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To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Cc: [Alexander Lee](#)
Subject: Part 6 Responses
Date: Thursday, July 11, 2024 5:26:39 PM
Attachments: [Part 6 Questions 7.3.24 - Trump Responces 7.11.2024.pdf](#)
[Part 6 New 2024 OGE 278e Revised 7.11.24.pdf](#) 1st att. - follows. 2nd att. - WIF/(b)(3), 158 p.

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Deb and Heather,

Attached please find responses to the OGE's part 6 questions of 7/3/2024 and an updated Part 6.

Thanks,
Scott

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Donald J. Trump : Round 1 (Pre-Review), OGE Comments

Part 6

General Comments:

*** EIF Designations**

- Please have the filer use “N/A” when reporting an asset or a source of income that does not have underlying assets (e.g., stock in an operating business or a contractual obligation such as bond).
- Please have the filer use “Yes” for publicly traded mutual funds and ETFs and any investment funds/vehicle that meet the EIF criteria.
 - The excepted investment fund criteria are explained in some detail in the Public Financial Disclosure guide.
<https://www.oge.gov/web/278eGuide.nsf/Definitions#EIF>
- Please have the filer use “No” for an investment vehicle (fund, account, etc.) that has underlying assets but does not qualify as an excepted investment fund. If the EIF field is marked “No,” we would expect to see underlying holdings disclosed.

*Capital gains are identified in very few places throughout Part 6. Please confirm whether there are additional capital gains to report. If so, please amend those entries to reflect capital gains and amounts. **RESPONSE:** There are none.

* Dividends: Please confirm the income amounts on Part 6 reflect the income earned during the reporting period, including any reinvested dividends. **RESPONSE:** Any dividends earned are reported within the guidelines.

*Financial Institutions: Part 6 includes line items with several financial institutions. Please confirm that those entries are disclosing investments in company stock for those entities, as opposed to products managed by those entities (e.g., mutual funds, or wealth management portfolios containing underlying assets.) **RESPONSE:** Confirmed that those entries are disclosing investments in company stock for those entities.

- If those line items are disclosing any items other than investments in company stock, please describe those items, and OGE will provide reporting guidance. **RESPONSE:** N/A

* OGE is assuming that where company names are listed, the filer owns company stock, unless specified otherwise. (For example, Investment Account # 1, Line 46 – (b)(3) .) Is this correct? **RESPONSE:** Correct.

* If an asset is an EIF, you are not required to provide a type of income. **RESPONSE:** Please clarify that you want me to remove income type but not income amount on assets that are yes in the EIF box. note that prior filings had income type and amount next to each EIF that had a yes in the box.

Investment Account 1

* Lines 6-39:

CONTROLLED

- The filer reported BOND INTEREST as the type of income for treasury securities and bonds with income amounts reported. Please update type of income to INTEREST.
 - **RESPONSE:** We have made the requested adjustments 278(e).
- Did the filer receive capital gains during the Part 6 reporting period for any of the treasury securities or bonds he reported? If so, he needs to add CAPITAL GAINS as type of interest and confirm if the income amounts reported in the Income Amount fields include capital gains.
 - **RESPONSE:** Capital gains were not received.
- * Line 2 - (b)(3): Please change EIF to N/A.
 - **RESPONSE:** We have made the requested adjustments 278(e).
- * Line 5 - It appears (b)(3) was renamed (b)(3) in July 2023. If that is the case, please change the entry to (b)(3) (formerly named (b)(3)).
 - **RESPONSE:** We have made the requested adjustments 278(e).

* Line 43: (b)(3)

- Please clarify “CLASS IS.” Did the Filer mean to type CLASS I or a different type of class?
 - **RESPONSE:** It is Class I: We have made the requested adjustments 278(e).

* Line 44: (b)(3)

- I am having trouble finding this fund name, but I did find Invesco Variable Rate Preferred ETF. <https://www.invesco.com/us/financial-products/etfs/product-detail?audienceType=Investor&ticker=VRP>
- Please confirm the correct name of the fund and update the Description field as necessary.
 - **RESPONSE:** We have made the requested adjustments 278(e).

Investment Account 2

* The filer reported “(b)(3)” in the Value field, (b)(3) in the Income Type field, and income range of (b)(3) in the Income Amount field. Please confirm if the filer received capital gains income of more than \$200 during the Part 6 reporting period. If so, he needs to add CAPITAL GAINS as type of income and confirm if the income amount reported in the Income Amount field includes capital gains.

- Line 1419
 - **RESPONSE:** No capital gains.

CONTROLLED

* The filer reported (b)(3) in the Value field, (b)(3) in the Income Type field, and income range of (b)(3) in the Income Amount field for each of these line entries listed below. Please confirm if the filer received capital gains income of more than \$200 during the Part 6 reporting period for any of these bonds? If so, he needs to add CAPITAL GAINS as type of income and confirm if the income amounts reported in the Income Amount fields include capital gains.

- Lines 1-5, 7-17, 19-21, 23-25, 27-33, 36, 38, 45-51, 53-54, 56-60, 63-64, 67-73, 75-80, 82-88, 90-93, 96-102, 104-112, 115-118, 120-121, 123-131, 135-161, 163-169, 173-186, 190-192, 196-207, 211-216, 220-231, 242-273, 276-281, 288-296, 298, 300-303, 307-320, 322, 324-326, 328-335, 348-367, 370-374, 380-382, 387-395, 425-522, 530-546, 548-555, 560-567, 569-571, 585-641, 664-689, 692-694, 700-728, 733-741, 743-747, 764-805, 807-808, 814-827, 870-987, 990-994, 1004-1046, 1048-1101, 1103-1180, 1422-1583
 - **RESPONSE:** No capital gains.

