

February 24, 2022

Mr. Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear. Mr. Rounds:

The purpose of this letter is to forward the attached amendment to Ms. Pham's Public Financial Disclosure Report (278e) dated November 3, 2021. Ms. Pham explains in her letter dated February 23, 2022, that in her initial 278e, she disclosed the value of her anticipated bonus as \$100,000-250,000. However, she did not clarify that the bonus would be paid in cash and deferred stock.

As the Alternate Designated Agency Ethics official of the U.S. Commodity Futures Trade Commission, I have reviewed the updated information contained in the amendment and based upon my review of these and the prior commitments made by Ms. Pham in her previously transmitted Ethics Agreement, I continue to believe that Ms. Pham is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

FRANK WALSH 
Digitally signed by FRANK
WALSH
Date: 2022.02.24 08:27:17 -05'00'

Frank M. Walsh

February 23, 2022

John Einstman
Designated Agency Ethics Official
Legal Division
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: Amendment to Financial Disclosure Report of Caroline Pham

Dear Mr. Einstman:

The purpose of this letter is to correct inadvertent errors in the financial disclosure report that I signed on November 3, 2021. In my initial disclosure, I disclosed the value of my anticipated bonus as \$100,000-250,000. However, I did not clarify that the bonus would be paid in cash and deferred stock. The entry below reflects that my bonus will be comprised of both cash and deferred stock.

The item(s) identified below are amended, as follows:

Part 2, line 2:

#	Description	EIF	Value	Income Type	Income Amount
2	Citi, anticipated bonus	No			
2.1	Unvested deferred stock bonus	N/A	\$50,001-\$100,000		None (or less than \$201)
2.2	Cash bonus	N/A	\$100,001 -\$250,000		None (or less than \$201)

Part 3, line 1

Employer or Party	City/State	Status and Terms	Date
Citi	New York, New York	I may be eligible for a discretionary annual year-end performance bonus if employed at the end of January. The bonus will be comprised of cash and unvested Citi deferred stock. Any unvested deferred stock I receive as a bonus will be treated pursuant to the Citi policy described on Part 3, line 3.	10/2014

I understand that this amendment will be attached to my financial disclosure report and released upon request with that report.

Sincerely,



Caroline Pham

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Pham, Caroline

Commissioner, Commodity Futures Trading Commission

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Committee on Agriculture, Nutrition, and Forestry
-

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

/s/ Pham, Caroline [electronically signed on 11/03/2021 by Pham, Caroline in Integrity.gov]

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

/s/ Walsh, Frank, Certifying Official [electronically signed on 01/13/2022 by Walsh, Frank in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 01/20/2022 by Apol, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Citi	New York, New York	Corporation	Managing Director	10/2014	Present
2	Family Revocable Trust #1	New York, New York	Trust	Grantor and Trustee	5/2015	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Citi	N/A		Salary/Bonus	\$881,362
2	Citi, anticipated bonus	N/A	\$100,001 - \$250,000		None (or less than \$201)
3	Citigroup, Inc. (C)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
4	Citigroup, Inc. (C) unvested deferred stock award	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
5	Citigroup Inc. 401(k) plan	No			
5.1	BlackRock LifePath Fund 2050	Yes	\$250,001 - \$500,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Citi	New York, New York	I may be eligible for a discretionary annual year-end performance bonus if employed at the end of January 2022.	10/2014
2	Citigroup Inc. 401(k) plan	New York, New York	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	10/2014
3	Citi	New York, New York	Citigroup Inc. (C) unvested deferred stock award. Pursuant to Citi policy, Citi will cancel 25% of my unvested deferred stock and the remaining 75% of my unvested deferred stock will be distributed prior to the date of my appointment.	2/2018

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Citi	New York, New York	Director, Compliance; Managing Director, Global Regulatory Affairs

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

None

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	U.S. bank #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	New York's 529 College Savings Program	No			
3.1	Aggressive Age-Based Option: Growth Portfolio	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	MetLife Group Universal Life Insurance	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Principal LargeCap Growth Fund I Class A Shares (PLGAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Principal SmallCap Fund Class A Shares (PLLAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	Ethereum (Coinbase account)	N/A	\$1,001 - \$15,000		None (or less than \$201)

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Citibank, N.A.	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2016	3.125	30 years
2	Citibank, N.A.	Mortgage on Personal Residence	\$100,001 - \$250,000	2016	3.490	25 years

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
3	Citibank, N.A.	Credit Card	\$15,001 - \$50,000	2021	14.99	Revolving
4	American Express	Credit Card	\$10,001 - \$15,000	2021	15.49	Revolving
5	First Republic Bank	Student Loan	\$100,001 - \$250,000	2016	3.75	15 years

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

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: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

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

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

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

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (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 the reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

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

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 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 \$166 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 a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) 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; (10) 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; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) 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; (13) 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 (14) 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

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