# **GENERAL INFORMATION**



If you received a notice from the Clerk of the House that you are required to file a Financial Disclosure Report (FD) or Periodic Transaction Report (PTR), DO NOT DISREGARD. Contact the Committee immediately, since only the Committee can relieve you of your filing obligation.

# INTRODUCTION

#### STATUTORY BACKGROUND

Title I of the Ethics in Government Act of 1978 (EIGA), as amended (5 U.S.C. §§ 13101-13111), requires Members, Officers, Candidates, and certain Employees of the U.S. House of Representatives (the House) and Legislative Branch Offices to file a Financial Disclosure Report (FD) with the Clerk of the House (the Clerk).

In addition, the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act (STOCK Act) amended the EIGA to require Members, Officers, and certain Employees<sup>1</sup> of the House and Legislative Branch Offices to disclose transactions over \$1,000 for certain securities by the earlier of these two dates:

- 1. 30 days from being made aware of the transaction; or
- 2. 45 days from the transaction date.

These STOCK Act filings are known as Periodic Transaction Reports (PTRs). In addition, House Rule 26 provides that Title I of the EIGA is deemed a rule of the House regarding House Members, Officers, and Employees. The Committee on Ethics (Committee) administers the EIGA for the House.

#### **GETTING ASSISTANCE**

If you have questions concerning the disclosure requirements or how to fill out your FD or PTR, please call the **Committee on (202) 225-7103 or email** <u>Financial.Disclosure@mail.house.gov</u>.

Employees of the following agencies should contact their respective general counsel's office with any questions about their financial disclosure obligations.

- Congressional Budget Office (ogc@cbo.gov), (202) 997-4623
- Library of Congress (ogcfd@loc.gov), (202) 707-6316
- Architect of the Capitol (<a href="mailto:ethics@aoc.gov">ethics@aoc.gov</a>), 202-225-1210
- ➤ Government Publishing Office (generalcounsel@gpo.gov), 202-512-0033
- > Capitol Police, (202) 593-3619

Pursuant to its authority under 5 U.S.C. § 13108(b), the Committee has delegated to each of these offices the responsibility to review and certify FDs and PTRs and to issue FD extensions for their respective employees.

<sup>&</sup>lt;sup>1</sup> Senior Staff rate is defined on page 6.

#### **NOTABLE CLARIFICATIONS FOR 2025**

This instruction guide clarifies disclosure requirements regarding the following assets in the interest of simplicity and conformity with all applicable laws and policies.

- Business Development Company (BDC)
- Defined Benefit Plan (Pension)
- Defined Contribution Plan
- Employee Stock Ownership Plan
- Employee Stock Purchase Plan
- Excepted Investment Fund (EIF)

- Health Savings Account (HSA)
- Restricted Stock Unit (RSUs)
- Stable Value Fund
- TIAA (formerly TIAA-CREF)
- Unit Investment Trust (UIT)

**Note:** It is the Committee's opinion that ambiguity in the disclosure requirements favors disclosure. In other words, if you believe a disclosure requirement is ambiguous, you should assume the information at issue should be disclosed. Alternatively, you may request an Advisory Opinion from the Committee to resolve any ambiguity.

If you have questions about standards of conduct that apply in the House, you may obtain the *House Ethics Manual* and Advisory Memoranda by contacting the Committee on (202) 225-7103 or on the Committee's website at <a href="https://ethics.house.gov">https://ethics.house.gov</a>. The Committee's Rules are also on the website.

# WHERE AND HOW TO FILE

(Electronic Filing System and Paper Forms)

# FINANCIAL DISCLOSURES (FDs) AND PERIODIC TRANSACTION REPORTS (PTRs)

FDs and PTRs (including amendments) are required to be filed with the Clerk, not the Committee, either by using the electronic filing system or submitting a paper copy to the Legislative Resource Center (LRC), B-81 Cannon House Office Building, Washington, DC 20515. Paper forms are located on the Committee's website or at the LRC.

# Filing Electronically

- The electronic filing system can be accessed here: https://fd.house.gov.
- Form A or B is preloaded based on your filing status.
- The system requires confirmation of your personal and office address, phone number and email.
- When there is nothing to report, the system generates a question asking you to confirm that the disclosure requirements are correct. The system prompts you to click "Add to the Schedule" if additional information is needed or "Skip this Schedule" if there is nothing more to disclose, which will move you to the next schedule.
- For your login and password, including password resets, contact the LRC on (202) 225-7103.
- Attachments are not allowed if your file electronically.

The Committee strongly encourages you to use the electronic filing system for completing FDs and PTRs to improve speed, efficiency, and accuracy. The electronic filing system can significantly increase the accuracy of proper disclosure by leading you through the process and asking for the required information. Once you input your reportable information, the system will retain this information to be used for future filings. Additionally, you can grant access to one or more third parties, such as a spouse, accountant, or attorney, to assist you in preparing your filing. If you experience any difficulties with the electronic filing system, contact the LRC on (202) 226-5200.

# Filing on Paper

- You must ensure to complete the correct Form A or B.
- Members and Candidates are required to submit one original (with an original signature) and two photocopies of the completed and signed FD or PTR to the Clerk at the LRC.
- Officers and Employees of the House or Legislative Branch Offices are required to submit one original (with an original signature) and one photocopy of the completed and signed FD or PTR to the Clerk at the LRC.
- At the top of each page, indicate your name, page number, and total pages in the filing.
- Type or print clearly in blue or black ink (illegible submissions may require amendment).
- This guide contains "Column-by-Column" instructions for some schedules that only apply to the paper form.

### Completing Paper Form A or B

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#### Completing the Cover Page on the paper form requires:

- Provide your name, address, and daytime telephone number so the Committee can contact you if there are questions (office address and telephone number are acceptable).
- Check the box indicating your status as Member, Candidate, Officer, or Employee of the House or specific Legislative Branch Office.

### Completing Page 1 on the paper form requires:

- Provide your name and daytime telephone number.
- Check the box indicating your status as Member, Candidate, Officer, Employee of the House, or specific Legislative Branch Office.
  - Members and Candidates are required to identify the state and congressional district they represent or seek to represent.
  - Officers and Employees are required to provide the name of the Member, committee, or office they are employed.
  - Shared Employees are required to list the name of at least one employing Member, committee, or office you are employed.
- Check the box indicating the report type: annual, new, amendment, or termination report.
- You are required to answer "YES" or "NO" to each of the questions A-J. These questions summarize the actual disclosure requirements. Answering these summary questions does not eliminate the need to complete the rest of the form. You should read the detailed instructions contained in this guide to assist in completing the rest of the form.

• Each of the questions correspond to a Schedule with the same letter (e.g., question A corresponds to Schedule A). Where the answer to any question is "YES," you are required to attach the completed corresponding Schedule. By answering "NO" to a question, you are stating that there is no information to disclose in this area. For any "NO" answer, do not file the corresponding Schedule. For pages that contain two Schedules, where there is information to be disclosed for one Schedule but not for the other, you do not need to complete the Schedule for which the answer was "NO." Leave it blank, or type "N/A" or "Not Applicable."

FDs and PTRs are required to contain an original signature on paper copies or be transmitted personally through the electronic filing system. Paper forms are required to be hand-delivered or mailed to the Clerk at the LRC. The Clerk's office will not accept paper forms submitted via fax or email. FDs and PTRs are frankable.

#### **Use of Brokerage Statements**

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If you are using the electronic filing system, you cannot attach statements. If filing on paper, brokerage statements may be attached to Schedule A or B; however, you are required to disclose the account name in Schedules A and B and indicate that a statement is attached (e.g., Morgan Stanley Brokerage Account Attachment 1). You are required to clearly identify each statement and number each page of the attachment. You are not required to complete Blocks B through E if you provided an attached statement with the required information.

Any attachment to the form must include all the information required by the form. For Schedule A, the brokerage statements are required to include the value of each asset held in the account at the end of the reporting period (December 31 for most filers). This information is typically included in the last quarterly or monthly statement. Schedule A also requires you to disclose income (e.g., dividends, interest, or capital gains) which generated more than \$200 by an asset during the reporting period. Income generated by assets during the reporting period is not generally found in the last monthly statement. You will need to check each quarterly statement, or you may be able to obtain an income summary for the full reporting period from your broker even if one is not normally provided.

Schedule B requires the disclosure of transactions that exceed \$1,000 during the reporting period. If you choose to submit brokerage statements in lieu of completing the form, you are required to ensure that the statement provides the transaction information for the complete reporting period (rather than just those transactions at the end of the reporting period).

In general, tax forms do not track the financial disclosure requirements and should not be used as attachments.



You should redact or delete from your attachments any confidential information, such as your account number, Social Security number, home address, or the names of your spouse or dependent children, because the attachment will be publicly disclosed as part of your FD. You must make any changes before you file your FD with the Clerk.

# WHO MUST FILE AND WHEN

# **NEW MEMBERS**

New Members sworn in between November 5, 2024, and April 15, 2025, must file an FD (Form B) and complete Schedules A, C, D, E, F, and J on or before **May 15, 2025**. The requirement to file PTRs applies upon swearing in.

**The reporting period** for New Members is the preceding calendar year, January 1 through December 31. When completing Schedules A and C, mark the "Current Year" information "Not Applicable (N/A)." For Schedule E, disclose the current year and preceding calendar year.

New Members sworn in between April 16, 2025, and November 4, 2025, must file an FD (Form A) and complete all schedules on or before **May 15, 2026**. The requirement to file PTRs applies upon swearing in.

**The reporting period** for New Members is the preceding calendar year, January 1 through December 31. For Schedule E, the reporting period is January 1 of the preceding calendar year through the date of filing.

Filer	Form	Reporting Period	Due Date
New Members			
Sworn in 11/5/2024 – 4/15/2025	В	Calendar Year 2024	May 15, 2025
New Members			
Sworn in 4/16/2025 – 11/4/2025	Α	Calendar Year 2025	May 15, 2026

# **INCUMBENT MEMBERS**

Incumbent Members of the House of Representatives, Delegates to Congress, and the Resident Commissioner of Puerto Rico must file an FD (Form A) on or before **May 15** of each calendar year. The requirement to file PTRs applies to all Members upon swearing in.

**The reporting period** for incumbent Members is the preceding calendar year, January 1 through December 31. For Schedule E, the reporting period is January 1 of the preceding calendar year through the date of filing.

Filer	Form	Reporting Period	Due Date
Incumbent Members sworn in 11/5/24 - 4/15/2025	А	Calendar Year 2024	May 15, 2025

#### NEW OFFICERS AND NEW EMPLOYEES OF THE HOUSE AND LEGISLATIVE BRANCH OFFICES

New Officers or New Employees are required to file an FD (Form B) within 30 days of assuming a position in the House or Legislative Branch Offices if they are hired at a compensation rate at or above 120% of the minimum pay for Executive Branch GS15 employees and remain in the position for at least 60 days (2 pay periods for House employees). The compensation rate is established by statute and referred to as the "senior staff rate." A one-time hiring bonus paid in the first month of employment is not counted as part of the compensation rate at which an employee is hired but may be considered in the calculation of a temporary increase in pay. The requirement to file PTRs applies for all applicable transactions executed following the second pay period.

- The rate triggering disclosure in 2024 was \$147,649 (\$12,304 per month).
- The rate for 2025 is \$150,160 (\$12,513 per month).
- The rates for the previous years are on the Committee's website.

The triggering salary is based on the individual's "base rate of pay." It does not include annuities paid by the United States, overtime payments, night differential payments, locality pay adjustments, or student loan repayment by the House. However, if, in any two pay periods during a calendar year (whether or not consecutive), an employee has a temporary increase in pay (such as a year-end bonus paid in November and December that is processed as a salary adjustment) that results in the *gross* pay for those two months exceeding the senior staff rate, that employee will be required to file an FD even though the employee's total salary for the year was less than the senior staff rate annual amount. Lump sum payments (i.e., bonuses) will not be counted as part of the employee's compensation rate for disclosure purposes unless paid as a salary adjustment.

Although New Officers or New Employees are required to file an FD within 30 days of assuming a position in the House or other Legislative Branch Office, it is the Committee's practice to allow new filers to file within 30 days of the date on the Notification Letter they received from the Clerk.

The reporting period for New Officers and New Employees of the House or Legislative Branch Offices is generally January 1 of the preceding calendar year through the current calendar year up to within 30 days of filing the FD. In other words, if your FD is due on May 15, 2025, and it is filed April 15, 2025, the reporting period is January 1, 2024, through any date between March 16 and April 15, 2025. For Schedule E and Schedule J, New Officers and Employees are required to provide information for the current year and two preceding calendar years. Therefore, if you are filing in 2025, you are required to provide information for these two schedules for 2023, 2024, and 2025 through the date of filing.

Filer	Form	Reporting Period	Due Date
New Officers and Employees at the senior staff rate	A	Calendar Year 2024 up to within 30 days of filing	May 15, 2025



# **Exclusions from the New Employee Filing Obligation**

The requirement to file a New Employee FD does not apply to:

- Individuals who move from one position to another within a House or Legislative Branch Office.
- Individuals who receive a pay increase in their current position (an employee who receives a raise that lifts them to the senior staff rate does not file an FD within 30 days of the increase but will be required to file the following calendar year).
- An individual who left a federal government position, which requires the filing of a public FD (e.g., OGE 278), and started their new position with the House or Legislative Branch Office within 30 days.

Individuals who believe they are not required to file must notify the Clerk by submitting a New Employee FD Exemption Form (Appendix F or available on the Committee's website):

- using the electronic filing system; or
- on a paper copy to the LRC (faxes and emails are not accepted).

#### OFFICERS AND EMPLOYEES OF THE HOUSE AND LEGISLATIVE BRANCH OFFICES

Officers and Employees of the House and Legislative Branch Offices are required to file an FD (Form A) on or before May 15 of each calendar year when compensated for at least 60 days at or above the senior staff rate in 2024, even if you are no longer paid at or above the senior staff rate. The requirement to file PTRs applies the 61<sup>st</sup> day when you are paid at the senior staff rate. The senior staff rate changes yearly and the rate triggering disclosure for 2024 was \$147,649 (\$12,304 per month) and is \$150,160 (\$12,513 per month) for 2025.

The reporting period for Officers and Employees of the House and Legislative Branch Offices is the preceding calendar year, January 1 through December 31. For Schedule E, the reporting period is January 1 of the preceding calendar year through the date of filing. This applies to Employees who are required to file because of a raise in their rate of pay but does not apply to New Employees or designated Principal Assistants (PAs).

Filer	Form	Reporting Period	Due Date
Senior Staff (excluding new hires and terminating employees)	A	Calendar Year 2024	May 15, 2025

### PRINCIPAL ASSISTANTS (PAs)

A Member office is required to have at least one employee who files an annual FD (Form A) on **May 15** of each calendar year. Most offices have at least one employee who is paid at or above the senior staff rate (see preceding subsection) and therefore are required to file an FD. However, a Member who does not have an employee paid at or above the senior staff rate must designate at least one current employee as a PA to file an FD. To designate a PA, a Member is required to complete the paper Principal Assistant Designation Form available on the Committee's website or prepare and sign a letter identifying the PA. The completed form or signed letter must be submitted to the Clerk at the LRC. The employing office should notify their employee immediately of their designation as a PA.

**Note:** Members are required to re-assign the-Principal Assistant each year.

The reporting period for PAs is the preceding calendar year, January 1 through December 31. Except in the case of New Members, an employee designated as a PA is required to have been employed in the Member's office for more than 60 days in the calendar year covered by the report and still be employed by the Member on the May 15, 2025, deadline. Neither an FD filed by a New Employee, nor one filed by a terminated employee of the Member will satisfy the requirement. In addition, when a Member's designated PA terminates their House employment, the Member is required to designate a new PA (Appendix B, Interpretive Ruling No. 1). PA are not required to file a Termination FD, unless the PA's employing Member is also leaving the House.

Members have broad discretion in choosing which employee to designate as the PA. The Committee encourages, but does not require, Members to select an employee whose relationship with the Member permits the person to act on the Member's behalf or with the Member's authority. A Member is also free to designate more than one employee as a Principal Assistant to file an FD.

Filer	Form	Reporting Period	Due Date
Principal Assistant	А	Calendar Year 2024	May 15, 2025

#### SHARED EMPLOYEES

In 2008, the Committee on House Administration (CHA) adopted Committee Resolution #110-7, which requires each House employee who is employed simultaneously by three or more offices for more than 60 days (2 pay periods for House employees) in a calendar year to file an FD (Form A) by **May 15** of the following year, regardless of their rate of pay. CHA has not required that such Shared Employees file PTRs or Termination FDs if they are not otherwise required to file because of their rate of pay.

The reporting period for Shared Employees is the preceding calendar year, January 1 through December 31.

Filer	Form	Reporting Period	Due Date
Shared Employees	А	Calendar Year 2024	May 15, 2025

#### **TERMINATION FILERS**

Most Members, Officers, and Employees of the House or Legislative Branch Offices who were required to file an FD and terminate employment are required to file a Termination FD (Form A). This includes employees of the House and Legislative Branch Offices who qualified based on a temporary increase in pay for 60 days (2 pay periods for House employees) or more in the current calendar year but will not be employed with the House or Legislative Branch Offices by May 15 of the following year. Although a Termination FD is required to be submitted within 30 days of leaving House employment, it is the Committee's practice to allow terminating filers to file within 30 days from the date on the Clerk's Notification Letter.

The reporting period for Termination Filers depends on the termination date. If the termination date is prior to May 15, the reporting period is from January 1 of the prior calendar year through the date of termination in the current calendar year. If the individual's termination date is after May 15, the reporting period is the calendar year the termination occurs through the date of termination (*i.e.*, the final date on payroll if leave is being used). For Schedule E, the reporting period is January 1 of the preceding calendar year through the date of filing.

	rm	Reporting Period	Due Date
Termination Filer	A	January 1 of the prior Calendar Year through the date of termination	Within 30 days of leaving employment



# **Exclusions from the Termination Filing Obligation**

An individual who, within 30 days of leaving House employment or Legislative Branch Office, accepts another federal government position that requires the filing of a *public* FD (e.g., OGE Form 278) is not required to file a Termination FD with the House or Legislative Branch Office. However, the individual must notify the Clerk of the new position to excuse the obligation by submitting a Terminated Employee FD Filing Exemption Form (Appendix G or available on the Committee's website):

- using the electronic filing system; or
- on paper copy to the LRC (faxes and emails are not accepted).

The requirement to file a confidential FD (e.g., OGE Form 450) for the new position will not excuse the filing of a Termination FD for the House position. An individual who files only because they were designated as a Principal Assistant is not required to file a Termination FD unless the Principal Assistant's employing Member is also leaving the House.

# **CANDIDATES**

Definitions				
	The term "Candidate" for the purposes of the EIGA is the same found in section 301 of the Federal Election Campaign Act of 1971 (now codified at 52 U.S.C. § 30101).			
	A Candidate is an individual, other than a Member of the House, who seeks nomination for election, or election to Federal office. The individual is deemed to seek nomination for an election if:			
Candidate	<ol> <li>There is a valid Form 2 on file with the Federal Election Commission (FEC), and such individual has received contributions aggregating more than \$5,000 or made expenditures aggregating more than \$5,000; or</li> </ol>			
	<ol> <li>Consent is given to another person to receive contributions or make expenditures on behalf of such individual and such a person has received contributions aggregating more than \$5,000 or has made expenditures aggregating more than \$5,000.</li> </ol>			
Election	The term "election" means (1) general, special, primary, or run-off election, or (2) a convention or caucus of a political party with the authority to nominate a Candidate.			

	The term "qualify" means individuals who raise or spend more than \$5,000 as a Candidate in a campaign election to the House of Representatives.
Qualify	Funds loaned to a campaign from any source, including from themselves, as well as funds expended for state filing fees, count toward the \$5,000 threshold. However, only funds raised or spent in the election cycle in which the Candidate is a Candidate (i.e., the two-year period consisting of the calendar year of the election and the prior calendar year) are considered in determining whether the Candidate has "qualified."
	For example, if the Candidate is running for the House in an election to be held on November 5, 2026, funds raised or spent in the current election cycle (2025 and 2026) count toward the \$5,000 threshold. Any campaign funds carried over from the prior election cycle do not count toward the \$5,000 threshold. Qualifying Candidates are only required to file one FD for any calendar year.
Election Cycle	The term "election cycle" means the year of the election (even-numbered years) and the prior year (odd-numbered years). If a Candidate qualifies during a non-election year, then the Candidate will likely owe 2 FDs.

Candidates are required to file an FD (Form B) once they "qualify." If you receive a notice to file an FD before you've met the requirement, you are required to notify the Clerk promptly by submitting the Campaign Notice Regarding Financial Disclosure Requirement Form (Appendix E and the Committee's website):

- using the electronic filing system; or
- on a paper copy to the LRC (faxes and emails are not accepted).

