

**From:** [David J. Apol](#)  
**To:** [Dale A. Christopher](#)  
**Subject:** FW: Changes to Financial Disclosure Forms  
**Date:** Wednesday, March 20, 2024 4:49:02 PM  
**Attachments:** [DRAFT FOR DISTRIBUTION - OGE Form 278e 2019.pdf](#)  
[DRAFT FOR DISTRIBUTION - OGE Form 450 2019.pdf](#)

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Also wanted to discuss whether we needed to this again. I'm not sure we do.

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**From:** Deborah J. Bortot <djbortot@oge.gov>  
**Sent:** Friday, March 15, 2024 11:19 AM  
**To:** David J. Apol <djapol@oge.gov>; Heather A. Jones <hajones@oge.gov>; Jody Keegan <jkeegan@oge.gov>  
**Subject:** FW: Changes to Financial Disclosure Forms

For our meeting

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**From:** Dale A. Christopher <[dachrist@oge.gov](mailto:dachrist@oge.gov)>  
**Sent:** Wednesday, August 15, 2018 9:17 AM  
**To:** Dale A. Christopher <[dachrist@oge.gov](mailto:dachrist@oge.gov)>  
**Subject:** Changes to Financial Disclosure Forms

Good Morning,

You are receiving this email because your agency uses an electronic filing system other than *Integrity* to collect the OGE Form 450 and/or OGE Form 278e. Please be advised that both forms, and the corresponding systems, will need to be modified as a result of the recent changes to 5 CFR part 2634 (See [83 FR 33980](#)). OGE is currently in the process of seeking approval from OMB to make the necessary changes to the forms. We expect that approval will be granted before the changes to part 2634 go into effect on January 1, 2019. We have attached drafts of the revised forms indicating the changes to be made, so that you may prepare to make corresponding changes to your electronic filing systems.

The draft changes are not final until OMB has completed its review pursuant to the Paperwork Reduction Act, and the final approved language may be different from the attached drafts. Therefore, please do not make these changes in "production" until you receive notice from OGE. If you have questions about the forms approval process, you may contact Jennifer Matis in OGE's Legal, External Affairs and Performance Branch at 202-482-9216 or [jmatis@oge.gov](mailto:jmatis@oge.gov). If you have questions about the changes to the forms, contact Keith Labedz in OGE's Presidential Nominations Branch at 202-482-9218 or [klabedz@oge.gov](mailto:klabedz@oge.gov).

If your agency is using a legacy public financial disclosure system, there is still time to adopt *Integrity* for all public filers before the next filing season. Moving to *Integrity* would eliminate the cost and inconvenience of updating your legacy system with these and all future changes to the OGE Form 278e. If you are interested in adopting *Integrity* for additional public filers, please contact George Hancock in OGE's Strategic Initiatives Section at 202-482-9309 or [ghancock@oge.gov](mailto:ghancock@oge.gov).

Thank you,

Chip Christopher  
Deputy Director for Compliance  
U.S. Office of Government Ethics

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

### 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.

#### Warni

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.

**Instructions for Completing Part 1 of the OGE Form 278e: Filer's Positions Held Outside United States Government**

**Applicability:** All filers complete Part 1.

**Reporting Period:**

Candidate, Nominee or New Entrant: Preceding two calendar years and current year to filing date

Annual: Preceding calendar year and current year to filing date

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

Report any positions that you held at any time during the reporting period (excluding positions with the United States Government). Reportable positions include those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any for-profit or non-profit organization (whether compensated or uncompensated).

**Exceptions:**

Do not report the following: (1) positions held as part of your official duties with the United States Government; (2) positions with religious, social, racial, or political entities; (3) positions solely of an honorary nature; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

In addition, you do not need to report service as a member of an advisory board or committee if the following criteria are met: (1) the advisory board or committee is that of a non-profit or governmental organization; (2) your service is unpaid; (3) you have no fiduciary duties of the sort exercised by officers, directors, or trustees; and (4) your role does not involve sufficient supervision by the organization to create a common law employee-employer relationship.

**Completing the Fields:**

Organization Name: Provide the name of the organization.

City/State: Provide the city and state in which the organization is located.

Organization Type: Describe the type of organization.

Position Held: Provide the title or a brief functional description of the position you hold or held.

From: Provide the month and year in which you began in the position.

To: Provide the month and year in which the position ended. If you still hold the position, write "present."

**Nothing to Report:** If you do not have anything to report, write "None."

**Instructions for Completing Part 2 of the OGE Form 278e: Filer's Employment Assets & Income and Retirement Accounts**

**Applicability:** All filers complete Part 2.

**Reporting Period:**

**Candidate, Nominee, or New Entrant:** Preceding calendar year and current year to filing date

**Annual:** Preceding calendar year

**Termination:** Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

- Report each source of your earned and other non-investment income over \$200 during the reporting period (e.g., salary, fees, partnership share and other business income, honoraria, scholarships, and prizes).
- Report each asset related to your business, employment, or other income-generating activities if the value of the asset at the end of the reporting period exceeded \$1,000 or if more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, anticipated payments such as severance payments, deferred compensation, and intellectual property such as book deals and patents).

**Exceptions:**

Do not include assets or income from United States 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 Part 6.

**Completing the Fields:**

**Description:** Provide a description sufficient to identify the asset or source being reported.

**EIF:** If you are reporting an investment vehicle that invests in assets of its own you need to report each underlying asset that was individually worth more than \$1,000 at the end of the reporting period or from which more than \$200 in income was received during the reporting period. As an exception to this requirement, however, you do not need to report the underlying assets of an investment vehicle that qualifies as an excepted investment fund (EIF). Indicate whether your entry qualifies an excepted investment fund. If your entry is not an investment vehicle at all, select "N/A."

**Value:** Report the value of an asset by selecting the appropriate category.

**Income Type:**

- (1) Income Less than \$201: Leave this field blank.
- (2) Asset Qualifies as an EIF: Leave this field blank.
- (3) Dividends, Interest, Capital Gains, or Rent or Royalties: Enter these types of income into the field .
- (4) Other Income: Provide an appropriate description (e.g., "salary").

**Income amount:**

- (1) Income Less than \$201: Select "None (or less than \$201)."
- (2) Asset Qualifies as an EIF: Select the category that corresponds to the total amount of income received during the reporting period.
- (3) Dividends, Interest, Capital Gains or Rent or Royalties: Select the category that corresponds to the total amount of income received during the reporting period.
- (4) Other Cases: Provide the exact amount of income received during the reporting period in the space provided.

**Nothing to Report:** If you do not have anything to report, write "None."

**Definitions:**

**Definition of "Excepted Investment Fund":** An excepted investment fund is an investment fund that is (1) widely held; (2) either publicly traded or available or widely diversified; and (3) independently managed, meaning you neither exercise control nor have the ability to exercise control over the financial interests held by the fund. A fund is widely diversified if it does not have a stated policy of concentrating its investments in any industry, business, or single country other than the United States or bonds of a single state within the United States.

**Definition of "Received":** You have received income when you have the right to exercise control over the income regardless of whether you have taken actual possession.

**Instructions for Completing Part 3 of the OGE Form 278e: Filer's Employment Agreements and Arrangements**

**Applicability:** All filers must complete Part 3.

**Reporting Period:**

Candidate, Nominee, or New Entrant: As of the date of filing

Annual: Preceding calendar year and current year to filing date

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

Report any agreements or arrangements that you had during the reporting period for the following: (1) continuing participation in an employee welfare or benefit plan maintained by a former employer; (2) leave of absence; (3) future employment; or (4) continuation of payments by a former employer (e.g., severance payments).

**Exceptions:**

Do not report the following: (1) agreements and arrangements with the United States Government, such as your participation in the Federal Employees Retirement System or the Civil Service Retirement System; (2) agreements and arrangements of your spouse or your dependent children; and (3) if you are filing a Nominee, New Entrant, or Candidate report, any agreement or arrangement that will end before you file your report.

