



July 9, 2026

T. March Bell  
Department of Health and Human Services  
Office of the Inspector General  
330 Independence Avenue, SW  
Washington, DC 20201

*Submitted via HHS-OIG Hotline Portal*

Dear Inspector General T. March Bell,

Campaign Legal Center (“CLC”) writes to request that the U.S. Department of Health and Human Services (“HHS”) Office of the Inspector General (“OIG”) investigate whether former HHS General Counsel Michael Stuart<sup>1</sup> violated federal ethics laws and his ethics agreement by failing to divest in conflicting financial interests valued between \$183,015 to \$550,000 and by purchasing financial interests in prohibited entities valued between \$1,058,053 to \$2,945,000.

Under his ethics agreement and federal ethics laws, Stuart was required to divest his prohibited financial interests within 90 days of his confirmation and refrain from acquiring prohibited holdings during his government appointment. Despite these ethics requirements and the certification he signed under penalty of the Criminal False Statement Act, Stuart did not divest all of his prohibited holdings and appears to still hold some. Additionally, according to his transaction disclosure reports, Stuart continued to purchase prohibited financial interests while serving as HHS general counsel. The Office of Government Ethics (“OGE”) publicly acknowledged that Stuart may be in violation of federal ethics laws when it declined to certify Stuart’s March 24, 2026, transaction disclosure report “due to continued non-compliance with ethics agreement.”<sup>2</sup>

Public officials are expected to refrain from using their public office for private gain, and the public has a right to know that government officials are using their positions in service of the public’s interest.<sup>3</sup> The potential ethics issues surrounding Stuart’s ownership and purchase of prohibited financial interests demand a wide-ranging OIG fact finding. The HHS OIG should investigate and determine if Stuart violated his ethics agreement and federal ethics laws by failing

---

<sup>1</sup> As of June 3, 2026, Stuart is no longer serving as general counsel of HHS. See Dave Levinthal, *Top HHS Lawyer Reassigned After Stock Trading Rebuke*, NOTUS (June 3, 2026), <https://www.notus.org/money/hhs-lawyer-stock-trading-rebuke>. Stuart stated on June 4, 2026, that he remains within HHS in a Senior Advisor role. See Jessica Paterson & Savannah Young, *Mike Stuart Explains HHS Role Reassignment*, WOWK-TV (June 4, 2026), <https://www.wowktv.com/national-news/mike-stuart-explains-hhs-role-reassignment>. A termination financial disclosure report has not yet been filed by Stuart as of the date of this complaint.

<sup>2</sup> See Ex. J, Michael Stuart Periodic Transaction Report 278-T (Mar. 24, 2026). As of July 8, 2026, eight of Stuart’s periodic transaction reports are pending final OGE disposition. See U.S. Off. of Gov’t Ethics, *Officials’ Individual Disclosures Search Collection* (last updated July 8, 2026), <https://oge.gov/web/OGE.nsf/Officials%20Individual%20Disclosures%20Search%20Collection?OpenForm>.

<sup>3</sup> See Exec. Order No. 12674, 54 Fed. Reg. 15159 (Apr. 12, 1989).

to divest his prohibited interests, making false statements on his Ethics Certification, and acquiring prohibited financial interests while in office.

## **I. Federal Ethics Rules and Ethics Agreements Prohibit Senior HHS Officials from Owning Stock in Prohibited Businesses**

Pursuant to 5 C.F.R. § 5501.102(b)(1), certain HHS employees, including employees of the HHS General Counsel’s Office, are prohibited from owning financial interests in significantly regulated organizations (“SRO”).<sup>4</sup> SRO means:

[A]n organization for which the sales of products regulated by the Food and Drug Administration (“FDA”) constitute [10%] or more of annual gross sales in the organization’s previous fiscal year. . . [or] . . . if the organization’s operations are predominately in fields regulated by FDA; or if [the organization’s] research, development, or other business activities are reasonably expected to result in the development of products that are regulated by FDA.<sup>5</sup>

These organizations are identified and regularly updated on the FDA SRO List.<sup>6</sup>

In addition to the federal ethics regulations, Stuart’s ethics agreement required him to divest his financial interests in 41 companies in a variety of industries.<sup>7</sup> These industries include technology, industrials, healthcare, defense and aerospace, entertainment, food and beverage providers, and energy.<sup>8</sup> Stuart’s ethics agreement also stated that he would not acquire:

