

All Form Fields are Required

## **OCC CONFIDENTIAL FINANCIAL DISCLOSURE REPORT**

for Covered Employees of the Office of the Comptroller of the Currency

Last Name: First Name: OCC E-mail Address:		Date of Appointment or Promotion to Financial Disclosure Filing Position:	NB Band:
		Position Title:	
Department/Div	sion:	udget Code: Permanent Duty Station Location:	Work Phone
iling Period For:	Annual Filers - January 1, 2023 thro	h December 31, 2023	
		the filing of this form, but do not report loans that hav nents (e.g., stock) that have already been divested.	ve already bee

Are you an Administrative Employee? 🔿 Yes 🔿 No

## Part 1: Loans from National Banks or Federal Savings Associations

All filers except administrative employees must complete this part. OCC Financial Disclosure Filers, their spouses, and minor children are generally prohibited from seeking or obtaining loans or other extensions of credit from a national bank or a federal savings association or from any officer, director, employee, or subsidiary of a national bank or a federal savings association. This prohibition does not extend to a credit card or a primary residence loan if the terms and conditions of the extension of credit or loan are no more favorable than those offered to similarly situated borrowers. In the case of a primary residence loan, the employee must also consult with the employee's supervisor and ethics official prior to entering into the loan and observe a recusal from matters affecting the lender.

The following are the requirements of the OCC ethics policy for taking out a primary residence loan from a national bank or a federal savings association or from a subsidiary of a national bank or a federal savings association.

1. Before taking out a primary residence mortgage loan from a national bank or a federal savings association or from a subsidiary of a national bank or a federal savings association, the examiner or other covered employee must consult with his or her supervisor and ethics official to confirm that the proposed loan complies with the primary residence loan exception to OCC's borrowing prohibition and with OCC ethics policy. In addition, immediately after entering into the loan, the employee must report the loan to his or her ethics official so that the employee's recusal can be appropriately noted in the ethics system.

2. This exception to the borrowing prohibition applies to loans secured by an employee's primary residence, including new mortgage loans, refinanced loans, and home equity lines of credit. It does not apply to loans secured by a vacation home or other dwelling.

3. Examiners and other covered employees may not take out a primary residence mortgage loan from a national bank or a federal savings association or from a subsidiary of a national bank or a federal savings association if they are currently assigned to an examination or other matter (e.g., a licensing matter or enforcement case) involving that lender or if they know they will soon be receiving such an assignment. Note: Examiners are "assigned to examine" a bank or a savings association if they work: 1) in a district field office, and the bank or savings association is one they examine or that is assigned to their Assistant Deputy Comptroller (ADC) or rating official; or 2) in a bank or savings association to which they are regularly or otherwise assigned. ADCs and those assigned to perform the duties of ADC analysts may not take out a primary residence mortgage loan from any bank or savings association under the ADC's supervision.

4. The employee taking out the primary residence mortgage loan is recused from examining or participating in other matters involving the national bank or federal savings association extending the loan; but, if the employee is subsequently assigned to a matter involving the bank or federal savings association, this recusal may be waived so long as it is determined that the loan was entered into appropriately, and there are no other circumstances present that might require that the recusal be continued.



For additional information, see definitions in <u>HELP</u>. HELP also explains the various kinds of loans that must be reported, including loans to certain partnerships, closely held corporations, trusts, etc., in which a covered OCC employee or the employee's spouse or minor child has an interest.

(HELP PDF is available at the following location: http://occnet.occ/human-resources/ethics/forms/occ-confidential-financial-disclosure-help.pdf)

## A. Primary Residence Loans from National Banks or Federal Savings Associations

A.1. Do you have one or more loans secured by your primary residence that are held by a national bank, a federal savings association, or a subsidiary of a national bank or a federal savings association? (Include loans issued jointly to you and any other person.) Report only those loans of which a national bank or a federal savings association or a subsidiary of a national bank or a federal savings association is the owner or owner/servicer of the note, as distinguished from loans for which the bank or savings association is only the servicer. Do not report loans that are only serviced - but not owned - by a national bank or a federal savings association or one of their subsidiaries.

## B. Other Loans and Extensions of Credit from National Banks or Federal Savings Associations

B.1. Are you indebted to a national bank or a federal savings association or to a subsidiary of a national bank or a federal savings association on any other loan or extension of credit (e.g., student loans, loans secured by second homes, car loans and leases, and overdraft coverage)? (Include loans and extensions of credit issued jointly to you and any other person, but do not include credit cards or loans secured by your primary residence.)