* The filer reported (b)(3) in the Income Type field but (b)(3) in the Income Amount field. Please confirm if the filer received capital gains income of more than \$200 during the Part 6 reporting period for any of these bonds? If so, he needs to add CAPITAL GAINS as type of income and confirm if the income amounts reported in the Income Amount fields include capital gains.

- Lines 1181-1183, 1227, 1233, 1265, 1313, 1315, 1327, 1335-1385, 1584-1856
 - **RESPONSE:** No capital gains.

* Please change EIF type from “Yes” to “N/A”

- Lines 1386 and 1388-1421.
 - **RESPONSE:** We have made the requested adjustments 278(e).

*Line 1857: (b)(3) – Is this a mutual fund? If so, please change the EIF designation to “Yes.”

RESPONSE: We have made the requested adjustments 278(e).

Investment Account 3

* The filer reported (b)(3) in the Value field, (b)(3) in the Income Type field, and income range of (b)(3) in the Income Amount field for each of these line entries. Did the filer also receive capital gains income during the Part 6 reporting period? If so, please add CAPITAL GAINS in the Income Type field and confirm if the income amounts reported in the Income Amount field include capital gains income.

- Lines 1, 25-26, 28, 30-31, 33-35, 37, 39, 41-44, 46, 49, 51-60, 62, 64, 66-68, 70-77, 81-90, 92-96, 99, 102-107, 110-112, 115, 117-121, 122, 127-128, 130, 134-140, 142, 144, 146-48, 153, 155, 157-158, 161, 164-165, 167-169, 173-177, 179, 181-182, 184-185, 190-192, 194-197, 199, 201, 203, 205, 207, 209-210, 214-224, 226, 228, 230, 236-237, 239-248, 250, 252-254, 257-265, 267-274, 276-282, 284, 286-287, 290-292, 294-298, 301-302, 304, 306-312, 316-318, 320, 322-324, 327-328, 330, 332-336, 338-340, 343-346, 348, 351-355, 357-360, 362-365, 369-379, 382, 384-387, 389-390, 392-400, 403,

CONTROLLED

405, 407, 410-412, 417-421, 423, 427, 429, 431-434, 436-442, 444-447, 453-454, 456, 463, 465, 470, 477, 491, 493-494, 497, 501-504, 507-509, 513-514, 520, 523, 526, 529-531, 537, 542, 548, 551, 552, 554, 556, 559-560, 564-566, 573, 576, 582, 585, 587, 589-590, 592, 595, 599, 602

- **RESPONSE:** No capital gains.

* The filer reported “(b)(3)” in the Value field and (b)(3) in the Income Type field for each of these line entries listed below. Did the filer also receive INTEREST during the Part 6 reporting period? If so, he needs to add INTEREST as type of interest and confirm if the income amounts reported in the Income Amount fields include capital gains income.

- Lines 18-20, 114, 229, 422
 - **RESPONSE:** No interest earned/only capital gains.

* The filer reported “(b)(3)” in the Value field, (b)(3) in the Type of Income field, and income range of (b)(3) in the Income field for each of these line entries listed below. Please confirm if the filer received capital gains income of more than \$200 during the Part 6 reporting period. If so, please add CAPITAL GAINS in the Type of Income field and confirm if the income amounts reported in the Income Amount field include capital gains income.

- Lines 21, 32, 61, 86, 97-98, 129, 132, 141, 143, 149, 151, 154, 171, 198, 206, 212-213, 225, 255, 283, 299, 325, 329, 342, 347, 356, 361, 391, 402, 406, 413, 415, 425, 612, 639, 680, 786, 807, 827, 844, 865, 910, 920, 939, 974, 1020, 1080, 1101, 1117, 1171, 1175, 1191, 1265, and 1389
 - **RESPONSE:** No capital gains.

* Lines 9, 368 and 579 - (b)(3).

Is this the (b)(3)?

<https://www.schwabassetmanagement.com/products/snvx> If so, please add “Fund” to the Description field for lines 9 and 579. In addition, please change the EIF designation to “Yes.”

RESPONSE: We have made the requested adjustments 278(e).

Are Line 9, Line 368, and 579: (b)(3), the same asset? If so, please update the names to match. Also, please confirm that the filer has three separate holdings within the same investment account.

RESPONSE: We have made the requested adjustments 278(e).

* Line 27 - (b)(3): The filer reported “(b)(3)” in the Value field and (b)(3) in the Income Type field. Did the filer also receive dividends over \$200 during the Part 6 reporting period? If so, he needs to add DIVIDENDS in the Income Type field and confirm if the income amount reported in the Income Amount field include dividends income.

RESPONSE: No.

CONTROLLED

* Line 36 - (b)(3) : Is this a stock holding entry (common or preferred stock)? If so, please confirm that the type of income is INTEREST and not DIVIDEND. Stocks typically generate dividends. If it is a bond holding, please add “(bond)”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 48 - (b)(3) : Is this stock holding or bond holding in (b)(3) ? If it is a stock, please update to (b)(3) in the Description field. If it is a stock, please confirm that the type of income is INTEREST and not DIVIDEND. Stocks typically generate dividends. If it is a bond holding, please add “(bond)”.

RESPONSE: We have made the requested adjustments 278(e).

