference: Your designee will receive a different User ID. ****Please be sure to let your designee know in advance to create a password**** Your designee may be confused by receiving this email if you don't explain it to him/her in advance. (Do not provide your designee with your own password, User ID and password.)



MAX.GOV LOGIN

[Home](#)[Manage Password](#)[Contact Us](#)

To Create Password, Change Password, or Reset a Forgotten Password:

Enter the MAX Personal Username or email address you use as your MAX ID and select the *Submit* button. You will receive an email containing a link to create a new password.

MAX Personal Username or Email Address:

(If you do not have immediate access to your registered e-mail address but need access right away, please contact MAX Support using the Contact Us above.)

Dear Integrity User Integrity User,

You have requested the setting/resetting of your MAX.gov account password on the MAX.gov Manage Password page.

To set your password, click on the Password Reset Link below within 2 hours (i.e. by 07:06 PM, February 02, 2016).

PASSWORD RESET LINK (you may need to copy and paste this link into your browser):

<https://test.max.gov/chpw?token=4cb26d52&email=F94BA480-3737-4BF8-966A-30044186948F@oge.tcg.com>

Then follow the instructions on the webpage.

Notes:

- If it is already past 07:06 PM, February 02, 2016, you can click on <https://test.max.gov/maxportal/resetPasswordForm.action?email=F94BA480-3737-4BF8-966A-30044186948F@oge.tcg.com>
- If your email system has removed the above Password Reset Link, please follow the instructions in the Alternative Password Reset Service Section below.

For assistance please contact the MAX Support team at maxsupport@omb.eop.gov or 202-395-6860.

Thank you
The MAX Support Team

---- Alternative Password Reset Service Section ----

If your Email system has completely removed the MAX Password Reset Link referenced above from this Email, you may still set your password using the following:

1. Copy (ctrl+c) the following Alternate Password Reset Key into your clipboard:

Alternate Password Reset Key: 4cb26d52

2. Paste it into the appropriate place on the Alternate Password Reset form.



MAX User Agreement Required

Our records indicate that you have not yet accepted the MAX user agreement. You are required to accept the MAX user agreement before you are provided access to MAX applications. Please indicate your acceptance by clicking on the "I Agree" button below.

This agreement is issued under the authority of the Federal Information Security Management Act of 2002 (Pub. L. No. 107-347, Title III).

By checking the "I ACCEPT" check boxes and clicking on the "REGISTER" button, I signify my understanding and acceptance of these policies and practices concerning access to the MAX systems and that I will be held accountable for any breach of these policies and practices.

MAX is a U.S. Government computer system used to conduct official government business. Business conducted on MAX shall be conducted in a manner above reproach and in accordance with the highest ethical standards to ensure the public's confidence in the integrity of the Government, its employees, and systems.

1. I understand that the MAX systems are U.S. Government systems for the purposes of conducting official Government business, and that the MAX User ID and any other information related to access and use of the MAX systems are considered sensitive and critical.
2. I will NOT enter classified information into the MAX systems.
3. I will protect my personal password from disclosure.
4. I will log off of or otherwise restrict access to any MAX System session when I am not personally attending to it.
5. Upon completion of my government-related duties that involve using the MAX systems, I will contact the MAX Data Management Team to ensure my User ID is properly disabled.
6. If I suspect someone else has tried to learn my password or fraudulently gain access to the MAX systems I will immediately report the incident to a MAX representative.

I acknowledge that with my MAX ID I may have access to government information of a sensitive or critical nature that is the sole property of the U.S. Government and I hereby agree to protect that information in the strictest confidence and to use it only to support Government purposes.

[Home](#)[Manage Password](#)[Contact Us](#)

Change Password

Please complete the form below and select the *Submit* button. When creating your password please note the following password requirements.

NOTE: You cannot re-use any of the last 16 passwords.

- Password must contain at least 8 characters (minimum) and no more than 32 characters (maximum)
- Password must contain at least one each of the following four character types:
 1. Uppercase alpha (A-Z),
 2. Lowercase alpha (a-z),
 3. Numeric (0-9), and
 4. Special non-alphanumeric characters (i.e., !@#\$%^&*()-=+[]{};:~",./?~\).
- Password must not include greater than (>) or less than (<) characters

Email Address: F94BA480-3737-4BF8-966A-30044186948F@oge.tcg.com

New Password:

Confirm New Password:

Adding a designee 1

The screenshot shows a web application interface with a dark blue sidebar on the left and a main content area on the right. The sidebar contains a menu with the following items: MY TASKS (highlighted in yellow), My Tasks (underlined), SETTINGS (with a gear icon), My Contact Info, My Designees (highlighted with a red box), HELP (with a question mark icon), and LOG OUT (with a door icon). The main content area is titled 'My Tasks' and is divided into three sections: 'MY CURRENT REPORTS', 'MY TOOLS', and 'MY PAST REPORTS'. The 'MY CURRENT REPORTS' section contains a table with columns: YEAR, ITEM, TYPE, AGENCY, GROUP, POSITION, DUE DATE, STATUS, DATE FILED, and ACTION. A single row is visible with the following data: 2016, Nominee Report, 278, Summit Agency, Summit Agency, Nominee Group, Sample Position, Not Started, and a yellow 'Start' button. The 'MY TOOLS' section contains two items: '278-T' with a right-pointing chevron, and 'Update My Contact Information' with a right-pointing chevron. The 'Manage My Designees' item is highlighted with a red box and has a right-pointing chevron. The 'MY PAST REPORTS' section contains a yellow message box with the text 'No past reports available.' and a right-pointing chevron.

My Tasks

MY CURRENT REPORTS

YEAR	ITEM	TYPE	AGENCY	GROUP	POSITION	DUE DATE	STATUS	DATE FILED	ACTION
2016	Nominee Report	278	Summit Agency	Summit Agency, Nominee Group	Sample Position		Not Started		Start

MY TOOLS

- 278-T > Update My Contact Information >
- [Manage My Designees](#) >

MY PAST REPORTS

No past reports available.

Adding a designee 2

- ☰
- MY TASKS
- SETTINGS
- My Contact Info
 - My Designees
- HELP
- LOG OUT

My Designees

Space is available to invite another designee to assist with your filing.

No designees have been invited.

ADD A NEW DESIGNEE

Adding a designee 3

- MY TASKS
- SETTINGS
- My Contact Info
- My Designees
- HELP
- LOG OUT

Add a New Designee

LAST NAME	FIRST NAME	MIDDLE INITIAL	SUFFIX
<input type="text" value="Please enter your Answer"/>	<input type="text" value="Please enter your Answer"/>	<input type="text" value="Please enter your Answer"/>	<input type="text" value="Please Select"/>
ADDRESS LINE 1		ADDRESS LINE 2 (OPTIONAL)	
<input type="text" value="Please enter your Answer"/>		<input type="text" value="Please enter your Answer"/>	
CITY	STATE	COUNTRY	
<input type="text" value="Please enter your Answer"/>	<input type="text" value="Please Select"/>	<input type="text" value="Please Select"/>	
ZIP CODE (ZIP + 4 OPTIONAL)	TELEPHONE		
<input type="text" value="Please enter your Answer"/>	<input type="text" value="Please enter your Answer"/>		
EMAIL TO USE FOR INTEGRITY NOTIFICATIONS	CONFIRM E-MAIL TO USE FOR INTEGRITY NOTIFICATIONS		
<input type="text" value="Please enter your Answer"/>	<input type="text" value="Please enter your Answer"/>		
<input type="button" value="Save Designee"/>	<input type="button" value="Cancel"/>		

Opening the draft

The screenshot displays a web application interface with a dark blue sidebar on the left and a main content area. The sidebar contains navigation links: MY TASKS (highlighted), My Tasks, SETTINGS, HELP, and LOG OUT. The main content area is titled 'My Tasks' and is divided into three sections: 'MY CURRENT REPORTS', 'MY TOOLS', and 'MY PAST REPORTS'. The 'MY CURRENT REPORTS' section features a table with columns: YEAR, ITEM, TYPE, AGENCY, GROUP, POSITION, DUE DATE, STATUS, DATE FILED, and ACTION. A single row is visible with the following data: 2016, Nominee Report, 278, Summit Agency, Summit Agency, Nominee Group, Sample Position, Not Started, and a yellow 'Start' button highlighted with a red border. The 'MY TOOLS' section contains two items: '278-T' with a right-pointing chevron and 'Update My Contact Information', and 'Manage My Designees' with a right-pointing chevron. The 'MY PAST REPORTS' section shows a message: 'No past reports available.' with a close button.

MY TASKS

My Tasks

SETTINGS

HELP

LOG OUT

My Tasks

MY CURRENT REPORTS

YEAR	ITEM	TYPE	AGENCY	GROUP	POSITION	DUE DATE	STATUS	DATE FILED	ACTION
2016	Nominee Report	278	Summit Agency	Summit Agency, Nominee Group	Sample Position		Not Started		Start

MY TOOLS

- 278-T > [Update My Contact Information](#)
- Manage My Designees >

MY PAST REPORTS

No past reports available.

Pre-population?

- Filer, Sample
- MY FILINGS
- Getting Started
- Printable View
- CLOSE WINDOW

Prepopulate

CHOOSE A PRIOR REPORT AS A STARTING POINT.

Pre-populate my report with the report I have selected below - this option allows you to use the data from a previous report as a starting point for the new one. Note: Virtually all filers should use this option and choose their most recent report.

Report(s)

2015 Annual Report - Sample Position

Don't pre-populate my report - use this option to start a new report.

Next

CHOOSE A PRIOR REPORT AS A STARTING POINT.

Pre-populate my report with the report I have selected below - most recent report.

Report(s)

2015 Annual Report - Sample Position

Getting started

Filer, Sample

MY FILINGS

Getting Started

Printable View

CLOSE WINDOW

Getting Started: Nominee Report 278

GENERAL INFORMATION

YOUR NAME

As it will appear in your public financial disclosure report.

LAST NAME

Filer

FIRST NAME

Sample

MIDDLE INITIAL

Please enter your Answer

SUFFIX

Please Select

POSITION & AGENCY

Provide the title and agency of the position for which you are filing.

AGENCY

Summit Agency

GROUP

Summit Agency, Nominee Group

POSITION TITLE

Sample Position

DUE DATE

Please enter your Answer

FILER CATEGORY

Please select a filer category.

PAS

SPOUSE

If you are married, you will need to report your spouse's assets and income. Select the one answer that best describes the application of the disclosure rules to your marital status. This question is required to proceed to the next question.

- I have a spouse and the spousal disclosure requirement applies.
- This requirement does not apply.