**Completing the Fields:**

Employer or Party: Provide the parties to the agreement or arrangement, other than yourself. In most cases, the other party will be your employer.

City/State: Provide the city and state of the other parties.

Status and Terms: Briefly describe the type of agreement or arrangement, its terms (in particular, the timing and form of any payments), and its current status.

Date: Provide the month and year in which the agreement or arrangement began. In many cases, this will be when you joined the employer or otherwise became eligible for coverage under the agreement or arrangement.

**Nothing to Report:** If you do not have anything to report, write "None."

**Instructions for Completing Part 4 of the OGE Form 278e: Filer's Sources of Compensation Exceeding \$5,000 in a Year**

**Applicability:** Complete Part 4 if you are filing a Nominee or New Entrant report. Otherwise, leave this Part blank.

**Reporting Period:**

Nominee or New Entrant: Preceding two calendar years and current year to filing date

Other Reports: N/A

**Reporting Requirement:**

Report any source (except the United States Government) that paid more than \$5,000 for your services during any year of the reporting period. Report employers and any clients to whom you personally provided services. You must report a source even if the source made its payment to your employer and not to you. Do not report a client who paid your employer if you did not provide the services for which the client made the payment.

**Exception:**

The name of a source of compensation may be excluded only if that information is specifically determined to be confidential as a result of a privileged relationship established by law and if the disclosure is specifically prohibited:

- by law or regulation,
- by a rule of a professional licensing organization, or
- by a client agreement that at the time of engagement of the filer services expressly provided that the client's name would not be disclosed publicly to any person.

If you exclude the name of any source, you must indicate in the report that such information has been excluded, the number of sources excluded, and, if applicable, a citation to the statute, regulation, rule of professional conduct or other authority pursuant to which disclosure of the information is specifically prohibited.

**Completing the Fields:**

Source Name: Provide the name of the source.

City/State: Provide the city and state in which this source is located.

Brief Description of Duties: Provide a brief description of your duties or the type of services rendered

**Nothing to Report** If you do not have anything to report and you are filing a Nominee or New Entrant report write "None."

**Instructions for Completing Part 5 of the OGE Form 278e: Spouse's Employment Assets & Income and Retirement Accounts**

**Applicability:** All filers complete Part 5.

**Reporting Period:**

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

- Report each source of earned income, excluding honoraria, for your spouse over \$1,000 during the reporting period.
- Report each source of honoraria for your spouse over \$200 during the reporting period.
- Report each asset related to your spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock or retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents).

**Exceptions:**

Do not include assets or income from United States Government employment. In addition, do not include assets that were acquired separately from your spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in Part 6.

**Completing the Fields:**

Complete these fields using the instructions from Part 2 with two exceptions. First, you do not need to provide the exact amount of your spouse's earned income, other than honoraria. Instead, simply describe the type of income in the Income Type field and leave the Income Amount field blank. Second, the value and income amount fields include a category labeled "Over \$1,000,000." You may use this category or you may use the higher value and amount categories.

**Nothing to Report** If you do not have anything to report, write "None."



**Instructions for Completing Part 6 of the OGE Form 278e: Other Assets and Income**

**Applicability:** All filers complete Part 6.

**Reporting Period:**

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

Each asset held for investment or the production of income, not already reported in Part 2 or Part 5, that ended the reporting period with a value greater than \$1,000 or from which more than \$200 in income was received during the reporting period. For purposes of the value and income thresholds, aggregate your interests with those of your spouse and your dependent children.

**Exceptions:**

Do not report any of the following: (1) a personal residence that you did not rent out during the reporting period; (2) retirement benefits from the United States Government, including the Thrift Savings Plan; (3) income from social security veterans' benefits, and other similar United States Government benefits; (4) deposits in a single financial institution aggregating \$5,000 or less in money market accounts, certificates of deposit, savings accounts, checking accounts or other cash deposits (unless the income exceeded \$200); (5) interests in a single money market mutual fund aggregating \$5,000 or less (unless the income exceeded \$200); (6) loans made by you or your spouse to each other or to a partner, sibling, child, or grandchild; (7) interests of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; (8) interests of a former spouse or a spouse from whom you are permanently separated; and (9) payments from a spouse or former spouse associated with a divorce or permanent separation.

**Completing the Fields:**

Complete these fields using the instructions from Part 2 with one exception. The value and income amount fields include a category labeled "Over \$1,000,000."

You may use this category only for your spouse's or dependent child's assets. Do not use this category for your assets or assets held jointly with your spouse or dependent child.

**Nothing to Report** If you do not have anything to report, write "None."

**Instructions for Completing Part 7 of the OGE Form 278e: Transactions**

**Applicability:** Complete Part 7 if you are filing an Annual or Termination report. Otherwise, leave this Part blank.

**Reporting Period:**

Candidate, Nominee, or New Entrant: N/A

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

Report any purchase, sale, or exchange of real property or securities in excess of \$1,000 that was made by you, your spouse, or your dependent child during the reporting period.

**Exceptions:**

Do not report the following: (1) a personal residence, unless the personal residence was rented out at any point during the reporting period; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, notes, and bonds; (4) Thrift Saving Plan accounts; (5) an underlying asset held within an excepted investment fund, an excepted trust, or a qualified trust; (6) transactions that you already reported in your periodic transaction report (OGE Form 278-T), unless your agency requires duplicate reporting; (7) transactions that occurred when you were not a public financial disclosure filer or an employee of the United States Government; (8) transactions that occurred solely by and between you, your spouse, and your dependent child; (9) interests of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; and (10) interests of a former spouse or a spouse from whom you are permanently separated.

**Completing the Fields:**

Description: Provide the name of the asset.

Type: Specify the type of transaction as a purchase, sale, or exchange.

Date: Provide the month, day, and year of the transaction.

Amount: Report the amount of transaction by selecting the appropriate category. You may use the "Over \$1,000,000" category only for transactions involving your spouse's or dependent child's assets. Do not use this category for your assets or assets held jointly with your spouse or dependent child.

**Nothing to Report:** If you do not have anything to report, write "None."

**Instructions for Completing Part 8 of the OGE Form 278e: Liabilities**

**Applicability:** All filers complete Part 8.

**Reporting Period:**

**Candidate, Nominee, or New Entrant:** Preceding calendar year and current year to filing date

**Annual:** Preceding calendar year

**Termination:** Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

Report liabilities over \$10,000 that you, your spouse, or your dependent child owed at any time during the reporting period.

**Exceptions:**

Do not report the following: (1) loans secured by a personal motor vehicle, household furniture, or appliances, provided that the loan does not exceed the item's purchase price; (2) revolving charge accounts, such as credit card balances, where the outstanding liability did not exceed \$10,000 at the end of the reporting period; (3) personal liabilities owed to a spouse, parent, sibling, or child of yours, your spouse, or your dependent child; (4) liabilities of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; (5) liabilities of a former spouse or a spouse from whom you are permanently separated; and (6) obligations arising from divorce permanent separation.

**Additional Exception for Certain Mortgages:**

- If you are not a nominee or appointee to a Presidentially-appointed, Senate-confirmed (PAS) position, you do not need to report a mortgage or home equity loan secured by your personal residence, unless you rented out the personal residence during the reporting period. However, you must report mortgages or home equity loans on properties that do not qualify as personal residences.
- If you are a nominee or appointee to one of the three types of PAS positions listed below, you do not need to report a mortgage or home equity loan secured by your personal residence, unless you rented out the personal residence during the reporting period. However, you must report mortgages or home equity loans on properties that do not qualify as personal residences. The three types of PAS positions are: (1) a position in which you will serve as a special Government employee (SGE); (2) a position as a Foreign Service Officer below the rank of

ambassador; or (3) a position in the uniformed services for which the pay grade prescribed by section 201 of title 37, United States Code is O-6 or below.

- If you are a nominee or appointee to any other type of PAS position, you must report a mortgage or home equity loan secured by your personal residence as you would a mortgage on any other property.