*Line 80 – (b)(3) : Is this a stock holding entry (common or preferred stock)? If so, please confirm that the type of income is INTEREST and not DIVIDEND. Stocks typically generate dividends. If it is a bond holding, please add “(bond)”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 154 - (b)(3) : Is this stock holding in (b)(3) ? <https://www.fnf.com/> If so, please update the asset name in the Description field.

RESPONSE: We have made the requested adjustments 278(e).

* Line 156: This asset appears to be a bond, but one of the income types is DIVIDENDS. Please confirm that the income type should be DIVIDENDS rather than INTEREST.

RESPONSE: We have made the requested adjustments 278(e).

* Lines 159, 178, 204:

Please add the income amount.

RESPONSE: We have made the requested adjustments 278(e).

If the filer received income of more than \$200 during the Part 6 reporting period, please add type of income.

RESPONSE: We have made the requested adjustments 278(e).

* Line 229 – Please confirm that no interest was earned from this bond.

RESPONSE: Confirmed.

*Line 303 - (b)(3) : This appears to be a stock holding. If so, please confirm that the type of income is INTEREST and not DIVIDEND. Stocks typically generate dividends. If it is a bond holding, please add “(bond)”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 347 - (b)(3) : Please correct spelling to (b)(3)

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

* Line 368 – Please change the EIF to “Yes”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 383 – (b)(3): Is this a stock holding entry (common or preferred stock)? If so, please confirm that the type of income is INTEREST and not DIVIDEND. Stocks typically generate dividends. If it is a bond holding, please add “(bond)”.

RESPONSE: We have made the requested adjustments 278(e).

*Line 414: (b)(3): Is this a stock holding entry (common or preferred stock)? If so, please confirm that the type of income is INTEREST and not DIVIDEND. Stocks typically generate dividends. If it is a bond holding, please add “(bond)”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 422 – Please change the EIF to “Yes”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 579 - (b)(3).

Is this the (b)(3)?

<https://www.schwabassetmanagement.com/products/snvxx> If so, please add “Fund” to the Description field and change the EIF designation to “Yes.”.

RESPONSE: We have made the requested adjustments 278(e).

* Line 606 - (b)(3):

Does “A” stand for class A?

RESPONSE: No. We have made the requested adjustments 278(e).

Change the EIF designation to “N/A.”

RESPONSE: We have made the requested adjustments 278(e).

*Line 607 – (b)(3): Change the EIF designation to “N/A.”

RESPONSE: We have made the requested adjustments 278(e).

*Please have the filer change EIF to N/A for every entry on the following pages, *except for Page 119, Line 1245:*

pages 97-123 (Lines 608-1346) and

RESPONSE: We have made the requested adjustments 278(e).

pages 123-126 (Lines 1356 - 1420)

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

* Page 97, Line 617, (b)(3)

Please have the filer add *Income Type* to this entry.

RESPONSE: We have made the requested adjustments 278(e).

*Page 99, Line 664, (b)(3) :

- Please have the filer confirm whether he has stock in the company or if he has an investment product (e.g., mutual fund or wealth management portfolio) with this entity.
 - **RESPONSE:** He has stock.

If the filer has stock in the company, please change EIF to N/A.

RESPONSE: We have made the requested adjustments 278(e).

- If this entry is disclosing a mutual fund, please have amend the entry to list the full name of the fund and make the determination if it is an EIF.
 - **RESPONSE:** Not a mutual fund.

*Page 100, Line 694, (b)(3)

Please have the filer add *Income Type* to this entry.

RESPONSE: We have made the requested adjustments 278(e).

*Page 100, Line 719, (b)(3)

Please have the filer add *Income Type* to this entry.

RESPONSE: We have made the requested adjustments 278(e).

*Page 103, Line 782, (b)(3)

- Please confirm that the filer owns stock in (b)(3) rather than virtual currency held in a (b)(3) wallet.
 - **RESPONSE:** He has stock.

*Page 104, Lines 815 and 816, (b)(3)

Is this duplicate reporting? LINE ITEM DUPLICATED

RESPONSE: We have made the requested adjustments 278(e).

What does “active” on line 816 mean?

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

*Page 114, Line 1109, (b)(3)

Account Numbers are not required to be reported, as this report can be released to the public. If the numbers at the end of the entry are an account number, please have the filer remove them.

RESPONSE: We have made the requested adjustments 278(e).

*Page 115, Line 1118, (b)(3)

Account Numbers are not required to be reported, as this report can be released to the public. If the numbers at the end of the entry are an account number, please have the filer remove them.

RESPONSE: We have made the requested adjustments 278(e).

*Page 115, Line 1119, (b)(3)

Please have the filer add the *Income Type* to the entry.

RESPONSE: We have made the requested adjustments 278(e).

*Page 115, Line 1121 (b)(3)

Please have the filer add the *Income Type* to the entry.

RESPONSE: We have made the requested adjustments 278(e).

*Page 117, Line 1181, (b)(3)

Please have the filer add the *Income Type* to the entry.

RESPONSE: We have made the requested adjustments 278(e).

*Page 117, Line 1190 and page 149, line 650, (b)(3)

RESPONSE: OHIO was removed. We have made the requested adjustments 278(e).

Please clarify why the filer included “Ohio” in the asset name.

RESPONSE: OHIO was removed. We have made the requested adjustments 278(e).

*Page 119, Line 1245, - (b)(3)

RESPONSE: We have made the requested adjustments 278(e).

Is this the (b)(3)?

<https://www.schwabassetmanagement.com/products/snvxx> If so, please add “Fund” to the Description field. In addition, please leave the EIF designation as “Yes.”