## C. Spouse and Minor Child Loans and Extensions of Credit

(Note: Loans that are solely the obligation of an employee's spouse or minor child do not require the employee to be recused from the issuing bank or savings association, unless an OCC ethics official determines a recusal is necessary to avoid any appearance of a conflict of interest.)

C.1. Does your spouse or minor child have one or more loans or other extensions of credit from a national bank or a federal savings association or from a subsidiary of a national bank or a federal savings association (excluding credit cards and loans reported under Part 1, A. or B. above)?

#### D. Extensions of Credit from Affiliates of a National Bank or Federal Savings Association

(Note: The term "affiliate" does not include subsidiaries of national banks or federal savings associations. See HELP for definition of "affiliate." OCC ethics rules do not prohibit an examiner from having a loan from an affiliate. An OCC ethics official, however, may determine that an affiliate loan creates a real or apparent conflict with the performance of an examiner's job duties.)

D.1. Are you or your spouse or minor child indebted to an affiliate of any national bank or federal savings association in amounts aggregating more than \$25,000 (not including credit cards and loans secured by your primary residence, e.g., first mortgage or home equity loans)?

#### E. Examiners Loans and Extensions of Credit

(Note: Examiners are "assigned to examine" a bank or a savings association if they work: 1) in a district field office, and the bank or savings association is one they examine or that is assigned to their ADC or rating official; or 2) in a bank or savings association to which they are regularly or otherwise assigned.

E.1. Are you "assigned to examine" any of the banks, savings associations, or an affiliate listed in Part 1, A-D above?

$\bigcirc$	Yes	$\bigcirc$	No
$\bigcirc$	N/A		

## Part 2: Financial Interests in Banks or Savings Associations

## A. Ownership of Securities in Banks or Savings Associations

(Note: All OCC employees and their spouses and minor children are prohibited from owning the securities (e.g., stocks, bonds, equity-linked notes) of the following: 1) commercial banks (both national and state), 2) savings associations (both federal and state), and 3) affiliates (e.g., bank holding companies) of banks or savings associations (both national and state). Any such interests must be reported here. These reportable interests include financial interests that result when an OCC employee, spouse, or minor child is the trustee or beneficiary of a trust that holds such securities.)

See **HELP** for a definition of the term "securities" and a list of other securities of banks or savings associations that must be reported, including securities that are held by partnerships, closely held corporations, or other entities in which the covered employee or the employee's spouse or minor child has an ownership interest. Securities of a commercial company that owns a national bank or a federal savings association (e.g., Macy's, Deere & Company) should be listed in Part 7 rather than this part.

A.1. Do you or your spouse or minor child directly or indirectly own securities (including stocks or bonds in IRAs and non-OCC 401Ks) in any commercial bank (national or state-chartered) or savings association (federal or state-chartered) or in any affiliate of a commercial bank or savings association (including a bank holding company)?



#### B. Financial Services Sector or Banking Sector Mutual Funds and Exchange-Traded Funds

(Note: All employees, their spouses, and minor children are generally prohibited from owning mutual funds and exchange-traded funds (ETFs) that have a stated policy of concentrating in the financial services sector or in the banking sector. Examples of prohibited sector funds include Davis Financial Fund, Schwab Financial Services Fund, and Fidelity Select Banking Portfolio.)

B.1. Do you, your spouse, or minor children have an investment in a mutual fund or other collective investment fund or in O Yes O No a widely held pension or similar fund that has a stated policy of concentrating in the financial services sector or in the banking sector?

#### C. Pension, Retirement or Other Interests Resulting from an OCC Employee or Spouse Working at a Bank or a Savings Association

(Note: When an OCC employee or the employee's spouse participates in a pension or retirement plan from a bank or a savings association or from an affiliate of a bank or savings association (usually as a result of prior or current employment), a recusal is ordinarily required. Consult your OCC ethics official about the scope of the recusal.)

C.1. Do you or your spouse have any of the following arrangements with or continuing financial interests in a bank or a savings association or in an affiliate of a bank or a savings association (including a bank holding company) where you or your spouse have worked or plan to work in the future: a defined benefit pension plan (e.g., fixed retirement annuity, cash balance pension plan); a defined contribution plan (e.g., 401K) where the employer is continuing to make contributions; an agreement or arrangement for future employment; a leave of absence; or a continuation of payment from a former employer? (Do not report a 401K or other defined contribution plan if the employer is no longer making contributions. But if the plan holds bank securities, report those assets in Part 2, Section A.)