**Completing the Fields:**

**Creditor Name:** Provide the name of the creditor/lending institution.

**Type:** Identify the type of liability.

**Amount:** Select the appropriate category of amount or value. For revolving charge accounts, select the value of the liability at the end of the reporting period. For all other liabilities, select the category that corresponds to the highest amount owed during the reporting period. You may use the "Over \$1,000,000" category only for your spouse's or dependent child's liabilities. Do not use this category for your liabilities or a joint liability for you and your spouse or dependent child.

**Year Incurred:** Provide the year that the liability was incurred.

**Rate:** Provide the interest rate. Describing the rate in reference to a prime rate, such as "prime + 1," is also sufficient.

**Term:** Specify, in years or months, the time that the loan allows for repayment. If applicable, you may write "on demand" or "revolving."

**Nothing to Report:** If you do not have anything to report, write "None."

**Instructions for Completing Part 9 of the OGE Form 278e: Gifts and Travel Reimbursements**

**Applicability:** Complete Part 9 if you are filing an Annual or Termination report. Otherwise, leave this Part blank.

**Reporting Period:**

Candidate, Nominee, or New Entrant: N/A

Annual: Preceding calendar year

Termination: Current calendar year to termination date (in addition, the preceding calendar year if an Annual report for that year is required but has not yet been filed)

**Reporting Requirement:**

- Gifts totaling more than \$390 that you, your spouse, and your dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that you, your spouse, and your dependent children received from any one source during the reporting period.

If more than one gift or travel reimbursement was received from a single source: (1) Determine the value of each item received from that source; (2) exclude each item valued at \$156 or less; and (3) add the value of those items valued at more than \$156. If the total is more than \$390, then you must report each item valued at more than \$156.

**Exceptions:**

Do not report the following: (1) anything received from a decedent (2) bequests and other forms of inheritance; (3) suitable mementos of a function honoring you (e.g., retirement party); (4) food, lodging, transportation, and entertainment or reimbursements provided by a foreign government within a foreign country or by the United States Government, the District of Columbia or a State or local government; (5) food and beverages not consumed in connection with a gift of overnight lodging; (6) anything given to your spouse or dependent child totally independent of their relationship to you; (7) gifts in the nature of communications to your office, such as subscriptions to newspapers and periodicals; (8) gifts of hospitality (food, lodging, entertainment) on the donor's personal or family premises, as defined in 5 C.F.R. Part 2634; (9) any gifts and travel reimbursements received when you were not an employee of the United States Government; and (10) any reimbursements you received for political trips that were required to be reported under section 304 of the Federal Election Campaign Act of 1971 (2 U.S.C. § 434).

**Completing the Fields:**

Source Name: Provide the identity of the source.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the item or reimbursement received. For travel-related gifts and reimbursements, include a travel itinerary, the dates of travel, and the nature of the expenses. Although not required, it is helpful to specify your relationship to the source or note the basis on which you accepted the gift or reimbursement.

Value: Provide the fair market value of the gift(s) or travel reimbursement(s).

**Nothing to Report:** If you do not have anything to report, write "None."



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

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

Signature:	Date:
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Other Review Conducted By:

Signature:	Date:
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U.S. Office of Government Ethics Certification (if required)

Signature:	Date:
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Comments of Reviewing Officials:

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

#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
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[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
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**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.				



[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
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**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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10.			
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[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
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**Part 5: Spouse's Employment Assets & Income and Retirement Accounts**

#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
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[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
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**Part 6: Other Assets and Income**

#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
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[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
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**Part 7: Transactions**

#	Description	Type	Date	Amount
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				

[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.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
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18.						
19.						
20.						

[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.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				

## Summary of Contents

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

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation. This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: This type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

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

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity sharing in profit or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period. The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

## 6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children. This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period. This section does not include transactions that concern the following: (1) personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## 8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period. This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (exceptions apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## 9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.



**Privacy Act Statement**

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to 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 OGE, an employee of OGE, 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 this system of records; (11) on the OGE Website and to any person, department or agency, any written ethics agreement including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (12) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (13) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order; (14) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, national security, and disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remove such harm; and (15) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

**Public Burden Information**

This collection of information is estimated to take an average of ten minutes 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 501 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, 3209-0045 is displayed here and at the top of the first page of this OGE Form 278e).

## CONFIDENTIAL FINANCIAL DISCLOSURE REPORT

### Executive Branch

- Why Must I File?** The duties and responsibilities of your position require you to file the Confidential Financial Disclosure Report to avoid involvement in a real or apparent conflict of interest. The purpose of this report is to assist employees and their agencies in avoiding conflicts between official duties and private financial interests or affiliations. The information you provide will only be used for legitimate purposes, and will not be disclosed to any requesting person unless authorized by law. (See the Privacy Act Statement at the bottom of this page.) Please ensure that the information you provide is complete and accurate.
- When Must I File?** **New Entrants:** The report is due within 30 days of your assuming a position designated for filing, unless your agency requests the report earlier or your agency grants you a filing extension.  
**Annual Filers:** The report is due no later than February 15, unless your agency grants you a filing extension.
- What is the Reporting Period?** **New Entrants:**  
Part I – Report assets as of the date of filing but report sources of earned income, honoraria, and other non-investment income for the preceding 12 months.  
Part II – Report liabilities as of the date of filing.  
Part III – Report positions for the preceding 12 months.  
Part IV – Report agreements and arrangements as of the date of filing.  
**Annual Filers:** Report required information for the preceding calendar year (January 1 – December 31).
- What if I Have Questions?** If you have any questions about how to complete this form, please contact your ethics official or go to the Office of Government Ethics web site at [www.oge.gov](http://www.oge.gov) and select **OGE Form 450: Confidential Financial Disclosure Report under Forms Library.**

#### PENALTIES

Falsification of information or failure to file or report information required to be reported may subject you to disciplinary action by your employing agency or other authority. Knowing and willful falsification of information required to be reported may also subject you to criminal prosecution.

#### Privacy Act Statement

[See revised Privacy Act Statement, attached]

#### Public Burden Information

It is estimated that completing this form, including reviewing the instructions and gathering the data needed, takes an average of three hours. No private citizen is required to respond to a collection of information unless it displays a currently valid OMB control number as printed in the top right-hand corner of the first page of this form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: Program Counsel, U.S. Office of Government Ethics, Suite 500, 1201 New York Avenue, NW, Washington, DC 20005-3917. Do not send your completed OGE Form 450 to this address.

Date Received by Agency
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Page Number
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## 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 <i>(mm/ d/yy)</i>	
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 180 days during any consecutive 365-day period.		
If an SGE, Mailing Address <i>(Number, Street, City, State, ZIP Code)</i>			

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> filing 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 <i>(mm/dd/yy)</i>
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**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 <i>(if required by the agency)</i>	Date <i>(mm/dd/yy)</i>
E-mail Address	Phone Number
Signature and Title of Agency's Final Reviewing Official	Date <i>(mm/dd/yy)</i>
Comments of Reviewing Officials	
(Check box if continued on additional page <input type="checkbox"/> )	

Save

Print

<b>Employee's Name (Print last, first, middle initial)</b>	<b>Page Number</b>
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**Part I: Assets and Income**