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

*Page 123, Lines 1353-1355: (b)(3)

- The filer reports capital gains, which is indicative of an asset that has been sold rather than matured. Please confirm that the reporting is correct.
 - **RESPONSE:** They matured as stated dates on lines.

*Page 125, Line 1405, (b)(3)

Account Numbers are not required to be reported, as this report can be released to the public. If the numbers at the end of the entry are an account number, please have the filer remove them.

RESPONSE: We have made the requested adjustments 278(e).

Pages 126-157, Investment Account #4:

*The filer reported “(b)(3)” in the Value field, (b)(3) in the Type of Income field, and income range of (b)(3) in the Income field for each of these line entries listed below. Please confirm if the filer received capital gains income of more than \$200 during the Part 6 reporting period. If so, please add CAPITAL GAINS in the Type of Income field and confirm if the income amounts reported in the Income Amount field include capital gains income.

- Lines 86, 633 **RESPONSE:** No capital gains.

*Please have the filer change EIF to N/A for the entries on the following pages, *except for Page 151, Line 704*:

RESPONSE: We have made the requested adjustments 278(e).

Pages 127- 157 (Lines 47-876)

RESPONSE: We have made the requested adjustments 278(e).

*Page 127, Line 39, (b)(3).

Is this the (b)(3) ?

<https://www.schwabassetmanagement.com/products/snvxx> If so, please add “Fund” to the Description field. In addition, please leave the EIF designation as “Yes.”

RESPONSE: We have made the requested adjustments 278(e).

*Page 127, Line 47, (b)(3)

Please have the filer provide the full name of this asset (e.g., (b)(3)).

RESPONSE: We have made the requested adjustments 278(e).

*Page 129, Line 109, (b)(3)

- Please confirm whether “F” is a typo.
 - **RESPONSE:** Name as reported by investment bank.

CONTROLLED

*Please confirm that both of these lines represent stock that the filer held or holds in (b)(3)

- Page 130, Line 113, (b)(3)
 - **RESPONSE:** Stock.
- Page 130, Line 114, (b)(3)
 - **RESPONSE:** Stock.

*Page 134, Line 239, (b)(3)

- Please confirm that the filer owns stock in (b)(3) rather than virtual currency held in a (b)(3) wallet.
 - **RESPONSE:** Stock.

*Page 146, Line 579, (b)(3)

Account Numbers are not required to be reported, as this report can be released to the public. If the numbers at the end of the entry are an account number, please have the filer remove them.

RESPONSE: We have made the requested adjustments 278(e).

*Page 151, Line 704, (b)(3)

- Is this the (b)(3)?
<https://www.schwabassetmanagement.com/products/snvxx> If so, please add “Fund” to the Description field. In addition, please leave the EIF designation as “Yes.”

Please confirm that this is not a duplicate of line 39.

RESPONSE: We have made the requested adjustments 278(e).

*Pages 157-158, Family Trust 1:

- Please have the filer use “Yes” for publicly traded mutual funds and ETFs and any investment funds/vehicle that meet the EIF criteria. The excepted investment fund criteria are explained in some detail in the Public Financial Disclosure guide.

<https://www.oge.gov/web/278eGuide.nsf/Definitions#EIF>

RESPONSE: We have made the requested adjustments 278(e).

- Line 5, (b)(3)

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Please confirm the correct income type is Interest and not Dividends.

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

- Line 6, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Please confirm the correct income type is Interest and not Dividends.

RESPONSE: We have made the requested adjustments 278(e).

- Line 7, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Please confirm the correct income type is Interest and not Dividends.

RESPONSE: We have made the requested adjustments 278(e).

- Line 8, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Also, please **confirm** that **the actual name** of this asset is (b)(3) [REDACTED]. If so, please amend the entry to reflect the actual name [REDACTED].

RESPONSE: We have made the requested adjustments 278(e).

Please confirm the correct income type is Interest and not Dividends.

RESPONSE: We have made the requested adjustments 278(e).

- Line 9, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Please confirm the correct income type is Interest and not Dividends.

RESPONSE: We have made the requested adjustments 278(e).

- Line 15, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Also, please add (b)(3) [REDACTED] to the beginning of the entry.

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

Please confirm the correct income type is Interest is not Dividends.

- **RESPONSE:** We have made the requested adjustments 278(e).
- Line 21, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Please confirm the correct income type is Interest and not Dividends.

RESPONSE: We have made the requested adjustments 278(e).

- Line 23, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

- Line 24, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

- Line 25, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

- Line 26, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

- Line 27, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

- Line 28, (b)(3) [REDACTED]

Please have the filer change EIF to Yes

RESPONSE: We have made the requested adjustments 278(e).

Line 10, (b)(3) [REDACTED]

RESPONSE: We have made the requested adjustments 278(e).

Please confirm this is the (b)(3) [REDACTED].

RESPONSE: We have made the requested adjustments 278(e).

CONTROLLED

If not, please amend the entry to reflect the actual name of this asset.

RESPONSE: We have made the requested adjustments 278(e).