## Part 3: Employment of Employee or Family Members

The term "family member" includes a covered employee's spouse, father, mother, brother, sister, child, stepchild, grandparent, and grandchild; the father, mother, brother, sister, and grandparent of the employee's spouse; the spouse of the employee's father, mother, brother, sister, grandparent, child, step-child, and grandchild, and any other member of the employee's household.

(Note: A covered employee generally must be recused from matters related to a national bank or a federal savings association or an affiliate where a family member of the employee works or serves in some other capacity, unless an exception is granted by an OCC ethics official. Covered employees may also be recused on the basis of their own prior bank-related employment, especially if that employment occurred in the years immediately prior to their joining the OCC. An OCC ethics official may limit recusals or extend them to other affiliated or non-affiliated companies.)

1. During the past two years, have you served in any capacity with a commercial bank (national or state-chartered) or a savings association (federal or state-chartered) or an affiliate of a bank or savings association? Or do any of your family members currently serve in any capacity with one of these institutions?

## Part 4: Outside Employment or Business Activity

(Note: Except as provided in this note, OCC employees are required to notify their supervisors of all compensated or non-compensated outside employment or other business activity. The term "business activity" includes services performed with or without compensation for a corporation, company, firm, partnership or other business enterprise, nonprofit organization, or educational or other institution as an employee, owner, director, member, trustee, partner, advisor, or consultant. The term does not include uncompensated nonbusiness-related activities, such as membership or other participation in a nonprofit organization that does not involve making business decisions about that organization. Furthermore, unless there is a conflict or the appearance of a conflict of interest, employees do not have to report any positions with religious, social, fraternal or political entities or those solely of an honorary nature. See "Outside Employment" in the Ethics Management System for a further discussion of outside employment with examples.)

Employees must obtain prior written approval from their immediate supervisors and the concurrence of an OCC ethics official before engaging in compensated or non-compensated outside employment or business activity that could create a conflict of interest with the performance of the employee's duties or could result in the appearance of a conflict of interest or the unauthorized disclosure of non-public information.

1. Are you employed in any compensated or non-compensated outside (non-OCC) employment or business activity?



Part 5: Bankruptcy, Loan Default, or Debt Restructuring	
Click on the links below for more information on the specified topic.	
<u>Responsibility to Satisfy Just Financial Obligations (Reporting Bankruptcies and Defaults)</u>	
(http://occnet.occ/human-resources/ethics/guidance/responsibility-to-satisfy-just-financial-obligations.html)	
Debt Restructuring	
(http://occnet.occ/human-resources/ethics/guidance/debt-restructuring.html)	
A. Bankruptcy	
A.1. Did you file for bankruptcy during the reporting period?	🔿 Yes 🔿 No
B. Defaulted Loan	
B.1. Did you have any loan or loans owed to a national bank or a federal savings association or a subsidiary of one (including all extensions of credit in any form from any creditor, including commercial or consumer loans, auto loans, loans obtained from retailers or merchants, mortgages and credit cards) where interest and/or principal payments exceeded their due dates by more than 90 days during the reporting period (and that have not been subsequently fully repaid)?	🔿 Yes 🔿 No
C. Debt Restructuring	
C.1. Did you engage in a debt restructuring transaction involving a national bank or a federal savings association, including a short sale (where the bank or savings association agreed to discount your loan balance) of your residential real property, during the reporting period?	🔿 Yes 🔿 No
C.2. Do you owe a national bank or a federal savings association any unpaid amount or outstanding balance under the original terms of a loan that was the subject of a debt restructuring transaction?	🔿 Yes 🔿 No
Part 6: Employee Purchases of Foreclosed Real Property and Short Sales	
Click on the link below for more information on the specified topic.	
<u>Purchases of Foreclosed Properties and Short Sales</u>	
(http://occnet.occ/human-resources/ethics/guidance/purchases-foreclosed-real-property-and-short-sales.html)	
A. Purchase of Real Property	
A.1. Did you purchase real estate from a national bank or a federal savings association or from an affiliate of a national bank or a federal savings association during the reporting period?	🔿 Yes 🔿 No
B. Short Sales	
B.1. Did you purchase property during the reporting period in a "short sale" transaction (where the lender agreed to discount the seller's loan balance) involving a national bank or a federal savings association or an affiliate of a national bank or a federal savings association?	🔿 Yes 🔿 No

## Part 7: Other Conflicts of Interest or Appearances of a Loss of Impartiality

List other conflicts or appearances of a loss of impartiality or recusals not otherwise listed on this report, e.g. appearances of a loss of impartiality related to personal friendships or bank or savings association employment by a relative (uncle, cousin, etc.) not reported under Employment of Employee or Family Members. Include financial interests (e.g., bank securities) of your household members (e.g., minor children of spouse from your spouse's prior marriage), which you have not reported elsewhere. Also, new employees should list names of entities supervised by the OCC that the employee interviewed with, or received an offer from, within the last 6 months.