The reporting period for Candidates is generally January 1 of the prior calendar year through the current calendar year to a date within 30 days prior to the date of filing. You may select the period-ending date so long as it is no more than 30 days prior to the filing date. Therefore, if your FD is due on May 15, 2025, and you submitted it on April 15, 2025, then the reporting period is January 1, 2024, through any date of your choosing between March 16 and April 15, 2025. For paper forms only, you are required to state the date determined in the "Period Covered" box at the top of the "Preliminary Information" page.

Only first year Candidates are required to provide information for the current year and two preceding calendar years for Schedule E and Schedule J (e.g., if the FD is submitted in 2025, you are required to provide information for 2023, 2024, and 2025 through the date of filing). Second year Candidates must provide information for their filing year.

#### Filing Deadlines for Qualified Candidates

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The deadline for filing the FD depends on whether you qualified in an election (even) or non-election (odd) year.

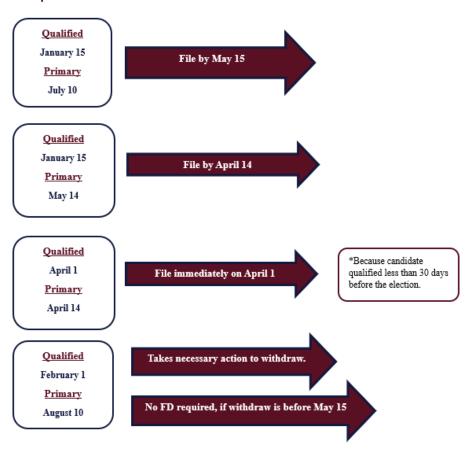
### **Qualified Candidate in Even-Numbered Years**

You are required to file an FD within 30 days of becoming a Candidate *or* by May 15 of that year, whichever is later, unless you meet one of the exceptions below.

#### There are two exceptions to this general rule:

- 1. You are required to file an FD no later than 30 days before any election (including primaries) which the individual is participating. If you become a qualified Candidate on January 5 in an election year and the primary is on April 22; the FD is due no later than March 23 (no later than 30 days before the election).
- 2. If you cross the \$5,000 threshold within the 30-day period prior to an election, you are required to file the FD immediately.

#### **Examples of Even-Numbered Years**

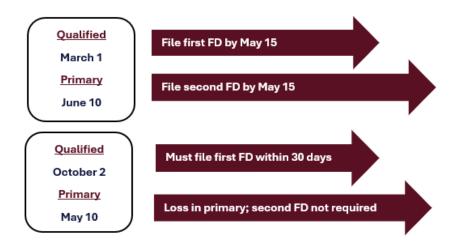


#### **Qualified Candidate in Odd-Numbered Year**

You are required to file an FD within 30 days of becoming a Candidate or by May 15 of that year, whichever is later. You are then required to file a second FD on May 15 of the following year if you are still a Candidate on that date. If you lose a primary election or formally withdraw, as explained below, before May 15, 2025, then you are not required to file the second FD and are required to notify the Clerk.

**Note:** If you qualify as a Candidate in a special election, the application of rules concerning your FD due date can result in a departure from the general structure discussed in this section. We encourage Candidates to contact the Committee for additional guidance.

### **Examples of Odd-Numbered Years**



### Withdrawal of Candidacy

If you withdraw your candidacy in accordance with applicable state law before the FD due date then you are not required to file. However, you are required to notify the Clerk of the withdrawal of candidacy by submitting the Campaign Notice Regarding Financial Disclosure Requirement Form (Appendix E or available on the Committee's website):

- using the electronic filing system; or
- on a paper copy to the LRC (mail or hand delivery fax and email are not accepted).

Merely ceasing to campaign without formally withdrawing from the race under your state's applicable law does not alleviate the requirement to file the FD.

If you withdraw your candidacy on or after the FD due date, you are still required to file even though you are no longer seeking a nomination or an election.

Candidates who are unsure when or if an FD is due should contact the Committee on (202) 225-7103.

# PERIODIC TRANSACTION REPORTS (PTRs) Who, When and How

#### WHO IS REQUIRED TO FILE

All Members, Officers, and Employees of the House and Legislative Branch Offices compensated at the senior staff rate are required to file PTRs for reportable transactions. The PTR filing requirement remains in effect for senior staff who take leave without pay (LWOP) or medical or family leave (including maternity or paternity leave) from their House or Legislative Branch employment.

**Note:** Principal Assistants, and Shared Employees are not required to file PTRs, unless paid at the senior staff rate for more than 60 days.

#### WHEN TO FILE

PTRs must be filed by the earlier of these two dates:

- 1. 30 days from being made aware of the transaction; or
- 2. 45 days from the transaction date.

New Employees and Employees paid at or above the senior staff rate on January 3 for more than 60 days, are required to file PTRs for that calendar year even if their pay is later reduced below the senior staff rate.

Employees who receive a pay increase or mid-year bonus, which results in being paid the senior staff rate for 60 days (2 pay period for House employees), are required to begin filing PTRs for all applicable transactions beginning the 61st day. However, the PTR filing requirement would not attach to an employee who receives a bonus paid as a salary adjustment in November and December unless the employee's pay rate remains above the senior staff rate on January 3.



Even if you did not personally conduct or direct the transaction, you are still required to disclose the transaction on a PTR if it triggers the reporting requirements.

If you do not receive regular notices of reportable transactions for yourself, your spouse, or dependent children, we suggest setting up a system to receive regular notices or, at the very least, a monthly calendar reminder to check your statements for reportable transactions.

#### **HOW TO FILE**

Complete and submit a PTR by either:

- using the electronic filing system; or
- on a paper copy to the LRC (faxes and emails are not accepted).

When using the electronic filing system, the program will retain the transaction information and allow you to transfer it to the Annual or Termination FD. If choosing to file using the paper form, file only the necessary pages and complete the top of each page with your name, page number, and total pages in the filing.

**Reporting:** Disclose on a PTR for yourself, your spouse, or dependent children each purchase, sale, or exchange involving stocks, bonds, commodities futures, or other securities when the amount of the transaction exceeds \$1,000. The reporting threshold for disclosure of transactions is triggered when the gross amount of a single purchase or sale transaction exceeds \$1,000. This includes transactions that result in a net loss (e.g., the sale transaction of an asset is \$5,000 but you paid \$7,000. The income earned is \$5,000, even though it resulted in a \$2,000 net loss).

Note: It is possible to have transactions in Schedule B that are not required on PTRs.

TRANSACTIONS DE	FINED
Purchase Transactions	<ul> <li>Purchase transactions that are required to be disclosed include:</li> <li>Individual purchases involving a reportable asset where the transaction amount exceeds \$1,000.</li> <li>Reinvestment of income (e.g., dividends or interest) in a reportable asset in which the amount of the reinvestment transaction exceeds \$1,000.</li> </ul>
Sales Transactions	<ul> <li>Sales transactions that are required to be disclosed include:</li> <li>Individual sales involving a reportable asset where the transaction amount exceeds \$1,000.</li> <li>When only a portion of the asset is sold (e.g., half of your shares in Mega Corporation), check the "Partial Sale" box on the PTR.</li> </ul>
Exchange Transactions	Exchange transactions are somewhat rare and refer only to a limited set of circumstances that involve the exchange of stock certificates following the purchase of one company by another, a merger of two companies, or a spin-off of one company from another. Exchanges are only reportable when the original stock owned is surrendered for new stock. Consult with the Committee for further guidance.

# TRANSACTIONS REQUIRED FOR INVESTMENT VEHICLES

# Excepted Investment Fund (EIF)<sup>2</sup>

If you own a fund that does not qualify as an EIF, you are required to disclose on a PTR any investment you make in the fund that increases your percentage of ownership in the fund. In addition, you are required to file a PTR for each reportable transaction made by the fund if you, your spouse's, or dependent child's interest in the transaction is more than \$1,000 or provide the Committee a letter<sup>3</sup> from you and from the manager of the investment fund with certain attestations.

<sup>&</sup>lt;sup>2</sup> Discussed on page 27.

<sup>&</sup>lt;sup>3</sup> Discussed on page 39.

	You are not required to disclose transactions of assets held within an EIF on a PTR. However, transactions of EIFs are still required to be disclosed on Schedule B if they trigger the \$1,000 reporting threshold.
Brokerage, Managed or Retirement Accounts	Transactions exceeding \$1,000 involving assets (e.g., such as stocks, bonds, or other securities) held within managed accounts, brokerage accounts, and retirement accounts are required to be disclosed. Transfers between currently held assets within these accounts are also considered purchase and sale transactions for financial disclosure purposes. These types of transfers are commonly referred to as reallocation or rebalancing of funds.
Partnership Transactions	You are only required to disclose transactions related to the ownership interests in partnerships and limited liability companies that were formed for the purpose of holding investments. If, for example, you are a partner in a limited partnership that transacted in five stocks, you are required to separately disclose each transaction if your interest exceeded \$1,000 during the reporting period.
Asset-Backed Securities	This term refers to a security whose value and income payments are derived from and collateralized (or "backed") by a specified pool of underlying assets such as mortgages, auto loans, credit card receivables or other securities. Transactions in these types of securities are subject to disclosure on a PTR, even if they are backed by an underlying asset which would otherwise not require a PTR. For example, a note may be tied to the performance of a bond fund that qualifies as an EIF. A transaction in the bond fund itself would not be subject to PTR disclosure, but a transaction in a note backed by the bond fund would be subject to PTR disclosure. For additional information contact the Committee.



#### EXCLUSIONS

You are not required to disclose the following transactions on a PTR:

- Transactions involving real property.
- The purchase or sale of any Excepted Investment Funds.
- Transactions involving a mutual fund or Exchange-Traded fund (ETF).
- Transactions solely by and between you, your spouse, and/or your dependent children.
- Transactions in assets held in a federal retirement program, such as the Thrift Savings Plan (TSP).
- Stock splits.
- Stablecoins, (if they are pegged 1:1 to a fiat currency and/or a precious metal (e.g., U.S. dollars and/or troy ounces of gold) and are backed by the fiat currency and/or precious metal held in government-insured accounts and professional vault facilities).
- Bequests or inheritances.
- Deposits, withdrawals, or the opening and closing of cash accounts.
- The purchase or sale of certificates of deposit (CDs).
- The call, redemption, or maturation of a bond.
- A company's grant of options to its employees or board members.

Note: You may still be required to disclose some of these transactions on your FD.

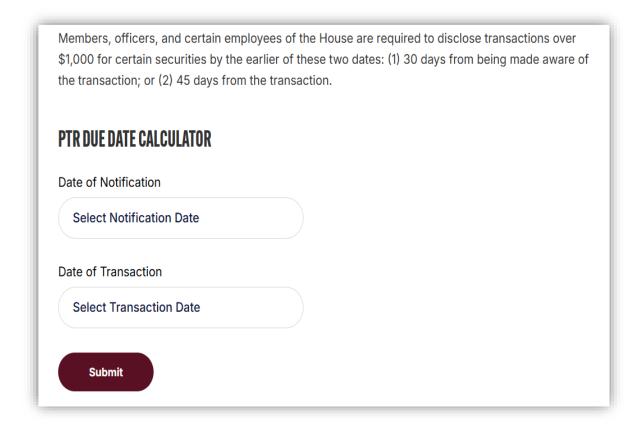
#### **FILING DEADLINES FOR PTRs**

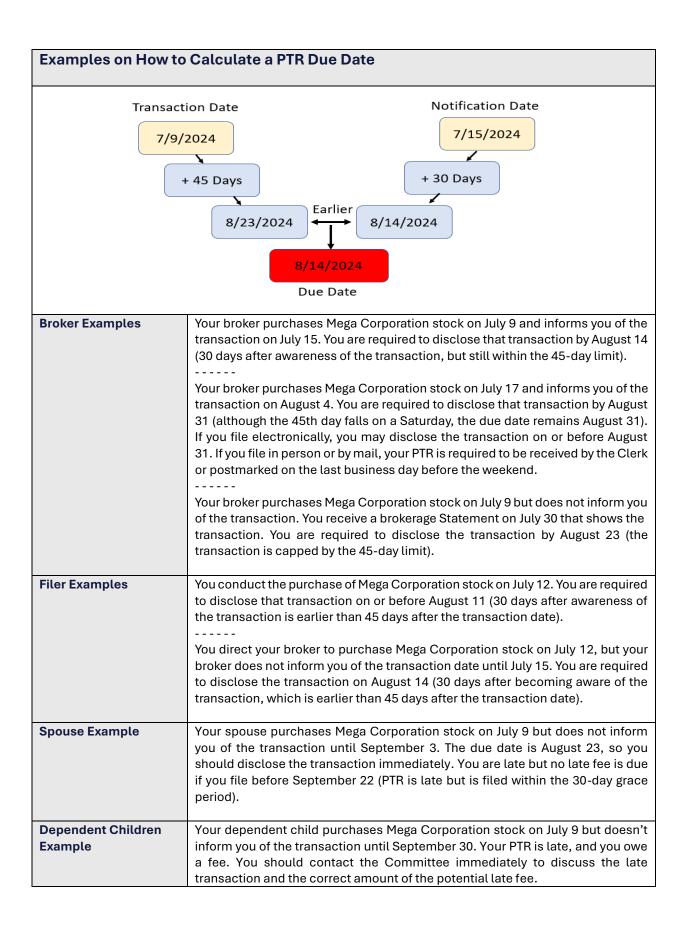
When the deadline for a PTR falls on a weekend or federal holiday, the PTR can still be filed timely through the electronic filing system that day. If you submit the PTR using the paper form, it is required to be received by the Clerk, legibly postmarked, by the last business day before the holiday or weekend.

If you, your spouse, or dependent children do not have transactions, then no PTR is due; however, some transactions are still required to be disclosed in Schedule B of the FD.

# PTR DUE DATE CALCULATOR

The Committee strongly encourages you to use the Periodic Transaction Report Calculator on the Committee's website to automatically generate your PTRs due date by inputting the transaction and notification dates.





COLUMN BY COLU	MN INSTRUCTIONS FOR PTR DISCLOSURE (PAPER FORM)
SP/DC/JT Column	You may indicate that a transaction involves an asset that is held by your spouse or dependent child or is jointly held, by including an "SP" for spouse, "DC" for dependent children, or "JT" for jointly held property. If you use these distinctions on your FD, use them on your PTR.
Asset Column	You are required to provide the complete name of the asset for reportable transactions, not just the ticker symbols (using both is the best practice). For options, include the name of the security, strike price, expiration date, and if applicable, indicate if it is a put or a call.
Type of Transaction Column	Indicate the type of transaction (purchase, sale, or exchange) by placing an "X" in the appropriate box.
Date of Transaction Column	Indicate the month, day, and year of the transaction. For securities, the transaction date is generally the date the security was traded.
Date Notified of Transaction Column	Indicate the month, day, and year that you were notified of the transaction. If you executed the trade yourself, in most cases this will be the transaction date.
Amount of Transaction Column	Select the category of value of the total purchase price or total sale price (or the fair market value in the case of an exchange) of the transaction. As explained above, use the gross amount of a transaction to determine which category of amount to disclose a transaction. The extent of any capital gain or loss on the transaction is irrelevant for the purpose of determining the transaction amount. The column "Transaction in a Spouse or Dependent Children Asset over \$1,000,000" should only be used for assets that are owned by your spouse or dependent children, and in which you have no interest.

# WAIVERS AND EXCLUSIONS FROM THE PTR REQUIREMENT

Section 6 of the STOCK Act requires the filing of PTRs "subject to any waivers and exclusions." As a result, House or Legislative Branch Employees who receive a filing waiver under section 13103(i) of the EIGA are not required to file PTRs. In addition, PTRs are not required for transactions of assets held in a "Qualified Blind Trust" as defined in section 13104(f)(3) of the EIGA or in an "Excepted Trust" as defined in EIGA section 13104(f)(2)(B).

Since Excepted Trusts and Blind Trusts<sup>4</sup> approved by the Committee are excluded from the PTR requirement, they do not need a PTR waiver. However, you, your spouse, or your dependent children may be the beneficiary of a trust that does not meet the "no knowledge" criteria for an Excepted Trust" if the beneficiary receives statements on the contents of the trust. In that case, PTRs *are* required for transactions of assets in the trust *unless* the Committee grants a PTR waiver. The Committee may waive the PTR requirement for such trusts or other financial arrangements on a case-by-case basis.

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<sup>&</sup>lt;sup>4</sup> Discussed on page 48.

To qualify for such a waiver, you are required to meet the following criteria:

- 1. You, your spouse, or dependent children must have a beneficial interest in a trust or some other financial arrangement.
- 2. If it is a trust, the trust was not established by you, your spouse, or dependent child (or you, your spouse, or dependent child jointly with another person).
- 3. You, your spouse, and dependent child do not have the power to direct the investments of the trust or other financial arrangement.
- 4. You, your spouse, and dependent child are not entitled by law or contract (including trust documents) to receive Statements on a monthly (or more frequent) basis.

Regarding item 1, the types of non-trust financial arrangements that will qualify for this waiver are very limited.

Regarding item 3, whether you, your spouse, or dependent child have the authority or discretion to direct, even if not exercised, the investments of a trust or other investment vehicle is construed broadly by the Committee when making waiver determinations. The power to direct includes, but is not limited to, the ability to select the investments among a variety of investment options, the ability to allocate the percentage of your contributions among your designated investment options, the ability to move funds among and between your designated investment options (or select new ones), and the ability to place a certain investment option "off limits."

**To request such a waiver**, you must submit, in writing to the Committee, from the trustor (or representative of the investment company), a letter attesting that all 3 of the following are met:

- 1. You, your spouse, or dependent children do not have the power to direct the investments of the trust or account.
- 2. Under state law, the trust agreement, or some other legal authority, you, your spouse, or dependent children are only entitled to statements on a quarterly, annual, or other, less-than-monthly basis.
- 3. A certification by you, or by the trustee of financial institution, that the trust was not created by you, your spouse, or your dependent children.

The Committee's letter granting you a waiver will be placed in the public record by the Clerk. This waiver would only apply to the filing of PTRs. Transactions are still required on Schedule B of your annual FD.

# **TIMELINESS OF FILINGS**

FDs are timely when submitted electronically on or before the due date or when the paper form is received by the Clerk legibly postmarked on or before the due date. When the FD deadline falls on a weekend or federal holiday, the filing deadline is extended to the next business day for Members and Annual, New and Termination Filers. Candidate FDs are not extended to the next business day.

PTRs are filed timely when the paper form is received by the Clerk legibly postmarked by the last business day before the holiday or weekend or filed electronically on or before the earlier of these two dates:

- 3. 30 days from being made aware of the transaction, or
- 4. 45 days from the transaction date.



PTR deadlines are not extended to the following business day when the original due date falls on a weekend or federal holiday.

#### **EXTENSIONS**

The Committee can grant limited extensions of time on or before the date your FD or FD Amendments are due. By law, an extension request for a single filing in a calendar year may not exceed 90 days. Extension requests are not timely if only postmarked but not received by the due date. **Extensions for PTRs are not permitted under the STOCK Act.** 



Extension deadlines that are 90 days from the original due date are not extended to the following business day when the deadline falls on a weekend or federal holiday.

Requesting an extension for an FD requires that you use one of the following methods:

- 1. The electronic filing system.
- 2. Submit a paper FD Extension Request Form to the Committee at 1015 Longworth House Office Building or e-mail the paper copy to <a href="mailto:financial.disclosure@mail.house.gov">financial.disclosure@mail.house.gov</a>.
- 3. Submit a written request stating the length of time requested to <a href="mailto:financial.disclosure@mail.house.gov">financial.disclosure@mail.house.gov</a>.

**Note:** Extension requests for amendments require submissions using the paper FD Extension Request Form.

In addition, pursuant to the STOCK Act, the Clerk is required to post notice of all FD extensions granted for Members and Candidates on the public website of the Office of the Clerk. The Committee will provide the Clerk with notice regarding extensions that are granted.

Employees of the Congressional Budget Office, Library of Congress, Architect of the Capitol, Government Publishing Office, or Capitol Police are required to file a written request for an extension with the general counsel of their agency and follow the extension request policy established by that agency.

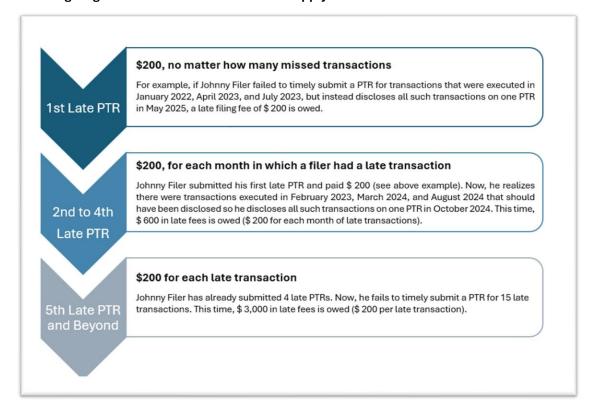
#### LATE FILING FEE

You will be subject to a late filing fee of \$200 for all FDs and FD Amendments filed more than 30 days after the due date.