Tip about reporting periods: Different parts of your financial disclosure report will need to cover different periods of time. Click the "?" icon on a page to see the reporting period applicable to the questions being asked.

Save

Next

Wizards and grids

Filers complete Nominee drafts in the same manner as a New Entrant report:

- Prior Federal positions
- Non-Federal positions
- Wizard questions about assets/income related to those positions
- Wizard questions about retirement plans/accounts
- Data-entry tables for filer's employment-related assets/income, agreements/arrangements, and sources of compensation
- Wizard questions about assets/income related to spouse's employment
- Wizard questions about spouse's retirement plans/accounts
- Remaining data-entry tables

Submit draft

Submit OGE Form 278e.

TO SUBMIT YOUR OGE FORM 278E, CHECK THE BOX AT THE BOTTOM OF THIS PAGE AND SELECT THE "SUBMIT OGE FORM 278E" BUTTON.

Nominee Report | U.S. Office of Government Ethics, 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (March 2014)

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

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

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).

Other review conducted by

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

In accordance with the Digital Signature Act of 1999, I recognize that my eSignature (Electronic or Digital Signature) shall be given the same legal status as a signature made with a pen. I further recognize that the eSignature may not be denied legal effect, validity, or enforceability solely because it is in electronic form. I hereby consent to the use of eSignature.

I understand that my eSignature is applied to the information that I have provided and not the presentation formatting of the information on the screen or printed page.

Your Nominee Report has been signed. You may now close this window.

Submit OGE Form 278e

Releasing the initial draft

Release steps

PPO releases the draft to WHCO.

WHCO releases the draft to the agency and OGE at the same time.

Access rules:

- Prior to PPO release: Only the filer and PPO can see the draft. Only the filer can edit the draft.
- Prior to WHCO release, only the filer, PPO, and WHCO can see the draft. Only the filer can edit the draft.

OGE and agency review of the draft

Agency Nominee Group

Each agency within *Integrity* has 1 Nominee Group.

Roles for drafts:

- Router (Primary): Receives notice of a released draft.
- Router (Alternates): Can see a released draft.
- Reviewers: Can see a draft after it is routed by a Router.
- Records Manager: Can delete Nominee drafts/reports.

Roles for reports (after formal submission):

- Depends on the agency's PAS workflow.

Group Setup

Reviewer Admin

ADMINISTRATION

Manage Agencies & Groups

Find Users

Management Reports

Provision Users Status

SETTINGS

HELP

LOG OUT

SUMMIT AGENCY, NOMINEE GROUP, SUMMIT AGENCY, NOMINEE GROUP

Save

Cancel

Basic Information

Group Staff

Nominees

GROUP INFORMATION

GROUP NAME

Summit Agency, Nominee Group

GROUP DESCRIPTION

Summit Agency, Nominee Group

GROUP IDENTIFIER

EB37FC171171408A8A8A3A103EA904DD

PARENT GROUP OR AGENCY

Summit Agency

Each group has a parent (the larger organizational unit to which it belongs).

Child groups help to organize filings so that they can be properly routed for review.

FILING TYPES

What types of filings will members of this group complete?

Nominee 278 Filings

Basic Information

Group Staff

Nominees

GROUP CONTACTS

POINT OF CONTACT

Not Assigned

Assign

POINT OF CONTACT (ALTERNATES)

Not Assigned

Add an Alternate

NOMINEE REVIEWER

TR_OGE_0415, testFirst Mi

Change

Remove

NOMINEE REVIEWER (ALTERNATES)

Not Assigned

Add an Alternate

RECORDS MANAGER

TR_OGE_0413, testFirst Mi

Change

Remove

RECORDS MANAGER (ALTERNATES)

Not Assigned

Add an Alternate

NOMINEE 278 REVIEWERS

ROUTER

TR_OGE_0414, testFirst Mi

Change

Remove

ROUTER (ALTERNATES)

TR_OGE_0419, testFirst Mi

Add an Alternate

Remove

ETHICS OFFICIAL

TR_OGE_0416, testFirst Mi

Change

Remove

ETHICS OFFICIAL (ALTERNATES)

Not Assigned

Add an Alternate

CERTIFYING OFFICIAL

TR_OGE_0417, testFirst Mi

Change

Remove

CERTIFYING OFFICIAL (ALTERNATES)

Not Assigned

Add an Alternate

Receipt by router

Notice received by the Primary Router will follow the format of the agency's "Report Pending Your Action" notice template.

Draft is "Assigned To" the Primary Router.

Alternate Routers must turn off the "Assigned To" filter to find the draft on the My Queue page.

Reviewer Admin

MY QUEUE

My Queue

SEARCH

SETTINGS

HELP

LOG OUT

My Queue

ITEMS:
 TYPE:
 YEAR:
 AGENCY:
 GROUP:

STATUS:
 ASSIGNED TO:
 PENDING ACTION:
Go Reset

Manage Reviewer Customize Display

records per page
 Search:

FILE#	ITEM	TYPE	YEAR	AGE	GROUP	POSITION	STATUS	ASSIGNED TO	PENDING ACTION	REASSIGN
Filer, Sample	Nominee	278	2016	1 Day	Summit Agency, Nominee Group	Sample Position	Draft, Under Review	TR_OGE_0414, testFirst Mi	Router	Route

Showing 1 to 1 of 1 entries

← Previous
1
Next →

Reviewer Admin

MY QUEUE

My Queue

SEARCH

SETTINGS

HELP

LOG OUT

My Queue

ITEMS: All | TYPE: All | YEAR: All | AGENCY: All | GROUP: All

STATUS: All

ASSIGNED TO

- TR_OGE_0419, testFirst MI
- All
- TR_OGE_0419, testFirst MI

PENDING ACTION: All

Go Reset

Manage Reviewer

20 records per page

Search:

Customize Display

FILER	ITEM	TYPE	YEAR	AGE	GROUP	POSITION	STATUS	ASSIGNED TO	PENDING ACTION	REASSIGN
-------	------	------	------	-----	-------	----------	--------	-------------	----------------	----------

No data available in table

Showing 0 to 0 of 0 entries

← Previous Next →

Route to reviewers

Routers grant Reviewers access to a draft by selecting the “Route” button.

Routing does not change the “Pending Action” or “Assigned To” status on the “My Queue” page.

Reviewer Admin

MY QUEUE

My Queue

SEARCH

SETTINGS

HELP

LOG OUT

My Queue

ITEMS: All | TYPE: All | YEAR: All | AGENCY: All | GROUP: All

STATUS: All | ASSIGNED TO: TR_OGE_0414, testFirst MI | PENDING ACTION: All | Go | Reset

Manage Reviewer

Customize Display

20 records per page

Search:

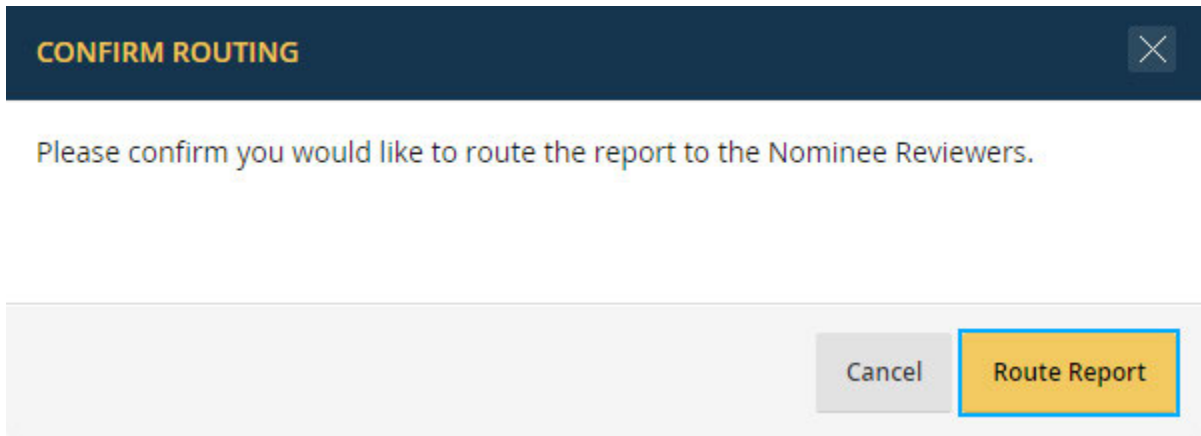
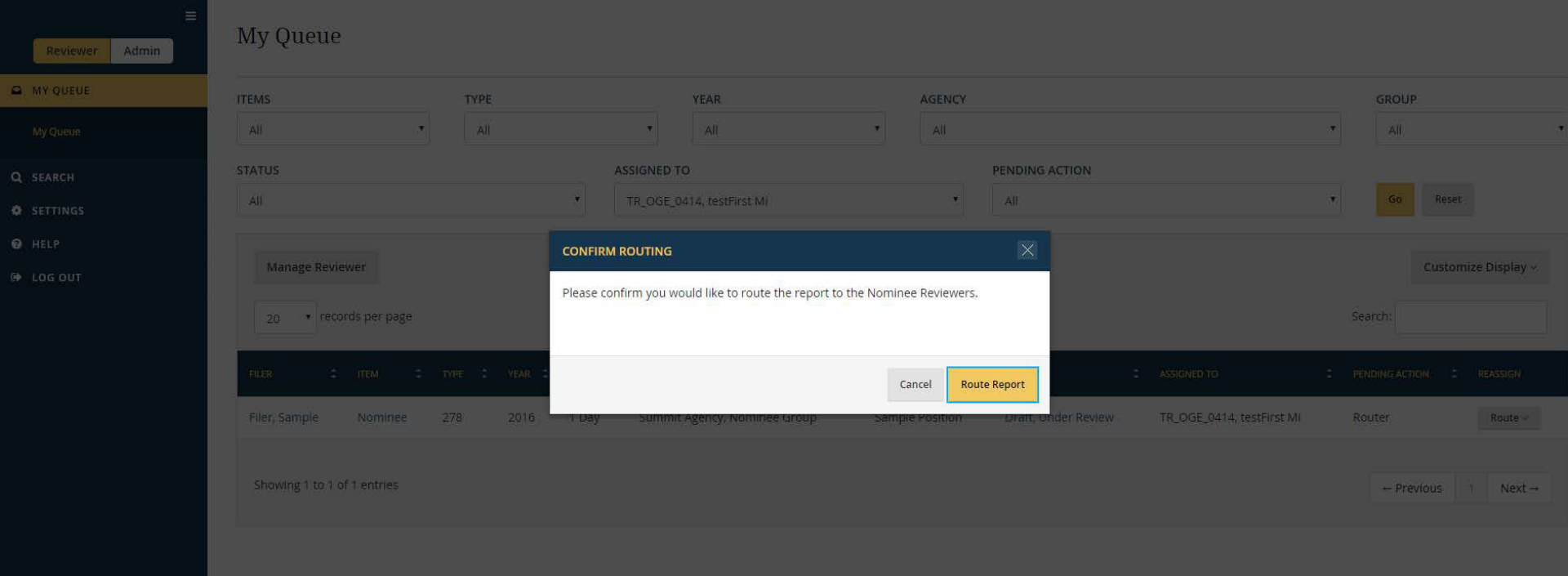
FILER	ITEM	TYPE	YEAR	AGE	GROUP	POSITION	STATUS	ASSIGNED TO	PENDING ACTION	REASSIGN
Filer, Sample	Nominee	278	2016	1 Day	Summit Agency, Nominee Group	Sample Position	Draft, Under Review	TR_OGE_0414, testFirst MI	Router	Route

Router

Route To Nominee Reviewers

Previous 1 Next

Showing 1 to 1 of 1 entries



Assign a reviewer

At present, there is no “Reassign” button for Nominee drafts.