<p><b>Report for Yourself, Spouse, and Dependent Child:</b></p> <ul style="list-style-type: none"> <li>Assets held for investment or the production of income that ended the reporting period with a value greater than \$1,000. In addition, annual filers must report assets from which more than \$1,000 in income was received during the reporting period. Reportable assets include, but are not limited to:                     <ul style="list-style-type: none"> <li>Assets such as stocks, bonds, annuities, trust holdings, partnership interests, life insurance, investment real estate, or a privately-held trade or business</li> <li>Sector mutual funds: those funds invested in a particular industry, business, or location, such as ABC Electronics Fund or XYZ Canada Fund (report the <u>full</u> name of the fund, not just the family fund name)</li> <li>Holdings of retirement plans, such as 401(k)s or IRAs, investment life insurance, or variable annuities (report each holding unless listed in the Do Not Report section)</li> <li>Defined benefit pension plans provided by a former employer (include the name of the employer)</li> </ul> </li> </ul>	<p><b>Do Not Report:</b></p> <ul style="list-style-type: none"> <li>Federal Government retirement benefits</li> <li>Thrift Savings Plan</li> <li>Certificates of deposit, savings or checking accounts</li> <li>Term life insurance</li> <li>Money market mutual funds and money market accounts</li> <li>Your personal residence, unless you rent it out</li> <li>U.S. Government Treasury bonds, bills, notes, and savings bonds</li> <li>Diversified mutual funds, such as ABC Equity Value Fund or XYZ Large Capital Fund</li> <li>Diversified funds within an employee benefit plan</li> <li>Money held to you, your spouse, or dependent child by a spouse, parent, sibling or child</li> </ul>
<p><b>Also Report:</b></p> <ul style="list-style-type: none"> <li><u>For yourself:</u> (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, (2) honoraria greater than \$1,000, and (3) other non-investment income such as scholarships, prizes, and gambling income greater than \$1,000</li> <li><u>For your spouse:</u> (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, and (2) honoraria greater than \$1,000</li> </ul>	<p><b>Do Not Report:</b></p> <ul style="list-style-type: none"> <li>Dependent child's earned income</li> <li>Veterans' benefits</li> <li>Federal Government salary</li> <li>Social Security benefits</li> </ul>

**Important Definitions**

<b>Diversified Mutual Fund</b> – A mutual fund that does not have a stated policy of concentrating its investments in one industry, business, or single country other than the United States.
<b>Sector Mutual Fund</b> – A mutual fund that concentrates its investments in an industry, business, single country other than the United States, or bonds of a single state within the United States.
<b>Diversified fund within an Employee Benefit Plan</b> – An employee benefit plan fund that has a written policy of varying investments without concentration in one industry, business, or single country other than the United States.
<b>Dependent Child</b> – A son, daughter, stepson or stepdaughter who is either unmarried and under age 21 and living in the filer's house, or considered dependent under the U.S. tax code.

**Reportable Information** – Go to the last page to see examples of how to report assets and income.

<b>Specific stock, bond, sector mutual fund, type/location of real estate, etc. (Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.)</b> <b>Name of Employer or Business; Source of Fees, Commissions, or Honoraria (Include brief description.)</b> You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	<b>No longer held</b>
1	<input type="checkbox"/>
2	<input type="checkbox"/>
3	<input type="checkbox"/>
4	<input type="checkbox"/>
5	<input type="checkbox"/>

Employee's Name (Print last, first, middle initial)	Page Number
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**Part I: Assets and Income**  
**Continuation Page**

Specific stock, bond, sector mutual fund, type/location of real estate, etc. (Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.) Name of Employer or Business; Source of Fees, Commissions, or Honoraria (Include brief description.) You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	No longer held
1	<input type="checkbox"/>
2	<input type="checkbox"/>
3	<input type="checkbox"/>
4	<input type="checkbox"/>
5	<input type="checkbox"/>
6	<input type="checkbox"/>
7	<input type="checkbox"/>
8	<input type="checkbox"/>
9	<input type="checkbox"/>
10	<input type="checkbox"/>
11	<input type="checkbox"/>
12	<input type="checkbox"/>
13	<input type="checkbox"/>
14	<input type="checkbox"/>
15	<input type="checkbox"/>
16	<input type="checkbox"/>
17	<input type="checkbox"/>
18	<input type="checkbox"/>
19	<input type="checkbox"/>
20	<input type="checkbox"/>

<b>Employee's Name (Print last, first, middle initial)</b>	<b>Page Number</b>
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**Part II: Liabilities**

<b>Report for Yourself, Spouse, and Dependent Child:</b>	<b>Do Not Report:</b>
<ul style="list-style-type: none"> <li>If you are a new entrant filer, liabilities that exceeded \$10,000 at the end of the reporting period.</li> <li>If you are an annual filer, liabilities that exceeded \$10,000 during the reporting period.</li> </ul>	<ul style="list-style-type: none"> <li>Any liability, such as a mortgage, a student loan, or a credit card account, from a financial institution or business entity granted on terms made available to the general public</li> <li>Loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures</li> <li>Liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child</li> </ul>

**Reportable Information** – Go to the last page to see examples of how to report liabilities.

<b>Name of creditor (include city and state where creditor is located)</b>	<b>Type of liability (personal loan, margin account, etc.)</b>
1	
2	

**Part III: Outside Positions**

<b>Report for Yourself:</b>	<b>Do Not Report:</b>
<ul style="list-style-type: none"> <li>All positions outside the U.S. Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position. Positions include an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of any of the following:                             <ul style="list-style-type: none"> <li>Corporation, partnership, trust, or other business entity</li> <li>Non-profit or volunteer organization</li> <li>Educational institution</li> <li>State or Local Government</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Any position with a                             <ul style="list-style-type: none"> <li>Religious entity</li> <li>Social entity</li> <li>Fraternal entity</li> <li>Political entity</li> </ul> </li> <li>Any position held by your spouse or dependent child</li> <li>Any position that you hold as part of your official duties</li> </ul>

**Reportable Information** – Go to the last page to see examples of how to report outside positions.

<b>Organization (include city and state where organization is located)</b>	<b>Type of organization</b>	<b>Position</b>	<b>No longer held</b>
1			<input type="checkbox"/>
2			<input type="checkbox"/>
3			<input type="checkbox"/>
4			<input type="checkbox"/>
5			<input type="checkbox"/>
6			<input type="checkbox"/>

<b>Employee's Name (Print last, first, middle initial)</b>	<b>Page Number</b>
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**Part IV: Agreements or Arrangements**

<b>Report Your Agreements or Arrangements for:</b>	<b>Do Not Report:</b>
<ul style="list-style-type: none"> <li>Continuing participation in an employee pension or benefit plan maintained by a current or former employer</li> <li>A leave of absence</li> <li>Future employment, including date you accepted employment offer</li> <li>Continuation of payment by a current or former employer (including severance payments)</li> </ul>	<ul style="list-style-type: none"> <li>Any agreement or arrangement related to your employment by the Federal Government</li> <li>Spouse's and dependent child's agreements or arrangements</li> <li>Continuing participation in a defined contribution plan, such as a 401(k) plan, to which an employer is no longer making contributions</li> </ul>

**Reportable Information** – Go to the last page to see examples of how to report agreements and arrangements.

<b>Entity with which you have an agreement or arrangement (include city and state where entity is located)</b>	<b>Terms of Agreement or Arrangement</b>
1	
2	
3	
4	

**Part V: Gifts and Travel Reimbursements**

Fill out this part only if you are filing an Annual Report. If you are a new entrant or an SGE, skip this part.