In addition, if an employee or an employee's spouse or minor child owns securities of a commercial company that owns a national bank or a federal savings association, the employee should list the ownership interest (amount and value) here and recuse himself or herself from the regulation or supervision of the bank or savings association or other supervised entity owned or operated by the company. The employee must observe a recusal from any particular matter that would affect his or her financial interests in the company, and, depending on the value of the securities, an expanded recusal from matters, such as the development of policies and regulations, affecting that class of institutions. For a list of these companies, see the Ethics Bulletin on Commercial Holding Companies in the Ethics Management System. Examples of such companies



include Macy's and Deere & Company.

Also, employees assigned to examine non-bank affiliated Technology Service Providers (TSPs) and other service providers examined by the OCC (e.g., Amazon, IBM, First Data Corporation, VISA, Jack Henry, Fiserv) should list family employment and the employee's (or an employee's spouse or minor child's) security ownership interests in those entities and observe the appropriate recusal.

Finally, if you are an examiner who has previously served as a senior executive with a bank or savings association within the past five years, please list your former employer below and provide your position and dates of employment under "Nature of Conflict."

In the space below, list any other financial interests, relationships, or other circumstances that you believe could create a conflict of interest or the appearance of a conflict with the performance of your OCC duties.

Complete Name of Bank, Savings	Main Office Address	Nature	Check if Observing	
Association or Company	(City/State)	of Conflict	a Recusal	
				X

## **Comments or Additional Entries**

If you have any comments or entries that did not fit elsewhere on the form, enter them below.

## Part 8: Attestation and Recusal

By signing this financial disclosure report, I acknowledge that I am committed to observing the recusals listed immediately below, except to the extent that these recusals have been amended, modified, or supplemented in writing by an OCC ethics official. In addition, if I am subject to the prohibition on borrowing from national banks and federal savings associations, I attest that any national bank or federal savings association credit card held by myself (or by my spouse or minor children, if applicable) was sought and obtained on terms and conditions no more favorable than those offered to the general public.

**Part 1**: Unless otherwise advised by my ethics official, I will observe a recusal from specific party matters affecting any national bank or federal savings association to which I am indebted on a loan referenced in Part 1 or from the subsidiary or department that holds a loan referenced in Part 1, if I am paying down an existing balance on a loan that was taken out prior to my OCC employment or a loan that became a national bank or a federal savings association loan through no action of mine (e.g., through sale of the loan) after I took the loan out with another lender. I will also observe a recusal with respect to the national bank or federal savings association holding a loan of my spouse or minor child referenced in Part 1C that remains my obligation under these rules. If I am an examiner assigned to examine a bank or a savings association from which I hold a credit card, I will inform my supervisor and ethics official prior to the examination if a significant issue exists with respect to my credit card debt, e.g., payments not current, involved in a billing dispute, or negotiating with the bank concerning restructuring the debt.

**Part 2A**: I consider myself recused from specific party matters affecting any bank or savings association referenced in Part 2A as well as any affiliates (including holding company) of that bank or savings association. If the value of my securities in any one such institution exceeds \$25,000 or if the aggregate value of my securities in all such institutions exceeds \$50,000, I will observe an expanded recusal that would generally preclude me from participating in the development of banking industry policies, bank regulations, bank legislation, and similar matters that affect any class of institutions of which the institution is a member (unless advised otherwise in writing by an OCC ethics official).

**Part 2B**: I consider myself recused from specific party matters affecting any bank or savings association whose stock is held by a mutual fund listed in Part 2B, unless otherwise advised in writing by an OCC ethics official.

Part 2C: I consider myself recused from any company and its affiliates which sponsor a defined benefit plan referenced in Part 2C.

**Part 3**: I consider myself recused from the bank or savings association or affiliate where a family member listed in Part 3 is employed or serves in some other capacity and will observe any recusal imposed by an OCC ethics official for my own prior work at a bank or a savings association or an affiliate of a bank or a savings association.