To assign a draft:

- Go to the General Information page.
- Enter the name in the “Agency Reviewer” field.

To check assignments on the My Queue page:

- Open the “Customize Display” option.
- Select “Agency Reviewer.”

☰

Filer, Sample

REVIEW REPORT

General Information

General Comments

Filer's Federal Positions

Filer's Positions

Filer's Employment-Related Assets and Income

Filer's Employment-Related Arrangements

Filer's Sources of Compensation

Spouse's Employment Related Assets and Income

Other Assets and Income

Liabilities

Report Data (Summary)

Submit Report

Printable View

☰ COMPARE

MEMO

DOCUMENTS

General Information: Filer, Sample

REPORT SUMMARY

FILER SNAPSHOT Edit

<i>Filer:</i>	Filer, Sample	<i>Item:</i>	Nominee Report	<i>Status:</i>	Draft, Under Review
<i>Agency:</i>	Summit Agency	<i>Report type:</i>	278	<i>Spouse:</i>	Yes
<i>Position:</i>	Sample Position				

REVIEWER & FILER INFORMATION Edit

<i>Filer Category:</i>	PAS	<i>Public Availability:</i>	Releaseable	<i>Agency Reviewer:</i>	
<i>Filer Status:</i>				<i>OGE Reviewer:</i>	

DUE DATES & EXTENSIONS Edit

<i>Extension:</i>	0 days	<i>Original Due Date:</i>		<i>Due Date:</i>	
<i>Extension Comments:</i>		<i>Due Date Comments:</i>		<i>Late Fee Waiver:</i>	
				<i>Late Fee Paid:</i>	No

REVIEW DATES Edit

General Information: Filer, Sample

- Filer, Sample
- REVIEW REPORT
- General Information
- General Comments
- Filer's Federal Positions
- Filer's Positions
- Filer's Employment-Related Assets and Income
- Filer's Employment-Related Arrangements
- Filer's Sources of Compensation
- Spouse's Employment-Related Assets and Income
- Other Assets and Income
- Liabilities
- Report Data (Summary)
- Submit Report
- Printable View
- COMPARE
- MEMO
- DOCUMENTS

REPORT SUMMARY

FILER SNAPSHOT

Edit

Filer: Filer, Sample Item: Nominee Report Status: Draft, Under Review
Agency: Summit Agency Report type: 278 Spouse: Yes
Position: Report Year: 2016
Sample Position

REVIEWER & FILER INFORMATION

Cancel

Filer Category:

PAS

Public Availability:

Releaseable

Please Select

Agency Reviewer:

Sample Reviewer

Filer Status:

Please Select

OGE Reviewer:

Save

Cancel

Public Availability:

Releaseable

Please Select

Agency Reviewer:

Sample Reviewer

OGE Reviewer:

Save

Reviewer Admin

MY QUEUE

My Queue

SEARCH

SETTINGS

HELP

LOG OUT

My Queue

ITEMS: All | TYPE: All | YEAR: All | AGENCY: All | GROUP: All
 STATUS: All | ASSIGNED TO: TR_OGE_0414, testFirst Mi | PENDING ACTION: All
 Go Reset

Manage Reviewer

20 records per page

Search:

FILER	ITEM	TYPE	YEAR	AGE	GROUP	POSITION	STATUS	ASSIGNED TO	PENDING ACTION
Filer, Sample	Nominee	278	2016	19 Days	Summit Agency, Nominee Group	Sample Position	Draft, Under Review	TR_OGE_0414, testFirst Mi	Router

Showing 1 to 1 of 1 entries

Customize Display

- FILER
- ITEM
- TYPE
- YEAR
- AGE
- AGENCY
- GROUP
- DATE SUBMITTED
- END INITIAL REVIEW
- AGENCY REVIEWER
- OGE REVIEWER
- POSITION
- STATUS
- ASSIGNED TO
- PENDING ACTION

Reviewer Admin

MY QUEUE

My Queue

SEARCH

SETTINGS

HELP

LOG OUT

My Queue

ITEMS: All | TYPE: All | YEAR: All | AGENCY: All | GROUP: All

STATUS: All | ASSIGNED TO: TR_OGE_0414, testFirst MI | PENDING ACTION: All

Go Reset

Manage Reviewer

20 records per page

Customize Display

Search:

FILER	ITEM	TYPE	YEAR	AGE	GROUP	POSITION	AGENCY		STATUS	ASSIGNED TO	PENDING ACTION	REASSIGN
							REVIEWER	OGE REVIEWER				
Filer, Sample	Nominee	278	2016	19 Days	Summit Agency, Nominee Group	Sample Position	Sample Reviewer	Sample OGE Reviewer	Draft, Under Review	TR_OGE_0414, testFirst MI	Router	Route

Showing 1 to 1 of 1 entries

← Previous 1 Next →

View a draft

Reviewers can view drafts in several ways:

- One screen at a time
- Report Data (Summary) page
- Printable View page

To print a copy:

- Go to Printable View.
- Print directly from browser or select “Export to PDF” to obtain a PDF copy for later printing.

☰

Filer, Sample

REVIEW REPORT

- General Information
- General Comments
- Filer's Federal Positions
- Filer's Positions
- Filer's Employment-Related Assets and Income
- Filer's Employment-Related Arrangements
- Filer's Sources of Compensation
- Spouse's Employment Related Assets and Income
- Other Assets and Income
- Liabilities
- Report Data (Summary)
- Submit Report
- Printable View

COMPARE

Preview

Enable Basic Fonts

Export to PDF

REVIEW REPORT

Nominee Report | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (March 2014)

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

Filer's Information

Filer, Sample
Sample Position, Summit Agency

Other Federal Government Positions Held During the Preceding 12 Months:
None

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/ Filer, Sample [electronically signed on 02/02/16 by Filer, Sample in Integrity.gov]

Enable Basic Fonts

Export to PDF

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

Filer's Information

Filer, Sample

Sample Position, Summit Agency

Other Federal Government Positions Held During the Preceding 12 Months:

None

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/ Filer, Sample [electronically signed on 02/02/2016 by Filer, Sample in Integrity.gov]

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).

Other review conducted by

U.S. Office of Government Ethics Certification

Comments

General Comments page: Used to make or respond to comments not tied to specific entries.

Line-entry comments: Used to make or respond to comments tied to specific entries.

Report Data (Summary) page: Displays all comments on the draft.

Notify filer or other reviewer of comments offline (e.g., call or email).

General Comments

GENERAL COMMENTS AND PUBLIC ANNOTATIONS

Text of a comment on the draft report.

Share as Comment Clear

Public Annotation

Previous

Next

GENERAL COMMENTS AND PUBLIC ANNOTATIONS

Text of a comment on the draft report.

Share as Comment Clear

Part 2: Filer's Employment Assets & Income and Retirement Accounts

Add New Item

In order to have a complete financial disclosure report, you need to report all of the following:

- Each source of your earned and other non-investment income totaling more than \$200 during the reporting period for this section (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes).
- Each asset related to your business, employment, or other income-generating activities if the asset has a value greater than \$1,000 or if the asset 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, anticipated payments such as severance, deferred compensation, and intellectual property such as book deals and patents). Click the question mark for more examples.
 - Do not include assets or income from United States federal government employment. In addition, do not include assets that were acquired separately from your business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in a later section.

20 records per page Search:

		#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
<input type="checkbox"/>	<input type="checkbox"/>	1	George and Chapman, LLP (law firm)	N/A		Partnership Share	\$352,344
<input type="checkbox"/>	<input type="checkbox"/>	2	George and Chapman, LLP (law firm) anticipated partnership share	N/A	\$100,001 - \$250,000		None (or less than \$201)
<input type="checkbox"/>	<input type="checkbox"/>	3	George and Chapman, LLP capital account	N/A	\$50,001 - \$100,000		None (or less than \$201)
<input type="checkbox"/>	<input type="checkbox"/>	4	Small Cap Value	Yes	\$50,001 - \$100,000		None (or less than \$201)
<input type="checkbox"/>	<input type="checkbox"/>	5	Equity Income	Yes	\$50,001 - \$100,000		None (or less than \$201)



4

Small Cap Value

Part 2: Filer's Employment Assets & Income and Retirement Accounts

Add New Item

In order to have a complete financial disclosure report, you need to report all of the following:

- Each source of your earned and other non-investment income totaling more than \$200 during the reporting period for this section (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes).
- Each asset related to your business, employment, or other income-generating activities if the asset has a value greater than \$1,000 or if the asset 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, anticipated payments such as severance, deferred compensation, and intellectual property such as book deals and patents). Click the question mark for more examples.
 - Do not include assets or income from United States federal government employment. In addition, do not include assets that were acquired separately from your business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in a later section.

20 records per page Search:

	#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
<input type="checkbox"/>	1	George and Chapman, LLP (law firm)	N/A		Partnership Share	\$352,344
<input type="checkbox"/>	2	George and Chapman, LLP (law firm) anticipated partnership share	N/A	\$100,001 - \$250,000		None (or less than \$201)
<input type="checkbox"/>	3	George and Chapman, LLP capital account	N/A	\$50,001 - \$100,000		None (or less than \$201)
<input type="checkbox"/>	4	Small Cap Value	Yes	\$50,001 - \$100,000		None (or less than \$201)

Please provide the full name of this fund (e.g., "American Century Small Cap Value").

