

Report Type: Termination Report

Year (Annual Report only):

Date of Appointment: 03/2022

Date of Termination: 05/2025

Appointment Type: Career

## Executive Branch Personnel

### Public Financial Disclosure Report (OGE Form 278e)

#### Filer's Information

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Palmer, Virginia E

Ambassador to Ghana, Department of State

Date of Termination: 05/28/2025

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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/ Palmer, Virginia E [electronically signed on 06/27/2025 by Palmer, Virginia E in Integrity.gov]

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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).

/s/ Veidenheimer, Paul S, Certifying Official [electronically signed on 07/28/2025 by Veidenheimer, Paul S in Integrity.gov]

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Other review conducted by

/s/ Veidenheimer, Paul S, Ethics Official [electronically signed on 07/28/2025 by Veidenheimer, Paul S in Integrity.gov]

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U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 08/06/2025 by Granahan, Megan in Integrity.gov]

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

None

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

None

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## 3. Filer's Employment Agreements and Arrangements

None

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

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

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

| #   | DESCRIPTION                          | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|-----|--------------------------------------|-----|-----------------------|-------------|---------------------------|
| 1   | Cassaday IRA #1                      | No  |                       |             |                           |
| 1.1 | Invesco Developing Mkts Fund (ODVIX) | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.2 | Diamond Hill Large-Cap Fund (DHLRX)  | Yes | \$100,001 - \$250,000 |             | None (or less than \$201) |
| 1.3 | FPA New Income Inc (FPNIX)           | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |

| #    | DESCRIPTION                                                    | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|------|----------------------------------------------------------------|-----|-----------------------|-------------|---------------------------|
| 1.4  | Grandeur Peak International Stalwarts (GISYX)                  | Yes | \$100,001 - \$250,000 |             | None (or less than \$201) |
| 1.5  | Guggenheim Total Return Bond Fund (GIBIX)                      | Yes | \$100,001 - \$250,000 |             | None (or less than \$201) |
| 1.6  | Harding Loevner International Equity (HLMIX)                   | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 1.7  | The Hartford International Value Fund (HILIX)                  | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 1.8  | Vanguard World Mega Cap Growth (MGK)                           | Yes | \$250,001 - \$500,000 |             | None (or less than \$201) |
| 1.9  | SPDR World Gold MiniShares (GLDM)                              | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.10 | Cohen & Steers Institutional Realty Shares, Inc. (CSRIX)       | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.11 | iShares Russell Mid-Cap Value ETF (IWS)                        | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 1.12 | iShares Russell Mid-Cap Growth ETF (IWP)                       | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.13 | iShares Russell 2000 Value ETF (IWN)                           | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 1.14 | iShares Russell 2000 Growth ETF (IWO)                          | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.15 | Schwab US Dividend Equity ETF (SCHD)                           | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.16 | AcadianEmerging Markets Portfolio Class I Shares (AEMZX)       | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 1.17 | Vanguard Long-Term Treasury Index Fund ETF Class Shares (VGLT) | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |

## 6. Other Assets and Income

| #  | DESCRIPTION                                        | EIF | VALUE                   | INCOME TYPE       | INCOME AMOUNT             |
|----|----------------------------------------------------|-----|-------------------------|-------------------|---------------------------|
| 1  | Costco Wholesale Corp. (COST)                      | N/A | \$100,001 - \$250,000   | Dividends         | \$201 - \$1,000           |
| 2  | 5Starlife AFBA Whole Life Insurance Policy         | N/A | \$15,001 - \$50,000     |                   | None (or less than \$201) |
| 3  | Jackson National Whole Life Insurance Policy       | N/A | \$50,001 - \$100,000    |                   | None (or less than \$201) |
| 4  | John Hancock Whole Life Insurance Policy           | N/A | \$50,001 - \$100,000    |                   | None (or less than \$201) |
| 5  | 5Starlife AFBA Whole Life Insurance Policy         | N/A | \$50,001 - \$100,000    |                   | None (or less than \$201) |
| 6  | STATE DEPARTMENT FEDERAL CREDIT UNION CASH ACCOUNT | N/A | \$1,001 - \$15,000      |                   | None (or less than \$201) |
| 7  | CAPITAL ONE BANK - CASH ACCOUNT                    | N/A | \$50,001 - \$100,000    | Interest          | \$1,001 - \$2,500         |
| 8  | STATE DEPARTMENT FEDERAL CREDIT UNION CASH ACCOUNT | N/A | \$50,001 - \$100,000    | Interest          | \$201 - \$1,000           |
| 9  | Residential Real Estate - Washington, D.C.         | N/A | \$250,001 - \$500,000   | Rent or Royalties | \$5,001 - \$15,000        |
| 10 | AMERICAN EXPRESS NATIONAL BANK - CASH ACCOUNT      | N/A | \$500,001 - \$1,000,000 | Interest          | \$5,001 - \$15,000        |
| 11 | Axon Enterprise, Inc. (AAXN)                       | N/A | \$15,001 - \$50,000     |                   | None (or less than \$201) |
| 12 | BJ's Wholesale Club Holdings, Inc. (BJ)            | N/A | \$15,001 - \$50,000     |                   | None (or less than \$201) |
| 13 | Cassaday & Company brokerage account               | No  |                         |                   |                           |

| #     | DESCRIPTION                                                                   | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|-------|-------------------------------------------------------------------------------|-----|-----------------------|-------------|---------------------------|
| 13.1  | ASML HOLDING NV (ASML)                                                        | N/A | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 13.2  | Advanced Micro Devices, Inc. (AMD)                                            | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 13.3  | Capital One Financial Corp. (COF)                                             | N/A | \$15,001 - \$50,000   | Dividends   | \$201 - \$1,000           |
| 13.4  | Costco Wholesale Corp. (COST)                                                 | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 13.5  | Freeport-McMoRan, Inc. (FCX)                                                  | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 13.6  | LVMH MOET HENNESSY (LVMUY)                                                    | N/A | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 13.7  | FPA New Income, Inc (FPNIX)                                                   | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 13.8  | Grandeur Peak International Stalwarts Fund Institutional Class Shares (GISYX) | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 13.9  | iShares PHLX Semiconductor ETF (SOXX)                                         | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 13.10 | Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)                          | Yes | \$100,001 - \$250,000 |             | \$201 - \$1,000           |
| 13.11 | SPDR Gold MiniShares Trust (GLDM)                                             | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 13.12 | iShares Russell 1000 Value ETF (IWD)                                          | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 13.13 | iShares Trust MSCI Emerging Markets Index Fund (EEM)                          | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 13.14 | iShares Russell 2000 Growth ETF (IWO)                                         | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |

| #     | DESCRIPTION                                                          | EIF | VALUE                | INCOME TYPE | INCOME AMOUNT             |
|-------|----------------------------------------------------------------------|-----|----------------------|-------------|---------------------------|
| 13.15 | iShares MSCI EAFE Growth ETF (EFG)                                   | Yes | \$15,001 - \$50,000  |             | \$201 - \$1,000           |
| 13.16 | Proshares S&P 500 Dividend Aristocrats ETF (NOBL)                    | Yes | \$15,001 - \$50,000  |             | \$201 - \$1,000           |
| 13.17 | Real Estate Select Sector SPDR Fund (XLRE)                           | Yes | \$15,001 - \$50,000  |             | \$1,001 - \$2,500         |
| 13.18 | Guggenheim Total Return Bond Fund Institutional Class Shares (GIBIX) | Yes | \$50,001 - \$100,000 |             | \$2,501 - \$5,000         |
| 13.19 | Vanguard Long-Term Treasury Index Fund ETF Class Shares (VGLT)       | Yes | \$15,001 - \$50,000  |             | \$1,001 - \$2,500         |
| 13.20 | AcadianEmerging Markets Portfolio Class I Shares (AEMZX)             | Yes | \$15,001 - \$50,000  |             | \$201 - \$1,000           |
| 14    | NIO INC. (NIO)                                                       | N/A | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 15    | United Airlines Holdings, Inc. (UAL)                                 | N/A | \$15,001 - \$50,000  |             | None (or less than \$201) |
| 16    | Goodyear Tire & Rubber Co. (GT)                                      | N/A | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 17    | CREF Global Equities Account Class R3 (QCGLIX)                       | Yes | \$15,001 - \$50,000  |             | None (or less than \$201) |
| 18    | Nuveen Mid-Cap Growth Fund Retirement                                | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 19    | Nuveen Large-Cap Value Fund Retirement                               | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 20    | Nuveen International Equity Index Fund                               | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |
| 21    | Nuveen Large-Cap Growth Index Fund Retirement                        | Yes | \$1,001 - \$15,000   |             | None (or less than \$201) |