<b>Report for Yourself, Spouse, and Dependent Child:</b>	<b>Do Not Report:</b>
<ul style="list-style-type: none"> <li>Any gifts or travel reimbursements (items such as lodging, transportation and food) totaling more than \$390* from any one source during the reporting period; include where you traveled, the purpose, and date(s) of the trip for travel gifts and reimbursements</li> </ul> <p>*If you received more than one gift from one source:</p> <ol style="list-style-type: none"> <li>Determine the value of each item you received from that source</li> <li>Ignore each item valued at \$156 or less</li> <li>Add the value of those items valued at more than \$156; if the total is more than \$390, then you must list those items on this form</li> </ol>	<ul style="list-style-type: none"> <li>Anything received from relatives, the U.S. Government, D.C., state, or local governments</li> <li>Bequests and other forms of inheritance</li> <li>Gifts and travel reimbursements given to your agency in connection with your official travel</li> <li>Gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises</li> <li>Anything received by your spouse or dependent child totally independent of their relationship to you</li> </ul>

**Reportable Information** – Go to the last page to see examples of how to report gifts and travel reimbursements.

<b>Source</b>	<b>Description</b>
1	
2	
3	

## EXAMPLES

### Part I: Assets and Income

Specific stock, bond, sector mutual fund, type/location of real estate, etc. (Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.) Name of Employer or Business; Source of Fees, Commissions, or Honoraria (Include brief description.) You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	No longer held
OGC Communications (OGC) (Example of a stock with a ticker symbol)	<input type="checkbox"/>
OGE Energy (Example of sold stock that produced more than \$1,000 in income)	<input checked="" type="checkbox"/>
(S) OGE Energy bond (Example of a corporate bond held by a spouse)	<input type="checkbox"/>
ABC Healthcare Fund (Example of a sector fund held in a 401(k) plan)	<input type="checkbox"/>
Residential real estate, Anchorage, AK (Example of investment real estate)	<input type="checkbox"/>
Bryggadune University – salary (Example of earned income from a former employer)	<input checked="" type="checkbox"/>
(S) Express Medical Clinic – salary (Example of a spouse's earned income from current employer)	<input type="checkbox"/>
Association of Accountants – honorarium (Example of a single honorarium from the listed source)	<input type="checkbox"/>

### Part II: Liabilities

Name of creditor (city and state)	Type of liability (personal loan, margin account, etc.)
John Jones (Denver, CO)	Personal loan from a friend
ANW Investment Company (San Francisco, CA)	Margin account

### Part III: Outside Positions

Organization (city and state)	Type of organization	Position	No longer held
Bryggadune University (Memphis, TN)	Educational institution	Professor	<input checked="" type="checkbox"/>
ISK Family Trust (Boynton Beach, FL)	Family Trust	Trustee	<input type="checkbox"/>
Scenic Rivers Associ (Nashville, TN)	Non-profit environmental organization	Member, Board of Directors	<input checked="" type="checkbox"/>

### Part IV: Agreements or Arrangements

Entity with which you have an agreement or arrangement (include city and state where entity is located)	Terms of Agreement or Arrangement
Dee, Jones & Smith (San Diego, CA)	I will continue to participate in this defined benefit plan. (Example of continuing participation in a defined benefit plan with a former employer)
Hartford & Brown (San Diego, CA)	Employment agreement with Hartford & Brown. Starting work as attorney in July 2019. Entered into agreement in October 2018. (Example of an agreement for future employment)

### Part V: Gifts and Travel Reimbursements

Source	Description
Dee, Jones & Smith	Leather briefcase (Example of a gift totaling more than \$390 from one source)
CGH Culinary Institute	Airline ticket, hotel room, and meals incident to culinary seminar in Tokyo, Japan from May 1-5, 2018 (Example of a travel reimbursement)



## Privacy Act Statement

Title I of the Ethics in Government Act of 1978 (5 U.S.C. app. 101), Executive Order 12674 (as modified by Executive Order 12731), and 5 CFR Part 2634, Subpart I, of the Office of Government Ethics (OGE) regulations require the reporting of this information. Failure to provide the requested information may result in separation or disciplinary action. The primary use of the information on this form is for review by Government officials of your agency, to determine compliance with applicable Federal conflict of interest laws and regulations. Additional disclosures may be made pursuant to the routine uses set forth in OGE/GOVT-2: (1) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of a violation or potential violation of law or regulation; (2) to a 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; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or decision; (4) to the National Archives and Records Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) to the Department of Justice or in certain legal proceedings when OGE, an employee of OGE, 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; (7) to reviewing officials in a new office, department or agency when an employee transfers from one covered position to another; (8) 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; ~~and~~ (9) to contractors and other non-Government employees working for the Federal Government to accomplish a function related to this OGE Government-wide system of records; (10) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (11) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security.

Note: When an agency is requested to furnish such records to OGE, such a disclosure is to be considered as made to those officers and employees of the agency which co-maintains the records who have a need for the records in the performance of their official duties in accordance with the Ethics in Government Act and other pertinent authority conferred on OGE, pursuant to the provisions of the Privacy Act at 5 U.S.C. 552a(b)(1). This confidential report will not be disclosed to any requesting person unless authorized by law. See also the OGE/GOVT-2 Executive Branch Confidential Financial Disclosure Reports Privacy Act system of records.

**From:** [David J. Apol](#)  
**To:** [David Apol](#)  
**Subject:** FW: redline  
**Date:** Thursday, March 21, 2024 9:13:15 AM  
**Attachments:** [March 19th Redline showing compare of 3.13 ROCIS submission to current 2635.docx](#)

---

Attachment WIF (b)(5)  
deliberative (133pp)

---

**From:** Kimberly L. Sikora Panza <[klspanza@oge.gov](mailto:klspanza@oge.gov)>  
**Sent:** Wednesday, March 20, 2024 12:32 PM  
**To:** David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Subject:** FW: redline

Here you go

---

Kimberly L. Sikora Panza  
Senior Associate Counsel  
U.S. Office of Government Ethics  
250 E Street SW, Suite 750  
Washington, DC 20024  
202.482.9214

---

**From:** Kimberly L. Sikora Panza  
**Sent:** Tuesday, March 19, 2024 1:45 PM  
**To:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>  
**Subject:** redline

Attached is a redline showing the comparison of the regulatory text from the 3.13.24 OMB ROCIS submission and the current 2635 regulatory text.

---

Kimberly L. Sikora Panza  
Senior Associate Counsel  
U.S. Office of Government Ethics  
250 E Street SW, Suite 750  
Washington, DC 20024  
202.482.9214

Referred to Americorp

**From:** Deborah J. Bortot <djbortot@oge.gov>

**Sent:** Friday, March 29, 2024 5:20 PM

**To:** Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email>

**Cc:** David J. Apol <djapol@oge.gov>; Heather A. Jones <hajones@oge.gov>; Teresa L. Williamson <tlwillia@oge.gov>; Joyce Merilos <jmerilos@oge.gov>; Rubiella, Evelio <(b)(6) Rubiella email>

**Subject:** [External] PRECLEARED: Shirley Sagawa - [Contains CUI]

You don't often get email from [djbortot@oge.gov](mailto:djbortot@oge.gov). [Learn why this is important](#)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

CONTROLLED

All, Shirley Sagawa is precleared.

Evelio, the references on page three of the report to the attachment page numbers seems off. For example, Brokerage Account #1 (See Attachment, pp. 1-2) should reference page 1. The references all seem off by one page. Please fix the references.

Joyce or Stephanie, please send the report and ethics agreement to the White House.

Thanks,

Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
250 E Street, SW, Suite 750  
Washington, DC 20024  
Telephone: (202) 482-9227

---

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---

**From:** [Fatemi, Mandy EOP/WHO](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [David J. Apol](#); [Heather A. Jones](#); [Teresa L. Williamson](#); [Stephanie J. Dyer](#); (b)(6) P Wilson email  
**Subject:** RE: PRECLEARED: Michael Purnell - [Contains CUI]  
**Date:** Friday, March 29, 2024 9:42:33 AM

---

**CAUTION:** This email originated from outside OGE. Use caution before clicking on links, opening attachments, or responding. If you believe this email is suspicious, please forward it to spam@oge.gov for additional analysis.

Hi all,

Apologies if I missed this in my inbox, but I'm not seeing the ethics agreement for Purnell.

Mandy

---

**From:** Deborah J. Bortot <djbortot@oge.gov>  
**Sent:** Wednesday, March 27, 2024 4:55 PM  
**To:** Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email>  
**Cc:** David J. Apol <djapol@oge.gov>; Heather A. Jones <hajones@oge.gov>; Teresa L. Williamson <tlwillia@oge.gov>; Stephanie J. Dyer <sdyer@oge.gov>; (b)(6) P Wilson email <(b)(6) P Wilson email>  
**Subject:** PRECLEARED: Michael Purnell - [Contains CUI]

CONTROLLED

All, Michael Purnell is precleared.

Stephanie, please send the ethics agreement to the White House.