Share as Comment Clear Public Annotation

4 Small Cap Value

Please provide the full name of this fund (e.g., "American Century Small Cap Value").

Share as Comment

Clear

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/ Filer, Sample [electronically signed on 02/02/16 by Filer, Sample in Integrity.gov]

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).

Other review conducted by

U.S. Office of Government Ethics Certification

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(02/03/16, TR_OGE_0414, testFirst Mi): Text of a comment on the draft report.
2.	4	Small Cap Value	(02/03/16, TR_OGE_0414, testFirst Mi): Please provide the full name of this fund (e.g., "American Century Small Cap Value").

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(02/03/16, TR_OGE_0414, testFirst Mi): Text of a comment on the draft report.
2.	4	Small Cap Value	(02/03/16, TR_OGE_0414, testFirst Mi): Please provide the full name of this fund (e.g., "American Century Small Cap Value").

Editing

Unlike the workflow for other report types, the filer, agency, and OGE can edit a draft Nominee report in parallel.

- No need to “return” a draft in order to permit edits by the filer. (Submit page is inactive.)
- If two users are editing a draft, refresh the browser to see changes made by the other user.

Change History feature

Records workflow events and edits to entries between WHCO release and the filing of the formal report.

Use this feature to check for changes since the last time you opened the draft.

- Filer, Sample
- REVIEW REPORT
- COMPARE
- MEMO
- DOCUMENTS
- AUDIT TRAIL**
- Audit Trail
- Change History
- CLOSE WINDOW

Change History

20 records per page

DATE	NAME
Feb 3rd 2016, 7:53:04 am	testFirst TR_OGE_0414
Feb 3rd 2016, 6:58:00 am	testFirst TR_OGE_0414
Feb 2nd 2016, 8:04:52 pm	testFirst TR_OGE_0414

Search:

ROLE	EVENT
Router	Employment Assets and Income Updated
Router	Agency Reviewer Updated
Router	Report Routed to Target Agency Reviewer

Showing 1 to 3 of 3 entries

← Previous 1 Next →

- Filer, Sample
- REVIEW REPORT
- COMPARE
- MEMO
- DOCUMENTS
- AUDIT TRAIL**
- Audit Trail
- Change History

Change History

20 records per page

DATE	NAME
Feb 3rd 2016, 7:53:04 am	testFirst TR_OGE_0414
Feb 3rd 2016, 6:58:00 am	testFirst TR_OGE_0414
Feb 2nd 2016, 8:04:52 pm	testFirst TR_OGE_0414

DATE	NAME	ROLE	EVENT
Feb 3rd 2016, 7:53:04 am	testFirst TR_OGE_0414	Router	Employment Assets and Income Updated

DESCRIPTION	PARENT ASSET	EIF	VALUE	TYPE	AMOUNT
American Century Small Cap Value	n/a	Yes	\$50,001 - \$100,000		None (or less than \$201)
Small Cap Value	n/a	Yes	\$50,001 - \$100,000		None (or less than \$201)

DESCRIPTION	PARENT ASSET
American Century Small Cap Value	n/a
Small Cap Value	n/a

Other features

Documents: Can upload the ethics agreement and other materials.

Memo: Can save searchable reviewer notes.

Compare: Can see differences between the Nominee draft and a prior report (if pre-population was used).

Ready for preclearance?

OGE Nominee Reviewer forwards the draft to the OGE Program Manager for preclearance.

No agency workflow action is needed.

- If you wish to tell OGE that the draft is ready from your perspective, call or email the reviewer.

Preclearance to certification

Before nomination

Filer can edit a precleared draft if necessary.

- Changes are recorded in Change History.

Filer cannot officially file a report until OGE enters the nomination date on the General Information page.

Warnings

Knowing and willful falsification of information, or failure to file or report information required to be reported by section 102 of the Ethics in Government Act of 1978, as amended (the Act), may subject you to a civil monetary penalty and to disciplinary action by your employing agency or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

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).

You cannot sign this report until a nomination date has been entered. Please contact your ethics official for further assistance.

You cannot sign this report until a nomination date has been entered. Please contact your ethics official for further assistance.

Final submission

OGE will inform the agency that the nomination date has been entered.

Filer opens the draft, goes to the “Submit” page, checks the certification statement, and clicks the “Submit” button.

Status changes from “Draft” to “Report.”

Signature dates

Filer's submission of the official report is recorded in the Audit Trail.

Printed OGE Form 278e displays the original signature date from the draft because that date reflects the reporting period used.

If the reporting period needs to be updated, OGE will use the (pending) "update" feature, which changes the displayed signature date.

Final review

Notice will be sent to the Primary for the first role in the PAS report workflow (e.g., the Screener).

Report will go through the standard PAS workflow for the agency, using the role holders specified for the Nominee Group.

Once the agency certifies, the report goes to OGE for certification.

Audit Trail records any edits to the report between formal submission and certification.

After certification

Effects of certification

Report data entry tables are removed.

User can view the report through Report Data (Summary) or Printable View only.

Comments are removed.

Change History is cleared of data edit events.

Once confirmed

OGE enters the confirmation date, which prevents report from being purged/deleted until the end of the 6-year retention period.

Agency:

- Shares the Nominee report with the filer's "home" Group.
- (if applicable) Adds the filer to *Integrity* with a new agency email address.
- (if applicable) Requests that the *Integrity* Helpdesk merge the filer's prior account with the account for the new agency email address.

☰

Filer, Sample

REVIEW REPORT

General Information

Printable View

COMPARE

MEMO

DOCUMENTS

AUDIT TRAIL

CLOSE WINDOW

General Information: Filer, Sample

REPORT SUMMARY

FILER SNAPSHOT

<i>Filer:</i>	Filer, Sample	<i>Item:</i>	Nominee Report	<i>Status:</i>	Report, OGE Certified
<i>Agency:</i>	Summit Agency	<i>Report type:</i>	278	<i>Spouse:</i>	Yes
<i>Position:</i>	Sample Position	<i>Report Year:</i>	2016		

REVIEWER & FILER INFORMATION

<i>Filer Category:</i>	PAS	<i>Public Availability:</i>	Releaseable	<i>Agency Reviewer:</i>	Sample Reviewer
<i>Filer Status:</i>				<i>OGE Reviewer:</i>	Sample Reviewer 2

DUE DATES & EXTENSIONS

<i>Extension:</i>	0 days	<i>Original Due Date:</i>		<i>Due Date:</i>	
<i>Extenson</i>		<i>Due Date</i>		<i>Late Fee Watver:</i>	
<i>Comments:</i>		<i>Comments:</i>		<i>Late Fee Paid:</i>	No

REVIEW DATES

DUE DATES & EXTENSIONS

Extension: 0 days

Extension
Comments:

Original Due Date:

Due Date
Comments:

Due Date:

Late Fee Waiver:
Late Fee Paid: No

REVIEW DATES

End Initial Review:

Final Status: Certified

Final Status Date: 2/3/16

Status Comment:

NOMINEE REPORT INFORMATION (OGE ONLY)

Committee(s): Committee on Appropriations

Nominated: 02/03/2016

Sent to Senate: 02/03/2016

Confirmed: 02/10/2016

Recess
Appointment:

Withdrawn:

NOMINEE REPORT ACCESS

Shared with Group: None

Edit

NOMINEE REPORT ACCESS

Shared With

Please Select ▼

Please Select

Summit Agency, Group 1

Save

If not confirmed

OGE will remove the report 1 year after the filer is no longer under consideration by the Senate.

Quick summary

1. One Nominee Group per *Integrity* agency
 - Draft: Router, Reviewer, and Records Manager
 - Report: Reviewer roles for PAS reports at your agency
2. Filer ID: Existing ID if in *Integrity*; otherwise, cloaked
3. Access to the draft:
 - No OGE or agency access before WHCO release
 - Parallel access for filer, agency, and OGE after WHCO release
 - Change History log shows who changed the draft
4. “Signature date” is the draft submission date, unless the draft is subject to the update process
5. After OGE certification: No changes to the report; Clear draft history
6. After confirmation: Add the filer to a Group, share the report, and, if necessary, merge accounts

