

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS

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**CERTIFICATE OF DIVESTITURE**

**CERTIFICATE NO:** OGE-2022-081

**DATE OF ISSUANCE:** March 17, 2022

**ELIGIBLE PERSON:** John Phillips and Sheila Kadagathur [spouse of John Phillips],  
National Security Council

[The divestiture property is identified in the attachment to this Certificate.]

**[Please note: Upon the sale of this property, only the capital gain realized under Federal tax law is eligible for deferral under section 1043. This Certificate of Divestiture does not apply to ordinary compensation income.]**

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code and 5 C.F.R. § 2634.1002 with respect to the specific property described in the attachment. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Section 1043 of the Internal Revenue Code and the rules of 5 C.F.R. part 2634, subpart J provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service. Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should also be consulted as to these matters. Eligible persons must follow Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824).

A Certificate of Divestiture may only be used if the person identified above is an “eligible person” at the time of divestiture. The rules of 5 C.F.R. part 2634, subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003.

DAVID  
APOL

David J. Apol  
General Counsel

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DAVID APOL  
Date: 2022.03.17 15:21:21  
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Attachment



**ATTACHMENT****CERTIFICATE NO: OGE-2022-081**

| <b>Description<br/>of the Property</b> (include the name of the property<br>being divested (e.g. name of stock)) | <b>Quantity<br/>or Percentage Owned</b> (quantity<br>may be represented by the<br>number of shares of stock, units<br>owned, or percentage of the<br>partnership owned) | <b>Owner(s)<br/>of the<br/>Property</b> (full name of the owner(s) of<br>the property) |
|--|---|--|
| APTIV PLC  | 200   | John Phillips and Sheila Kadagathur  |
| ASTRAZENECA PLC  | 400   | John Phillips and Sheila Kadagathur  |
| BANK OF MONTREAL   | 290   | John Phillips and Sheila Kadagathur  |
| LYONDELLBASELL INDUSTRIES  | 130   | John Phillips and Sheila Kadagathur  |
| MEDTRONIC PLC  | 210   | John Phillips and Sheila Kadagathur  |
| NETEASE INC  | 200   | John Phillips and Sheila Kadagathur  |
| RESTAURANT BRANDS  | 500   | John Phillips and Sheila Kadagathur  |
| ABBVIE INC   | 150   | John Phillips and Sheila Kadagathur  |
| AIRBNB INC   | 360   | John Phillips and Sheila Kadagathur  |
| ALPHABET INC   | 12  | John Phillips and Sheila Kadagathur  |
| AMAZON.COM INC   | 10  | John Phillips and Sheila Kadagathur  |
| AMGEN INC  | 100   | John Phillips and Sheila Kadagathur  |
| ANALOG DEVICES INC   | 150   | John Phillips and Sheila Kadagathur  |
| APPLE INC  | 600   | John Phillips and Sheila Kadagathur  |
| APPLIED MATERIALS INC  | 350   | John Phillips and Sheila Kadagathur  |
| ARK ETF TRUST  | 410   | John Phillips and Sheila Kadagathur  |
| AUTOMATIC DATA PROCESSING INC  | 150   | John Phillips and Sheila Kadagathur  |
| BEST BUY COMPANY INC   | 300   | John Phillips and Sheila Kadagathur  |
| BLOCK INC  | 300   | John Phillips and Sheila Kadagathur  |
| CAPITAL ONE FINANCIAL CORP   | 150   | John Phillips and Sheila Kadagathur  |
| CATERPILLAR INC  | 100   | John Phillips and Sheila Kadagathur  |
| CISCO SYSTEMS INC  | 450   | John Phillips and Sheila Kadagathur  |
| CITIZENS FINANCIAL GROUP INC   | 400   | John Phillips and Sheila Kadagathur  |
| CROWDSTRIKE HOLDINGS INC   | 100   | John Phillips and Sheila Kadagathur  |
| CUMMINS INC  | 70  | John Phillips and Sheila Kadagathur  |
| CVS HEALTH CORPORATION   | 300   | John Phillips and Sheila Kadagathur  |