| #  | DESCRIPTION                                        | EIF | VALUE                     | INCOME TYPE       | INCOME AMOUNT             |
|----|----------------------------------------------------|-----|---------------------------|-------------------|---------------------------|
| 22 | Nuveen International Opportunities Fund Retirement | Yes | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 23 | AIRBNB INC (ABNB)                                  | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 24 | American Airlines Group, Inc. (AAL)                | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 25 | Coinbase Global Inc (COIN)                         | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 26 | Delta Air Lines, Inc. (DAL)                        | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 27 | DoorDash Inc (DASH)                                | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 28 | Ford Motor Co. (F)                                 | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 29 | McDonald's Corp. (MCD)                             | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 30 | Micron Technology, Inc. (MU)                       | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 31 | Krispy Kreme Inc. Common Stock (DNUT)              | N/A | \$1,001 - \$15,000        |                   | None (or less than \$201) |
| 32 | Tesla, Inc. (TSLA)                                 | N/A | \$15,001 - \$50,000       |                   | None (or less than \$201) |
| 33 | Residential real estate, Arlington, VA             | N/A | \$1,000,001 - \$5,000,000 | Rent or Royalties | \$15,001 - \$50,000       |
| 34 | Financial Select Sector SPDR Fund (XLF)            | Yes | \$15,001 - \$50,000       |                   | \$201 - \$1,000           |
| 35 | Industrial Select Sector SPDR Fund (XLI)           | Yes | \$50,001 - \$100,000      |                   | \$201 - \$1,000           |

| #  | DESCRIPTION                                                               | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|----|---------------------------------------------------------------------------|-----|-----------------------|-------------|---------------------------|
| 36 | SPDR S&P Biotech ETF (XBI)                                                | Yes | \$15,001 - \$50,000   |             | None (or less than \$201) |
| 37 | Vanguard S&P Mid-Cap 400 Value Index Fund ETF Shares (IVOV)               | Yes | \$1,001 - \$15,000    |             | \$201 - \$1,000           |
| 38 | Vanguard Emerging Markets Stock Index Fund ETF Shares (VWO)               | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 39 | Vanguard Mid-Cap Index Fund ETF Shares (VO)                               | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 40 | Vanguard Small-Cap Index Fund ETF Shares (VB)                             | Yes | \$50,001 - \$100,000  |             | \$201 - \$1,000           |
| 41 | Vanguard Total Stock Market Index Fund ETF Class Shares (VTI)             | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 42 | Vanguard International Equity Index Fund Total World Stock Index ETF (VT) | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 43 | Vanguard European Stock Index Fund ETF Shares (VGK)                       | Yes | \$1,001 - \$15,000    |             | \$201 - \$1,000           |
| 44 | Vanguard Mega Cap Growth Index Fund ETF Shares (MGK)                      | Yes | \$100,001 - \$250,000 |             | \$201 - \$1,000           |
| 45 | Vanguard Mega Cap Value Index Fund ETF Shares (MGV)                       | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 46 | Vanguard Real Estate Index Fund ETF Shares (VNQ)                          | Yes | \$15,001 - \$50,000   |             | \$1,001 - \$2,500         |
| 47 | ARK Innovation ETF (ARKK)                                                 | Yes | \$50,001 - \$100,000  |             | None (or less than \$201) |
| 48 | Fidelity MSCI Consumer Staples Index ETF (FSTA)                           | Yes | \$50,001 - \$100,000  |             | \$1,001 - \$2,500         |
| 49 | Global X FinTech ETF (FINX)                                               | Yes | \$1,001 - \$15,000    |             | None (or less than \$201) |