THANK YOU



MARCH 7 2016

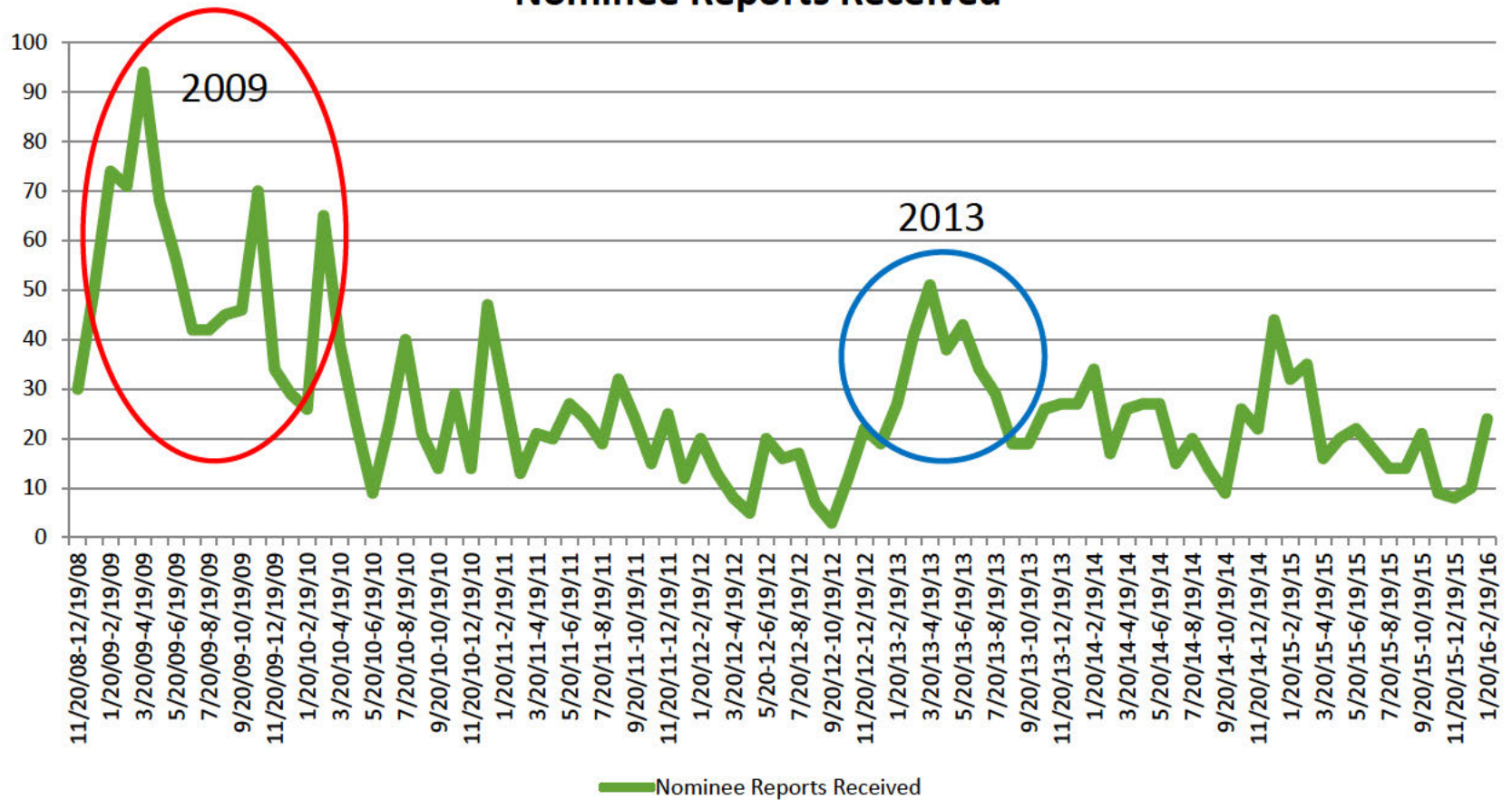
SYMPOSIUM

ON FINANCIAL DISCLOSURE

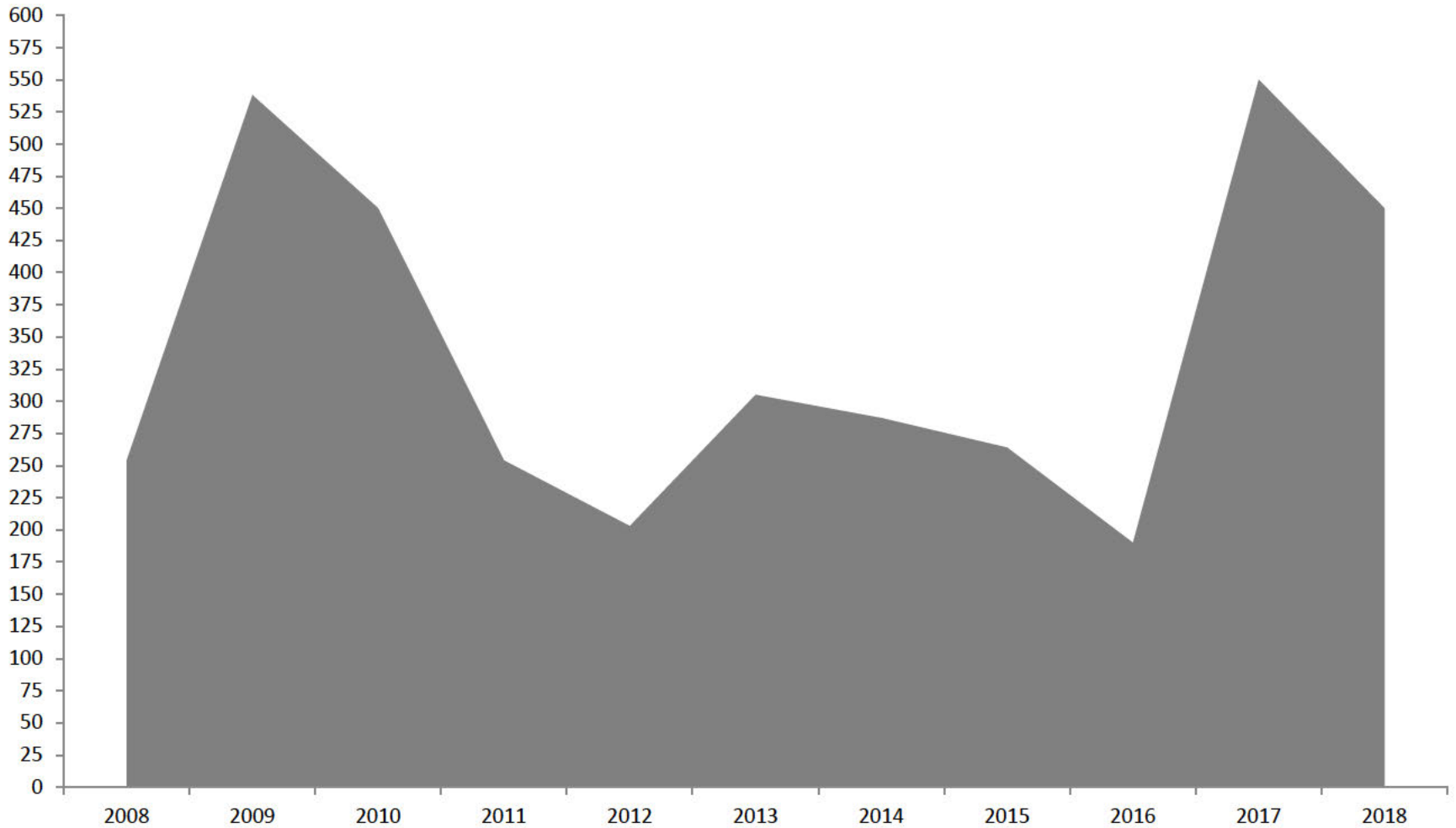
Nominee Financial Disclosure

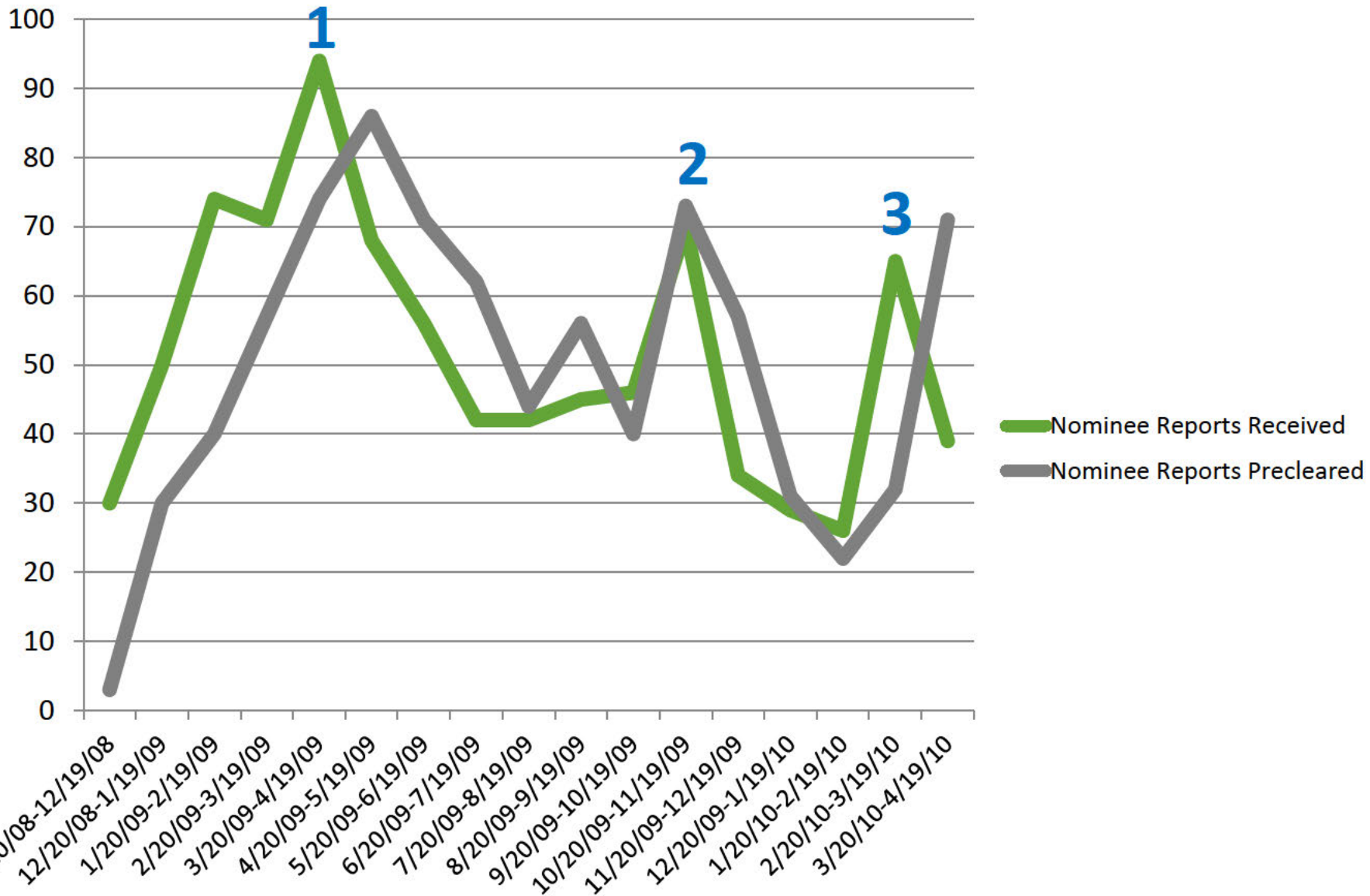
	Auditorium	Room A	Room B	Room C
8:30 – 9:00 Check-In				
9:00 – 9:40	Groups A, B, and C Nominee Financial Disclosure During the Presidential Transition			
10:00 – 10:45		Group A: Attorneys	Group B: Integrity’s Nominee Functionality	Group C: Executives & Bankers
11:00 – 11:45		Group A: Professors	Group B: Selected Financial Interests	Group C: Things That Hold Things
11:45-12:45 (Lunch)				
1:00 – 1:45		Group A: Executives & Bankers	Group B: Attorneys	Group C: Selected Financial Interests
2:00 – 2:45		Group A: Things That Hold Things	Group B: Professors	Group C: Integrity’s Nominee Functionality
3:00 – 3:45		Group A: Selected Financial Interests	Group B: Executives & Bankers	Group C: Attorneys
4:00 – 4:45		Group A: Integrity’s Nominee Functionality	Group B: Things That Hold Things	Group C: Professors

Nominee Reports Received



of Nominee Financial Disclosure Reports (Precleared)





ENSURING A SMOOTH AND SAFE TRANSFER OF POWER



SYMPOSIUM



Presidential Transition Directory

FEDERAL
GOVERNMENT
STRUCTURE

HIRING / BEING A
FEDERAL EMPLOYEE

RECORDS
MANAGEMENT
GUIDELINES

ETHICS GUIDELINES

EXTERNAL
TRANSITION
RESOURCES



Welcome to the 2016 Presidential
Transition Directory

This directory is designed to connect the people
working on designing our next federal government

READ MORE >

Key Resources



PUBLIC FINANCIAL DISCLOSURE GUIDE

- ▶ Public Financial Disclosure Guide
- ▶ How to Use this Guide
- ▶ OGE Form 278e
- ▶ Cover Page
- ▶ 1 - Your Positions
- ▶ 2 - Your Employment Assets & Income
- ▶ 3 - Your Employment Agreements & Arrangements
- ▶ 4 - Your Sources of Compensation
- ▶ 5 - Spouse's Employment Assets & Income
- ▶ 6 - Other Assets and Income
- ▶ 7 - Transactions
- ▶ 8 - Liabilities
- ▶ 9 - Gifts & Travel Reimbursements
- ▶ OGE Form 278-T
- ▶ For Ethics Officials

Public Financial Disclosure Guide

Welcome to the Public Financial Disclosure Guide, a web-based set of instructions for completing and reviewing the Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e) and the supplemental Periodic Transaction Report (OGE Form 278-T).