**Note**: Late filing fees are not assessed until the 31<sup>st</sup> day after the original due date or extension deadline (e.g., grace period). However, the FD is still late.

All late PTR submissions are subject to a minimum fee of \$200. However, multiple late PTR filings could result in additional fees. If you believe you have late transactions, contact the Committee before filing.

The following diagram demonstrates how the fees apply to late transactions on PTR submissions.



The late filing fee is required to be paid by check or money order made **payable to the United States Treasury** and submitted to the Clerk at the LRC. Payment of the fee does not preclude the Committee from taking other disciplinary action authorized by law or the rules of the House. Fees cannot be paid using campaign funds.

The Committee has the authority to waive the fee in extraordinary circumstances. A fee waiver request requires a written submission to the Committee. The request is required to include the name of the asset(s), transaction date(s), notification date(s), and filing date(s) for each late transaction and the circumstances to justify the waiver. A Late Fee Waiver Form is available on the Committee's website. Please email requests to <a href="mailto:Financial.Disclosure@mail.house.gov">Financial.Disclosure@mail.house.gov</a> or deliver to the Committee at 1015 Longworth House Office Building, Washington, DC 20515. Neither the request nor the Committee's response will be made publicly-available.

# **COMMITTEE REVIEW**

The Committee is required to review FD and PTRs and determine whether they are filed in a timely manner, appear accurate, complete, and comply with applicable laws and rules.

The Committee staff compares assets disclosed in your previous FD with the assets and transactions in the current year's FD. Reviewers will look for corresponding transactions when assets appear for the first time or previously disclosed assets no longer appear. When none are found, the Committee staff may contact you to verify that the item was not inadvertently omitted. Reviewers will also confirm that PTRs were timely and accurately submitted.

Unintentional errors and omissions in FDs and PTRs are an ordinary part of the process for many filers, and identifying and remedying them is part of the normal course of review. Amending FDs or PTRs is the most

common method used to address unintentional errors or omissions. Amendments are publicly available in the same manner as the original FDs or PTRs they amend.

Unless there is some evidence that errors or omissions are knowing or willful or appear to be significantly related to other potential violations, you are notified by the Committee staff of the implicated law or rule that requires the FD or PTR to be amended or requests you provide an explanation why they believe an amendment is not required.

If you agree with the Committee, you should submit an Amended FD or PTR by either:

- using the electronic filing system; or
- on a paper copy to the LRC (faxes and emails are not accepted).

Disagreements with the Committee's findings require you to submit a letter to the Committee, not the Clerk, explaining why you believe the amendment is not required. The Committee is the final arbiter of whether any FD or PTR requires clarification or an amendment. Communications between you and the Committee concerning the review of your FD or PTR are confidential and will not be publicly discussed or released by the Committee.

Filing an amendment on a paper form requires the same number of copies as the original filing. An amendment may be in the form of a revised FD or PTR (indicating where appropriate that it is an amendment) or by an explanatory letter addressed to the Honorable Kevin McCumber, Clerk of the House, at the LRC.

The Committee is also authorized by the EIGA to render advisory opinions interpreting the disclosure requirements to any person required to file an FD or PTR. Any person who acts in good faith in accordance with a written advisory opinion from the Committee is not subject to any sanction by the Committee under the EIGA. The Committee takes no further action on properly submitted amendments.

**Note:** An explanation by you in the description box or parenthetically (e.g., XYZ Corp. stock, spin-off from Allied Corp., or Big Corp., formerly Medium Corp.) is strongly recommended for assets being disclosed for the first time or being omitted after being disclosed on a prior FD.

You are personally responsible for incomplete and inaccurate information contained in your FD or PTR, regardless of who assisted in preparation. Per the EIGA, the Attorney General may pursue civil or criminal penalties against an individual who knowingly and willfully falsifies an FD or fails to file an FD. The maximum criminal penalty is up to one year in prison and a fine of up to \$73,627.<sup>5</sup>

In addition, 18 U.S.C. § 1001, as amended by the False Reports Accountability Act of 1996, is applicable to FDs and PTRs. That criminal statute provides for a fine of up to \$250,000 and/or imprisonment for up to five years for knowingly and willfully making any materially false, fictitious, fraudulent statements or representation, or falsifying, concealing, or covering up a material fact, in a filing under the EIGA.

House Rule 26 provides that Title I of the EIGA is deemed to be a rule of the House regarding House Members, Officers, and Employees. In addition to the penalties noted above, a Member, Officer, or Employee who violates these provisions is subject to additional action by the Committee and/or the House.

<sup>&</sup>lt;sup>5</sup> 2025 Civil Monetary Penalties Inflation Adjustments for EIGA Violations, 89 Fed. Reg. 1439 (Jan. 10, 2025).

# **PUBLIC ACCESS**

Several statutes mandate public access to financial disclosure filings, including the EIGA, the Honest Leadership and Open Government Act of 2007 (HLOGA), and the STOCK Act. Under these provisions, the Clerk makes all FD and PTRs publicly available within 30 days of filing (or within 30 days of May 15 for FDs due by that date). The Clerk posts all subsequently filed Member FDs no later than the end of each 45-day period following the initial public posting. PTRs filed by Members require posting within 30 days of filing. The Clerk is required to send a copy of each FD or PTR filed by a Member or a Candidate to the appropriate state officer in the state represented by the Member or in which the individual is a Candidate.

The Clerk is required to post on its public website the following information:

- Copies of all FDs filed by Members and Candidates.
- All PTRs filed by Members and any extensions granted to Members and Candidates.
- All amendments filed by Members and Candidates.
- All notices of a blind trust filed by Members and Candidates.

All FDs and PTRs filed with the Clerk are made available for public inspection at the LRC. A nominal fee is required to cover the cost. A reasonable fee to cover the cost of reproduction or mailing may be required.

By statute, the Clerk may not make any FDs or PTRs available to any person, or provide a copy of any report to any person, except upon written application by such person stating each of the following:

- The requester's name, occupation, and address.
- The name and address of any person or organization on whose behalf the inspection or copy is requested.
- That such person is aware of the prohibitions on the obtaining or use of the report.

All FDs and PTRs of Members are made available for public inspection until six years after the individual ceases to be a Member of Congress. All FDs and PTRs of Officers and Employees are made available for public inspection for six years after filing. FDs of Candidates who were not elected will remain available for one year after the individual ceases to be a Candidate.

# **UNLAWFUL USE**

It is illegal for any person to obtain or use FDs and PTRs filed under the EIGA for:

- Any unlawful purpose.
- Any commercial purpose, other than by news and communications media for dissemination to the public.
- Determining or establishing the credit rating of any individual.
- Use, directly or indirectly, in the solicitation of money for any political, charitable, or other purpose.

The Attorney General may bring a civil action against any person who obtains or uses an FD or PTR for any of the prohibited purposes mentioned above. The court may assess a penalty not to exceed \$24,496.6

<sup>&</sup>lt;sup>6</sup> 2024 Civil Monetary Penalties Inflation Adjustments for Ethics in Government Act Violations, 89 Fed. Reg. 1439 (Jan. 10, 2024).

FDs are not intended as net worth reports, nor are they well suited to that purpose. As the Commission on Administrative Review of the 95<sup>th</sup> Congress stated in recommending broader financial disclosure requirements: "The objectives of financial disclosure are to inform the public about the financial interests of government officials in order to increase public confidence in the integrity of government and to deter potential conflicts of interest.<sup>7</sup>"

# REPORTING OF SPOUSE AND DEPENDENT FINANCIAL INFORMATION

You are required to disclose certain information concerning the income, assets, liabilities, and other information of your spouse and dependent children on the FD. Following the June 26, 2013, U.S. Supreme Court opinion in *U.S. v. Windsor*, these requirements will also be enforced for filers who are legally married to a spouse of the same sex. For the specific disclosure requirements for all filers, please refer to the detailed discussion of reporting obligations for each schedule provided in this Instruction Guide.

For assets, income, transactions, and liabilities of over \$1,000,000 in value that are held solely by your spouse or dependent child, you may mark the "Spouse/DC Asset [or Income, or Liability] over \$1,000,000" or the "Over \$1,000,000 (Spouse/DC Asset)" column. For items that you hold either singly or jointly with your spouse or dependent child, you must mark the other higher categories of value as appropriate.

**Dependent Child** means one's child or stepchild who (A) is unmarried, under age 21, and living in the household of the reporting individual, or (B) is a "dependent" of the reporting individual within the meaning of section 152 of the Internal Revenue Code of 1986.

**Separation from Spouse**. You are not required to disclose financial information about a spouse from whom you have separated with the intention of terminating the marriage. If you exclude information because of a separation or marital dissolution, answer "NO" to the Spousal Exemption Question.

# TOOLS TO COMPLETE THE FD FORM

The following documents may help provide the information necessary for completing your FD. There is no requirement to file any supporting documentation with your completed Report.

- 1. A copy of the FD Report you filed last year (for a new Member, this would be the FD Report you filed as a Candidate).
- 2. End of year Statements for any brokerage accounts, retirement accounts, or bank accounts that pay interest
- 3. Tax forms (W-2s or 1099s) or pay stubs for any outside earned income you or your spouse received in the previous year.
- 4. Annual accounting or other financial statements for any business you own.
- 5. Any other documents which indicate the gross revenue, income, loss, sales, purchases, or debt for the previous calendar year for your investments, income, or liabilities.

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<sup>&</sup>lt;sup>7</sup> Financial Ethics, House Document No. 95–73 (1977).

# SPECIFIC REPORTING INSTRUCTIONS

# SCHEDULE A – ASSETS AND UNEARNED INCOME

(To be completed by all filers)

In Schedule A, you are required to disclose for yourself, your spouse, and dependent children:

- 1. **Assets** (real and personal property) held for investment, or the production of income that exceeded **\$1,000** at the end of the reporting period; or
- 2. Unearned income that exceeded \$200 during the reporting period.

### **REPORTABLE ASSETS**

Specific disclosure requirements for the following reportable assets are provided in this section.

- 529 College Plans
- Asset-Backed Securities
- Annuities (Fixed and Variable)
- Business Development Company (BDC)
- Cash Accounts
- Collectibles Held for Investment (including Non-Fungible Tokens)
- Corporate Securities (Stocks, Bonds, & Notes)
- Cryptocurrency
- Debts Owed to the Filer
- Defined Benefit Plans (Pensions)
- Defined Contribution Plans
- Employee Stock Ownership Plans
- Employee Stock Purchase Plans
- Exchange Traded funds (ETF)
- Farms
- Futures
- Health Savings Plans (HSA)

- Hedge Funds, Private Equity
   Funds, and other Private Funds
- Intellectual Property
- Insurance Policies (Whole/Universal)
- Intellectual Property
- Mineral/Oil/Solar Energy Rights
- Mutual Funds
- Options
- Ownership Interests in Privately Held Companies, including S Corporations
- Precious Metals
- Real Estate
- Real Estate Investment Trust (REIT)
- Stable Value Funds
- Restricted Stock Units (RSUs)
- TIAA
- Trusts
- Unit Investment Trusts (UIT)

Retirement Accounts, Investment Clubs, and Brokerage Accounts are Investment Vehicles (formerly "Asset Classes") not assets in and of themselves.

#### REPORTABLE UNEARNED INCOME

Unearned income is a type of income received by you, your spouse, or dependent children as a return on investment and includes, but is not limited to:

- Dividends
- Interest
- Capital Gains
- Rent
- Royalties
- Income from Ownership Interests in Privately Held Companies or Other Business Entities
- Income from an Interest in an Estate or Trust
- Income resulting from the Discharge of Indebtedness

You have "**received**" income when you have the right to exercise control over the income, regardless of whether you have taken actual possession (e.g., reinvested dividends).

You are required to disclose the gross amount of unearned income. You cannot offset any losses.

#### This includes:

- The aggregate value of dividends (e.g., if a mutual fund earned \$150 in dividends for the first quarter, \$90 for the second quarter but takes a loss in the third and fourth quarter, you are required to disclose the total amount of \$240 of unearned income for the reporting period).
- The gross value of rent received. You cannot offset the mortgage or any repairs.

**Note:** You are not required to disclose unearned income generated by assets held in tax-deferred accounts (e.g., 401ks, IRAs). However, you are required to disclose the underlying assets and all transactions that exceeded \$1,000, which includes reinvested dividends and/or contributions.

# **VALUATION OF ASSETS**

For each asset disclosed, you are required to indicate the value of the asset if it was more than \$1,000 at the end of the reporting period. It is acceptable to provide a good faith estimate of the fair market value of an asset if the exact value is not known or easily obtainable.

You may also value assets by any of the following alternative methods:

- The year-end market value of publicly-traded securities (e.g., stocks or mutual funds).
- The year-end book value of an interest in a non-publicly-traded company.
- The purchase price of real property, if you indicate and provide the exact purchase price and date, or a good faith estimate of recent sales of comparable property.
- A property tax assessment adjusted to reflect 100 percent value if you indicates and provide the exact assessed value.
- A recent professional appraisal.
- The net worth of a business partnership.
- The value of an individually-owned business.

# **DISCLOSURE OF EXCEPTED INVESTMENT FUNDS (EIFs)**

You are not required to disclose on either an FD or PTR the underlying assets of an Investment Fund that qualifies as an EIF (e.g., mutual funds, ETFs) if:

- It is a Fund.
- 2. It is widely held (i.e., has 100 or more investors).
- 3. It is independently managed (*i.e.*, you have no authority to exercise control over the financial interests held by the Fund).
- 4. It is publicly-traded or available or the assets of the Investment Fund are widely diversified.

**Note:** Even if a Fund is an EIF, you are still required to disclose the Fund name, value, and unearned income (if it is not held in a tax-deferred or exempt account) on the FD when the value exceeds more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period.

# Fund

A Fund is a separate legal entity that holds pooled investments. Investors own shares of the Fund rather than owning each of the underlying assets held in the Fund (e.g., mutual funds and ETFs, which are a portfolio of investments funded by all the investors who have purchased shares in the Fund). Mutual Funds are registered with the SEC under the Investment Company Act of 1940. Other examples include Exchange Traded Funds and Unit Investment Trusts.

### Widely Held

A Fund is widely held if it has more than 100 participants or investors. When determining if a Fund is widely held, count all the individuals invested in the Fund, including the partners, members, and participants. Specifically, do not just count the number of partnerships, LLCs, and legal entities participating in the Fund (e.g., if Apple Rock LLC is comprised of six limited partnerships, with 20 members each, you count the total number of members and individual investors in the LLC, which is 120 participants).

# Independently Managed

A Fund is independently managed if you have no discretion or authority to exercise control over the investments within the Fund.

# Publicly-Traded or Available

A Fund is publicly-traded if it is on an exchange (e.g., Nasdaq) or Over-the-Counter (OTC) market.

A Fund is publicly available (i.e., open for investment by any member of the public), even if it is not publicly-traded. A requirement for a minimum investor net worth or initial investment amount, which is commonly seen with hedge and private equity funds, is not a bar to the Fund qualifying as publicly-available. Additionally, a Fund that was publicly available at the time of investment but is now closed is considered publicly available for purposes of meeting the EIF criteria (e.g., ABC Fund was open and available to the public but is now closed to new members. Since ABC Fund was publicly available at the time of their investment, it is considered publicly available).

# Widely Diversified

If a Fund cannot be classified as publicly traded or available, it may qualify as widely diversified. A Fund is widely diversified if it does not have a stated policy of concentrating its investments in any industry, business, or single country other than the United States or bonds of a single state within the United States (e.g., mutual funds are widely diversified, unlike sector mutual funds, which concentrate investments in an industry, business, or county).

# **DISCLOSURE OF INVESTMENT VEHICLES (Accounts)**

(Disclosure of Particular Assets begin on page 30)

# Retirement Accounts

**Retirement accounts** are financial investment vehicles, usually provided through employers, which offer tax benefits and holds assets. These types of vehicles include but are not limited to:

- Individual Retirement Accounts (IRA and Roth IRA)
- Keogh Plans
- Simplified Employee Pensions (SEPs)
- Public Employee Retirement System pensions (PERS)
- TIAA and CREF Accounts (formerly TIAA-CREF) are generally employer offered retirement plans.
- Defined Contribution Plans (e.g., 401(k), 403(b), 401(a), and 457(b)<sup>8</sup>
- Pensions (e.g., FERS, CSRS Do not confuse pensions with defined contribution plans)

**Note**: You are required to disclose your retirement account held with your former employer in Schedule F, even if you are no longer contributing. If you are receiving distributions, you are required to disclose the distributions in Schedule C as earned income and any sales transactions that trigger the reporting threshold in Schedule B.

**Defined Contribution Plans** are retirement plans offered by an employer (e.g., 401(k), 403(b) and 457(b)). Employees are able to select various investments (e.g., mutual funds, target retirement portfolios, stock, index portfolios) and make contributions to those investments with deductions from the employees' salary. The employer will make often contributions to the employee's investments, too. Employer sponsored investment portfolios/funds generally meet the definition of an EIF but contact Committee staff to ensure accurate reporting.

**Reporting:** Disclose for yourself, your spouse, and dependent children, each asset held within the account that triggers the reporting threshold (e.g., Amazon (AMZN), Schwab Large-Cap Growth Fund (SWLSX), Vanguard Consumer Staples ETF (VDC)). It is acceptable to use "tax-deferred" for Income Type.

You are also required to disclose the reinvestment of unearned income in Schedule B as a purchase transaction if the amount exceeded \$1,000 for a single reinvestment. You are

<sup>&</sup>lt;sup>8</sup> You are not required to disclose information relating to your federal retirement benefits, including the Thrift Savings Plan (TSP). However, you are required to disclose state and local government retirement benefits.

not required to disclose the income from any new assets contributed to the plan by you or your employer during the reporting period (those will be disclosed as transactions in Schedule B if they exceeded \$1,000 in any single transaction).

If you move assets from one retirement account or custodial account to another and the assets remain the same, you are not required to disclose this as a transaction. However, we recommend including a comment (public or private) to explain any change in Schedule A where you disclose the new account (e.g., assets previously held in Schwab 401(k)). If the assets from the first account were sold and new assets were purchased when moved into the new account, you are required to disclose each of these as transactions in Schedule B and/or on a PTR.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Roth IRA → Vanguard Energy Fund Admiral Shares (VGELX) [MF]		\$15,001-\$25,000	Tax-Deferred		

**TIAA (formerly TIAA-CREF)** is a non-profit entity that provides a variety of financial services, including retirement plans. TIAA holdings may consist of annuities, various forms of insurance, cash accounts, and mutual funds.

### Reporting:

- TIAA Traditional is a Fixed Annuity.9
- CREF accounts (e.g., "CREF Stock" or "CREF Money Market") and TIAA Real Estate are variable annuity accounts that are offered as part of retirement plans and qualify as an EIF for reporting of this asset.

Brokerage
Accounts
(SMAs, UMAs
and Accounts
with an
Investment
Advisor)

A brokerage account is an investment account where individual investors choose types of investments, such as stocks, bonds, mutual funds, ETFs, or similar.

**A managed account** is not a Fund. <sup>10</sup> As an investor in a managed account, you have not "pooled" your money with other investors. Instead, you hold a separate account of your own. Although the account manager may have offered you the option of selecting a predetermined "portfolio" of assets, you own each of these assets individually and directly in your own name.

**Reporting:** Disclose for yourself, your spouse or dependent children, information about each specific underlying asset held in the account that triggers the reporting threshold<sup>11</sup> for the specific reporting of the particular asset.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Ameriprise → Fidelity Advisor New Insight Fund A (FNIAX) [MF]	JT	\$15,000 - \$50,000	Dividends	\$201- \$1,000	

<sup>&</sup>lt;sup>9</sup> Reporting of Fixed Annuities on page 27.

<sup>&</sup>lt;sup>10</sup> Defined on page 26.



Failure to disclose underlying assets in investment vehicles is one of the most common errors made.

# Investment Clubs

An Investment Club is a private investment formed by individual investors pooling their money together. The investors may or may not document their arrangement with a written agreement, may adopt several different legal structures, or may have rules of varying formality and complexity. Most investment clubs are structured as general partnerships and management of the portfolio is relatively informal.

**Reporting:** Disclose for yourself, your spouse, or dependent children the share of the holdings to the extent of your interest or that of your spouse or dependent children in each asset that triggers the reporting threshold. If you, your spouse, or child's interest in a transaction exceeded \$1,000, it is required to be disclosed in Schedule B and/or a PTR.