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|                                |       |                                     |
|--------------------------------|-------|-------------------------------------|
| DEERE & CO                     | 120   | John Phillips and Sheila Kadagathur |
| DRAFTKINGS INC                 | 500   | John Phillips and Sheila Kadagathur |
| EMERSON ELECTRIC CO            | 200   | John Phillips and Sheila Kadagathur |
| EXXON MOBIL CORP               | 550   | John Phillips and Sheila Kadagathur |
| GENERAL MOTORS COMPANY         | 550   | John Phillips and Sheila Kadagathur |
| GENUINE PARTS CO               | 130   | John Phillips and Sheila Kadagathur |
| GILEAD SCIENCES INC            | 550   | John Phillips and Sheila Kadagathur |
| HASBRO INC                     | 130   | John Phillips and Sheila Kadagathur |
| HERCULES CAPITAL INC           | 950   | John Phillips and Sheila Kadagathur |
| HOME DEPOT INC                 | 100   | John Phillips and Sheila Kadagathur |
| HUNTINGTON BANCSHARES INC      | 1,000 | John Phillips and Sheila Kadagathur |
| INTEL CORP                     | 475   | John Phillips and Sheila Kadagathur |
| INTERNATIONAL BUSINESS         | 200   | John Phillips and Sheila Kadagathur |
| JOHNSON & JOHNSON              | 125   | John Phillips and Sheila Kadagathur |
| JPMORGAN CHASE & CO            | 190   | John Phillips and Sheila Kadagathur |
| L3HARRIS TECHNOLOGIES INC      | 145   | John Phillips and Sheila Kadagathur |
| MARRIOTT INTERNATIONAL         | 250   | John Phillips and Sheila Kadagathur |
| MCCORMICK & CO INC NON-VOTING  | 160   | John Phillips and Sheila Kadagathur |
| MERCK & CO INC                 | 200   | John Phillips and Sheila Kadagathur |
| MICROCHIP TECHNOLOGY INC       | 450   | John Phillips and Sheila Kadagathur |
| MICROSOFT CORP                 | 200   | John Phillips and Sheila Kadagathur |
| MODERNA INC                    | 100   | John Phillips and Sheila Kadagathur |
| NEXTERA ENERGY INC             | 400   | John Phillips and Sheila Kadagathur |
| PALO ALTO NETWORKS INC         | 100   | John Phillips and Sheila Kadagathur |
| PAYPAL HOLDINGS INC            | 125   | John Phillips and Sheila Kadagathur |
| PELOTON INTERACTIVE INC        | 200   | John Phillips and Sheila Kadagathur |
| PFIZER INC                     | 500   | John Phillips and Sheila Kadagathur |
| PRUDENTIAL FINANCIAL INC       | 250   | John Phillips and Sheila Kadagathur |
| QUALCOMM INC                   | 425   | John Phillips and Sheila Kadagathur |
| SALESFORCE.COM INC             | 175   | John Phillips and Sheila Kadagathur |
| TARGET CORP                    | 250   | John Phillips and Sheila Kadagathur |
| TESLA INC                      | 30    | John Phillips and Sheila Kadagathur |
| TEXAS INSTRUMENTS INCORPORATED | 180   | John Phillips and Sheila Kadagathur |
| TRUIST FINANCIAL CORPORATION   | 400   | John Phillips and Sheila Kadagathur |

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|                                  |          |                                     |
|----------------------------------|----------|-------------------------------------|
| UBER TECHNOLOGIES INC            | 1,650    | John Phillips and Sheila Kadagathur |
| UNION PACIFIC CORP               | 75       | John Phillips and Sheila Kadagathur |
| US BANCORP DEL                   | 725      | John Phillips and Sheila Kadagathur |
| WALGREEN BOOTS ALLIANCE INC      | 1,100    | John Phillips and Sheila Kadagathur |
| WALT DISNEY CO                   | 200      | John Phillips and Sheila Kadagathur |
| ZOOMINFO TECHNOLOGIES INC        | 800      | John Phillips and Sheila Kadagathur |
| BOOZ ALLEN HAMILTON HOLDING CORP | 375      | John Phillips and Sheila Kadagathur |
| THE BOEING COMPANY               | 3681.924 | John Phillips and Sheila Kadagathur |
| ICICI BANK LIMITED               | 1282.279 | John Phillips and Sheila Kadagathur |

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**CERTIFICATE OF DIVESTITURE**

**CERTIFICATE NO:** OGE-2022-082

**DATE OF ISSUANCE:** March 17, 2022

**ELIGIBLE PERSON:** Sheila Kadagathur [spouse of John Phillips], National Security Council

[The divestiture property is identified in the attachment to this Certificate.]

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ELIGIBLE PERSON: Sheila Kadagathur [spouse of John Phillips], National Security Council