Transparency is a critical part of government ethics, and Congress has determined that the citizens should know their leaders' financial interests. To facilitate such transparency, Congress enacted the financial disclosure provisions of the Ethics in Government Act. The Act imposes detailed requirements for public financial disclosure by senior United States Government officials. The OGE Form 278e and the OGE Form 278-T are financial disclosure reports that request only as much information as the Act requires a filer to disclose.

To assist you with completing or reviewing a report, the Public Financial Disclosure Guide offers helpful instructions, illustrations of sample language, definitions, and answers to frequently asked questions in plain language. We have attempted to keep our instructions clear and concise without compromising detail and accuracy.

This guide is an evolving document, which we plan to update over time. We encourage feedback and invite you to send your comments, suggestions, corrections, or submissions to contactOGE@oge.gov.

Proceed to the "[How to Use this Guide](#)" page in order to get started.



INTEGRITY^{.GOV}
Play your part.

[Login to Integrity \(using MAX.gov\)](#)

[What is MAX.gov?](#) ⓘ

Status: Normal.

NOTE: Integrity will perform weekly server restarts on Sundays from 3:00 - 3:15 am ET. Please logoff and save your work before this time. In addition, Integrity users may experience intermittent login issues from 2:00 am - 8:00 am Sundays during MAX.gov's weekly maintenance window.

Please report any issues to integrity@oge.gov.

Click on the [Help](#) link at the bottom of the screen for login assistance information.

Integrity is the U.S. Office of Government Ethics system for electronically filing and reviewing Public Financial Disclosures (OGE Forms 278e and 278-T).

- 1
- 2
- 3

	Auditorium	Room A	Room B	Room C
8:30 – 9:00 Check-In				
9:00 – 9:40	Groups A, B, and C Nominee Financial Disclosure During the Presidential Transition			
10:00 – 10:45		Group A: Attorneys	Group B: Integrity’s Nominee Functionality	Group C: Executives & Bankers
11:00 – 11:45		Group A: Professors	Group B: Selected Financial Interests	Group C: Things That Hold Things
11:45-12:45 (Lunch)				
1:00 – 1:45		Group A: Executives & Bankers	Group B: Attorneys	Group C: Selected Financial Interests
2:00 – 2:45		Group A: Things That Hold Things	Group B: Professors	Group C: Integrity’s Nominee Functionality
3:00 – 3:45		Group A: Selected Financial Interests	Group B: Executives & Bankers	Group C: Attorneys
4:00 – 4:45		Group A: Integrity’s Nominee Functionality	Group B: Things That Hold Things	Group C: Professors

THANK YOU



MARCH 7 2016

SYMPOSIUM

ON FINANCIAL DISCLOSURE

Professors

Stephanie Nonluecha

Dealing with professors

Tips

**Do own research
(Internet search, University website, etc.)**

Ask a lot of questions

Be hands-on

**Provide detailed information, instructions,
illustrations, etc.**

Counsel, counsel , counsel

E.O. 12731 §102

Outside Earned Income Ban

Sec. 102. Limitations on Outside Earned Income.

Provides in part:

No full-time PAS may receive any earned income for any outside employment or activity performed during that Presidential appointment.

18 U.S.C. 209

Supplementation of Salary

18 U.S.C. § 209(a) prohibits:

- 1) An officer of the executive branch or an independent agency of the United States Government from
- 2) receiving salary or any contribution to or supplementation of salary from
- 3) any source other than the United States
- 4) as compensation for services as an employee of the United States.

Leave of Absence

- ✓ Unpaid (E.O. 12731 & 18 U.S.C. § 209)
- ✓ Dean positions (must resign)
- ✓ Continuing benefits?

Unpaid Leave of Absence

Terms of the unpaid leave of absence—

- Does university have a policy on the terms of the unpaid leave of absence?
- What is the length?
- What is the possibility that the unpaid leave of absence will be extended?
- If the leave is extended, will any benefits be extended along with the unpaid leave of absence?

Unpaid Leave of Absence: 278e Reporting

Part 1: Filer's Positions Held Outside the U.S. Government

Organization Name	City/State	Organization Type	Position Held	From	To
East State University	Fresno, CA	Education	Professor	5/2011	Present

Part 3: Filer's Employment Agreements and Arrangements

Employer or Party	City/State	Status and Terms	Date
East State University	Fresno, CA	I will take an unpaid, two-year leave of absence from my faculty position.	2/16

Sources of Earned Income

- ✓ Salary, bonus, honoraria, royalties, etc.
- ✓ Report in Part 2 of 278e for Nominee (Part 5 for Spouse)

Sources of Earned Income: 278e Reporting

Part 2: Filer's Employment Assets and Income

Description	EIF	Value	Income Type	Income Amount
East State University	N/A		salary	\$187,489
Loomis County University – 8/12/2015	N/A		honorarium	\$220
East State University, anticipated honorarium	N/A	\$1,001 - \$15,000		None (or less than \$201)

Part 5: Spouse's Employment Assets and Income

Description	EIF	Value	Income Type	Income Amount
East State University	N/A		salary	
Loomis County University – 10/20/2015	N/A		honorarium	\$220



SYMPOSIUM

Benefits

- Retirement plans
- Health/Life Insurance
- Reduced rate mortgage
- Mortgage subsidies
- Housing allowance
- Tuition assistance (college tuition, subsidized day care, nursery school, other)
- Student loan forgiveness

Other benefits

- ❑ Use of office space, email account, research assistants, research facilities, library system
- ❑ Access to university gym or healthcare facilities

Continuing Benefits: 278e Reporting

Part 3: Filer's Employment Agreements and Arrangements

Employer or Party	City/State	Status and Terms	Date
East State University	Fresno, CA	I will continue to participate in the East State 403(b) plan. The university will not make contributions during my leave.	8/92
East State University	Fresno, CA	During my leave of absence, I will continue in East State University's Health Care Benefits program, but I will pay for all costs associated with this Health Care program.	2/16

Teaching, Speaking, Writing & Other Intellectual Property



Teaching

- No teaching for pay if no longer employed or while on a leave of absence
- Cannot provide any services while on leave of absence

Speaking

- No honoraria after appointment
 - E.O. 12731
 - 18 U.S.C. § 209

Writing

- Book deals
- Book advances
- Book royalties

Book Deals: Resources

- 5 C.F.R. § 2635.807
- E.O. 12731 §102 (Outside Earned Income Ban)
- DAEOgram DO-08-006 (March 06, 2008)(and the corresponding attachments, DO-08-006a and DO-08-006b)
- Summit Session: *Professors, Authors, Book Deals, and Related Intellectual Property*

Books: Conflicts Analysis

- Potential Conflicts With Publisher
- 18 U.S.C. § 208 “Ability or Willingness” recusal
- 5 C.F.R. § 2635.502
- Other Issues

Other Intellectual Property

- ✓ Patents, copyrights, trademarks
- ✓ Report in Part 2 of 278e for Nominee (Part 5 for Spouse)

Intellectual Property: 278e Reporting

Part 2: Filer's Employment Assets and Income

Description	EIF	Value	Income Type	Income Amount
"History of Clocks," Stateburg University Press (value not readily ascertainable)	N/A		rent or royalties	\$201 - \$1,000
"Financial Disclosure," 4 th ed., Zorn & Co. (value not readily ascertainable)	N/A		advance	\$22,000
"Circular frame and hub system for a conveyance," Patent # 202,482,924 (value not readily ascertainable)	N/A			None (or less than \$201)

Ethics Agreement:

12.2.0 – arrangement to write a book in the future

Sample Language:

Before learning of my consideration for a possible nomination to a position at the U.S. Banking Administration, I received an advance from Molinaro Publishers, Inc., for a textbook on economics that I have agreed to write.

I understand that I may not work on this textbook or perform any other services for compensation during my appointment to the position of Deputy Administrator if the Senate confirms my nomination.

I will not participate personally and substantially in any particular matter involving specific parties in which I know Molinaro Publishers, Inc., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Ethics Agreement:

12.2.1 – arrangement with a publisher regarding royalties

Sample Language:

I receive royalties from Molinaro Publishers, Inc., for sales of my book, *Bortot's Field Guide to Wilderness Survival Techniques*.

I will not participate personally and substantially in any particular matter involving specific parties in which I know Molinaro Publishers, Inc., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Ethics Agreement:

8.5.0 – leave of absence from an institution of higher learning

Sample Language:

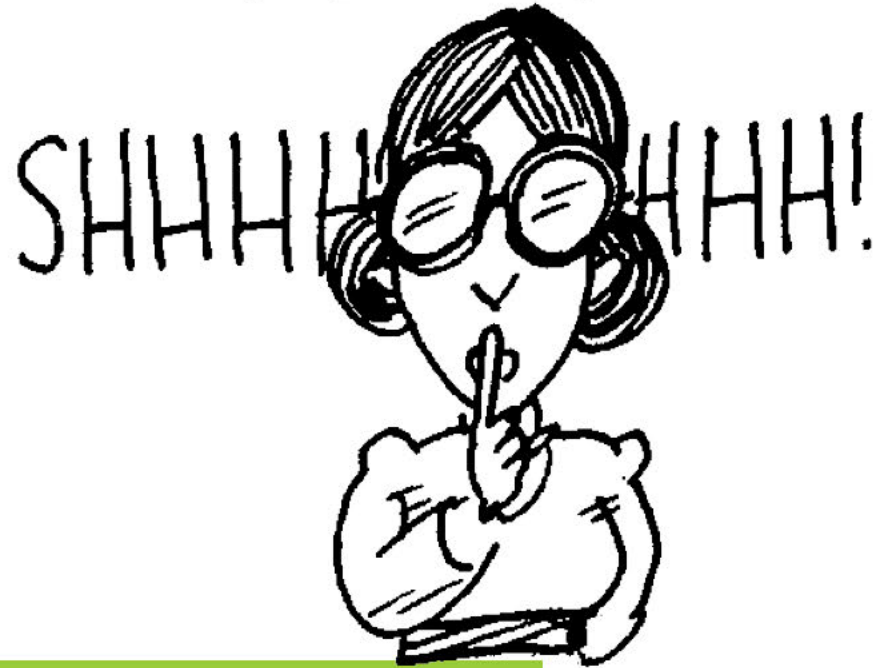
Upon confirmation, I **will take an unpaid leave of absence** from my position as Associate Professor at Borlino University.