# **DISCLOSURE OF PARTICULAR ASSETS**

Sample Paper Forms are located on Page SF – 1

# 529 COLLEGE SAVINGS PLANS AND PREPAID TUITION PLANS

A 529 plan is an education savings plan operated by a state or educational institution designed to help families set aside money for future college costs. You are required to disclose 529 plans held by, or for the benefit of, you, your spouse, or dependent children. **Do not disclose the name of your dependent child.** Plans may be identified as "DC1" for your first dependent child, "DC2" for your second dependent child, and so on (or listed cumulatively if they are identical).

There are two types of 529 plans:

#### **College Savings Plans**

College Savings Plans are tax-advantaged i

College Savings Plans are tax-advantaged investment plans where investors choose among a variety of investment options that are typically based on risk, age of the children, or graduation date.

**Reporting:** Disclose each underlying asset or portfolio in a College Savings Plan for yourself, your spouse or dependent children valued more than \$1,000 at the end of the reporting period or earned income of more than \$200 during the reporting period. Provide the name of the sponsor as the Investment Vehicle and each asset or portfolio held within the plan (e.g., VA 2042 Portfolio, VA). Income generated by assets held in a 529 plan is tax-deferred, therefore, you may check "tax-deferred" for type of income.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
VA 2042 Portfolio [5F] Location: Virginia, US	DC	\$25,001-\$50,000	Tax-Deferred		

#### **Prepaid Tuition Plans**

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Prepaid Tuition Plans are contracts with a state or educational institution that allow a person to pay for some or all the cost of a future education at present-day costs.

**Reporting:** You are required to disclose a prepaid tuition plan for you, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or earned income of more than \$200 during the reporting period. Provide the name of the plan and sponsor, indicate that it is prepaid, and the value of the plan (e.g., Alabama Prepaid Affordable College Tuition Program). Income generated by assets held in a 529 plan is tax-deferred, therefore, you may check "tax-deferred" for type of income.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Florida Prepaid Tuition Plan [5P] Location: Florida, US	DC	\$25,001-\$50,000	Tax-Deferred		

# ASSET-BACKED SECURITIES

Asset-Backed Securities refer to a security in which the value and income payments are derived from and collateralized (or "backed") by a specified pool of underlying assets, such as mortgages, auto loans, credit card receivables or other securities. The monthly payments from the underlying assets typically consist of principal and interest.

**Reporting:** You are required to disclose Asset-Backed Securities for you, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the complete name of the security (e.g., Mega LLC Note Mid Cap Growth – 03/20/2025 0.000%), the value in the same manner as government securities and type of income and amount.

#### **ANNUITIES**

An annuity is a contract with a life insurance company where the investor pays a premium to the insurance company in either a single payment or a series of payments. In return, the insurance company makes payments to the investor beginning at some future time, such as at retirement or at a specific age.

#### Variable Annuities

Variable annuities are insurance contracts where the rate of return is based on the performance of investment options chosen by the investor. The investment options are usually mutual funds or portfolios. Some variable annuities, however, also provide a fixed account option that pays a set rate of interest.

**Reporting:** You are required to disclose the underlying assets of a variable annuity for you, your spouse, or dependent children if the individual asset value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the issuing company and value at the end of the reporting period for each specific asset (*i.e.*,

mutual funds, ETFs, bonds) held within the account, and the type of income earned and amount.

#### **Fixed Annuities**

Fixed annuities are insurance contracts that offer a specific, guaranteed rate of return. Fixed annuities do not allow investors to choose among investment options and the investor does not control how the issuing company invests the premiums.

Reporting: You are required to disclose a fixed annuity for you, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the issuing company and the value at the end of the reporting period. For year-end value, you may use the annuity's face value, the company's estimate of year-end value, or the value of your paid premiums plus accrued income. You are not required to disclose income generated by a fixed annuity until you begin receiving payments. If you are receiving payments, you are required to disclose the type of income (by selecting 'Other' and writing "Annuity Payments") and the amount earned during the reporting period. If you are not receiving payments, you may disclose the income type as "None."

# BUSINESS DEVELOPMENT COMPANY (BDC)

A BDC is a type of closed-end investment fund that often makes investments in developing and financially distressed companies, which do not have access to other financing options like issuing bonds. BDCs invest in income as well as for capital appreciation and often hold debt securities as well as stocks (private or public) in their investment portfolios. Investors may equate BDCs to private equity funds, but unlike private equity funds, many BDCs are open to retail investors and are publicly-traded. Many of the publicly-traded BDCs have "capital corporation," "finance corporation," or "investment corporation" as part of their name, but often are not easy to identify by name.

**Reporting (EIF):** If the BDC qualifies as an EIF, you are required to disclose your, your spouse's, or dependent children's ownership interest in the BDC if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Disclose the name of the BDC and provide in the description that it is a BDC, the value of the BDC at the end of the reporting period, and the type of income and amount earned during the reporting period.

Reporting (non-EIF): If the BDC does not qualify as an EIF, you are required to disclose your, your spouse's, or dependent children's ownership interest in each of the underlying assets if their value was more than \$1,000 at the end of the reporting period or they generated more than \$200 in income during the reporting period. You are required to disclose the name of each asset and provide in the description that it is part of a BDC, the value of the asset at the end of the reporting period, and amount of income. You may provide only the proportionate interest that you, your spouse or your dependent children have in the underlying assets. In certain cases, investment funds do not provide information regarding an investor's interest in the value and/or income of the BDC's underlying assets. If you are unable to ascertain the value of the underlying assets, you may instead provide value information for the total interest that you, your spouse, and your

dependent children have in the BDC. Similarly, if you are unable to ascertain the income from the underlying assets, you may instead provide income information for the total interest that you, your spouse, and your dependent children have in the BDC.

#### **CASH ACCOUNTS**

Cash accounts to be disclosed include all interest-bearing cash-deposit accounts at banks, credit unions, savings & loan associations, checking/savings accounts, passbooks, money market accounts/funds, negotiable order of withdrawal (NOW) accounts, certificates of deposit (CDs) and individual retirement accounts (IRAs) held in the form of savings accounts or CDs. There is no requirement to disclose transactions related to bank accounts on Schedule B, including the opening and closing of bank accounts or deposits to or withdrawals from such accounts.

**Reporting:** To determine whether disclosure is required, add all interest-bearing accounts held by you, your spouse, or dependent children at every financial institution in which you have such accounts. If the aggregate value of these accounts exceeded \$5,000 at the end of the reporting period, then you are required to disclose the name of each financial institution that has a cash value of more than \$1,000. You are required to also disclose any account that generated more than \$200 in interest during the reporting period, even if it was valued at less than \$1,000 at the end of the reporting period or your total deposits were less than \$5,000.

All accounts at one institution, including those of a spouse or dependent children, may be combined as one entry (e.g., a checking account, savings account, and certificate of deposit as "checking/savings/CD bank accounts and aggregating the total year-end values and interest income.)"

**Note:** If you are listed on an account purely for custodial reasons and you do not assert any ownership rights to the assets in the account (e.g., if you are a joint tenant with an elderly relative), you do not need to disclose the account.

# COLLECTIBLES HELD AS INVESTMENTS

Collectibles are personal or digital property held, at least in part, for investment purposes (e.g., works of art, vintage automobiles, stamps, jewelry, precious metals, rare coins, books, and non-fungible tokens (NFTs)).

**Reporting:** You are required to disclose collectibles for you, your spouse, or dependent children that are held for investment or the production of income and had a value of more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. There is no requirement to disclose collectibles if held strictly for enjoyment or utility (e.g., antique household furnishings and paintings displayed for decorative or artistic purposes are not collectibles held for investment, while periodic sales from a coin collection do indicate an investment purpose). Provide the name of the collectible by using a description (e.g., rare book or Impressionist oil painting) and indicate the value at the end of the reporting period.

Common methods of determining fair market value include: the purchase price, a recent appraisal for insurance purposes, a published price guide, the recent sale price of similar items, or a good faith estimate of value. Provide the type and amount of income earned during the reporting period. This will typically be

"None" until an item(s) from the collection is sold at which time there may be capital gains.

# CORPORATE SECURITIES

Types of reportable corporate securities include stocks, bonds, notes, stock options<sup>12</sup> and restricted stock units (RSUs).<sup>13</sup>

#### **Corporate Stocks**

Each security, as well as any reportable income generated by that security (*including reinvested income*), is required to be disclosed. You are not required to provide the number of shares. Provide the complete name of the company or security (**using only stock trading or "ticker" symbols is not permitted**).

**Reporting:** You are required to disclose corporate stock for yourself, your spouse, or dependent children if the value is more than \$1,000 at the end of the reporting period or it generated more than \$200 in income during the reporting period.

# Securities or an Ownership Interest in a Privately Held Company not Publicly Traded

**Reporting:** You are required to disclose the stock or ownership interest for yourself, your spouse, or dependent children of privately-held companies if the value is more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the stock or company (including a brief description of the trade or type of business and city and state), the value at the end of the reporting period and the type of income and amount generated during the reporting period.

If there is no stock issued and you have an interest in the corporation, you are only required to disclose your percentage of interest.

### **Corporate Bonds and Notes**

Corporate bonds and notes are debt securities issued by a corporation and sold to investors. The backing for the bond/note is usually the payment ability of the company, which is typically money to be earned from future operations.

**Reporting:** You are required to disclose a bond or note for you, your spouse, or dependent children if the value is more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the bond or note, indicate the value at the end of the reporting period, and the type of income and amount earned during the reporting period.

#### **CRYPTOCURRENCIES**

Cryptocurrency includes all ownership interests of virtual currency (e.g., Bitcoin, Ethereum, Cardano, Dogecoin, etc.). Transactions exceeding \$1,000 involving Stablecoins, such as USDC, are reportable in Schedule B of the annual FD, but are not reportable on PTRs, if the Stablecoins in question are pegged one to one with a fiat currency or precious metal (e.g., U.S. Dollar or troy ounces of gold).

<sup>&</sup>lt;sup>12</sup> See, Stock Options on page 42 for reporting.

<sup>&</sup>lt;sup>13</sup> See, Restricted Stock Options on page 46 for reporting.

**Reporting:** You are required to disclose for yourself, your spouse, or dependent children the name of the cryptocurrency if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. You are required to disclose purchases, sales, or exchanges of cryptocurrencies over \$1,000 on PTRs. If you have a question about whether a particular asset is considered cryptocurrency for financial disclosure purposes, you should contact the Committee for guidance.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Bitcoin [CT]		\$1,001-\$15,000	None		

# DEBTS OWED TO THE FILER

Debts owed to you are required to be disclosed if you are owed more than \$1,000 by anyone other than your spouse, children, parent or sibling and you are charging interest on the debt. Loans to a campaign committee are required to be disclosed if interest is being charged, including those situations where the interest is being passed through the filer to a bank or other financial institution.

**Reporting:** You are required to disclose debts owed to you if you are owed more than \$1,000 at the end of the reporting period or if they generated more than \$200 in income during the reporting period. Provide the name of the person or entity and their city and state of residence, the value of the debt, the income type, and amount of interest received during the reporting period.

# DEFINED BENEFIT PLANS (PENSIONS)

A Defined Benefit Plan (Pension) is a non-federal employer-sponsored retirement plan where employee benefits are based on a formula using factors, such as salary history and duration of employment. Investment risk and portfolio management are entirely under the control of the employer and investment manager. There are also restrictions on when and how you may withdraw these funds without penalties.

**Reporting:** You are required to disclose each non-federal defined benefit plan, including pension plans held with a state or local government, and cash balance plans held by you, your spouse, or dependent children. Provide the name of the plan or location of the account (e.g., Maryland State Pension Plan) and its overall value at the end of the reporting period. You may indicate that your pension value is "undetermined" or "determined at retirement." You may disclose "None" for type and amount of income for accounts that are not generating unearned income.

**Note**: Disclose any pension plans with prior employers in Schedule F. If you are receiving distributions, disclose the amount of distributions in Schedule C as earned income and the sales transaction in Schedule B, if it triggers the reporting threshold.

# EMPLOYEE STOCK OWNERSHIP PLANS (ESOP)

An Employee Stock Ownership Plan (ESOP) is a type of defined contribution plan that an employer contributes shares of company stock.

**Reporting:** You are required to disclose for yourself, your spouse or dependent children, an employee stock ownership plan if the value is more than \$1,000 at

the end of the reporting period or it generated more than \$200 in income during the reporting period. Provide the name of the employer and write an ESOP account, value and type of income and amount earned during the reporting period.

**Note:** Disclose an ESOP with prior employer in Schedule F. Do not confuse employee stock ownership plans with employee stock purchase plans. An employee stock purchase plan is an employer-sponsored incentive plan that allows employees to purchase company stock.

# EMPLOYEE STOCK PURCHASE PLANS (ESPP)

An Employee Stock Purchase Plan (ESPP) is an employer-sponsored incentive plan that allows employees to purchase company stock. The employer offers its employees the option to purchase company stock at the end of an "offering period."

When an employee exercises the option, the employer typically withholds the cost of purchasing the stock from the employee's pay in installments during the offering period. The employer holds this money in an account for the employee during the offering period. At the end of the offering period, the employee uses the money withheld to purchase company stock at the specified purchase price. Most employers offer the stock at discounts below fair market value.

**Reporting:** You are required to disclose for yourself, your spouse, or dependent children an employee stock purchase plan if the cash value is more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the employer and write an ESPP account, value and the type of income and amount earned during the reporting period. Once you have exercised the option, you are required to report the stock on a separate line item as "stock."



The purchase of stock triggers the requirement to file a PTR if the transaction exceeded \$1,000.

Note: Disclose ESPPs with prior employers in Schedule F.

# EXCHANGE TRADED FUNDS

An Exchange Traded Fund (ETF) is a collection of assets that typically tracks an index, a commodity, or sector, but trades like a stock on an exchange. ETFs experience price changes throughout the day as they are bought and sold. ETFs qualify as EIFs, and the underlying assets are not reportable.

Reporting: You are required to disclose for yourself, your spouse, or dependent children the complete name of each ETF (e.g., Vanguard Information Technology ETF (VGT)), if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the type and amount of income, even if reinvested (unless held in a tax-deferred account). Listing only "Fidelity Fund" or "exchanged traded fund" is insufficient since the specific investment is not identified.

### EXCHANGE TRADED NOTES

Exchange Traded Notes (ETN) is a debt instrument that tracks a reference index, benchmark, or portfolio and is traded on an exchange. Owners of an ETN do not own the underlying securities represented by the reference index, benchmark, or portfolio, but the structure of the note provides for a return that varies in response to the performance of the underlying securities. Unlike some other debt instruments, ETNs do not make interest payments; rather, the return occurs when the note reaches maturity or when the investor sells the ETN.

**Reporting:** You are required to disclose Exchange Traded Notes (ETNs) for yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the ETN, indicate the value at the end of the reporting period, and the type of income and amount earned during the reporting period.

### **FARMS**

A farm is an agricultural business operated with the intention of making a profit or creating a tax deduction for the owner. Investment farms are owned by investors who typically do not live on the farm or take part in any day-to-day operations.

**Note:** If you own livestock that you hold for an investment purpose or the production of income independent of a farming operation, disclose the livestock if they were worth more than \$1,000 collectively at the end of the reporting period or if transactions involving them generated more than \$200 in income during the reporting period.

**Reporting:** You are required to disclose ownership interest in a farm for yourself, your spouse, or dependent children if the farm is held for investment purposes or for the production of income, (regardless of whether the farm is held individually, cooperatively, or through a partnership or corporation) if the value of your interest was more than \$1,000 at the end of the reporting period or the farm generated more than \$200 in income during the reporting period. Disclose the name of the farm (e.g., Smith Family Farm), a description of what is produced (e.g., cattle, corn, or wheat), and the city/county and state. You may also want to indicate your percentage of interest. Disclose the aggregate value of the farm (e.g., land, buildings, farm equipment and crops) and the total gross amount of farm income, incorporating any farm subsidy you receive into the income amount.

### **FUTURES**

Futures contracts are agreements to buy or sell a commodity, such as agricultural products, or a financial instrument at a stipulated price, quantity, and time.

**Reporting:** You are required to disclose Futures for yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the futures contract for the commodity or security and in the description, indicate whether the position is open or closed. Disclose the value of the futures at the end of the reporting period (it is acceptable to disclose the value as "undetermined") and the type of income and amount earned during the reporting period.

### GOVERNMENT SECURITIES AND AGENCY DEBT

These terms refer to debt obligations issued by federal, state, or local governments, or by Government Sponsored Enterprises (GSEs). Such securities generally fall into three categories.

### **U.S. Treasury Securities**

U.S. Treasury Securities are debt obligations issued by the federal government and secured by the full faith and credit of the United States Constitution. These include Treasury bills, Treasury notes, Treasury bonds, and U.S. savings bonds.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
US Treasury Bill 1/12/2025		\$15,001- \$50,000	Interest		

### **U.S. Agency Securities**

U.S. Agency Securities are debt obligations issued by federal agencies and GSEs. A common agency security issuer is the Government National Mortgage Association (Ginnie Mae). Common GSE issuers include: the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Banks.

### **Municipal Securities**

Municipal Securities (Muni Bonds) are debt obligations (bonds and notes) of U.S. states, cities, counties, or other political subdivisions of states.



The purchase or sale of a government security might trigger the requirement to file a PTR. You should consult with Committee Staff if applicable.

Reporting: You are required to disclose government securities and agency debt for yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the issuing authority and type of security. When you own multiple types of government securities or agency debt issued by the same authority, you may disclose the aggregate value of the securities issued by the same authority and identify the type of securities (e.g., U.S. Treasury bonds or New York Port Authority Bonds are acceptable descriptions; whereas "Municipal bonds" is insufficient because the issuing authority is not identified). However, if you choose to disclose them separately, they are required to be distinguishable from one another and used consistently from year to year.

Securities pay interest in different ways. On Muni Bonds, interest accrues during the lifetime of the instrument but is not paid until maturity. If you can determine the interest that has accrued in a particular period, you may disclose that amount. However, you may find it easier to wait until a bond matures and disclose all the interest at that time. That approach is acceptable if you use it consistently.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
US Treasury Bill 1/12/2025		\$15,001- \$50,000	Interest	\$201-\$1,000	

# HEDGE FUNDS, PRIVATE EQUITY FUNDS, AND OTHER PRIVATE FUNDS

Hedge Funds, Private Equity Funds and other private funds are private investment vehicles that are open to a limited class of investors and frequently require a very large initial minimum investment.

### Reporting (EIF)

If the Fund qualifies as an EIF you are required to disclose your, your spouse's, or your dependent children's ownership interest in each hedge fund or private equity fund if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Disclose the name of the Fund, the value at the end of the reporting period, and the type and amount of income.

### Reporting (non-EIF)

If the Fund does not qualify as an EIF you are required to disclose each asset held in the Fund, the value of the Fund, type of income and amount; or submit to the Committee a letter from you and from the manager of the investment fund attesting to the following:

- 1. That you, your spouse, or dependent children cannot control or direct the investments made by the Fund; and
- 2. That you, your spouse, and your dependent children
  - a. are **not** entitled to receive investment information. Include an attestation that the fund manager considers the information regarding the investments made by the fund to be proprietary and confidential and as a result that information is not shared with investors in the Fund; or
  - b. are entitled to receive investment information but are subject to a confidentiality agreement that prohibits you from disclosing that information. Include:
    - i. a description of the types of information Fund investors receives; and
    - ii. a copy of the confidentiality agreement.

The letter is required to be on the Fund's letterhead and signed by a representative of the Fund. Please provide the letter to the Committee and any updates if there are changes. Once an acceptable letter has been received, you are required to disclose the name of the Fund (indicate in the description that there is a Fund Manager letter on file with the Committee) and its value at the end of the reporting period, the type of income and amount.

If the Fund is managed by your spouse or dependent children, then you are required to disclose the interest in the Fund in the same manner as a *privately-held company that is actively engaged in a trade or business* (e.g., a restaurant or car dealership), with one addition. You are required to disclose (1) the name of

the business in the description, (2) a brief description of the nature of its activities, (3) its location (city and state), (4) and indicate whether your spouse or dependent children participated in the management of the Fund (e.g., ABC Fund, investment management, New York, NY (spouse is Fund Manager). It is not necessary to provide an itemized list of the assets of the business. You are only required to disclose the total value of your interest in the business and not the individual holdings of the Fund.

## HEALTH SAVINGS ACCOUNTS (HSA)

A Health Savings Account (HSA) is a type of account that allows individuals to allocate pre-tax income for future use in paying qualified medical expenses. Contributions to a health savings account can also be made by an individual's employer. Although HSAs are often held in cash or cash equivalent, these accounts can hold types of investments. If the account holds investments, those holdings are reportable.