- For the following lines, please have the filer provide more information regarding the entries. Specifically, what are they? Are these cash accounts, funds, or something else? After providing more information, OGE will provide reporting guidance.
 - Page 158, Line 30, US Dollar **RESPONSE:** USD Cash Account
 - Page 158, Line 31, US Dollar Income **RESPONSE:** USD Cash Account

*Page 158, Donald J. Trump

- Are these assets held in trust or by the filer directly? **RESPONSE:** Filer
- If this is an irrevocable trust, amend the line to read Family Trust #2 **RESPONSE:** Filer
- If this is a revocable trust, amend the line to read Family Revocable Trust or D.T. Revocable Trust **RESPONSE:** Filer
- Add EIF No to title line if it is a trust. **RESPONSE:** Filer

Cash accounts: The filer need not specify the financial institution at which a cash account is held (if held within the U.S.). The filer may instead write “U.S. bank (cash).” Accounts at the same financial institution may be aggregated on a single line. Accounts at different financial institutions should not be aggregated on the same line and should be differentiated by noting U.S. bank #1 (cash), U.S. bank #2 (cash), etc. In addition, the **EIF** field will need to be marked as “N/A.”

RESPONSE: We have made the requested adjustments 278(e).

- In accordance with the above-mentioned guidance, please have the filer amend the following lines to read **U.S. bank #1 (cash), U.S. bank #2 (cash)**, etc.
- Also, please add a value and income amount (and type, if applicable) to each entry

Line 2, (b)(3)

RESPONSE: We have made the requested adjustments 278(e).

Line 3, (b)(3)

RESPONSE: We have made the requested adjustments 278(e).

Line 4, (b)(3) THERE ISN'T (b) (4)

- Line 5, (b)(3):
 - Please confirm that the income amount reflects the income earned during the reporting period, including any reinvested dividends over \$200.
 - **RESPONSE:** there isn't (b) (4)

CONTROLLED

Change EIF to N/A

RESPONSE: We have made the requested adjustments 278(e).

- Please confirm that this is separate from the equity interest reported in Part 2.
 - **RESPONSE:** These are the shares of stock.
- *Pages 158-159, Donald Trump Revocable Trust:

Please have the filer add EIF *No* to the title line.

RESPONSE: We have made the requested adjustments 278(e).

- Cash accounts: The filer need not specify the financial institution at which a cash account is held (if held within the U.S.). The filer may instead write “U.S. bank (cash).” Accounts at the same financial institution may be aggregated on a single line. Accounts at different financial institutions should not be aggregated on the same line and should be differentiated by noting **U.S. bank #1 (cash)**, **U.S. bank #2 (cash)**, etc.
 - In accordance with the above-mentioned guidance, please have the filer amend the following lines to read **U.S. bank #1 (cash)**, **U.S. bank #2 (cash)**, etc.
 - Trust Line 1, (b)(3) [REDACTED]
 - Also, please confirm the income amount for this entry reflects the income earned during the reporting period, including any interest.
 - **RESPONSE:** Confirmed.
 - Trust Line 4, (b)(3) [REDACTED]
 - Also, please confirm the income amount for this entry reflects the income earned during the reporting period, including any interest.
 - **RESPONSE:** Confirmed.
 - Trust Line 13, (b)(3) [REDACTED]
 - Also, please confirm the income amount for this entry reflects the income earned during the reporting period, including any interest.
 - **RESPONSE:** Confirmed.
 - Trust Line 14, (b)(3) [REDACTED]
 - Also, please confirm the income amount for this entry reflects the income earned during the reporting period, including any interest.
 - **RESPONSE:** Confirmed.

For the following lines, please have the filer confirm whether the accounts are **cash only**. If so, please **add (cash)** to the entries:

RESPONSE: We have made the requested adjustments 278(e).

- Trust Line 2, (b)(3) [REDACTED]
 - Also, please confirm the income amount for this entry reflects the income earned during the reporting period, including any interest.
 - **RESPONSE:** Confirmed.
- Trust Line 3, (b)(3) [REDACTED]
 - **RESPONSE:** Confirmed.

CONTROLLED

- Trust Line 5, (b)(3) [REDACTED]
 - **RESPONSE:** Confirmed.
- Trust Line 6, (b)(3) [REDACTED]
 - **RESPONSE:** Confirmed.

*The following assets appeared on the previous report but we do not see them listed on the current report. Please confirm these assets do not appear on the current report because they were sold and income (e.g. dividends, interest, capital gains etc.) was \$200 or less. If there is an alternative reason why they do not appear on the current report, please explain.

- Page 36, Line 1064: (b)(3) [REDACTED]. We see numerous Portland, OR bonds but not this exact one.
 - **RESPONSE:** Confirmed.
- Page 59, line 197: (b)(3) [REDACTED]. We see the (b)(3) [REDACTED] listed but not the one due in 2023.
 - **RESPONSE:** Confirmed.
- Page 64, line 385: (b)(3) [REDACTED]. We note that line 548 of the new report has a similar bond with a (b)(3) [REDACTED] due date. Please advise if that is the same bond with a revised due date.
 - **RESPONSE:** Same bond new due date.
- Page 67, line 494. (b)(3) [REDACTED]. On the previous report, line 494 was listed as (b)(3) [REDACTED]. Line 495 of the previous report was listed similarly but indicated (b)(3) [REDACTED] instead of (b)(3) [REDACTED]. We see line 495 of the previous report listed this year (b)(3) [REDACTED] but not line 494 ((b)(3) [REDACTED]). Both were individually valued (b)(3) [REDACTED].
 - **RESPONSE:** Confirmed.
- Page 67, line 499. (b)(3) [REDACTED].
 - **RESPONSE:** Confirmed.
- Page 76, line 248: (b)(3) [REDACTED].
 - **RESPONSE:** Confirmed.
- Page 114, line 23 (Family Trust): (b)(3) [REDACTED].
 - **RESPONSE:** Confirmed.