Thanks,  
Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
250 E Street, SW, Suite 750  
Washington, DC 20024  
Telephone: (202) 482-9227

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---

**From:** [Deborah J. Bortot](#)  
**To:** [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [David J. Apol](#); [Heather A. Jones](#); [Teresa L. Williamson](#); [Jody Keegan](#); (b)(6) C Blaine email  
(b)(6) W Mcmurry email  
**Subject:** PRECLEARED: (b) (6) - [Contains CUI]  
**Date:** Thursday, March 28, 2024 6:42:44 PM

---

CONTROLLED

All, (b) (6) is precleared.

Jody, please send the ethics agreement to the White House.

Thanks,  
Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
250 E Street, SW, Suite 750  
Washington, DC 20024  
Telephone: (202) 482-9227

**From:** [Crotty, Sean M. EOP/WHO](#)  
**To:** [Seth Jaffe](#); [David J. Apol](#)  
**Cc:** [Dorsey, Osasu Z. EOP/WHO](#)  
**Subject:** RE: call today  
**Date:** Thursday, March 28, 2024 1:26:42 PM

---

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That works, thank you!

---

**From:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>  
**Sent:** Thursday, March 28, 2024 1:06 PM  
**To:** Crotty, Sean M. EOP/WHO <(b)(6) S Crotty email [REDACTED]> David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Cc:** Dorsey, Osasu Z. EOP/WHO <(b)(6) O Dorsey email [REDACTED]>  
**Subject:** RE: call today

Hi Sean,

It is nice to hear from you.

Unfortunately, I will be unavailable for a call at 3:30pm today as I will be on an engagement call with GAO concerning their ongoing review of the executive branch financial disclosure system. I did discuss this issue with Dave, and he will be able to join the call.

Thanks,  
Seth

Seth Jaffe  
U.S. Office of Government Ethics  
Chief, Ethics Law & Policy Branch  
(202) 482-9303

---

**From:** Crotty, Sean M. EOP/WHO <(b)(6) S Crotty email [REDACTED]>  
**Sent:** Thursday, March 28, 2024 11:19 AM  
**To:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Cc:** Dorsey, Osasu Z. EOP/WHO <(b)(6) O Dorsey email [REDACTED]>  
**Subject:** call today

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---

Hi Dave and Seth,

Hope that you are well. Osasu and I have a call scheduled this afternoon at 3:30 with Deb and Heather regarding the ethics agreement for a PAS nominee. We think it would be helpful if one or both of you are able to join that call, as it touches on the (b) (5) discussion we had a couple weeks ago in the context of the proposed changes to the Standards of Conduct.

Are you available to join the call? Also happy to discuss beforehand if helpful.

Thank you,  
Sean

**Sean M. Crotty**  
Senior Counsel and Special Assistant to the President  
Office of the White House Counsel

(b) (6)  
(b) (6) Crotty email

---

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---

**From:** [Deborah J. Bortot](#)  
**To:** [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [David J. Apol](#); [Heather A. Jones](#); [Teresa L. Williamson](#); [Jody Keegan](#); (b)(6) VA Yorke; [Mr. David P. Huitema](#)  
(b)(6) D Huitema; [Hampton, Tommye L](#)  
**Subject:** PRECLEARED: Curtis Ried - [Contains CUI]  
**Date:** Wednesday, March 27, 2024 1:30:40 PM

---

CONTROLLED

All, Curtis Ried is precleared.

Jody, please send the ethics agreement to the White House.

Thanks,  
Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
250 E Street, SW, Suite 750  
Washington, DC 20024  
Telephone: (202) 482-9227

**From:** [Deborah J. Bortot](#)  
**To:** [David J. Apol](#)  
**Subject:** FW: Bowling at the White House?  
**Date:** Friday, March 22, 2024 6:19:46 PM

---

Dave,

Is it okay to share this with GCLPD?

Thanks,  
Deb

---

**From:** Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email [REDACTED]>  
**Sent:** Thursday, March 21, 2024 3:25 PM  
**To:** Heather A. Jones <hajones@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>  
**Subject:** Bowling at the White House?

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Deb and Heather,

Would you and some of your colleagues be interested in bowling at the White House on April 3<sup>rd</sup> from 5-7 PM? If so, please let me know. We have 10 slots and if you're interested, you all will need to complete the RSVP as soon as possible.

Mandy

**Mandy Fatemi**

Deputy Associate Counsel  
The White House Office of Presidential Personnel

(b) (6) [REDACTED]

*\*Does not receive texts*

**From:** [Heather A. Jones](#)  
**To:** [Chabora, Paige E. EOP/WHO](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Stephanie Nonluecha](#); [\(b\)\(6\) JM Parker](#); [Hampton, Tommye L](#); [Mr. David P. Huitema](#)  
[\(b\)\(6\) D Huitema](#); [e David J. Apol](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Teresa L. Williamson](#)  
**Subject:** Preleared: Christophe Tocco - (Contains CUI)  
**Date:** Friday, March 22, 2024 2:31:02 PM

---

CONTROLLED

All-

Christophe Tocco is preleared. Stephanie, please send the ethics agreement to the White House.

Thanks,  
Heather

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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**From:** [Deborah J. Bortot](#)  
**To:** [David J. Apol](#); [Seth Jaffe](#); [Megan V. Granahan](#)  
**Subject:** FW: Bowling at the White House?  
**Date:** Friday, March 22, 2024 8:36:01 AM

---

Should I share this with nominee reviewers or even all of GCLPD?

---

**From:** Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email >  
**Sent:** Thursday, March 21, 2024 3:25 PM  
**To:** Heather A. Jones <hajones@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>  
**Subject:** Bowling at the White House?

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Deb and Heather,

Would you and some of your colleagues be interested in bowling at the White House on April 3<sup>rd</sup> from 5-7 PM? If so, please let me know. We have 10 slots and if you're interested, you all will need to complete the RSVP as soon as possible.

Mandy

**Mandy Fatemi**

Deputy Associate Counsel  
The White House Office of Presidential Personnel

(b) (6) \*

*\*Does not receive texts*

**From:** [Dorsey, Osasu Z. EOP/WHO](#)  
**To:** [Seth Jaffe](#)  
**Cc:** [David J. Apol](#)  
**Subject:** Re: Follow up question  
**Date:** Thursday, March 21, 2024 7:45:05 AM

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Thank you, Seth. 10am works for me and should be less than 10 mins. I will call the number below. Thanks for making the time.

Osasu

Sent from my iPhone

On Mar 21, 2024, at 7:38 AM, Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)> wrote:

Hi Osasu,

Dave and I will be at OGE's summit tomorrow at the Department of the Interior and we will be doing a presentation in the early afternoon. I am not sure about Dave's availability, but I could do a call at either 10:00am or 3:45pm.

Thanks,  
Seth  
202-482-9303

---

**From:** Dorsey, Osasu Z. EOP/WHO <(b)(6) O Dorsey email>  
**Sent:** Wednesday, March 20, 2024 6:54 PM  
**To:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Subject:** Follow up question

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Hi Dave and Seth! Thanks again for the guidance you shared last week. I have one follow up question. Do you have some time tomorrow for a short call?

---

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---

**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Deborah J. Bortot](#); [David J. Apol](#)  
**Subject:** RE: Precleared but not nominated - 3/19 (e-mail and attachment contains CUI)  
**Date:** Tuesday, March 19, 2024 11:55:24 AM

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Thank you.

---

**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Tuesday, March 19, 2024 11:16 AM  
**To:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email> Fatemi, Mandy EOP/WHO  
<(b)(6) Fatemi email>  
**Cc:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Subject:** Precleared but not nominated - 3/19 (e-mail and attachment contains CUI)

**CONTROLLED**  
Attachment contains CUI

Attached is this week's report. There are 3 reports that go stale today, one more tomorrow, and two on Friday. There are an additional 5 that will go stale during the Senate recess.

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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email.