I **will not participate personally and substantially in any particular matter that** to my knowledge **has** a direct and predictable **effect on the financial interests of Borlino University,**

unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or **qualify for either the exemption at 5 C.F.R. § 2640.203(b)** or another regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Quiet!

EXAM IN PROGRESS



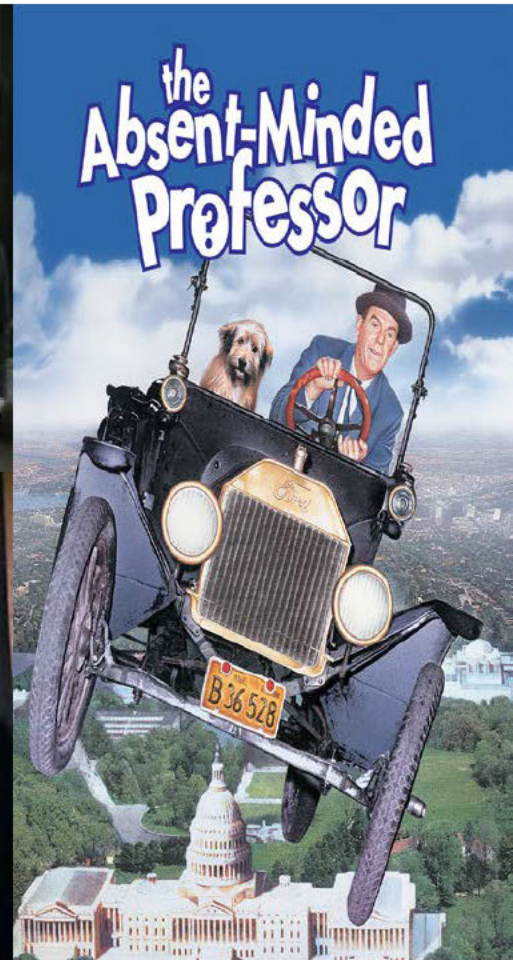
[SELECT ONE ITEM] Ned Brainard is a professor who is being considered for a nomination. Mr. Brainard has not reported anything in Part 3 (Agreements and Arrangements) of the OGE Form 278e.



Which, if any, of the following possible agreements or arrangements would need to be included in Part 3?

- a. A defined contribution plan
- b. A defined benefit pension plan
- c. An unpaid leave of absence
- d. A mortgage subsidy
- e. Discounted tuition for a child of the filer
- f. a, b, & c and not d & e
- g. All of the above

Professors



THANK YOU

Stephanie Nonluecha

Program Analyst (Finance)

Presidential Nominations Branch

U.S. Office of Government Ethics

(202) 482-9243

snonlue@oge.gov



MARCH 7 2016
SYMPOSIUM
ON FINANCIAL DISCLOSURE

Selected Financial Interests

Sandy Mabry and Megan Khaner

Selected Financial Interests

New Public Financial Disclosure Guide

- Uncompensated Positions
- Small Business ownership
- Cash Receivables
- Put & Call Options
- American Depositary Receipts
- Cash Accounts
- Sector Mutual Funds

Ethics Agreement Drafting

Part 1: Positions Held Outside U.S. Government

Report any compensated or uncompensated position held with a for-profit or non-profit organization unless an exception applies. Positions include:

- Officer
- Director
- Trustee
- General partner
- Proprietor
- Representative
- Employee
- Consultant

Positions that are Not Reportable

- Held by spouse or dependent children
- Held with the U.S. Government
- Held in a religious, social, fraternal, or political organization

Positions that are Not Reportable (con't.)

Member of an Advisory Board—

- Non-profit organization
- Uncompensated
- No fiduciary duties

Conflicts Analysis – Member of an Advisory Board

- Resignation
- Recusal

*White House has required all full-time PAS to resign from all outside positions, including advisory board positions that are not reportable.

If PAS is permitted to retain position agency must do a conflicts analysis

- 18 U.S.C. 208
- 5 C.F.R. 502

Ethics Agreement

- Retaining position
- Resigning position

Part 2: Filer's Employment Assets & Income

Small Business (general)

[See specific entries in Guide for farms, law firms and corporate stock.]

Farm (Operated as a business):

Description	EIF	Value	Income Type	Income Amount
Highlands Farm, Papillion, NE, general partner (crops)	N/A	\$500,001 - \$1,000,000	partnership income	\$130,005
Bailey Horse Farm, Ashburn, VA, sole proprietor (livestock)	N/A	\$250,001 - \$500,000	farming income	\$76,513

Description	EIF	Value	Income Type	Income Amount
Advanced Systems, LLC (software)	N/A	\$500,001 - \$1,000,000	business income	\$130,005
ABC Holdings, Inc., S-Corp, d/b/a Jones Management Solutions (HR consulting)	N/A	\$15,001 - \$50,000	business income	\$88,130
Accountant, sole proprietor	N/A	\$1,001 - \$15,000	accounting fees	\$93,153
Piano teacher, sole proprietor	N/A	\$1,001 - \$15,000	lesson fees	\$35,650

Exercise— Is this entry complete?

Description	EIF	Value	Income Type	Income Amount
Jones Management, speaking fees	N/A		honorarium	\$220

Additional Requirements

Compensation and Other Benefits:

[See Guide for specific entries]

Separate line item entries for

- Honoraria
- Copyright on a book
- Severance payments (cash receivables)

Exercise— Corrected Entry

Description	EIF	Value	Income Type	Income Amount
Jones Management LLC: Loomis County University – 8/12/2015	N/A		honorarium	\$220
Jones Management LLC: "Financial Disclosure," 4 th ed., Zorn & Co. (value not readily ascertainable)	N/A			None (or less than \$201)

Part 2: Filer's Employment Assets and Income

Cash Receivables

For purposes of financial disclosure, “cash receivables” includes any anticipated payments a filer is owed, such as anticipated salary or bonus, anticipated partnership share or LLC distribution, anticipated severance, anticipated director fees, and any other outstanding compensation.

Description	EIF	Value	Income Type	Income Amount
Xylophone Technologies Corporation, anticipated severance	N/A	\$50,000 - \$100,000		None (or less than \$201)
DSLK Financial Services, Inc., deferred director fees (cash receivable)	N/A	\$100,000 - \$250,000		None (or less than \$201)
Quasar Engineering (ventilation systems), anticipated bonus	N/A	\$1,001 - \$15,000		None (or less than \$201)

Part 3: Agreements and Arrangements

Getting out of a small business

- Selling business
- Retaining business—inactive during appointment

Employer or Party	City/State	Status and Terms	Date
Advanced Systems, LLC	NY, NY	Pursuant to the limited liability company agreement, I will sell my share of the LLC to the other member of the LLC. I will receive a lump sum payment that will be calculated on a formula established in the LLC agreement.	4/93

Part 4: Filer's Sources of Compensation

Report any source that paid more than \$5,000 for personal services in any calendar year during the reporting period.

Report payments from both employers and clients.

Part 6: Other Assets and Income

Option (put or call purchased)

American Depositary Receipt (ADR)

Cash Account

Mutual Fund - Sector

OPTIONS

(Put or Call Purchased)

Put option: When an investor buys a put option he has the **right to sell** a certain security at the strike price on or before the expiration date.

Call Option: When an investor buys a call option he has a contract for the **right to purchase** a certain security at the strike price, on or before the expiration date.

Strike price: The price at which an investor may buy the underlying stock if he holds a call option or sell the underlying stock if he holds a put.

Exercise: The time at which a person who holds an option gives an order to act on the option.

Expiration date: The date after which an option is no longer valid and the investor can no longer exercise it.

Description	EIF	Value	Income Type	Income Amount
Growlster, Inc. (GRWL), call option	N/A	\$1,001 - \$15,000	capital gains	\$201 - \$1,000
Growlster, Inc. (GRWL), call option (value not readily ascertainable): 100 shares, strike \$7, exp. 5/2016	N/A			None (or less than \$201)
Widgets Unlimited (WIG), put option	N/A	\$1,001 - \$15,000		None (or less than \$201)

Part 6: Other Assets and Income

American Depositary Receipts

An American depositary receipt is a certificate representing shares of foreign securities. It is a form of indirect ownership of foreign securities that are not traded directly on a national exchange in the United States. An “American depositary share” corresponds to a single share of the underlying security.

Description	EIF	Value	Income Type	Income Amount
Xylophone Technologies Corporation (XYZ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
Halley Research (pharmaceuticals), ADR	N/A	\$15,000 - \$50,000	Dividends	\$201 - \$1,000

Part 6: Other Assets and Income

American Depositary Receipts

Traded on a national exchange:

Acorn International, Inc. (ADR)(NYSE:ATV)

Baidu Inc (ADR)(NASDAQ:BIDU)

Over the counter:

Roche Holding Ltd. (ADR)(OTCMKTS:RHHBY)

Bayer AG (ADR)(OTCMKTS:BAYRY)

Part 6: Other Assets and Income

Cash Accounts

For purposes of financial disclosure, “cash accounts” include checking accounts, savings accounts, certificates of deposit and money market accounts. All cash accounts at a single financial institution should be aggregated to determine if they meet the reporting threshold. Cash accounts should be reported if the total value of the accounts is more than \$5,000 or if the accounts produced more than \$200 in total income.

Description	EIF	Value	Income Type	Income Amount
U.S. bank account #1 (cash)	N/A	\$15,001 - \$50,000	interest	\$201 - \$1,000
U.S. bank account #2 (cash)	N/A	\$15,001 - \$50,000	interest	\$201 - \$1,000
U.S. brokerage money market account (cash)	N/A	\$15,001 - \$50,000	interest	\$201 - \$1,000
1st Bank of France accounts (cash)	N/A	\$15,000 - \$50,000	interest	\$201 - \$1,000

How to Determine Whether a Fund is a Sector Mutual Fund

A sector mutual fund is a mutual fund that concentrates its investments in an industry, business, single country other than the U.S., or bonds of a single State within the U.S.