From: [Deborah J. Bortot](#)
To: ["Scott Gast"](#)
Cc: [Heather A. Jones](#)
Subject: Candidate report Part 6 comments and questions - [Email and attachment(s) contain CUI]
Date: Wednesday, July 3, 2024 6:07:10 PM
Attachments: [CUI Coversheet2.pdf](#)
[Part 6 Questions 7.3.24 - Trump 2024 candidate report \(prereview\).docx](#)

First attachment follows, second is nonresponsive (questions only, answers above starting at p2).

CONTROLLED

Email and attachment(s) contain CUI

Scott,

I have attached the questions to part 6.

Please confirm receipt.

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



CONTROLLED UNCLASSIFIED INFORMATION (CUI)

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If you need additional information regarding the attached document containing CUI, please contact Deborah Bortot at 202-482-9227 or djbortot@oge.gov.

ATTENTION

All individuals handling this information are required to protect it from unauthorized disclosure.

Handling, storage, reproduction, and disposition of the attached document(s) must be in accordance with 32 CFR Part 2002 and applicable agency policy.

Access to and dissemination of CUI shall be allowed as necessary and permissible to any individual(s), organization(s), or grouping(s) of users, provided such access or dissemination is consistent with or in furtherance of a Lawful Government Purpose and in a manner consistent with applicable law, regulations, and Government-wide policies.



From: [Scott Gast](#)
To: [Deborah J. Bortot](#)
Cc: [Heather A. Jones](#)
Subject: Re: Candidate report Part 6 comments and questions - [Email and attachment(s) contain CUI]
Date: Wednesday, July 3, 2024 8:34:47 PM

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.

Confirming receipt.

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Wed, Jul 3, 2024 at 6:07 PM Deborah J. Bortot <djbortot@oge.gov> wrote:

CONTROLLED

Email and attachment(s) contain CUI

Scott,

I have attached the questions to part 6.

Please confirm receipt.

Thanks,

Deb

Remainder of
thread produced
above

From: [Scott Gast](#)
To: [Deborah J. Bortot](#)
Cc: [Heather A. Jones](#)
Subject: Re: Candidate report Part 2 questions - [Email and attachment(s) contain CUI]
Date: Thursday, June 27, 2024 7:20:22 PM

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.

Thanks, Deb. Comments received.

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Thu, Jun 27, 2024 at 6:53 PM Deborah J. Bortot <djbortot@oge.gov> wrote:

CONTROLLED

Email and attachment(s) contain CUI

Scott,

I have attached the questions to part 2. We will provide part 6 questions once they are ready.

Please confirm receipt.

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: ["Scott Gast"](#)
Cc: [Heather A. Jones](#)
Subject: Candidate report Part 2 questions - [Email and attachment(s) contain CUI]
Date: Thursday, June 27, 2024 6:53:33 PM
Attachments: [CUI Coversheet2.pdf](#)
[Part 2 questions 6.27.24 Trump 2024 candidate report \(prereview\).docx](#)

First attachment follows, second is nonresponsive (questions only, answers in first rolling response).

CONTROLLED

Email and attachment(s) contain CUI

Scott,

I have attached the questions to part 2. We will provide part 6 questions once they are ready.

Please confirm receipt.

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: [Scott Gast](#)
To: [Deborah J. Bortot](#)
Cc: [Alexander Lee](#); [Heather A. Jones](#)
Subject: Re: [Contains CUI]
Date: Wednesday, June 26, 2024 9:10:47 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.

Yes, we received the questions and are working on answers.

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Wed, Jun 26, 2024 at 9:08 AM Deborah J. Bortot <djbortot@oge.gov> wrote:

CONTROLLED

Scott, Thank you for the update.

Please confirm receipt of the first set of questions I sent yesterday.

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: Scott Gast <(b)(6)>
Sent: Tuesday, June 25, 2024 4:07 PM
To: Deborah J. Bortot <djbortot@oge.gov>
Cc: Lorna A. Syme <lasyme@oge.gov>; Jack MacDonald <jjmacdon@oge.gov>; Alexander Lee <(b)(6)>
Subject: Financial Disclosure Report Filing Extension

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.

Deb, following up on our earlier call, the FEC has granted President Trump an additional 45 days to file his financial disclosure report. The report is now due by August 15, 2024.

Thanks,

Scott

Scott Gast

Compass Legal Group

[300 Independence Avenue, SE](#)

[Washington, DC 20003](#)

[202.937.2309](#)

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From: [Scott Gast](#)
To: [Jack MacDonald](#)
Cc: [Lorna A. Syme](#); [Alexander Lee](#)
Subject: Re: Draft DJT Financial Disclosure Report - [Message contains CUI]
Date: Thursday, June 20, 2024 1:58:20 PM

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 Jack,

Currently the report is due July 1st, but President Trump has the option of requesting an additional extension of up to 45 days.

Thanks,
Scott

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Thu, Jun 20, 2024 at 1:53 PM Jack MacDonald <jjmacdon@oge.gov> wrote:

CONTROLLED

Scott,

I am confirming receipt of both attachments. Can you please provide us with the due date for the report?

Thank you,

Jack

Jack MacDonald
Program Analyst, Presidential Nominations Branch

U.S. Office of Government Ethics
Suite 750, 250 E Street, SW
Washington, DC 20024
Tel: 202-482-9310

From: Scott Gast <(b)(6)>
Sent: Thursday, June 20, 2024 12:55 PM
To: Lorna A. Syme <lasyme@oge.gov>; Jack MacDonald <jjmacdon@oge.gov>
Cc: Alexander Lee <(b)(6)>
Subject: Draft DJT Financial Disclosure Report

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.