**Reporting:** You are required to disclose for yourself, your spouse, and dependent children each underlying asset held in your HSA that is valued at more than \$1,000 at the end of the reporting period. If you had more than \$200 in income from your HSA, disclose the type of income and total amount distributed during the reporting period.

### **INSURANCE POLICIES**

The type of insurance policy you own will determine whether, and to what extent, you are required to disclose your ownership interest.

Note: Term Life insurance policies are not reportable.

### Variable Life

Insurance policies that allow the policyholder to choose among a variety of investment options.

**Reporting:** You are required to disclose for yourself, your spouse, and dependent children the name of the insurance company, each investment option that had a value of more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period, the type of income and amount generated during the reporting period for each investment option.

### Whole Life or Universal Life

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Insurance policies that have a cash value.

**Reporting:** You are required to disclose whole and universal life insurance policies for yourself, your spouse and dependent children and provide the name of the insurance company, the type of policy, and the cash value at the end of the reporting period. You are not required to disclose income generated by whole life or universal life policies and may select "None" for the type of income and amount generated during the reporting period.

### **Convertible Life**

Insurance policies that have not been converted to a whole life policy, are not required to be disclosed. Once it converts, you are required to disclose it as a whole life policy.

### INTELLECTUAL PROPERTY RIGHTS

Under intellectual property law, owners of intellectual property are granted certain exclusive rights to a variety of intangible assets, including musical, literary, and artistic works; discoveries and inventions; and words, phrases, symbols, and designs. Common types of intellectual property include copyrights, trademarks, and patents.

**Note:** Members and senior staff are prohibited from receiving advance payments on royalties for book publishing contracts. In addition, Members and senior staff may not receive any copyright royalties under a contract unless it is submitted in writing and approved in advance by the Committee.

Reporting: You are required to disclose your, your spouse's, or dependent children's ownership interests in intellectual property if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide a brief description (e.g., Elements of Physics textbook published by Simon and Schuster) and the value at the end of the reporting period. This includes any advances and contract payments in the form of earned income that has not yet been received for the transfer of the intellectual property to the publisher, as well as any royalties currently due from the publisher for completed sales. When an interest in future royalties cannot be ascertained, it is acceptable to disclose the value as "undetermined." Disclose the type of income (by selecting "other" and writing "royalties") and the amount of income.

## MINERAL/OIL/SOLAR ENERGY RIGHTS

### Mineral and Oil Rights

Mineral and oil rights are ownership interests in those resources, which may be owned and conveyed exclusive of surface rights or other real property rights. In simpler terms, you may own mineral rights located on a parcel of land, but not the land itself. Payments for use of mineral or oil rights are called royalties and are reportable "unearned" income.

**Reporting:** You are required to disclose a lease for yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the lease, city and state or county and state where the resources are located, and in the description, the resource being extracted under the terms of the lease, and the name of the lessee (company extracting resources and paying royalties).

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Oil Lease Location: Dallas, TX	SP	Undetermined	Royalties	\$15,001- \$50,000	

### Solar Energy Rights

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Solar Energy Rights are based on the energy produced by solar panels installed by an individual (typically on or near their personal residence). Excess energy may be purchased from the individual by power companies, in exchange for Solar Renewable Energy Credits/Certificates (SRECs). SRECs are considered "unearned" income.

**Reporting:** You are required to disclose a solar renewable energy credit agreement for yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the entity paying income through the agreement, value can be disclosed as "undetermined," income that is produced can be selected as "other" and in the description, write "Solar Renewal Energy credit."

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Solar Energy Rights		Undetermined	Solar Energy Certificates/Credits	\$201-\$1,000	

### **MUTUAL FUNDS**

Mutual Funds pool money from investors to create a portfolio of assets, which can include stocks, bonds, and other securities. Investors own a share of the Fund. Mutual Funds can be identified by a ticker symbol that has five characters and ends in "X". Mutual Funds qualify as EIFs, and the underlying assets are not reportable.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Ameriprise → Fidelity Advisor New Insight Fund A (FNIAX) [MF]	JΤ	\$15,000 - \$50,000	Dividends	\$201- \$1,000	

Reporting: You are required to disclose for yourself, your spouse, or dependent children the complete name of each mutual fund or ETF (e.g., Fidelity Magellan Fund (FMGAX)), if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the type and amount of income, even if reinvested (unless held in a tax-deferred account). Listing only "Fidelity Funds" or "mutual funds" is insufficient since the specific investment is not identified.

### **OPTIONS**

Option Contracts grant a right, but not a legal obligation, to buy or sell a security on specified terms. Once the option is exercised it is required to be reported as a transaction on a PTR if it triggers the reporting threshold.

**Reporting:** You are required to disclose Options for yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the name of the option, (including those held in Employee Stock Option Plans), and include the name of the underlying security or index and the type of option (e.g., Widgets Unlimited (WIG), put option), the strike price, expiration date, the value of the option at the end of the reporting period (if the Option is

underwater or the value is difficult to determine, it is acceptable to write "undetermined,") the income type, and amount. Options normally do not produce income until they have been exercised or sold.

OWNERSHIP
INTERESTS IN
PRIVATELY-HELD
PARTNERSHIPS,
CORPORATIONS, AND
OTHER BUSINESS
ENTITIES

An "ownership interest" is an ownership stake in a business or company. It includes a broad range of business organizations, including Limited Liability Corporations (LLCs), Incorporations (Inc.), Limited Liability Partnerships (LLPs), Limited Partnerships (LPs), General Partnerships (GPs), and Sole Proprietorships. To determine disclosure of your ownership interests in a privately-held company depends on whether the company is actively engaged in a trade or business or was formed to hold investments (typically real estate).

## Privately Held Company that is Actively Engaged in a Trade or Business (e.g., a Restaurant or Dealership

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**Reporting:** You are required to disclose for yourself, your spouse or dependent children, the name of the business, its location (city and state), and the nature of its activities in the description (e.g., Peterson Construction Company, residential home builder, Phoenix, AZ). It is not necessary to provide an itemized list of the assets of the business. You are only required to disclose the total value of your interest in the business and not such items as office equipment.

The way you disclose income from a company engaging in a trade or business depends on how it is derived. Where your personal services generate significant income for the business, disclose the payments in Schedule C as earned income, rather than as "unearned" income in Schedule A. On the other hand, where the income truly reflects a return on investment, disclose them as "unearned" income in Schedule A. No matter how the income is characterized, you are required to disclose the value of the business in Schedule A.

**Note**: Disclose your position held in the business in Schedule E.

## Privately Held Company that was Formed for the Purpose of Holding Investments

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**Reporting:** You are required to disclose for yourself, your spouse or dependent children, each asset held by the company in which your interest or that of your spouse or dependent children had a value of more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. When disclosing multiple real estate properties, each property that had a value exceeding \$1,000 at the end of the reporting period, or rental income exceeding \$200 during the reporting period, are required to be disclosed separately, and descriptions are required to be distinguishable from one another and used consistently from year to year.

**Note**: Disclose the position you held in the business in Schedule E.

### **S** Corporations

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S Corporations are corporations that elect to pass on corporate income, losses, deductions, and credits through their shareholders for federal tax purposes. Shareholders of S Corporations disclose the flow-through of income and losses on their personal tax returns and are assessed as tax at their individual income tax rates.

**Reporting:** You are required to disclose S Corporations in the same manner as ownership interests in privately-held partnerships. If an S Corporation is actively engaged in a trade or business, you are required to disclose the name of the corporation, its location (city and state) and in the description provide the nature of its activities. Alternatively, if an S Corporation was formed for the purpose of holding investments, you are required to disclose each asset held by the company in which your interest or that of your spouse or dependent children had a value of more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period.

Income (also referred to as "dividends") from an S Corporation disclosure depends on how it is derived. If your personal services generate significant income for the business, disclose the payments in Schedule C as earned income, rather than as "unearned" income in Schedule A. On the other hand, if dividends truly reflect a return on investment, disclose them as "unearned" income in Schedule A. No matter how the dividends are characterized, you are required to disclose the value of the business in Schedule A.

**Note**: You are required to disclose your position in the business in Schedule E.

### **Limited Partnerships**

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A Limited Partner (LP) generally receives a Schedule K–1 (IRS Form 1065) at the end of each tax year summarizing the partner's share of income, deductions, and credits. If you hold a partnership interest, you do not need to disclose separately each type of income in which you shared (e.g., ordinary income, portfolio income, capital gain, and investment income). Instead, you may combine the income types and disclose the total as "Partnership Income." This total normally will be the sum of the income reflected on lines 1 through 11 and line 18 of your K-1 form.

Your share of income is required to be disclosed even if you do not physically receive the funds. However, if the amounts received do not exceed the total invested, withdrawals and distributions from your capital account are not reportable, since you are receiving your own money back. If you do not receive your K-1 form prior to your filing deadline, it is acceptable to provide a good faith estimate of the income based on the income received in the prior year. Once you receive your K-1 form, you are required to amend your FD if the category of value of your good faith estimate is different than the actual income received.

**Note**: You are required to disclose your position in the business in Schedule E.

### **PRECIOUS METALS**

Precious Metals are rare, naturally occurring metallic chemical elements of high economic value (e.g., gold, silver, platinum, etc.).

**Reporting:** You are required to disclose precious metals held by yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. Provide the type of precious metal, indicate the value at the end of the reporting period, and the type and amount of income earned during the reporting period.

### **REAL ESTATE**

Real Estate includes any interest in land, residential, or commercial property (e.g., office buildings, shopping malls, or apartment buildings) held in a trade or business or for investment or the production of income.

**Reporting:** You are required to disclose real estate owned by yourself, your spouse, or dependent children if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period unless it meets the exception below. Provide the name of the property sufficient to identify the property (e.g., Residential Rental Property), the location (city and state - **DO NOT use the street address**), the income type, and the total amount of rental income received without deducting mortgage payments or other expenses.

If you own more than one property, each property is required to be disclosed separately, distinguishable from one another and used consistently from year-to-year, (e.g., Residential Rental Property 1, Silver Spring, Maryland: Commercial Rental Property 2, Hanover, Maryland).

If you hold real estate in an LP or LLC, see, "Ownership Interests in Privately-Held Partnerships, Corporations, and Other Business Entities" on page 43.

You are not required to disclose a personal residence (or any gain from its sale) unless it generated rental income, such as renting the basement or a single room in your home (which requires disclosure of the value of the entire residence). You do not need to disclose a second home, vacation home, or other property that is held purely for personal use and was not rented at any time during the reporting period.

Asset	Owner	Value of Asset	Income Type	Income	Tx. > \$1,000
Bedmars Properties, LLC → West Harford Rental Location: West Harford, CT, US	JΤ	\$500,000- \$1,000,000	Rent	\$100,001- \$1,000,000	

## REAL ESTATE INVESTMENT TRUSTS (REITS)

A Real Estate Investment Trust (REIT) is a specific type of real estate holding company, which owns or finances income-producing real estate or mortgages.

### **Publicly-Traded REITs**

Publicly-Traded REITs are securities that sell like stocks on major exchanges but invest in real estate directly. Disclose in the same manner as stock (e.g., Simon Property Group (SPG)).

### **Private REITs**

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A Private REIT is typically structured as an LP, but can be set up as a fund, and is not listed on any national securities exchanges.

**Reporting:** If the REIT is a Fund that qualifies as an EIF, disclose your, your spouse's, or your dependent children's ownership interest in the REIT, if the value was more than \$1,000 at the end of the reporting period or it generated more than \$200 in income during the reporting period. Be sure to include the name of the REIT, the value at the end of the reporting period, and the type and amount of income.

If the REIT **does not qualify as an EIF**, disclose each underlying asset, the value, amount, and type of income; or submit a letter from you and from the manager of the REIT attesting to the following:

- 1. You, your spouse, or dependent children cannot control or direct the investments made by the REIT.
- 2. You, your spouse, or dependent children:
  - a. are *not* entitled to receive investment information. Include an attestation that the manager considers the information regarding the investments made by the REIT to be proprietary and confidential and as a result that information is not shared with investors in the REIT; or
  - b. **are** entitled to receive investment information but are subject to a confidentiality agreement that prohibits you from disclosing that information. Include:
    - i. a description of the types of information fund investors receives; and
    - ii. a copy of the confidentiality agreement.

The letter must be on the REIT's letterhead signed by a representative of the REIT; submitted to the Committee; and updated if there are any changes.

**Reporting:** You are required to disclose the name of the REIT (indicate in the description that there is a REIT manager letter on file with the Committee), its value at the end of the reporting period, the type, and amount of income generated during the reporting period.

If the REIT is managed by your spouse or dependent children, then you are required to disclose the interest in the REIT in the same manner as a privately-held company that is actively engaged in a trade or business (e.g., a restaurant or car dealership), with one addition: you are required to disclose the name of the business in the description, a brief description of the nature of its activities, its location (city and state), and indicate that your spouse or dependent children participate in the management of the REIT (e.g., ABC Fund, Investment Management, New York, NY (spouse is fund manager). It is not necessary to provide an itemized list of the assets of the business. You are only required to disclose the total value of your interest in the business, not disclose the individual holdings of the REIT.

## RESTRICTED STOCK UNITS (RSUs)

Restricted Stock Units (RSU) are a grant of company stock to an employee that has limitations on the employee's rights (usually, the right to sell the stock) until the shares vest. Specific terms, such as the vesting period and whether the employee will be paid dividends before vesting, are spelled out in an agreement between the employee and employer. Once the shares vest, the employee usually owns the stock without limitations and can sell it at any time. Generally, the employee forfeits restricted stock if the employee leaves the company before the restricted stock vests.

**Reporting**: You are required to disclose for yourself, your spouse, or dependent children your participation in a restricted stock plan if the value of stock was more than \$1,000 at the end of the reporting period or earned more than \$200 in income during the reporting period. Provide the name of the unvested stock (vested stock should be disclosed on a separate line item), value, type of income and amount.

Note: Disclose Restricted Stock Units with prior employers in Schedule F.

### STABLE VALUE FUNDS

A Stable Value Fund is generally offered as an investment option within an employee benefit or retirement plan. Stable Value Funds typically invest in bonds and interest-bearing contracts. Some Stable Value Funds are mutual funds that are registered with the U.S. Securities and Exchange Commission, but not all Stable Value Funds are registered mutual funds.

**Reporting:** You are required to disclose for yourself, your spouse and dependent children, a stable value fund held in a retirement account if the value was more than \$1,000 at the end of the reporting period or earned more than \$200 in income during the reporting period. Provide the name of the Fund, indicate the value at the end of the reporting period, and the type and amount of income earned during the reporting period.

Note: Disclose Stable Value Funds with prior employers in Schedule F.

### **TRUSTS**

If you, your spouse, or dependent children received income from, or has a vested beneficial interest in, principal or income in a trust or a similar financial arrangement, each asset held by the trust that had a fair market value of more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period. You are required to disclose the assets of the trust even if you currently do not receive income from the trust but have a vested interest in the principal.

**Reporting:** If you are not the sole beneficiary, you may disclose in one of two ways:

- 1. select the value bracket that represents your percentage of interest in the asset; or
- 2. indicate your percentage of interest in the description of the trust and provide the full value of the assets. For example, if you had a one-fifth interest in a trust, you disclose all assets worth more than \$5,000, together with a category of value that reflects the value of your interest. Alternatively, you may disclose that you have a one-fifth interest in the trust, and then you are required to disclose each asset of the trust that had a value more than \$5,000 at its full value.

You are required to state which of these two alternatives you are using and use it consistently from year to year.

You are not required to disclose assets of an estate or trust which you are an administrator or executor, receiving no income and having no beneficial interest in the corpus. Similarly, disclosure is not required if your interest is strictly contingent (e.g., if you stand to inherit certain property, but an event or time period must transpire before you may take possession (e.g., turning 30 years old or graduating from college)), you do not need to disclose the property. Disclose the holding only when your rights to it have been legally established. The requirement that the trust's grantor pass away before the vested beneficiary take possession of the property does NOT constitute a contingency.

Revocable Trusts, which are sometimes referred to as "living trusts," are only reportable if you, your spouse, or your dependent children are the grantor or receiving distributions.

### **Excepted and Qualified Blind Trusts**

In two rare circumstances, disclosure of trust assets is not required. If you are the beneficiary of a trust that falls into either of the categories described below, you should answer "Yes" in response to the "Trust" question at the end of the electronic filing or on page 1 of the paper form.

**Note:** You may never blind yourself to knowledge of the trust assets by simply avoiding information that is made available to you. In other words, you are required to provide documentation from the Trustee or the Trust documents that indicate you are not entitled to information on the Trust assets.

**Excepted Trusts** require both criteria below to be met.

- 1. The trust was not created by you, your spouse, or a dependent child.
- 2. You, your spouse, or your dependent child does not have specific knowledge of the assets or sources of income of the trust through a statement, or constructive receipt, whether intended or inadvertent. Constructive receipt occurs when a person is considered to have received information, even without having actual possession, such as when the legal requirements for delivery have been satisfied.

Reporting: You are required to disclose the name of the trust and indicate the general type of holdings to the extent known (e.g., Peterson Family Excepted Trust believed to contain energy stocks). Unless it is known, you are *not* required to disclose the value. If more than \$200 in income was received from the trust during the reporting period, you are required to disclose the income type as "Excepted Trust" and the value at the end of the reporting period. If no income was received, check "None." There is no requirement to disclose transactions related to the assets of an excepted trust. Before indicating for the first time that you are the beneficiary of an excepted trust, you are required to consult with the Committee.

A **Qualified Blind Trust**<sup>14</sup> is a type of trust that holds assets and investments including those of their spouse and dependent children as a method of avoiding conflicts of interest. **You must receive written approval from the Committee before establishing a Blind Trust.** 

**Reporting:** You are required to disclose the existence of the qualified blind trust and the total value at the end of the reporting period. If any reportable income was generated by the assets held in the trust during the reporting period, disclose the income type, "Blind Trust" and value (Block C and D of the paper form). If no income was received, check "None." There is no requirement to disclose transactions related to the assets of the trust.

In the event that a newly-formed trust is approved by the Committee as a qualified blind trust, all assets transferred to the trust upon its creation and subsequently (as long as the trustor is required to file FDs) are required to be identified, valued, and made available to the public in the same manner as FDs. Consult the EIGA itself for the specific requirements of a qualified blind trust.<sup>15</sup>

## UNIT INVESTMENT TRUST (UIT)

A Unit Investment Trust (UIT) is a type of investment company regulated under the Investment Company Act of 1940. A UIT buys a relatively fixed portfolio of securities and holds them with little or no change until the UIT's termination date.

**Reporting:** You are required to disclose for yourself, your spouse, and dependent children a UIT if the value was more than \$1,000 at the end of the reporting period or generated more than \$200 in income during the reporting period.



### **EXCLUSIONS**

You are not required to disclose the following assets on Schedule A, regardless of their value:

- Personal residences that do not generate rental income.
- Real estate not held for investment purposes or the production of income (e.g., second homes and vacation homes that do not generate rental income).
- Deposits in non-interest-bearing personal checking or savings accounts, regardless of amount.
- Debts owed to you by your spouse, or parent, brother, sister, or children of you or your spouse.
- Debts owed to you for which you are not charging interest.
- Personal property that is not principally held for investment or the production of income (e.g., furniture, automobiles, boats, jewelry, and artwork).
- Financial interests in or income derived from any federal retirement system, including the Thrift Savings Plan.
- Term Life Insurance Policies.
- Life Insurance Death Benefits.
- Health Savings Accounts (held in cash) or Flexible Spending Accounts.

<sup>&</sup>lt;sup>14</sup> Defined in the EIGA (5 U.S.C. § 13104(f)(3)).

<sup>&</sup>lt;sup>15</sup> See, Appendix A, pages A–6 through A–9.

### Column by Column Instructions for Schedule A (Paper Form) SP/DC/JT You may indicate that an item is that of a spouse or dependent child, or is jointly (Column within Block A) held, by including an "SP" for spouse, "DC" for dependent children, or "JT" for jointly-held property in the first column of Block A. If you use these labels, do so consistently each year for each filing. For example, if an asset was labeled "SP" in Schedule B on the previous FD or PTR, it should be labeled "SP" on this Schedule. Identity of Asset and/or Each asset should provide clear information regarding its identity, including the Income Source (Block A) nature of the holding and its location, where appropriate. **EIF** If you disclose an asset that is not publicly-traded but you assert it is an EIF, (column within Block A) place an "X" in this column. Value of Asset (Block B) Indicate the period-end value of each reportable asset by placing an "X" in the column of the appropriate range of value, designated A through M. As explained above in the "Valuation of Assets" discussion, providing a good faith estimate of the fair market value of an asset if the exact value is neither known nor easily obtainable is an acceptable method of valuation 16. The Value of Asset block includes a "None" box. Mark this box if an asset has been sold and therefore has no value to you at the end of the reporting period but is required to be included because it generated an income of more than \$200 (e.g., if the sale of an asset generated a capital gain of more than \$200, you are required to disclose this income in Blocks C and D of Schedule A). For year-end value, check the "None" column since you no longer held the asset at the end of the reporting period. For assets over \$1,000,000 in value that are held solely by your spouse or dependent children, you may mark the "Spouse/DC Asset over \$1,000,000"

column. For items that you hold either singly or jointly with your spouse or dependent children, you are required to mark the other higher categories of value as appropriate.