DO-00-030, LA-15-09

Government actions may directly and predictably affect the sector or companies in the sector.

Sector fund exemption at § 2640.201(b)

How to Determine Whether a Fund is a Sector Mutual Fund

Exercise: Is it a sector fund?

Franklin Natural Resources Fund (MUTF:FRNRX)

The investment seeks high total return. Under normal market conditions, the fund invests at least 80% of its net assets in the equity and debt securities of companies in the natural resources sector. It predominantly invests in equity securities, primarily common stock. For the Fund's investment purposes, the natural resources sector includes companies that own, refine, transport, or market natural resources including oil, gold and other precious metals, steel, forest products, and coal. In addition to its investments in companies in the natural resources sector, the fund may also invest up to 20% of its net assets in equity or debt securities of any type of foreign or U.S. issuer.

How to Determine Whether a Fund is a Sector Mutual Fund

Exercise: Is it a sector fund?

Reaves Utilities and Energy Infrastructure Fund (MUTF:RSRAX)

The investment seeks total return from income and capital growth. Under normal circumstances, the fund invests at least 80% of its net assets, plus any borrowings for investment purposes, in securities of domestic and foreign public utilities and energy companies. It has adopted a policy to concentrate its investments (invest at least 25% of its assets) in companies involved to a significant extent in the Utilities and/or Energy Industries. The fund may invest in municipal utility companies, including rural electric cooperatives and similar organizations.

How to Determine if a Mutual Fund is Registered Under the 1940 Act

Generally, mutual funds with five-letter ticker symbols ending in X (e.g. VGSTX) are registered under the 1940 Act.

If you can't find a mutual fund through research on sites such as Google Finance, Yahoo Finance, etc., you may have to search SEC's Edgar site for more information.

Ethics Agreement Drafting

Guide to Drafting Ethics Agreements for PAS Nominees

Standard paragraphs for full-time PAS

- 1.2.0—Introductory language
- 2.1.0—Basic 208 recusal
- 1.2.0—Language regarding public posting of certain PAS nominee agreements

THANK YOU



MARCH 7 2016
SYMPOSIUM
ON FINANCIAL DISCLOSURE

Things That Hold Things

Jack MacDonald

How to Report and Analyze for Conflicts

Managed Accounts

Investment Funds

Trusts

Exercise #1

Managed Accounts

What is a managed account?

- “Separately managed account” or “controlled account”
- Owned by the investor but managed for a fee by a financial advisor
- Not an “excepted investment fund.” The investor must disclose each asset as a separate line item on the financial disclosure report.

Although some managed accounts may appear similar to mutual funds, they are not mutual funds and do not qualify for the same treatment as mutual funds under conflicts of interest laws.

Managed Accounts

Description	EIF	Value	Income Type	Income Amount
ABC Diversified Bond Fund	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
Xylophone Technologies Corporation (XYZ)	N/A	\$1,001 - \$15,000	dividends capital gains	\$2,501 - \$5,000

Description	EIF	Value	Income Type	Income Amount
ANW Wealth Retention Strategy (ANW Investment, Inc.):	No			
. ABC Diversified Bond Fund	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
. Xylophone Technologies Corporation (XYZ)	N/A	\$1,001 - \$15,000	dividends capital gains	\$2,501 - \$5,000

Managed Accounts

Options for managing conflicts:

- Only purchase diversified mutual funds or Government/municipal bonds;
- Prescreen all purchases; or
- Move the assets out of the account

Investment Funds

What is an investment fund?

- Mutual funds, exchange traded funds, hedge funds, private equity funds

Investment Funds

Excepted Investment Funds

REMEMBER:

EIF = Reporting

EIF \neq Conflicts

Exercise #2

Investment Funds

Getting to EIF

- independently managed,
- “widely held,” and
- either “publicly traded or available” **OR** “widely diversified”

Investment Funds

Description	EIF	Value	Income Type	Income Amount
Positron Investments XI, LP	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000

Investment Funds

#	Description	EIF	Value	Income Type	Income Amount
1	ABC Large Cap Fund	No	\$50,001-\$100,000		\$201-\$1,000
1.1	Def Tirez Company	n/a	\$1,001-\$15,000		none or less than \$201
1.2	G&HI Shoe Corp.	n/a	\$1,001-\$15,000		none or less than \$201
1.3	J&KL Supplies, Inc.	n/a	\$1,001-\$15,000		none or less than \$201
1.4	Mnop Trucking, Co	n/a	\$1,001-\$15,000		none or less than \$201
1.5	Peaqpan Letters Corporation	n/a	\$1,001-\$15,000		none or less than \$201
1.6	Tuvvyz Storage, Inc.	n/a	\$1,001-\$15,000		none or less than \$201
1.7	Wyxorp Fittings & Co	n/a	\$1,001-\$15,000		none or less than \$201
1.8	Zozzox Times Post, Inc.	n/a	\$1,001-\$15,000		none or less than \$201
1.9	Aaabahk & Sons, Inc.	n/a	\$1,001-\$15,000		none or less than \$201
1.10	Guuyezo Construction Co	n/a	\$1,001-\$15,000		none or less than \$201
1.11	Faszlebar Wrecking Installations	n/a	\$15,001-\$50,000	Dividends	\$201-\$1,000
1.12	VanGaarsfold International, Inc.	n/a	\$1,001-\$15,000		none or less than \$201
1.13	...and so on...				
1.14	...				
1.15	...				
1.16	...				
1.17	...and so on...				
1.18	...				
1.19	...				
1.20	etc.				

Investment Funds

What if the filer can't report the underlying holdings?

OGE Guidance on Financial Disclosure Requirements for Pooled Investment Funds:

- DO-08-022 (July 22, 2008)
- LA-14-05 (September 20, 2014)

Investment Funds

Liabilities – Capital Calls

Report any capital calls the filer would legally be required to meet upon demand.

Creditor Name	Type	Amount	Year Incurred	Rate	Term
Eyewear Technologies Corporation	Capital Call	\$100,001 - \$250,000	2015	0%	N/A

Trusts

Trust Skills:

- If it's on the report, don't take it off. Ask the filer questions and discuss with OGE.
- If there is no trust on the report, ask the filer whether he or she has any trusts to report.

Trusts

OGE Guidance:

- 5 C.F.R. §§ 2634.310(a)-(b)
- Advisories:
 - DO-01-029
 - DO-02-008
 - DO-02-015
 - DO-08-024
 - LA-13-04
- Public Financial Disclosure Guide

Exercise #3

Trusts

Revocable Trust

Irrevocable Trust

Discretionary Trust

Excepted Trust

Trustee Positions

Trusts

Revocable Trust

- If the filer, spouse, or a dependent child is the grantor, report the assets and income in Part 6 (Other Assets and Income)
- If the filer, spouse, or a dependent child is receiving mandatory distributions, report the assets and income in Part 6 (rare)
- Do not report if the trust was established by a parent or grandparent, unless the filer, spouse, or a dependent child is receiving mandatory distributions (rare)

Trusts

Irrevocable Trust

- If the filer, spouse, or a dependent child has a vested beneficial interest (i.e., receiving or have a legal right to receive something from the trust) or received income – report the assets and income in Part 6

Trusts

Irrevocable Trust

Vested Beneficial Interest – Proportionate Interest in Value and Income of Underlying Assets Is Readily Ascertainable

Description	EIF	Value	Income Type	Income Amount
Family trust #1:	No			
- Xylophone Technologies Corporation (XYZ)	N/A	\$1,001 - \$15,000	dividends	\$201- \$1,000
- Philadelphia, PA bonds	N/A	\$1,001 - \$15,000	interest	\$201 - \$1,000
- QWERTY Growth Fund (QWTYX)	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000

Trusts

Irrevocable Trust

Vested Beneficial Interest – Proportionate Interest in Value and Income of Underlying Assets Is Not Readily Ascertainable

Description	EIF	Value	Income Type	Income Amount
Family trust #1:	No	\$50,001 - \$100,000	dividends interest	\$5,001 - \$15,000
- Xylophone Technologies Corporation (XYZ)	N/A			
- Philadelphia, PA bonds	N/A			
- QWERTY Growth Fund (QWTYX)	Yes			

Trusts

Irrevocable Trust

Vested Remainder Interest – Proportionate Interest in Value and Income of Underlying Assets Is Not Readily Ascertainable

Description	EIF	Value	Income Type	Income Amount
Family trust #1¹:	No	\$50,001 - \$100,000		None (or less than \$201)
- Xylophone Technologies Corporation (XYZ)	N/A			
- Philadelphia, PA bonds	N/A			
- QWERTY Growth Fund (QWTYX)	Yes			

¹ I have a 1/3 remainder interest in the trust. The current value of the trust is reported.

Trusts

Discretionary Trust

- Rare and complex
- Usually held by very wealthy individuals
- STOP and call OGE!
- Evaluated on a case-by-case basis

Trusts

Excepted Trust

- Also rare
- See Handout

Trusts

Trustee Positions and Fees

- Filer reports his/her trustee positions in Part 1
- Trustee fees for filer and spouse are reported in Parts 2 and 5, respectively
- If no financial interest in the trust, no reporting of trust assets but you need to analyze for conflicts!

Conflicts of Interest

- 18 U.S.C. § 208
- Your agency's statute and any supplemental ethics regulations

Conflicts – Mutual Fund Exemptions

5 C.F.R. § 2640.201

- Diversified mutual fund exemption
- Sector mutual fund exemption

*Must be registered under the 1940 Act

*Apply automatically (unless you have a statute or regulation that trumps them)

*They mitigate both the conflict AND any appearance concerns

Conflicts – Mutual Fund Exemptions

Diversified mutual fund exemption

- Must be diversified under OGE's definition

Conflicts – Mutual Fund Exemptions

Sector mutual fund exemption – two parts

- Okay for affected interests that are not part of the fund's sector
- Meaning of the \$50,000 limit

Conflicts – Mutual Fund Exemptions

OGE Guidance:

- DO-00-030
- LA-15-09 (Real estate funds)

Conflicts – Other Exemptions

Remember:

If it's not a mutual fund and the fund is held in an employee retirement plan, don't forget to consider if the fund would qualify for the diversified employee benefit plan exemption!

See 5 C.F.R. § 2640.201(c)

THANK YOU