Lorna and Jack,

Attached for OGE's informal review is a draft version of President Trump's financial disclosure report. Given the size of the two attachments, please confirm that you were able to receive both.

Attachments WIF/(b)(3) - 257
pages

Thank you,
Scott

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309

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From: [Scott Gast](#)
To: [Lorna A. Syme](#)
Cc: [Alexander Lee](#)
Subject: Re: FW: 2023 Financial Disclosure Report - [Message contains CUI]
Date: Wednesday, April 10, 2024 11:21:36 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.

Thank you, Lorna. Apologies for the delay in responding, but I was out of town last week. We will share this with the filer.

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Mon, Apr 1, 2024 at 4:53 PM Lorna A. Syme <lasyme@oge.gov> wrote:

CONTROLLED

Hi Scott,

I have discussed your question internally. Our guidance is that court judgements that are being appealed should still be disclosed as liabilities on the financial disclosure report. The filer may add a note indicating that the judgement is being appealed.

Lorna

From: Scott Gast <(b)(6)>
Sent: Monday, March 25, 2024 2:14 PM
To: Lorna A. Syme <lasyme@oge.gov>
Cc: Alexander Lee <(b)(6)> Jack MacDonald <jjmacdon@oge.gov>
Subject: Re: FW: 2023 Financial Disclosure Report - [Message contains CUI]

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Lorna,

We wanted to seek your guidance on whether court judgements that are being appealed should be disclosed as liabilities on the financial disclosure report. Would such a judgement be reportable only after the matter has fully concluded?

Thanks again,

Scott

Scott Gast

Compass Legal Group

300 Independence Avenue, SE

Washington, DC 20003

202.937.2309



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On Tue, Mar 12, 2024 at 12:01 PM Lorna A. Syme <lasyme@oge.gov> wrote:

CONTROLLED

Scott,

Just to clarify. Only Part 2 of the previous report used the separate Schedule 1 and Exhibit A for the copyrights. Part 6 was on the form itself. Please advise if you are planning something different this year for Part 6.

Thanks,

Lorna

Remainder of thread is produced below.

From: [Scott Gast](#)
To: [Lorna A. Syme](#)
Subject: Out of Office RE: FW: 2023 Financial Disclosure Report - [Message contains CUI]
Date: Monday, April 1, 2024 4:53:22 PM

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.

I will be out of the office, with very limited access to email, until Tuesday, April 9th. If you need immediate assistance, please contact Alex Lee at (b)(6)

--

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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From: [Lorna A. Syme](#)
To: "[Scott Gast](#)"
Cc: [Alexander Lee](#); [Jack MacDonald](#)
Subject: RE: 2023 Financial Disclosure Report - [Message contains CUI]
Date: Friday, March 8, 2024 12:27:29 PM

CONTROLLED

Hi Scott,

Thanks for the email. We will need to run your questions through Deb and Heather. We will get back to you with our responses.

Lorna

From: Scott Gast <(b)(6)>
Sent: Friday, March 8, 2024 11:15 AM
To: Lorna A. Syme <lasyme@oge.gov>; Jack MacDonald <jjmacdon@oge.gov>
Cc: Alexander Lee <(b)(6)>
Subject: 2023 Financial Disclosure Report

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Hi Lorna and Jack,

We are working with President Trump's team on beginning to compile information for his 2023 candidate financial disclosure report.

As we begin to collect the relevant data, could you confirm the following date ranges are correct (assuming President Trump selects April 30, 2024 as a record date for valuing assets and any revolving charge accounts):

Part 1	January 1, 2022	May 15, 2024
Part 2 – Assets	January 1, 2023	April 30, 2024
Part 2 – Income	January 1, 2023	May 15, 2024
Part 3	As of May 15, 2024	
Part 5 – Assets	January 1, 2023	April 30, 2024
Part 5 – Income	January 1, 2023	May 15, 2024
Part 6 – Assets	January 1, 2023	April 30, 2024
Part 6 – Income	January 1, 2023	May 15, 2024
Part 8*	January 1, 2023	May 15, 2024

**Liabilities are valued at the highest amount during the reporting period, except for revolving charge accounts, which are valued as of April 30, 2024.*

Could you confirm that these date ranges will not change if any extensions to the filing deadline are granted?

We are also seeking guidance for reporting of assets used to secure an appeal bond, as well as reporting the appeal bonds themselves.

We would be interested in potentially sharing a draft of the form prior to filing to begin an informal review and dialogue on any changes. Would you be amenable to that?

Finally, could you confirm that the attached reporting form is still appropriate to use?

attachment not found
in search

Thanks,
Scott

Scott Gast

Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309

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From: [Lorna A. Syme](#)
To: [Scott Gast](#)
Cc: [Alexander Lee](#); [Jack MacDonald](#)
Subject: FW: 2023 Financial Disclosure Report - [Message contains CUI]
Date: Tuesday, March 12, 2024 12:01:54 PM

CONTROLLED

Scott,

Just to clarify. Only Part 2 of the previous report used the separate Schedule 1 and Exhibit A for the copyrights. Part 6 was on the form itself. Please advise if you are planning something different this year for Part 6.

Thanks,

Lorna

From: Lorna A. Syme
Sent: Tuesday, March 12, 2024 11:35 AM
To: 'Scott Gast' <(b)(6)>
Cc: Alexander Lee <(b)(6)> Jack MacDonald <jjmacdon@oge.gov>
Subject: RE: 2023 Financial Disclosure Report - [Message contains CUI]

CONTROLLED

Scott,

In response to your questions, please see our comments below.