The fair market value of rental property or other real estate should *not* reflect any mortgage on such property. The law requires that the gross value of property and the gross rent receipts be disclosed. Any mortgage on the property is required to be shown as a liability in Schedule D. The gross value of the entire property is required to be disclosed even if only part of the property (e.g., the basement of a residence) is used for rental purposes.

### Type of Income (Block C)

"Unearned Income" is derived from the assets and other income sources listed in Block A. It includes, but is not limited to, such items as interest, rents, dividends, and capital gains. Place an "X" in the appropriate column, or, if you have some other type of unearned income not specifically listed, provide a brief description (e.g., Farm Income) in the "Other Type of Income" column. If an asset had more than one type of income, such as dividends and capital gains, you may check each box that applies, and then provide the total amount of

<sup>&</sup>lt;sup>16</sup> See, page 26 for a list of alternative valuation methods.

income received in Block D. If you had no income from a particular asset, you are required to check "None" under both Block C and Block D. Do not leave the columns blank.

**Note:** You are not required to disclose unearned income generated by assets held in tax-deferred accounts (including, but not limited to, 401(k)s, IRAs, 529 college savings accounts, and other similar accounts) in Schedule A. For such accounts, you may check the "tax-deferred" box for type and "None" for amount of income (Blocks C and D on the paper form). Disclosure of the asset itself, however, remains a requirement.

## Amount of Income (Block D)

Unearned income is required to be disclosed on the FD if it totaled more than \$200 during the reporting period from any one source. Indicate the amount of income by placing an "X" in the column of the appropriate range of income.

**Note**: The categories for disclosing "unearned income" are different from those used elsewhere on the form. They are identified by Roman Numerals (I through XII) rather than letters. There is also a "None" category at Roman numeral I. If an asset did not generate any income during the reporting period or is held in a tax-deferred account, you are required to check the "None" box; do not leave the column blank.



Disclose capital gains, dividends, interest income, and other types of income even if reinvested (unless the asset is held in a tax-deferred account).

In disclosing income (including from a business), the gross dollar amount or value is required to be used. The one exception is in the case of capital gains, where the net gain over basis is shown in Block D, while the gross value of the sale is shown in Schedule B as a transaction. You may also disclose the net value separately if you choose.

For income over \$1,000,000 in value that is generated by assets held solely by your spouse or dependent children, you may mark the "Spouse/DC Income over \$1,000,000" category at Roman numeral XII. For items that you hold either singly or jointly with your spouse or dependent children, you are required to mark the other higher categories of value as appropriate.

### Transactions (Block E)

If an asset was purchased, sold, or exchanged in a single transaction totaling over \$1,000 during the reporting period, indicate "P" (for purchase), "S" (for sale), or "E" (for an exchange) in this block. If you sell only a portion of a particular asset, such as half of your Google stock, then you indicate "S (Partial)" for a partial sale. In each case, you are required to also disclose the details of these transactions in Schedule B. For a more complete explanation of reportable transactions, refer to the discussion of Schedule B in the next section of these instructions. Leave Block E blank if you had no transactions or if each transaction in the assets was \$1,000 or less in the reporting period.

There are circumstances where an asset disclosed in the previous year no longer needs to be disclosed or an asset is disclosed for the first time, but no reportable purchase, sale, or exchange has occurred. For example, an asset may increase or decrease in value above or below the reporting threshold, an

asset may be the property of a new spouse or a former spouse or dependent, or an asset may have been acquired through inheritance. Because the Committee compares the current year's filing with the previous years and questions assets that appear or disappear without a corresponding transaction, you may wish to explain such occurrences in the description box or parenthetically on the column form. For a more complete discussion of the circumstances in which an asset may appropriately be disclosed for the first time or be omitted after being disclosed on a prior FD without a corresponding transaction, refer to the Schedule B discussion in the next section of these instructions.

### **SCHEDULE B – TRANSACTIONS**

(To be completed by annual and termination filers only)

In Schedule B, you are required to disclose the purchase, sale, or exchange of most Schedule A assets owned, in whole or in part, by yourself, your spouse, or dependent children if the amount of the transaction exceeded \$1,000.

The reporting threshold is reached when the gross amount of a single transaction exceeded \$1,000, not your gain or loss. This also includes transactions that resulted in a net loss (e.g., a sale transaction of an asset was \$5,000 but you paid \$7,000, you are required to disclose \$2,000 even though it resulted in a net loss).

**Note:** You are not required to disclose any transaction when the amount is \$1,000 or less, even if you had a series of transactions that totaled more than \$1,000 for a single asset.

### REPORTABLE TRANSACTIONS

### **Purchase Transactions**

**Purchase transactions** that are required to be disclosed in Schedule B include:

- Individual purchases involving a Schedule A asset in which the transaction amount exceeded \$1,000.
- Reinvestment of income, such as dividends or interest, in a Schedule A
  asset in which the amount of a single reinvestment transaction
  exceeded \$1,000 during the reporting period.
- Contributions to a retirement account where a single contribution to a single asset exceeded \$1,000 during the reporting period.

### Sale Transactions

Sale transactions that are required to be disclosed in Schedule B are:

 Individual sales involving a Schedule A asset where the transaction amount exceeded \$1,000. This includes taking mandatory distributions from a retirement account where the sale of a single asset exceeded \$1,000.

### **Exchange Transactions**

**Exchange transactions** are somewhat rare and refer only to a limited set of circumstances that involve the exchange of stock certificates following the purchase of one company by another, a merger of two companies, or a spin-off. Exchanges are only reportable when the original stock or fund owned is surrendered for a new stock or fund.

For example, if you own stock in Company A and that company is purchased by or merged with Company B, your stock in Company A may be exchanged for Company B stock. You are required to indicate the type of exchange transaction in your entry. If you disclose an exchange transaction, you may do so in a single entry in Schedule B and provide a statement in the description "Company A stock exchanged for Company B stock following merger."



You are not required to disclose the following transactions on Schedule B:

- The purchase or sale of your personal residence so long as it generated no rental income during the reporting period.
- The purchase or sale of real property, such as a second home, vacation home, or vacant land so long as it generated no income during the reporting period.
- The purchase or sale of personal property, such as an automobile or boat.
- Any transactions solely by and between you, your spouse, or dependent children.
- · Bequests or inheritances.
- Transactions such as contributions or withdrawals involving Federal Retirement System Plans (e.g., Thrift Savings Plan).
- A gift or donation to or from you, your spouse, or your dependent children (See, Appendix C for a detailed discussion of gifts).
- Stock splits.
- The opening or closing of bank accounts, money market accounts/funds or other cash accounts.
- Deposits to and withdrawals from a bank, including checks written on money market accounts.
- The purchase or sale of certificates of deposit.
- The call, redemption, or maturation of a bond.
- A company's grant of options to its employees or board members.

Purchase and sale transactions involving assets held within retirement accounts, such as 401ks and IRAs, are required to be disclosed, including those resulting from the contribution of an employer (e.g., if you have a 401(k) plan and you direct the plan administrator to sell your entire holding in the "Small Cap Fund" and purchase shares in the "Large Cap Fund"). You are required to separately disclose each of these transactions in Schedule B if the amount of each transaction exceeded \$1,000.

Transfers between currently held assets within these accounts are also considered purchase and sale transactions. These types of transfers are commonly referred to as reallocation or rebalancing of funds.

With very few exceptions, every purchase or exchange transaction disclosed in the FD requires that the assets involved also be disclosed in Schedule A. One exception to this general rule is in the case of an asset that decreases in market value following its purchase. For example, if you purchased a stock for \$1,200 in July 2024, but its market value fell to \$900 at the end of the year, you are required to disclose the purchase transaction because it exceeded \$1,000, but you are not required to disclose the asset in Schedule A because its value was below \$1,000 at the end of the reporting period (assuming that it generated less than \$200 of income). In such cases, however, it is advisable to disclose the assets in Schedule A with a value of \$1 - \$1,000 at the end of the reporting period.

Sale transactions may or may not require a corresponding entry in Schedule A, depending on the circumstances. If you sell your entire holding of an asset, you are not required to disclose the asset in Schedule A unless there is a capital gain generated by the sale which exceeded \$200 or there was other reportable income, such as dividends, during the reporting period exceeding \$200 attributable to the asset prior to its sale. If there was such a capital gain or other income generated by the asset exceeding \$200 during the reporting period, you are required to disclose that income in Schedule A but indicate the value of the asset as "None" since it had no value at the end of the reporting period.

If you sell less than your entire interest in an asset, but the asset's value is below the reporting threshold (i.e., the remaining interest is worth \$1,000 or less at the end of the reporting period), you may find it helpful to disclose the asset anyway, as a placeholder for future FDs. However, over-reporting an asset is not required.

**Partial Sale of Assets**: If only a portion of an asset is sold (e.g., half of your shares in Mega Corporation), check the "Partial Sale" box in Schedule B.

**Partnership Transactions:** You are only required to disclose transactions related to the ownership interests of privately held companies that were formed for the purpose of holding investments (typically real estate). If, for example, you are a partner in a limited partnership that owns five rental properties, you are required to separately disclose each transaction, such as the purchase of an additional rental property, if your share exceeded \$1,000. There is no requirement to disclose transactions made by a privately held company in which you, your spouse, or dependent children have an ownership interest if the company is engaged in a trade or business, such as a restaurant or family farm.

## COLUMN BY COLUMN INSTRUCTIONS FOR SCHEDULE B (PAPER FORM)

As noted above, you are required to disclose information regarding the transactions of your spouse or dependent children to the same extent you disclose your own. You may, but are not required to, indicate that a transaction involves an asset that is held by your spouse or dependent children, or is jointly held, by including an "SP" for spouse, "DC" for dependent children, or "JT" for jointly held, by including an "SP" for spouse, "DC" for dependent children, or "JT" for jointly held assets. If you use these labels, do so consistently each year for each filing. For example, if an asset was labeled "SP" in Schedule A on the previous FD or on a PTR, it should be labeled "SP" on this Schedule.  Asset Column  Provide the complete name of the asset for which a reportable transaction has occurred. You may not use ticker symbols exclusively but may add them to supplement the complete name of the asset. Asset descriptions used in Schedule B should be identical to those used to describe the same asset in Schedule A. For example, for options, include the type of option (call or put), strike price, and expiration date.  Type of Transaction  Column  Indicate the type of transaction (purchase, sale, partial sale, or exchange). Multiple transactions of the same type involving the same asset (e.g., three purchases of Google stock) may be combined into a single entry if they are made at regular intervals, such as monthly or quarterly, or are automatic reinvestments. You may not, however, combine multiple transactions that you initiate at irregular intervals, unless you provide all the dates in the date column (e.g., purchases of Google stock on January 6, May 12, and October 26). Nor may you combine multiple transactions of different types involving the same asset (e.g., a purchase and two sales of Google stock) into a single entry. If you choose to combine multiple transactions of Google stock on it is not provide all the dates in the date column (e.g., a purchase and two sales of Google stock) into a single entry. If you cho		
occurred. You may not use ticker symbols exclusively but may add them to supplement the complete name of the asset. Asset descriptions used in Schedule B should be identical to those used to describe the same asset in Schedule A. For example, for options, include the type of option (call or put), strike price, and expiration date.  Type of Transaction Column  Indicate the type of transaction (purchase, sale, partial sale, or exchange). Multiple transactions of the same type involving the same asset (e.g., three purchases of Google stock) may be combined into a single entry if they are made at regular intervals, such as monthly or quarterly, or are automatic reinvestments. You may not, however, combine multiple transactions that you initiate at irregular intervals, unless you provide all the dates in the date column (e.g., purchases of Google stock on January 6, May 12, and October 26). Nor may you combine multiple transactions of different types involving the same asset (e.g., a purchase and two sales of Google stock) into a single entry. If you choose to combine multiple transactions, you must follow the instructions for completing the "Date" column when multiple transactions are combined.  Capital Gain Column  On sale transactions only, place an "X" in this box if a sale resulted in a capital gain more than \$200, unless the asset was held in a tax-deferred account. If you check this box, you are required to disclose the capital gain in Schedule A.  Date Column  Indicate the month, day, and year of the transaction. For securities, the	SP/DC/JT Column	transactions of your spouse or dependent children to the same extent you disclose your own. You may, but are not required to, indicate that a transaction involves an asset that is held by your spouse or dependent children, or is jointly held, by including an "SP" for spouse, "DC" for dependent children, or "JT" for jointly held assets. If you use these labels, do so consistently each year for each filing. For example, if an asset was labeled "SP" in Schedule A on the previous
Multiple transactions of the same type involving the same asset (e.g., three purchases of Google stock) may be combined into a single entry if they are made at regular intervals, such as monthly or quarterly, or are automatic reinvestments. You may not, however, combine multiple transactions that you initiate at irregular intervals, unless you provide all the dates in the date column (e.g., purchases of Google stock on January 6, May 12, and October 26). Nor may you combine multiple transactions of different types involving the same asset (e.g., a purchase and two sales of Google stock) into a single entry. If you choose to combine multiple transactions, you must follow the instructions for completing the "Date" column when multiple transactions are combined.  Capital Gain Column  On sale transactions only, place an "X" in this box if a sale resulted in a capital gain more than \$200, unless the asset was held in a tax-deferred account. If you check this box, you are required to disclose the capital gain in Schedule A.  Date Column  Indicate the month, day, and year of the transaction. For securities, the	Asset Column	occurred. You may not use ticker symbols exclusively but may add them to supplement the complete name of the asset. Asset descriptions used in Schedule B should be identical to those used to describe the same asset in Schedule A. For example, for options, include the type of option (call or put),
gain more than \$200, unless the asset was held in a tax-deferred account. If you check this box, you are required to disclose the capital gain in Schedule A.  Date Column  Indicate the month, day, and year of the transaction. For securities, the		Multiple transactions of the same type involving the same asset (e.g., three purchases of Google stock) may be combined into a single entry if they are made at regular intervals, such as monthly or quarterly, or are automatic reinvestments. You may not, however, combine multiple transactions that you initiate at irregular intervals, unless you provide all the dates in the date column (e.g., purchases of Google stock on January 6, May 12, and October 26). Nor may you combine multiple transactions of different types involving the same asset (e.g., a purchase and two sales of Google stock) into a single entry. If you choose to combine multiple transactions, you must follow the instructions for
	Capital Gain Column	gain more than \$200, unless the asset was held in a tax-deferred account. If you
	Date Column	

Multiple transactions at regular intervals of the same type and involving the same asset may be combined into a single entry. The way you disclose the date depends upon the quantity of transactions. If the transactions are at regular intervals, indicate the interval (e.g., monthly). If it is an automatic dividend reinvestment, use the frequency of the reinvestment to indicate the date (e.g., monthly, or quarterly).



You may not combine multiple transactions that you initiate at irregular intervals. You are required to provide the month, day, and year for each of these transactions, but you can include multiple dates on the same line.

If you are filing on paper, you may choose to attach brokerage statements or transaction summaries to your FD as an alternative to completing Schedule B in its entirety. Before doing so, refer to the discussion on the use of brokerage statements on page 4 of these instructions.

## Amount of Transaction Column

The amount to be disclosed is the category of value of the total purchase price or total sale price (or the fair market value in the case of an exchange). As explained above, use the gross amount of a transaction to determine which value category amount to disclose. The extent of any capital gain or loss on the transaction is irrelevant for the purpose of determining the transaction amount.

For transactions of assets over \$1,000,000 in value that are held solely by your spouse or dependent children, you may mark the "Over \$1,000,000 (Spouse/DC Asset)" box. For items that you hold either singly or jointly with your spouse or dependent children, you are required to mark the other higher categories of value as appropriate.

### SCHEDULE C – EARNED INCOME

(To be completed by all filers)

You are required to disclose in Schedule C the following payments received by you and your spouse if they aggregated \$200 or more from a single source in the reporting period:

- Earned Income from employment outside the House; and
- Honoraria for new Members and Employees, Candidates, principal assistants, and all filers' spouses.

Annual Filers and New Members	Complete the "Prior Year" for amount of income.
Candidates, New Employees, and Termination Filers who file a Termination FD on or before May 15	Complete both the "Current Year" and "Prior Year" for amount of income.
Termination Filers who file a Termination FD after May 15 deadline	Complete the "Current Year" for amount of income.

### REPORTABLE EARNED INCOME

### **EARNED INCOME**

Earned Income is generally income you received resulting from "the fruit of your labor". By contrast, income that is unearned, or passive in nature, such as dividends, rent, and partnership income, is required to be disclosed in Schedule A, as discussed above. The earned income you disclose in Schedule C is intended to be comprehensive and means all income from whatever source derived, including but not limited to the following items:

- Compensation for services, including fees, commissions, and similar items.
- Gross income derived from business (and net income if the individual elects to include it).
- Earned Income from any source other than your current U.S. Government employment.
- Pension and retirement payments from any source other than the U.S. Government or Social Security.
- IRA and 401(k) distributions.
- Benefit payments from state or local governments, such as unemployment compensation.

### **HONORARIUM**<sup>17</sup>

Honorarium refers to a payment of money or anything of value for an appearance, speech, or article, excluding any actual and necessary travel expenses incurred by the individual (and one relative) to the extent that such expenses are paid or reimbursed. Members and employees who qualify as senior staff for more than 90 days are prohibited from accepting honoraria but may have the payment made to a charity in lieu of acceptance.

<sup>&</sup>lt;sup>17</sup> Refer to the discussion in Schedule I, Payments Made to Charity in Lieu of Honoraria on page 72, regarding the rules for the acceptance and disclosure of these payments.

## SPOUSE AND DEPENDENT CHILDREN

You are required to disclose the source and type, but not the amount of your spouse's earned income that totaled \$1,000 or more from a single source (including the federal government). In the "Amount" section, you may enter "N/A" for entries related to your spouse's employment, 401ks, IRAs, or other retirement distributions. For an honorarium that your spouse received, you are required to disclose the source, type of income and amount if it totaled more than \$200.

**Note:** For dependent children, you are not required to disclose information regarding earned income or honoraria.

**Reporting:** You are required to disclose for yourself and your spouse the source and type of income earned. Identify the source by naming the organization, corporation, or other entity making the payment. It is not necessary that individual clients of a business be named, only the business itself (e.g., an editor discloses the name of the publishing firm as the source of earned income, not the clients for whom the work was performed). Describe the type of income as salary, commissions, fees.

**Note:** The law requires that gross amounts be used for disclosing income. You are required to disclose the gross amount of salary or fees excluding expenses. Likewise, you are required to disclose the gross income of an unincorporated business, such as a sole proprietorship you own. You may disclose the net income in addition to, but not in place of, the gross income figure.



### **EXCLUSIONS**

You are not required to disclose the following on Schedule C, regardless of the amount:

- Income from your employment by the House.
- Filer income from any other current U.S. government employment, including military pay, such as from the National Guard or Reserve (spousal income is reportable).
- Benefits from federal retirement programs, and benefits received under the Social Security Act.
- Life insurance proceeds.
- · Earned income of a dependent child.
- Disability payments from the federal government, a state government, or a private insurance company.
- Alimony and child support payments.
- Foster parent income.

# Income Cap Members, Off

Members, Officers, and Employees paid at or above the senior staff rate for more than 90 days in a calendar year are subject to an annual outside earned income (OEI) limit of 15 percent of the Executive Level II salary. For the calendar year 2025, the outside earned income cap for Members and senior staff is \$33,285 (\$31,815 for 2024).

Certain types of earned income, such as pensions from prior employers or deferred compensation for services rendered prior to current legislative employment, do not count against the outside earned income limit for the current year. Income is required to be disclosed in Schedule C. You may wish to note parenthetically or in the comment section in the electronic filing system that such income is for services rendered prior to House employment.

### Fiduciary Restrictions

Regardless of whether the outside earned income cap has been reached, Members, Officers, and Employees paid at or above the senior staff rate for more than 90 days in a calendar year may not accept compensated for certain professional activities.

These individuals may not earn *any* income (even an amount below the income cap) for the following:

- Providing **professional services involving a fiduciary relationship,** such as the practice of law or the sale of real estate or insurance.
- Being employed by an organization that provides **fiduciary services.**
- Serving as an **officer or board member** of any association, corporation, or other entity (including charitable or political organizations, or family businesses).
- **Teaching** without the prior written approval of the Committee.