| #    | DESCRIPTION                                                    | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|------|----------------------------------------------------------------|-----|-----------------------|-------------|---------------------------|
| 50   | Invesco S&P 500 Equal Weight Technology ETF (RSPT)             | Yes | \$50,001 - \$100,000  |             | \$201 - \$1,000           |
| 51   | Invesco S&P 500 Equal Weight Consumer Discretionary ETF (RSPD) | Yes | \$50,001 - \$100,000  |             | \$201 - \$1,000           |
| 52   | iShares Core S&P Mid-Cap ETF (IJH)                             | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 53   | iShares Core S&P Small-Cap ETF (IJR)                           | Yes | \$100,001 - \$250,000 |             | \$1,001 - \$2,500         |
| 54   | iShares Core S&P Total US Stock Market ETF (ITOT)              | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 55   | iShares Core S&P 500 ETF (IVV)                                 | Yes | \$100,001 - \$250,000 |             | \$1,001 - \$2,500         |
| 56   | iShares S&P 500 Growth ETF (IVW)                               | Yes | \$100,001 - \$250,000 |             | \$201 - \$1,000           |
| 57   | iShares S&P 500 Value ETF (IVE)                                | Yes | \$50,001 - \$100,000  |             | \$1,001 - \$2,500         |
| 58   | iShares Edge MSCI USA Momentum Factor ETF (MTUM)               | Yes | \$50,001 - \$100,000  |             | \$201 - \$1,000           |
| 59   | iShares Core MSCI Total International Stock ETF (IXUS)         | Yes | \$15,001 - \$50,000   |             | \$201 - \$1,000           |
| 60   | Wealthfront Cash Account                                       | N/A | \$100,001 - \$250,000 | Interest    | \$1,001 - \$2,500         |
| 61   | Virginia529                                                    | No  |                       |             | None (or less than \$201) |
| 61.1 | Aggressive Growth                                              | Yes | \$1,001 - \$15,000    |             | None (or less than \$201) |
| 62   | NVIDIA Corp. (NVDA)                                            | N/A | \$15,001 - \$50,000   |             | None (or less than \$201) |

| #  | DESCRIPTION                                                           | EIF | VALUE                 | INCOME TYPE | INCOME AMOUNT             |
|----|-----------------------------------------------------------------------|-----|-----------------------|-------------|---------------------------|
| 63 | Etrade Bank                                                           | N/A | \$100,001 - \$250,000 | Interest    | \$2,501 - \$5,000         |
| 64 | TIAA-CREF Real Estate Securities Fund Retirement Class Shares (TRRSX) | Yes | \$1,001 - \$15,000    |             | None (or less than \$201) |

## 7. Transactions

| # | DESCRIPTION                   | TYPE     | DATE       | AMOUNT              |
|---|-------------------------------|----------|------------|---------------------|
| 1 | Costco Wholesale Corp. (COST) | Purchase | 03/07/2025 | \$1,001 - \$15,000  |
| 2 | Costco Wholesale Corp. (COST) | Purchase | 03/20/2025 | \$15,001 - \$50,000 |
| 3 | NVIDIA Corp. (NVDA)           | Purchase | 03/03/2025 | \$1,001 - \$15,000  |

## 8. Liabilities

None

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## 9. Gifts and Travel Reimbursements

None

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## 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 (note: certain PAS nominees and appointees are required to report all mortgages); (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 \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 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 \$192 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

5 U.S.C. § 13101 et seq., 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 5 U.S.C. §§ 13107 and § 13122(b)(1) 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 13989 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

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE) 250 E Street, S.W., Suite 750, Washington, DC 20024-3249.

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 (that control number 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).