---

**From:** [Heather A. Jones](#)  
**To:** [Chabora, Paige E. EOP/WHO](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Deborah J. Bortot](#); [David J. Apol](#)  
**Subject:** Precleared but not nominated - 3/19 (e-mail and attachment contains CUI)  
**Date:** Tuesday, March 19, 2024 11:16:23 AM  
**Attachments:** [Prcleared but not nominated - 3.19xlsx.xlsx](#)  
[CUI Coversheet \(OGE-HAJ\).pdf](#)

First att WIF (b)(5) and (b)(6) (4pp).  
Second att follows.

---

CONTROLLED

Attachment contains CUI

Attached is this week's report. There are 3 reports that go stale today, one more tomorrow, and two on Friday. There are an additional 5 that will go stale during the Senate recess.

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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(202) 482-9316  
hajones@oge.gov

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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Lorna A. Syme](#); [\(b\)\(6\) K Perry](#); [David J. Apol](#); [Deborah J. Bortot](#); [Teresa L. Williamson](#)  
**Subject:** RE: Preleared: Jack Leslie - (Contains CUI)  
**Date:** Monday, March 18, 2024 3:19:51 PM

---

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Thank you!

---

**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Monday, March 18, 2024 2:59 PM  
**To:** Chabora, Paige E. EOP/WHO <[\(b\)\(6\) P Chabora email](#)>; Fatemi, Mandy EOP/WHO <[\(b\)\(6\) Fatemi email](#)>  
**Cc:** Lorna A. Syme <[lasyme@oge.gov](mailto:lasyme@oge.gov)>; [\(b\)\(6\) K Perry email](#); [\(b\)\(6\) K Perry email](#); David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>  
**Subject:** Preleared: Jack Leslie - (Contains CUI)

CONTROLLED

All-

Jack Leslie is preleared. Lorna, please send the ethics agreement and report to the White House.

Thanks,  
Heather

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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---

**From:** [Dorsey, Osasu Z. EOP/WHO](#)  
**To:** [David J. Apol](#)  
**Subject:** RE: Time for a call today  
**Date:** Wednesday, March 13, 2024 12:01:18 PM

---

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Thanks! Ill call you then

---

**From:** David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Sent:** Wednesday, March 13, 2024 11:51 AM  
**To:** Dorsey, Osasu Z. EOP/WHO <(b)(6) O Dorsey email>  
**Subject:** RE: Time for a call today

Hi Osasu,

3:00 works for me.

---

**From:** Dorsey, Osasu Z. EOP/WHO <(b)(6) O Dorsey email>  
**Sent:** Wednesday, March 13, 2024 11:38 AM  
**To:** David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Subject:** Time for a call today

**CAUTION:** This email originated from outside OGE. Use caution before clicking on links, opening attachments, or responding. If you believe this email is suspicious, please forward it to [spam@oge.gov](mailto:spam@oge.gov) for additional analysis.

Hi Dave. Do you have time for a call today? I am generally available so please just let me know a time that works and I can call.

---

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---

**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [\(b\)\(6\) D Serrano](#); [Emma Robertson](#); [David J. Apol](#); [Deborah J. Bortot](#); [Teresa L. Williamson](#)  
**Subject:** RE: Precleared: Caroline Crenshaw - (Contains CUI)  
**Date:** Tuesday, March 12, 2024 12:39:05 PM

---

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Thank you all!

---

**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Tuesday, March 12, 2024 12:37 PM  
**To:** Chabora, Paige E. EOP/WHO <[\(b\)\(6\) P Chabora email](#)> [Fatemi, Mandy EOP/WHO](#)  
<[\(b\)\(6\) Fatemi email](#)>  
**Cc:** [\(b\)\(6\) D Serrano email](#) <[\(b\)\(6\) D Serrano email](#)> [Emma Robertson](#) <[eroberts@oge.gov](mailto:eroberts@oge.gov)>; [David J. Apol](#) <[djapol@oge.gov](mailto:djapol@oge.gov)>; [Deborah J. Bortot](#) <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; [Heather A. Jones](#) <[hajones@oge.gov](mailto:hajones@oge.gov)>; [Teresa L. Williamson](#) <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>  
**Subject:** Precleared: Caroline Crenshaw - (Contains CUI)

CONTROLLED

All-

Caroline Crenshaw is precleared. Emma, please send the ethics agreement to the White House.

Thanks,  
Heather

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Fatemi, Mandy EOP/WHO](#); [David J. Apol](#); [Heather A. Jones](#); [Teresa L. Williamson](#); [Stephanie Nonluecha](#); [Veidenheimer, Paul S](#); [Mr. David P. Huitema \(b\)\(6\) D Huitema](#); [Hampton, Tommye L](#)  
**Subject:** Re: PRECLEARED: Michael Heath - [Contains CUI]  
**Date:** Monday, March 11, 2024 5:24:37 PM

---

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Thank you all for your work on this review!  
Sent from my iPhone

On Mar 11, 2024, at 2:39 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)> wrote:

CONTROLLED

All, Michael Heath is precleared.

Stephanie, please send the ethics agreement to the White House.

Thanks,  
Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
1201 New York Ave., NW, Suite 500  
Washington, DC 20005-3917  
Telephone: (202) 482-9227

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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#)  
**Cc:** [Fatemi, Mandy EOP/WHO](#); (b)(6) S Kildall; [Morris C. Barren](#); [David J. Apol](#); [Deborah J. Bortot](#); [Teresa L. Williamson](#)  
**Subject:** Re: Preleared: Feliz Sanchez - (Contains CUI)  
**Date:** Monday, March 11, 2024 5:23:47 PM

---

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Thank you!  
Sent from my iPhone

On Mar 11, 2024, at 4:26 PM, Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)> wrote:

CONTROLLED

All-

Felix Sanchez is preleared. Morris, please send the report to the White House.

Thanks,  
Heather

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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---

**From:** [Heather A. Jones](#)  
**To:** [Chabora, Paige E. EOP/WHO](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Deborah J. Bortot](#); [David J. Apol](#)  
**Subject:** Precleared but not Nominated - 3/11 (e-mail and attachment contains CUI)  
**Date:** Monday, March 11, 2024 2:22:38 PM  
**Attachments:** [Prcleared but not nominated - 3.11.xlsx](#)  
[CUI Coversheet \(OGE-HAJ\).pdf](#)

---

First att WIF (b)(5) and (b)(6)  
(2pp). Second att follows.

CONTROLLED  
Attachment contains CUI

Attached is this week's report. There are 7 reports that will go stale next week.

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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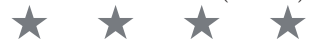
Heather Jones  
(202) 482-9316  
hajones@oge.gov

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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Emma Robertson](#); (b)(6) E Michel email; [David J. Apol](#); [Deborah J. Bortot](#); [Teresa L. Williamson](#)  
**Subject:** RE: Preleared: Christopher Hanson (Contains CUI)  
**Date:** Friday, March 8, 2024 5:12:09 PM

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Thank you!

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**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Friday, March 8, 2024 4:43 PM  
**To:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email>; Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email>  
**Cc:** Emma Robertson <[eroberts@oge.gov](mailto:eroberts@oge.gov)>; (b)(6) E Michel email <(b)(6) E Michel email>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>  
**Subject:** Preleared: Christopher Hanson (Contains CUI)

CONTROLLED

All-

Christopher Hanson is preleared. Emma, please send the ethics agreement to the White House.

Thanks,  
Heather

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Deborah J. Bortot](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [David J. Apol](#); [Heather A. Jones](#); [Teresa L. Williamson](#); [Jack MacDonald](#); [Lorna A. Syme](#); "[Card Mina, Mary \(HHS/OGC\)](#)"; [Shouman, Mohammad \(HHS/OGC/ETHICS\)](#)  
**Subject:** RE: PRECLEARED: Vivek Murthy - [Contains CUI]  
**Date:** Thursday, March 7, 2024 11:54:25 AM

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Thank you very much!