A more detailed discussion of the outside earned income limits for Members and staff is included in the House Ethics Manual.

### **SCHEDULE D – LIABILITIES**

(To be completed by all filers)

In Schedule D, you are required to disclose any debts personally owed by yourself, your spouse, or dependent children or that are jointly held at any time with any individual that was more than \$10,000 at any point during the reporting period.

### **REPORTABLE DEBTS**

· Personal loans.

- Student loans (including federal student loans).
- Mortgages on rental property or property held for investment purposes or the production of income. Candidates, officers, and employees do not have to disclose mortgages on personal residences or vacation properties that do not generate income.
- Promissory note with name of debtor.
- Loans or debts on which you are a co-signer.
- Liabilities of a business if you are personally liable for the debt.
- Margin accounts.
- MEMBERS ONLY: Mortgages and home equity loans on personal residences.
- Revolving charge accounts (e.g., credit cards) if the amount exceeded \$10,000 at the end of the reporting period.

### **TYPES OF SPECIFIC DEBT**

### **PERSONAL LOAN**

You are required to disclose any loan personally owed by you, your spouse, or your dependent children that totaled more than \$10,000 at any point during the reporting period. This includes loans to a business for which you are personally responsible. You are required to disclose these debts at the highest amount owed during the reporting period. A loan, (e.g., a student loan), which had over \$10,000 in principle due at some point in the year, but was paid off or paid below that amount, is required to be listed (you are free to include additional parenthetical information, such as the fact that the loan was satisfied during the reporting period). If you co-signed for your dependent children's college loan, you are required to disclose the loan in Schedule D if the balance exceeded \$10,000 at any point during the reporting period.

## MORTGAGES ON REAL PROPERTY

You are required to disclose for yourself, your spouse, or dependent children all mortgages, home equity loans, or home equity lines of credit on any property held for investment or the production of income. This includes any interest in rental property, commercial property (e.g., an office building or shopping mall), or land (including mineral rights).

Any liability on real property that generates income is required to be disclosed. This includes the mortgage on a vacation or second home that was rented during any portion of the reporting period. You are required to also disclose liabilities secured by real property held for investment or the production of income even if that property generated no income (e.g., a rental property that was not leased during the reporting period).

You are required to disclose the debts with the highest amount owed during the reporting period. For mortgages, disclose the entire amount, even if only part of the property, such as basement, is used for rental purposes.

**MEMBERS ONLY**: Mortgages and other liabilities, such as home equity loans or home equity lines of credit, are required to be disclosed on a personal residence, even if the property did not generate any income when the liability totaled more than \$10,000 at any point during the reporting period. In addition to your primary personal residence, this includes, but is not limited to, the mortgage on a vacation or second home or vacant piece of property. As with personal loans, you are required to disclose the debts to the highest amount owed during the reporting period.

**Note:** Unlike a rental or investment property, you are not required to disclose a personal residence as an asset in Schedule A (unless you derive income from the property).

### REVOLVING CHARGE ACCOUNTS (CREDIT CARDS)

You are required to disclose each credit card account separately if the balance on that card exceeded \$10,000 at the end of the reporting period, regardless of the balance owed on the card at any other point during the reporting period.

### **Examples:**

- You owed \$20,000 on your American Express card every month from January through November, but in early December you made an \$11,000 payment. Because you owed only \$9,000 on the card on December 31 (the end of the reporting period for an annual disclose), you are not required to disclose that account in Schedule D.
- At the end of the reporting period, you owed \$8,000 each on your Visa, MasterCard, and American Express charge accounts. Because the balance on each card was less than \$10,000, you are not required to disclose any of the accounts in Schedule D.

### **MARGIN ACCOUNTS**

You are required to disclose any margin account personally held by yourself, your spouse, or dependent children in which the account holder borrowed more than \$10,000 at any point during the reporting period. You are required to disclose the margin loan at the highest amount owed during the period. A margin loan that was over \$10,000 at some point in the year, but was paid off or paid below that amount, is required to be disclosed. You are free to include additional information in the description box, such as a margin loan that was satisfied during the year.



You are not required to disclose the following types of liabilities on Schedule D, regardless of their dollar value:

- Loans against your TSP or other retirement accounts.
- Car loans, if the loan amount does not exceed the purchase price that secures it.
- Loans on other types of motor vehicles (e.g., motorcycles, boats, and airplanes) are excluded under the same condition as cars.
- Liabilities owed to certain relatives.
- Loans you received from your spouse, or the parent, brother, sister, or children of you or your spouse.
- Contingent liabilities (e.g., that of a guarantor, endorser, or surety). You may still be required to disclose the position on Schedule E.
- Liabilities of a business in which you have an interest unless you are personally liable for the debt. This includes mortgages on rental or investment property held in a partnership or limited liability company.
- Loans secured by the cash value of a life insurance policy.
- Taxes owed to the IRS or a state or local government.
- Household furniture or appliances, if the loan amount does not exceed the purchase price of the item that secures it.
- Professional fees (e.g., legal, or medical fees) that you incur and are paying on a regular basis. However, fees of this kind that remain unpaid for a prolonged period, resulting in a debtor-creditor relationship, are required to be disclosed.
- Officers, Employees and Candidates Only: Mortgages and home equity loans on a personal residence, if the property is not used for rental purposes. This includes loans secured by a secondary residence ary reaction home if it does not generate rental income.

### COLUMN BY COLUMN INSTRUCTIONS FOR SCHEDULE D (PAPER FORM)

SP/DC/JT Column	You may, but are not required to, indicate that a debt is that of your spouse (SP), dependent children (DC), or jointly held with your spouse, children, or another individual (JT). Use of this column is optional, but if you choose to use it, be consistent from year to year.
Creditor Column	All information regarding a single creditor may be disclosed on a single line. If you have more than one liability owed to the same creditor, add up the loans to determine if the \$10,000 threshold has been met.  The identity of the creditor is the name of the person or organization to which the liability is owed. If the lender is an individual or a regional lender, also indicate the city and state (e.g., Jane Jones, Miami, FL or Main Street Bank, Columbus, MO).
Date Column	Provide the month and year that the liability was incurred (e.g., the date you signed the loan documents). Failure to provide the date a liability was incurred is a common error. For revolving charge accounts, disclose the month and year at the end of the reporting period (December 2024 for Annual Filers). If you are combining

multiple debts from a single lender, provide the date for the first debt you incurred (e.g., if you took out multiple student loans from the same lender while in college, you may disclose the loans under one entry name and provide the date you took out the first loan.

## Type of Liability Column

Examples are "personal loan," "business loan," "demand note," "margin account," and "mortgage on rental property." When you have several of the same type of loans, you are required to provide information to differentiate the debts from each other. For example, if you show only one rental property as an asset, "mortgage on rental property" is sufficient. If you have multiple rental properties, state the property to which each obligation relates, together with the type of liability (e.g., Mortgage on Rental Property 1, Dover, DE). For investment (i.e., rental) properties, the description of the property in Schedule D must match the description of the property in Schedule A.

**MEMBERS ONLY:** For your personal residence, examples include "mortgage on personal residence, Washington, DC (not rented)" and "mortgage on vacation home, Hilton Head, SC (not rented)." For any personal residence that has a rental income, you are required to disclose the property in Schedule A and provide the amount of the rental income, but you are otherwise not required to disclose a personal residence as an asset in Schedule A.

### Amount of Liability Column

As explained above, for all debts except credit cards, disclose the liability at the highest value owed during the reporting period. For credit cards, disclose on the category of value owed at the end of the reporting period. For liabilities over \$1,000,000 in value that are held solely by your spouse or dependent children, you may mark the box for "Spouse/DC Liability over \$1,000,000" in category K. For items that you hold either singly or jointly with your spouse or dependent children, you are required to mark the other higher categories of value as appropriate.

### SCHEDULE E – POSITIONS

(To be completed by all filers)

In Schedule E, you are required to disclose any position you held, not those held by your spouse or dependent children, compensated or not, with any organization, other than the federal government, at any time during the reporting period.

Annual Filers, New Members, second- year Candidates, and Termination Filers	Disclose positions held at any time during the reporting period up to the date of filing.
First-year Candidates and New Employee Filers	Disclose positions held at any time during the current calendar year up to the date of filing, plus the two prior calendar years.

### **REPORTABLE POSITIONS**

The EIGA requires specific positions to be disclosed if held with specific types of organizations:

- Officer
- Director
- Trustee
- Partner

- Proprietor
- Representative
- Employee
- Consultant

**Note:** These designated positions are different from titles and, therefore, a functional position which carries a different title may still need to be disclosed. For example, a "member" of a limited liability company (LLC) is generally a proprietor of that business, and a "manager" of an LLC is often an Officer.

### **REPORTABLE ENTITIES AND ORGANIZATIONS**

- Corporations
- Companies
- Limited Liability Companies
- Firms
- Partnerships

- Educational Institutions
- Nonprofit Organizations
- Labor Organizations
- Any type of Business Enterprise
- Any Institution other than the U.S.
   Government

If you no longer hold the position, you may wish to indicate it parenthetically in the description box, but you are required to still disclose the position.

In general, Members, Officers, and Employees paid at the senior staff rate may not be compensated for serving as an officer or board member of a corporation, association, or other entity. If you served as an unpaid member or officer of an entity, you may wish to indicate it parenthetically in your entry. However, income is permitted in certain limited circumstances. If you are permitted to receive income, then you are not required to disclose the amount of any salary or payment you receive in Schedule E, but you are required to disclose the income in Schedule C if it was \$200 or more.

Members and senior staff may not serve as an officer or director of a public company or company traded in a foreign market.<sup>18</sup> If you have questions about whether a particular position is prohibited, contact the Committee immediately.



### **EXCLUSIONS**

You are not required to disclose the following types of positions in Schedule E:

- Held in a religious, social, or fraternal organization.
- Honorary in nature.
- With political parties or campaign organizations.
- As a trustee or executor, unless it was for an organization (rather than, for example, a family member).
- If you have already reported your position AND employer in Schedule C.

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<sup>&</sup>lt;sup>18</sup> Comm. On Ethics, *Outside Position Regulations* (Dec. 11, 2019).

### **SCHEDULE F – AGREEMENTS**

(To be completed by all filers)

In Schedule F, you are required to disclose **only for you** the parties to and general terms of the following types of agreements with or for:

- Your future employer regarding your future employment following your departure from employment by the House. You are required to disclose the employer, position title, and starting date, but not the compensation.
- A leave of absence during your period of government service.
- Your former employer, including state but not the Federal Government, for continued participation in a benefit program, such as life or health insurance, 401(k), pension, or profit-sharing plan.
- All types of employers, for continuing compensation payments, such as buyout agreements, severance payments, or payments not yet received for previous work.



### **EXCLUSIONS**

You are not required to disclose the following agreements on Schedule F:

- Agreements entered into by your dependent children or spouse.
- Agreements for continued benefits from your prior employment with the Federal Government.

### SCHEDULE G - GIFTS

(To be completed by annual and termination filers only)

In Schedule G, you are required to disclose gifts valued over \$480 that you accepted, and, in some cases, by your spouse or dependent children.

Despite the Gift Rule's limitations on the acceptance of gifts, House Members, Officers, and Employees may accept certain gifts that are required to be disclosed on the FD. This section addresses only the disclosure requirements associated with a gift. In some situations, a House Member, Officer, or Employee is required to obtain prior Committee approval to accept a gift. Consult the Committee with any questions about whether you may accept a gift.

#### REPORTABLE GIFTS

- Gifts of personal friendship. This includes gifts of travel paid for under this exception.
- Commemorative items.
- Gambling or lottery winnings.
- Scholarships.
- Donations to a Legal Expense Fund.
- Member-to-Member, Member-to-staff, and staff-to-staff gifts.
- Tickets or admission to a charity event if the non-tax-deductible portion exceeds \$480.

**Note:** The Gift Rule prohibits the acceptance of a gift of personal friendship valued at more than \$250 unless the recipient receives prior written permission from the Committee (via Personal Friendship Gift Waiver or Special Occasion Gift Waiver) that the gift is acceptable under that provision of the Gift Rule. Reportable personal friendship gifts also include gifts of non-business travel paid for by a personal friend. If you have obtained a "Special Occasion Gift Waiver" from the Committee, you may also request a Financial Disclosure Gift Waiver.

The EIGA requires you to disclose any gifts received during the reporting period from a single donor, other than a relative, that total more than "minimal value," which is a statutory term of art. For 2024, the "minimal value" was \$480 and remains the same for 2025. However, any single gift valued at less than \$192 for 2024 (\$192 for 2025) need not be counted against the \$480 reporting threshold.

You, your spouse, and your dependent children do not have separate \$480 disclosure limits. If you, your spouse, and dependent children each receive gifts from the same source, the value of those gifts are totaled to determine if the reporting threshold has been met. The only exception is if your spouse or dependent children receive gifts totally independent of their relationship with you as a Member, Officer, or Employee.



House Rule 25, clause 5 (the House "Gift Rule") substantially limits the ability of House Members, Officers, and Employees to accept gifts. The text of the Gift Rule is reprinted in Appendix C of this guide, and explanatory materials on the rule are contained in the House Ethics Manual.

**Reporting:** In disclosing a gift, you are required to disclose the identity of the source, briefly describe the gift, and state its value. If you do not know the exact value of a gift, you may use a good faith estimate of its fair market value (which may be different from its cost to the donor). A group of items received from the same source at the same time are considered one gift and the total value should be added together.

### Examples of Gifts Received

- You received a \$120 gift and a \$250 item from the same source. Neither item requires disclosure, since the \$120 gift falls below the \$192 aggregation threshold and the remaining item is valued at less than \$480.
- You and your spouse each received a \$250 item from the same source. The gifts together total \$500 in value and therefore are required to be disclosed.
- Your spouse received a \$490 watch as a birthday present from her best friend, who
  has no official business before the House. You do not need to disclose the gift
  because it was given independently of your House employment.



You are not required to disclose the following gifts on Schedule G, regardless of their dollar value:

- Gifts from relatives. Under the EIGA, the term "relative" means an individual who is related to you as your father, mother, son, daughter, brother, sister, uncle, aunt, great aunt, great uncle, first cousin, nephew, niece, husband, wife, grandfather, grandmother, grandson, granddaughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, half-sister, or the grandfather or grandmother of your spouse. Your fiancé/fiancée is also deemed to be a relative under the EIGA. (A provision of the House Gift Rule expressly permits gifts from "relatives" and uses the EIGA's definition of "relative").
- Gifts of personal hospitality. These gifts include food, lodging, and entertainment extended for a non-business purpose by an individual, not a corporation or organization, at the personal residence of, or on property or facilities owned by, that individual or his or her family. The personal hospitality exemption is limited. It does not extend to hotel lodging or to air travel to get to the location where the hospitality is provided. The host may not take a tax deduction for the costs of the hospitality provided, may not be reimbursed by another source for the expenses of the hospitality, and may not be a federally registered lobbyist or registered foreign agent. As a general rule, the property may not generate any rental income.
- Bequests or inheritances.
- Items paid for by the federal, state, or local government. This exclusion covers gifts of food, lodging, transportation, entertainment, and tangible items paid for entirely by any federal, state, or local government entity.
- **Local food or meals.** This means food and beverages that are not consumed in connection with a gift of overnight lodging.
- Items received prior to your employment by the House.
- **Tickets to widely attended political events.** The tickets are required to be acceptable under the provision of the Gift Rule.

### SCHEDULE H – TRAVEL PAYMENTS AND REIMBURSEMENTS

(To be completed by annual and termination filers only)

In Schedule H, you are required to disclose travel over a certain dollar value accepted by private and foreign government sources during the reporting period.

### **REPORTABLE TRIPS**

Paid for by private source in connection with your official duties. This type of travel requires
written pre-approval by the Committee, and the actual dollar amount of the travel is required to
also be disclosed to the Clerk within 15 days of your return from travel. Privately sponsored travel
is also disclosed on the Clerk's website, <a href="https://clerk.house.gov">https://clerk.house.gov</a>.

- Paid for private sources in connection with your or your spouse's outside business or other activities.
- Paid for by non-federal political organization for travel in connection with a campaign or fundraising event.
- Paid for by nonprofit group in connection with your attendance at its charity fundraising event.
- Paid for by foreign government under the Mutual Educational and Cultural Exchange Act of 1961 (MECEA) (22 U.S.C. §§ 2451 et seq.).

**Reporting:** You are required to disclose the following information:

- The identity of the trip sponsor.
- The dates of the trip.
- The cities of departure (destination, and return).
- Whether you were accompanied by a family member.
- Whether you were provided with food and lodging.

You ARE NOT required to disclose the cost of any travel.

The EIGA requires you to disclose any trips you've taken that were paid by a source other than a federal, state, or local government or a relative if the trip expenses for food, transportation and lodging totaled more than \$480.

All travel, food, and lodging expenses received from one source in a reporting period are required to be counted in determining if the total exceeds \$480. Unlike the treatment of gifts, there is no \$192 minimum threshold for counting travel reimbursements. If you received airfare and lodging worth \$360 on one occasion from one source, and on a separate occasion received lodging worth \$140 from that same source, you are required to disclose both events.

You are required to disclose travel paid for by a private source, regardless of whether it was taken in connection with your House employment or otherwise. You are required to disclose travel regardless of whether it was paid for on your behalf directly or if you were reimbursed.

**Note:** You are not required to disclose any travel taken by your spouse or dependent children, without you. However, you may be required to disclose travel in which you accompanied your spouse on travel related to your spouse's employment or activities.



### **EXCLUSIONS**

You are not required to disclose the following travel on Schedule H, regardless of its dollar value:

- Paid for by relatives. Under the EIGA, the term "relative" means an individual who is related to you as your father, mother, son, daughter, brother, sister, uncle, aunt, great aunt, great uncle, first cousin, nephew, niece, husband, wife, grandfather, grandmother, grandson, granddaughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, half-sister, or the grandfather or grandmother of your spouse. Your fiancé/fiancée is deemed to be a relative under the Gift Rule.
- Paid for by a federal, state, or local government. You are not required to disclose any travel paid for by House funds, including funds of a committee or a Member's personal office. You also do not have to disclose any travel paid for by a federal government entity, such as a federal agency. Do not disclose travel paid for by the general funds of a public university.
- Taken only by your spouse or dependent children, provided it was taken totally independent of their relationship to you as a Member, Officer, or Employee of the House.
- **Provided by a foreign government** that is separately reportable pursuant to the Foreign Gifts and Decorations Act (5 U.S.C. § 7342).
- Taken prior to becoming a Member or House Employee.
- Paid for by a federal political organization for official or officially-related travel; or travel in connection with a campaign or fundraising event, if reported as an expense to the Federal Election Commission.

### COLUMN BY COLUMN INSTRUCTIONS FOR SCHEDULE H (PAPER FORM)

In disclosing travel on your FD, it is not necessary to indicate the dollar value or provide an itemized list of the expenses provided. Only the name of the organization providing the travel, together with the dates of travel and a brief description of the itinerary (departing and arriving cities) and nature of expenses, is required. Schedule H includes six columns prompting disclosure of the necessary information.

Source Column	Provide the name of the sponsor or organization that actually paid for or provided the travel (e.g., "XYZ Trade Association" or "International Visitors Board.") There may be more than one sponsor for a particular trip. For MECEA trips, the sponsoring entity is the government of the host country, or an agency or the department thereof. You may wish to indicate parenthetically the type of trip.
Date(s) Column	Disclose the starting and ending dates of each trip in the second column ( <i>i.e.</i> , the first day on which any travel was taken and the last day on which any travel ended). If all the travel occurred on one date, state that date.

Itinerary Column	Disclose the starting destination(s) and return location (provide the city and state or country, not the airport name).
Nature of Expenses Accepted Column	If the travel or travel expenses were accepted to permit a family member to accompany you, indicate that food and lodging were included. If a relative accompanied you at your own expense, rather than being paid for by the trip sponsor, answer "no" in this column.

### <u>SCHEDULE I – PAYMENTS MADE TO CHARITY IN LIEU OF HONORARIA</u>

(To be completed by annual and termination filers only)

In Schedule I, you are required to disclose any payments aggregating to \$200 or more from a single source that were made to charity in lieu of being paid as an honorarium to you.

Members, Officers, and Employees paid at or above the senior staff rate for more than 90 days in a calendar year are prohibited by both federal law and House rules from receiving honoraria, which are payments for speeches, appearances, and articles.

Even under this prohibition, payments in lieu of honoraria may be made to qualified charities by sponsors of speeches, appearances, and articles, subject to all the following four conditions:

- 1. The benefiting organization is required to be a § 501(c)(3) nonprofit entity.
- 2. The payments are required to be made directly by the sponsor of an event to the charity; the Member, Officer, or Employee may not serve as intermediary.
- 3. There is a \$2,000 limit that may be directed to charity for any one speech, appearance, or article.
- 4. There may be no financial benefit to the Member, Officer, or Employee, or to a parent, sibling, spouse, child or dependent relative of that individual from the benefitting charity.