Parts 5, 6 & 7: I will observe any recusals listed in Parts 5, 6 and 7.

Finally, I will observe any other recusals specified by an OCC ethics official.



## **Filer Certification**

- I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.
- I understand that the filing of complete and accurate statements is mandatory for employees in positions subject to the reporting requirement, and that the refusal to submit a statement when required or the submission of incomplete, false, or inaccurate information would be a violation of a legal requirement and could result in removal from my position or other disciplinary action.
- I acknowledge that I am committed to observing the recusals listed on this report, including those listed in Part 8 of the report, except to the extent that these recusals have been amended, modified, or supplemented in writing by an OCC ethics official.

# Electronic Signature

By completing the Typed Signature of Employee field and clicking the Submit button, I consent to and intend to electronically sign this form. I understand that my electronic signature constitutes the legal equivalent of my written signature and can be enforced in the same way. By electronically signing this form, I confirm I am the person authorized to sign this form and agree to be bound by the certifications therein.

Typed Signature of Employee	Electronically Signed By:	Signed On:

## **Employee Submission to Ethics Office**

Employee Signature is required before submission. The form should automatically submit when the form is signed. If there is a problem with the submission you can use the submit button to retry the submission.

## **Recusal List**

This recusal list was automatically generated based on information you entered on your financial disclosure report about certain interests in banks or thrifts. This is intended as an aid to you, but please be aware that this may not show all the recusals you must observe. For example, this may not show recusals from matters affecting an outside employer, a prospective employer, or your financial interests, such as stock, in OCC vendors or third party service providers. Nonetheless, to comply with federal conflict of interests laws, you must recuse yourself from any matter that affects the financial interests of you, your spouse, your minor children, or of any organization in which you are serving as an officer, director, trustee, general partner or employee or with whom you are negotiating for or have an arrangement for employment. Your ethics official may provide additional guidance based on the information you disclosed in your report. Please do not hesitate to contact your ethics official if you have any questions about the recusals you must observe. If you have any updates to this recusal list, please notify your ethics official.

## List of Recusals:

Recused Entity	Financial Interest/Issue	Scope (TBD by Ethics Official)	
			X



Ethics Official Remarks:

## **Ethics Official Electronic Signature**

By completing the Typed Signature of Ethics Official field and clicking the Submit button, I consent to and intend to electronically sign this form. I understand that my electronic signature constitutes the legal equivalent of my written signature and can be enforced in the same way. By electronically signing this form, I confirm I am the person authorized to sign this form and agree to be bound by the certifications

Typed Signature of Ethics Official	Electronically Signed By:	Signed On:

## Confidentiality

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The same confidentiality applies to the OCC Financial Disclosure Report as applies to the OGE 450. Thus, the OCC Financial Disclosure Report is confidential and is generally not subject to disclosure because it contains sensitive commercial and financial information, as well as personal privacy-protected information. This report and the information that it contains is, accordingly, exempt from being released to the public, under exemptions 3(a) and (b), 4 and 6 of the Freedom of Information Act (FOIA). Additional FOIA exemptions may apply to particular reports. Agency personnel shall not publicly release the OCC Financial Disclosure Reports or the information they contain, unless authorized by law. See discussion of authorized disclosures under Privacy Act notice below.

## **PRIVACY ACT NOTICE FOR:**

## CC6026-03 Supplemental Financial Disclosure Report

#### This information is provided pursuant to Public Law 93-579 (Privacy Act of 1974), December 31, 1974, for individuals completing this form.

## AUTHORITY

Executive Order 12674, as modified by Executive Order 12731; Title 1 of the Ethics in Government Act of 1978 (5 USC App.); 18 USC 201 et seq.; and 5 CFR 2634 require the reporting of this information.

#### PURPOSES AND USES

This information is used by appropriate reviewing officials to determine whether or not an employee's financial interest, or that of the employee's spouse or minor child, may result in a conflict or apparent conflict of interest with the person's duties and responsibilities as a federal employee. Additional disclosures of the information in this report may be made: (1) to a federal, state or local law enforcement agency if the disclosing agency becomes aware of a violation or potential violation of law or regulation; (2) to a court or party in a court or federal administrative proceeding if the government is a party or in order to comply with a judge-issued subpoena; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or decision; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; and (6) in response to a request for discovery or for the appearance of a witness in a judicial or administrative proceeding, if the information is relevant to the subject matter.