---

**From:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>  
**Sent:** Thursday, March 7, 2024 11:35 AM  
**To:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email [REDACTED]> Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email [REDACTED]>  
**Cc:** David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>; Jack MacDonald <[jjmacdon@oge.gov](mailto:jjmacdon@oge.gov)>; Lorna A. Syme <[lasyme@oge.gov](mailto:lasyme@oge.gov)>; 'Card Mina, Mary (HHS/OGC)' <(b)(6) M Card Mina email [REDACTED]> Shouman, Mohammad (HHS/OGC/ETHICS) <(b)(6) M Shouman email [REDACTED]>  
**Subject:** PRECLEARED: Vivek Murthy - [Contains CUI]

CONTROLLED

All, Vivek Murthy is precleared.

Jack, please send the report and ethics agreement to the White House.

Thanks,  
Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
1201 New York Ave., NW, Suite 500  
Washington, DC 20005-3917  
Telephone: (202) 482-9227

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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Stephanie J. Dyer](#); [\(b\)\(6\) JH Mann](#); [Hampton, Tommye L](#); [Mr. David P. Huitema](#); [\(b\)\(6\) D Huitema](#)  
[David J. Apol](#); [Deborah J. Bortot](#); [Teresa L. Williamson](#)  
**Subject:** RE: Preleared: Keith Hanigan (Contains CUI)  
**Date:** Wednesday, March 6, 2024 5:58:19 PM

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Thank you very much!

---

**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Wednesday, March 6, 2024 5:54 PM  
**To:** Chabora, Paige E. EOP/WHO <[\(b\)\(6\) P Chabora email](#)> Fatemi, Mandy EOP/WHO <[\(b\)\(6\) Fatemi email](#)>  
**Cc:** Stephanie J. Dyer <[sdyer@oge.gov](mailto:sdyer@oge.gov)>; [\(b\)\(6\) JH Mann email](#) <[\(b\)\(6\) JH Mann email](#)> Hampton, Tommye L <[\(b\)\(6\) TL Hampton email](#)> Mr. David P. Huitema <[\(b\)\(6\) D Huitema email](#)> <[\(b\)\(6\) D Huitema email](#)> David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>  
**Subject:** Preleared: Keith Hanigan (Contains CUI)

CONTROLLED

All-

Keith Hanigan is preleared. Stephanie, please send the ethics agreement to the White House.

Thanks,  
Heather

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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**From:** [Chabora, Paige E. EOP/WHO](#)  
**To:** [Heather A. Jones](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Deborah J. Bortot](#); [David J. Apol](#)  
**Subject:** RE: Precleared but not nominated - 3/5 (Attachment Contains CUI)  
**Date:** Wednesday, March 6, 2024 10:42:39 AM

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Thank you.

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**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Wednesday, March 6, 2024 10:09 AM  
**To:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email [REDACTED]> Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email [REDACTED]>  
**Cc:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
**Subject:** Precleared but not nominated - 3/5 (Attachment Contains CUI)

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Attached is this week's report.

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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**From:** [Heather A. Jones](#)  
**To:** [Chabora, Paige E. EOP/WHO](#); [Fatemi, Mandy EOP/WHO](#)  
**Cc:** [Deborah J. Bortot](#); [David J. Apol](#)  
**Subject:** Precleared but not nominated - 3/5 (Attachment Contains CUI)  
**Date:** Wednesday, March 6, 2024 10:08:57 AM  
**Attachments:** [Prcleared but not nominated - 3.5.xlsx](#)  
[CUI Coversheet \(OGE-HAJ\).pdf](#)

First att WIF (b)(5) and (b)(6)  
(2pp). Second att follows.

---

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Attached is this week's report.

Heather Jones (she/her/hers)  
Senior Counsel for Financial Disclosure  
(202) 482-9316  
U.S. Office of Government Ethics

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**From:** [Deborah J. Bortot](#)  
**To:** [Tracy Hurston](#); [Nicole Stein](#)  
**Cc:** [Diana Veilleux](#); [David J. Apol](#); [Dale A. Christopher](#); [Heather A. Jones](#)  
**Subject:** FW: [Contains CUI]  
**Date:** Tuesday, March 5, 2024 4:18:55 PM

---

Tracy,

Please see Paige's email below. Will (b) (5) need to do an MOA for Integrity?

Thanks,  
Deb

---

**From:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email>  
**Sent:** Tuesday, March 5, 2024 3:57 PM  
**To:** Deborah J. Bortot <djbortot@oge.gov>  
**Cc:** Heather A. Jones <hajones@oge.gov>; Teresa L. Williamson <tlwillia@oge.gov>; Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email>; Fatemi, Mandy EOP/WHO <(b)(6) Fatemi email>  
**Subject:** RE: [Contains CUI]

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Just writing with a quick update on this. (b) (5) agreed to handle the ethics review for the (b) (5) nominee. (That was a great suggestion from you – thank you!)

So I wanted to touch with you about next steps to be able to assign the report that the nominee completed to them. Does that mean that the (b) (5) needs to execute the MOA? Or can the agency for the nominee be (temporarily?) identified as (b) (5) for purposes of the ethics review?

Many thanks,  
Paige

---

**From:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>  
**Sent:** Friday, March 1, 2024 5:30 PM  
**To:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email>  
**Cc:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>  
**Subject:** RE: [Contains CUI]

CONTROLLED  
Paige,

We need to run that up that chain.

Thanks,  
Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
250 E Street, SW, Suite 750  
Washington, DC 20024  
Telephone: (202) 482-9227

---

**From:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email [REDACTED]>  
**Sent:** Friday, March 1, 2024 4:58 PM  
**To:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>  
**Cc:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>; Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email [REDACTED]>  
**Subject:** RE: MOA - [Contains CUI]

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Hi Deb,

Thank you for this. I've been researching how the ethics review was done for the other regional commissions, as we learned that the WHCO did not conduct the ethics review and conflict of interest analysis. In the case of the Southeast Crescent Regional Commission, the ethics office for USDA handled the ethics review. In the case of the Southwest Border Regional Commission, the Appalachian Commission handled it. (b) (5) [REDACTED]. During our call, one of you (I think Heather?) suggested the (b) (5) [REDACTED], so I will very likely start there.

So, this leads me to two questions related to the MOA.

1. Below, Tracy notes that this is an MOA that that WH DAEO/ADAEO would be required to sign. Is that the case if the WHCO is not the office conducting the review? Or would it be signed by the agency that agrees to take on the review?
2. Did the USDA and the Appalachian Commission complete this MOA when they agreed to take on the conflicts reviews, as discussed above?

Thanks,  
Paige

---

**From:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>  
**Sent:** Friday, March 1, 2024 4:24 PM  
**To:** Chabora, Paige E. EOP/WHO <(b)(6) P Chabora email [REDACTED]>



**Cc:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>

**Subject:** MOA - [Contains CUI]

CONTROLLED

Hi Paige,

Please see Tracy's email below attaching the MOA that will be required if the WH or another agency is going to agree to service the new agency until it is established.

Thanks,

Deb

Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
250 E Street, SW, Suite 750  
Washington, DC 20024  
Telephone: (202) 482-9227

---

**From:** Tracy Hurston <[thurston@oge.gov](mailto:thurston@oge.gov)>

**Sent:** Friday, March 1, 2024 3:33 PM

**To:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>

**Cc:** Diana Veilleux <[dveille@oge.gov](mailto:dveille@oge.gov)>; Rolando DeLeon <[rdeleon@oge.gov](mailto:rdeleon@oge.gov)>; Tracy Hurston <[thurston@oge.gov](mailto:thurston@oge.gov)>

**Subject:** MOA for PPO

Deb,

Attached is the MOA that the WH DAEO/ADAEO will be required to sign in order to set up an agency in Integrity for an agency that is not yet established (doesn't have a minimum of two employees). If they choose to setup the agency, they can email me, cc Roland, to assist with getting the MOA put in place.

Thank you,

Tracy Hurston  
*Integrity* Manager  
Program Counsel Division  
Legal, External Affairs and Performance Branch  
Office of Government Ethics  
1201 New York Avenue, NW, Suite 500  
Washington, DC 20005

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