### **HOW TO COMPLETE SCHEDULE I**

Submitted Schedule I to the Clerk as part of the completed FD. Submit a confidential list of recipient charities directly to the Ethics Committee as well.

Details on how to complete each part are provided below.

### Part 1: Schedule I

Complete Schedule I and include it as part of your completed FD filed with the Clerk.

In Schedule I, you are required to disclose under "source," the sponsor of each event for which a payment was made to charity in lieu of an honorarium being paid to the filer. The type of activity (e.g., speech, appearance, or article) are required to be identified, as well as the date and dollar amount of the payment. The date will either be the date of a speaking engagement or appearance or, in the case of an article, the date the payment was made.

Schedule I does not require the filer to disclose the name of any charity that received a payment in lieu of an honorarium. Instead, the filer provides that information on a confidential list submitted directly to the Committee, as explained in part 2.

Payments made by a federal lobbyist or foreign agent have an additional disclosure requirement, as explained later in this section.

### Part 2: Confidential List Of Recipient Charities

In addition to filling out Schedule I, you are required to submit to the Committee a confidential list of the charities receiving the payments, including the dates and amounts of such payments.

The Committee has not prepared a separate method for the disclosure of charities that receive payments in lieu of honoraria. Instead, you are free to use any format that is compatible with your personal record keeping. The disclosure requires you to include your name, the year, the names of each charity known to have received payments because of speeches, appearances, and articles, the amount, the entity making the payment to charity, and the date of the event or the date the payment was made or requested (the same date as on the public FD). If you file using the electronic filing system, you are required to submit the list in the "Comments" section. You can choose to make the section either public or private. If you are filing on paper, the easiest method is to photocopy your Schedule I page and add the names of the recipient charities.

The Committee recognizes that you may not always know that a charity has received a payment. For example, you may have requested that payment be made but did not receive confirmation that the request was honored. Or, you may have a policy of suggesting that the sponsor of an event choose from among several charities, but not know which organization was the actual recipient. If you have requested that a payment be made to a charity, then you are required to disclose in your FD the sponsor, date, and amount. If you do not know whether a charity received the payment, simply indicate in the confidential disclose what request was made of the sponsor (*i.e.*, the names of the charities), but state that you do not know which charity received the payment, or whether the requested payment was made.

The Committee has green envelopes to use for submitting the confidential disclose. These envelopes may be obtained at the Committee's offices at 1015 Longworth House Office Building or 508 Ford House Office Building. Alternatively, you may use your own envelopes. Indicate on the envelope your name, the year, and state and district (if a Member) or employing office (if an Officer or Employee). If you use a plain envelope rather than a green one, indicate on the front that it is your "green envelope" or your confidential list of charities.

After enclosing the confidential report, seal the envelope, and send it directly to the Committee at 508 Ford House Office Building, Washington, DC 20515. The Committee will retain the envelope in its files. It will be opened only if the Committee determines that an examination of the information is essential to an investigation by the Committee.



### **EXCLUSIONS**

You are not required to disclose the following in Schedule I:

- Honoraria earned by your spouse. However, the source and amount of these payments must be reported on Schedule C as earned income.
- Honoraria earned by your dependent children. For examples of how to report payments made to charity in lieu of honoraria, refer to the sample Form A FD Statement at page SF-1.

# Special Requirement for Payments from Federal Lobbyists or Foreign Agents

The House Gift Rule (House Rule 25, clause 5) imposes an additional requirement regarding the disclosure of charitable contributions in lieu of honoraria where the charitable contribution is made by a registered lobbyist or an agent of a foreign principal (registered under the Foreign Agents Registration Act). When the contribution is from either of these sources, the Member, Officer, or Employee who recommended or designated the recipient charity are required to file a Report with the Clerk within 30 days.

This disclosure requirement, which applies only where the donor is a registered lobbyist or foreign agent, is in addition to the requirement for the disclosure of the payments on your FD. The text of the Gift Rule appears as Appendix C to these instructions, and the provision that addresses charitable contributions in lieu of honoraria is clause 5(d)(2) of House Rule 25.

# SCHEDULE J – COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

(To be completed by new Members, new employees, and Candidates only)

In Schedule J, you are required to disclose compensation of more than \$5,000 paid by one source if you were employed in a position in which you **personally performed services for clients** in either of the two preceding calendar years that generated fees of more than \$5,000 for your employer.

**Reporting:** You are required to identify each of those clients if you have an ownership interest in the employer (e.g., if you were a partner or member (not an associate) of a law firm, accounting firm, or lobbying firm, you are required to disclose the clients or customers of your firm to whom you personally provided services which generated **fees of more than \$5,000**. The clients or customers of a filer who was the sole proprietor of a business or other professional practice are also required to be disclosed in the same manner.

In identifying the clients or customers, you are required to disclose the name and location (city and state) of the individual or company for which you performed the services. You are required to also describe the nature of the services generating compensation. This may be in general terms such as "legal services." It is not necessary to elaborate further on the type of legal services or to indicate a proceeding to which the services are related.



# **EXCLUSIONS**

You are not required to disclose the following information on Schedule J:

- Earned income from your employment (e.g., name of the law firm or consulting firm) that you reported on Schedule C.
- Compensation for work you performed for the U.S. government.
- The amount of the compensation received for your services.
- Information regarding your spouse or dependent children.

In addition, you are not required to disclose the names of clients whose identities are prohibited from disclosure because of a:

- Law barring disclosure of the client's identity and/or payment and remittance history, such as HIPAA.
- State bar rule provision.
- Confidentiality agreement entered into with the client at the time your services were retained.
- Court order
- Grand jury investigation or other non-public investigations for which there are no public filings.

If you are not disclosing your clients for any of these reasons, you are required to still check "Yes" to Question J on the "Preliminary Information" page. Then, you are required to indicate on Schedule J that "certain confidential clients are not reported" and state the specific reason for the nondisclosure, such as a cite to the specific bar rule of the state in which disclosure of client identities is not permitted.

# **BEFORE FILING A PAPER FORM**

If you file using the paper form, before filing please double check the following:

- Each required question on the Preliminary Information Page has been answered "YES" or "NO" by marking the appropriate box.
- You have attached the proper, completed schedule for each question to which you answered "YES" on the Preliminary Information Page.
- The Signature and Certification Page has been signed and dated.
- The correct number of forms have been prepared (Members and Candidates file an original and two photocopies; Officers and Employees file an original and one photocopy).

If you are using the electronic filing system, you will be prompted to address required questions or incomplete entries before the system will accept your submission. Please make sure the system generates a confirmation page before exiting and keep a copy for your records. The electronic filing system will automatically retain copies of your FD Statement or PTR as filed, but you will also have the option to download a PDF copy and/or print a hard copy for your records.

# **IPO ATTESTATION AND DISCLOSURE EXEMPTION QUESTIONS** Prior to Certification you are Required to Respond to 3 Questions

There are three "YES/NO" questions which you are required to answer by checking the appropriate boxes. If any of these questions are not answered, the FD may be deemed deficient.

### **INITIAL PUBLIC OFFERING ATTESTATION**

#### This question is for Annual and Termination Filers only.

The IPO question reads:

IPO: Did you purchase any shares that were allocated as a part of an Initial Public Offering?





Section 12 of the STOCK Act amended the Securities Exchange Act of 1934 to ban Members, Officers, and Employees who file FDs from participating in an Initial Public Offering (IPO) in a manner "other than is available to members of the public generally." The Committee notes that opportunities for the public to participate in an IPO are very limited. If you would like to participate in an IPO, we strongly recommend contacting the Committee in advance. 19 As a result of the ban, you will be required to indicate whether you purchased any shares that were allocated as part of an IPO on their FD by checking the appropriate box. If you answer "yes" to the question because you received an IPO allocation, Contact the Committee to discuss the disclosure format.

Cryptocurrencies have introduced the concept of Initial Coin Offerings (ICOs) to financial markets. The U.S. Securities and Exchange Commission (SEC) has indicated that it is continuing to review ICOs and assess how existing securities laws and regulations apply to them. It is currently unclear which ICOs, if any, may be considered by the SEC to be "the subject of an initial public offering" for purposes of the IPO prohibition. Accordingly, any House Member, Officer, or Employee who is considering participating in an ICO is strongly encouraged to contact the Committee for guidance first.

#### TRUST EXEMPTION

The trust exemption question reads:

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?





Generally, you are required to disclose information concerning each asset held in a trust in which you, your spouse, or dependent children have a beneficial interest. If you and your family members have no trusts, or if your FD fully discloses any trust assets, check the box marked "NO."

If you have an "Excepted Trust<sup>20</sup>" or "Qualified Blind Trust<sup>21</sup>" you are required to disclose in Schedule A the trust, its value, and any income received by you, your spouse, or your dependent children, but you do not need to disclose the assets. You also are required to check "YES" in response to the "Trust" question on page 1 because you are excluding assets from disclosure in Schedule A.

## **SPOUSE AND** DEPENDENT **DISCLOSURE EXEMPTION**

The spouse/dependent exemption question reads:

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?





You are required to disclose certain information concerning the income, assets, liabilities, and other information about your spouse and dependent children on the FD. This question asks you to indicate if you have omitted any information about your spouse or dependent children under the three statutory standards for exemption discussed below. In those rare instances where information may be excluded, check the "YES" box. You should not answer "Yes" to this question for the first time unless you have first consulted with the staff of the Committee. If you intend to include all information regarding the finances of a spouse or children, or if you have no spouse or children, then the box marked "NO" should be checked.

You may omit disclosure of certain financial interests and liabilities for a spouse or dependent children when *all three* of the following criteria are met:

- 1. Knowledge Test: The items are the sole financial interest or responsibility of your spouse or dependent children, and you have no specific knowledge of the items.
- 2. Independence Test: The items were not, in any way, past or present, derived from your income or assets.
- 3. Benefit Test: You do not derive or expect to derive any financial or economic benefit from the assets.

If you omit any reporting because these three circumstances are met, you are required to check the "YES" box on the first page of the FD in response to the "Exemption" question.

An explanation of the three criteria for exemption are below.

#### **Knowledge Test**

To satisfy the "knowledge test," you are required to have no detailed or specific knowledge of a financial interest or responsibility of your spouse or dependent children (e.g., if you know that your spouse has inherited stock in a number of different corporations, but you do not know the identity of the corporations or the extent of the stock holdings you are considered to have no knowledge of those financial interests for purposes of this exemption. However, knowledge is presumed if you filed a joint tax return that included information regarding the assets in question).

 $<sup>^{19}</sup>$  While interpretation of the STOCK Act regarding participation in IPOs will fall to the U.S. Securities and Exchange Commission, U.S. Department of Justice, or the courts, the opinion of the Committee is that, as drafted, the STOCK Act prohibits only the filer from participating in IPOs, but not the filer's spouse or dependent children, assuming the assets used for the purchase and the securities purchased are wholly owned by the spouse or dependent children, separate and independent of the filer. See, STOCK Act at § 12. Comm. on Ethics, Reminder About the Limitation on Participating in Initial Public Offerings (Nov. 5, 2013).

Again, you may never blind yourself to knowledge of assets by simply avoiding information that is available to you.

#### **Independence Test**

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To satisfy the "independence test," the financial interest or responsibility must be solely that of your spouse or dependent children and must have been obtained through your spouse's or children's own activities or financial resources (as is the case with a bequest inheritance, gift, or other means totally unrelated to you). If any part of your income, financial interests, or activities contributed in any way to the acquisition or disposition of the item, then the item does not meet this criterion.

#### **Benefit Test**

The **"benefit test** should be interpreted very broadly. The law requires that you neither derive, nor expect to derive, any financial or economic benefit from the item. See, 5 U.S.C. § 13104(e)(1)(E). You benefit under this standard if income from the assets of your spouse or dependent children is used. For example, for your vacations, the education of your dependents, the maintenance of your home or similar activities. In addition, you stand to benefit from interests held by a spouse or dependent children if you have the possibility of inheriting the interest.

#### SIGNATURE AND CERTIFICATION

The electronic system will require you to sign the form digitally before submission. If you file on paper, you are required to sign and date the signature page after completing the FD. Your signature on the paper form or electronic filing certifies that the FD or PTR (including any accompanying schedules or information) is accurate and complete. The completed FD/PTR is required to be signed by you *personally*, not by someone acting on your behalf, even if someone else prepared or assisted you in completing the FD.

**Note:** If you file the paper form, the signature and certification page **WILL NOT** be made available to the public. If you file electronically, no such page is created.

Any individual who knowingly and willfully falsifies, or who knowingly and willfully fails to file, a required FD may be subject to incarceration and/or a fine pursuant to 5 U.S.C. § 13106, and criminal sanctions under 18 U.S.C. § 1001.

# **Chart for Reporting Selected Assets**

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Asset	Disclose on FD Sch. A	Disclose on FD Sch. B <sup>22</sup>	Disclose on PTR <sup>23</sup>	Do Not Disclose
529 College Plans	✓	✓	X	
Bank Accounts/Money Markets/ CDs	<b>✓</b>	X	X	
Bank Accounts (non-interest bearing)	X	X	X	X
Business Development Company	✓	✓	X	
Corporate Bonds	✓	✓	<b>✓</b>	
Cryptocurrencies	✓	✓	✓	
Exchange Traded Funds	✓	✓	Х	
Futures	✓	✓	✓	
Government Securities (Treasury Bills/Notes/Muni Bonds)	✓	✓	✓	
Hedge/Private Equity Funds	✓	✓	Maybe <sup>24</sup>	
Life Insurance Policies and Annuities <sup>25</sup>	✓	Maybe	Maybe	
Mutual Funds	✓	✓	X	
Oil/Gas/Mineral Rights	✓	✓	<b>✓</b>	
REITS	✓	✓	Maybe <sup>26</sup>	
Options	✓	✓	✓	
Real Property (Investment) <sup>27</sup>	✓	✓	X	
Stable Value Fund	✓	✓	✓	
Stocks	✓	✓	<b>✓</b>	
TSP Contributions	Х	Х	Х	Х

 $<sup>^{22}</sup>$  Reportable if the gross value of the transaction in the asset is more than \$1,000.

 $<sup>^{23}</sup>$  Reportable if the gross value of the transaction in the asset is more than \$1,000.

 $<sup>^{\</sup>rm 24}$  Please consult the factors outlined on page 39 for Hedge Funds.

<sup>&</sup>lt;sup>25</sup> Transactions in assets within a variable annuity may be reportable if they are otherwise independently reportable (transactions in Fixed Annuities, Universal and Whole Life Insurance policies are not reportable transactions).

 $<sup>^{\</sup>rm 26}$  Please consult the factors outlined on page 45.

 $<sup>^{27}</sup>$  MEMBERS ONLY are required to report mortgages on any real property holdings on Schedule D (Liabilities).

# **FREQUENTLY ASKED QUESTIONS**

### Question: How do I value a fixed annuity?

It is acceptable to use the annuity's face value, the company's estimate of the current value, or the value of premiums paid plus accrued income.

#### Question: My frog won a prize in a jumping contest. Do I disclose the winnings?

Yes, if the value of the prize triggers the reporting threshold.

#### Question: I won a prize for public service. Do I disclose the winnings?

Yes, if the value of the prize triggers the reporting threshold.

#### Question: If my bond matured and I redeemed it during the reporting period, should I still disclose it?

Report the bond on Schedule A if you received more than \$200 in income (usually interest income) during the reporting period and report the value as "None." **Note**: If the bond was sold before its maturity date, you are required to disclose the transaction in Schedule B and on a PTR.

### Question: How do you calculate the income from a corporate bond?

You are required to make a good faith effort in calculating the amount of interest received. The information is usually found on an IRS Form 1099 or in a brokerage account statement. Otherwise, you may be able to estimate the amount of interest during a reporting period by apportioning the difference between the purchase price and the maturation value over the bond's term (It is not sufficient to state a bond series or interest rate).

#### Question: How do I value a municipal bond?

You may use any one of the following options:

- The bond's maturity value.
- The value as shown on an account statement at the end of the reporting period.
- The current market value.
- A good faith estimate if the exact value cannot be obtained without undue hardship, or expense.

# Question: I received a salary and a cash bonus from the same source. Can I combine these in Schedule E?

Yes, you may disclose salary and a cash bonus in a single entry. Write the phrase "salary and bonus" in the "Income Type" field. Be sure to provide the combined amount of your salary and bonus. However, you may not combine a salary with a bonus in the form of stock options, restricted stock, or other equity.

#### Question: I received my bonus in the form of stock options. How should I disclose this?

Follow the appropriate reporting requirement for Options, ESOP or ESPP.

#### Question: Why doesn't my brokerage account qualify as an excepted investment fund?

A brokerage account does not satisfy the various elements of the excepted investment fund<sup>28</sup> test.

# Question: All the dividends and capital gains within my account are reinvested into other assets. Do I have to disclose these dividends and capital gains as income?

Yes. Like how these dividends and capital gains are treated for purposes of federal income tax, you are required to disclose the dividends and capital gains as "received" income for purposes of public financial disclosure. The only exception is if the brokerage account itself is "tax-deferred" (e.g., this is an account for your IRA). In the event your account is "tax-deferred," refer to the applicable tax-deferred account in the instructions.

#### Question: How do I disclose a sweep account?

Disclose the name of the account holder and indicate it is cash (e.g., U.S. brokerage account (cash)).

#### Question: How do I know whether a collectible item is "held for investment purposes"?

If you purchased a collectible for the purpose of realizing a gain upon sale or if you subsequently began treating a set of collectibles as a source of income, then the collectibles would be reportable, subject to the value and income thresholds. Periodic sales from a collection of artworks would indicate that the collection is held for investment purposes. Similarly, acquiring a collectible with a group of investors would generally indicate an investment purpose. Absent any prior sales or other documented steps that signal an investment purpose, reporting would depend on your own sense of why you hold the collectible.

#### Question: How do I value a collectible item?

You may use a recent purchase price, a recent appraisal for insurance purposes, a published price guide, the recent sale price of similar items, or a good faith estimate.

# Question: My parents/grandparents established a 529 plan for my dependent children. Do I have to disclose the 529 plan?

No. The account is considered the property of your parents/grandparents.

#### Question: I established a 529 plan for my grandchildren. Do I have to disclose the 529 plan?

Yes, if the total value was more than \$1,000 at the end of the reporting period or if you received a distribution or withdrawal of more than \$200 during the reporting period. You do not need to disclose distributions or withdrawals made to your grandchildren or to an educational institution for your grandchildren's benefit because the distribution/withdrawal is viewed as your grandchildren's income.

<sup>&</sup>lt;sup>28</sup> Defined on page 27.

## **CANDIDATE Q&A**

#### **Question: Are all Candidates required to file Financial Disclosure Reports?**

No, only 'qualified' Candidates are required to file an FD. "Qualified' Candidates are those individuals who raise or spend more than \$5,000 during a campaign for election to the House of Representatives. This includes funds loaned to the campaign from any source.

# Question: If I qualified as a Candidate in a non-election (odd-numbered) year, when will I be required to file an FD?

Within 30 days of becoming a Candidate or by May 15<sup>th</sup>, whichever is later. You will then be required to file a second Financial Disclosure Disclose by May 15<sup>th</sup> of the following year if you are still a Candidate.

# Question: If I qualified as a Candidate in an election (even-numbered) year, when am I required to file an FD?

Generally, within 30 days of becoming a Candidate or by May 15<sup>th</sup> of that year, whichever is later.

#### Question: If I qualify as a Candidate less than 30 days prior to the election, when is my FD due?

The FD is due immediately.

#### Question: Can I get an extension of time to file my FD?

Generally, yes. The Committee can grant up to 90 days if requested prior to the original due date.

### Question: What if I stop campaigning, do I still need to submit an FD?

Yes, you are required to file an FD. To be excused from filing the FD, you are required to formally withdraw your candidacy by submitting the appropriate notice with the Clerk at the LRC prior to the FD due date.

#### Question: What is the reporting period for Candidates?

The reporting period for qualified Candidates is generally January 1<sup>st</sup> of the prior calendar year through the current year to a date within 30 days prior to filing the FD.

## Question: Are Candidates required to file PTRs?

No, Candidates are not required to file PTRs.

### Question: Do I complete Form A or Form B as a Candidate?

All Candidates complete Form B.

# Question: What if I did not raise or spend \$5,000. Do I still need to submit an FD?

You are required to submit an 'Under \$5,000 Threshold Declaration Form' to the Clerk at the LRC. However, once you do pass the \$5,000 threshold you are required to then notify the Clerk at the LRC to be assigned a new filing deadline.

Question: how do I obtain my username and/or password to login to the electronic filing system?

Contact the LRC on (202) 226-5200.