First, with respect to the reporting form, are we able to submit parts 2 and 6 in the same format used in the previous report (i.e., having the entities and trademarks broken out into two sections)?

Yes, you may use the same format used in the previous reports. However, per our previous email, you will need to use the current version of the form (updated 2/9/2024).

Second, is it possible to use different record dates for different sections. For example, could April 30, 2024 be used as the record date for valuing assets for Part 2 and Part 5, but a record date of May 15, 2024 for Part 6?

When valuing assets and revolving charge accounts, you may choose any date that is fewer than 31 days before the filing date. All other liabilities must be valued at the highest amount during the reporting period.

You may use different dates for different parts for valuing assets or revolving charge accounts. However, other liabilities require the highest amount during the reporting period. If the filer acquires an asset or incurs a liability between the date you pick and May 15, you still need to report it. In addition, if you use another date for valuation of assets or revolving charge accounts, you will need to specify on the report, the date you are using.

Lorna

From: Scott Gast <(b)(6)>
Sent: Monday, March 11, 2024 3:57 PM
To: Lorna A. Syme <lasyme@oge.gov>
Cc: Alexander Lee <(b)(6)> Jack MacDonald <jjmacdon@oge.gov>
Subject: Re: 2023 Financial Disclosure Report - [Message contains CUI]

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.

Thanks, Lorna. This is helpful. I will share with the team putting together the report.

Two other questions have arisen since our last email.

First, with respect to the reporting form, are we able to submit parts 2 and 6 in the same format

used in the previous report (i.e., having the entities and trademarks broken out into two sections)?
Second, is it possible to use different record dates for different sections. For example, could April 30, 2024 be used as the record date for valuing assets for Part 2 and Part 5, but a record date of May 15, 2024 for Part 6?

Thanks again,
Scott

Scott Gast

Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309

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CONTROLLED

Hi Scott,

I wanted to get back to you on the two other questions you asked.

We are also seeking guidance for reporting of assets used to secure an appeal bond, as well as reporting the appeal bonds themselves.

- The appeal bonds do not need to be reported as separate entries on the 278 report.
- Any assets used to secure an appeal bond should be disclosed on the 278 report. If the filer chooses, he may designate which assets are used to secure the bond, but he is not required to do so.
- Any money held in escrow (or similar) accounts to satisfy judgments will need to be reported on Part 6 as an asset.
- Any judgements should be reported on Part 8, Liabilities.

We would be interested in potentially sharing a draft of the form prior to filing to begin an informal review and dialogue on any changes. Would you be amenable to that?

OGE is available for informal review of the draft report. We will provide an initial set of comments as long as we are provided a draft at least one month before you plan to file the report.

We are available for a call if you have any questions.

Thank you,

Lorna

Lorna Syme

Program Analyst (Finance)

Presidential Nominations Branch

Office of Government Ethics

202.482.9277

From: Scott Gast <(b)(6)>

Sent: Friday, March 8, 2024 11:15 AM

To: Lorna A. Syme <lasyme@oge.gov>; Jack MacDonald <jjmacdon@oge.gov>

Remainder of thread
produced above

From: [Lorna A. Syme](#)
To: "Scott Gast"
Cc: (b)(6) - Alexander Lee's email address; [Jack MacDonald](#)
Subject: RE: 2023 Financial Disclosure Report - [Message contains CUI]
Date: Friday, March 8, 2024 3:03:09 PM
Attachments: [Excel 278.xlsx](#)

CONTROLLED

Good Afternoon Scott,

The reporting period is tied to a report's original due date and is unaffected by any extensions. The date ranges in your chart are correct.

The attached report is not the correct version of the 278e. The form has been updated and you must use the one with the latest OMB approval. I have attached the Excel version of the form. It was updated 2/9/2024. There is also a PDF version available on the OGE website if you would prefer to use that: <https://www.oge.gov/web/OGE.nsf/OGE%20Forms>

We will get back to you next week on your other questions.

Thanks,
Lorna

From: Scott Gast <(b)(6)>
Sent: Friday, March 8, 2024 11:15 AM
To: Lorna A. Syme <lasyme@oge.gov>; Jack MacDonald <jjmacdon@oge.gov>
Cc: Alexander Lee <(b)(6)>
Subject: 2023 Financial Disclosure Report

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 Lorna and Jack,

We are working with President Trump's team on beginning to compile information for his 2023 candidate financial disclosure report.

As we begin to collect the relevant data, could you confirm the following date ranges are correct (assuming President Trump selects April 30, 2024 as a record date for valuing assets and any revolving charge accounts):

Part 1	January 1, 2022	May 15, 2024
Part 2 – Assets	January 1, 2023	April 30, 2024
Part 2 – Income	January 1, 2023	May 15, 2024
Part 3	As of May 15, 2024	
Part 5 – Assets	January 1, 2023	April 30, 2024
Part 5 – Income	January 1, 2023	May 15, 2024

Remainder of thread
produced above



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:

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Name of Congressional Committee Considering Nomination (Nominees only):

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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:

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From: [Scott Gast](#)
To: [Lorna A. Syme](#)
Cc: (b)(6) [Jack MacDonald](#)
Subject: Re: 2023 Financial Disclosure Report - [Message contains CUI]
Date: Friday, March 8, 2024 3:06:26 PM

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Thank you for the quick response. This is helpful.

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Fri, Mar 8, 2024 at 3:03 PM Lorna A. Syme <lasyme@oge.gov> wrote:

CONTROLLED

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Remainder of thread produced above