[A]ny direct financial interest in entities listed on the [FDA’s] prohibited holdings list or in entities involved, directly or through subsidiaries, in the following industries or businesses:

1. Research, development, manufacture, distribution, processing, storage, or sale of pharmaceutical, biotechnology, or medical devices, equipment, preparations, treatments, or products;
2. Veterinary products or cosmetics;
3. Healthcare management or delivery;
4. Food and/or beverage production, processing, storage, or distribution;
5. Manufacture, marketing, sale and distribution of tobacco products;
6. Health, disability, or workers compensation insurance or related services;
7. Communications media;
8. Computer hardware, computer software, and related internet technologies;
9. Wireless communications;
10. Social sciences and economic research organizations;
11. Energy or utilities;
12. Commercial airlines, railroads, ship lines, and cargo carriers.<sup>9</sup>

---

<sup>4</sup> 5 C.F.R. § 5501.102(b)(1) (explaining that the term “employee of a component” includes “an employee of the Office of the General Counsel whose regularly assigned duties and responsibilities principally involve the provision of legal services to the relevant component with respect to substantive programmatic issues”).

<sup>5</sup> 5 C.F.R. § 5501.101(c)(2).

<sup>6</sup> U.S. Food & Drug Admin., *SRO List* (last updated Apr. 14, 2026), <https://www.accessdata.fda.gov/scripts/SDA/sdNavigation.cfm?sd=srolist>.

<sup>7</sup> See Ex. B at Sec. 7, Michael Stuart Ethics Agreement (Mar. 17, 2025).

<sup>8</sup> See *id.*

<sup>9</sup> *Id.* at Sec. 8.

Furthermore, Stuart was specifically prohibited from purchasing “any interests in any sector mutual fund or sector exchange-traded fund that concentrates its investments . . . in any of the aforementioned industries or businesses, in a single country other than the United States, or in bonds of a single State within the United States.”<sup>10</sup>

## II. Stuart May Not Have Divested All of His Prohibited Stock Holdings

Per his ethics agreement and federal ethics rules, Stuart was required to divest his prohibited stock holdings within 90 days of his confirmation by the Senate to the general counsel position. Stuart signed his ethics agreement on March 17, 2025, and he was confirmed by the Senate on October 7, 2025.<sup>11</sup> Based on this timeline, Stuart was required to divest all of his prohibited holdings by January 5, 2026.

Stuart’s ethics agreement states that he would not participate personally and substantially in any particular matter “that to my knowledge has a direct and predictable effect on the financial interests of [the below-listed entities] until I have divested [them], unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1)[.]”<sup>12</sup> Stuart verified that he would be able to carry out the required divestitures within the 90-day timeframe.<sup>13</sup> Importantly, OGE required a *complete* divestment of the prohibited assets listed in Stuart’s ethics agreement,<sup>14</sup> and there are no public records of Stuart being awarded a waiver under 18 U.S.C. § 208(b)(1) or qualifying for a regulatory exemption.<sup>15</sup>

On January 13, 2026, Stuart signed his required Ethics Agreement Compliance Certification. He certified that he had “completed all of the divestitures indicated in my ethics agreement within the time period specified.”<sup>16</sup> Stuart further certified that he had appropriately filed periodic transaction reports “to disclose the completion of these agreed upon divestitures” on November 30 and December 31, 2025.<sup>17</sup> This certification was signed under penalty of 18 U.S.C. § 1001.<sup>18</sup>

Despite these affirmations, Stuart’s periodic transaction reports from November 2025 through May 2026 do not include records of sales of 10 of the 41 entities identified in his ethics agreement.<sup>19</sup> Whether Stuart possibly divested of the assets before he was appointed is unclear. Below is a table of the ten assets that Stuart was required to divest in his ethics agreement but never reported selling.

---

<sup>10</sup> *Id.*

<sup>11</sup> *See* Ex. C, Michael Stuart Ethics Agreement Compliance Certification (Jan. 13, 2026).

<sup>12</sup> *See* Ex. B at Sec. 8.

<sup>13</sup> *See id.*

<sup>14</sup> U.S. Off. of Gov’t Ethics Legal Advisory 23-15: U.S. Off. of Gov’t Ethics Review of Nominees for Presidentially Appointed, Senate-Confirmed Positions at 5, (Dec. 20, 2023).

<sup>15</sup> Stuart was also granted a Certificate of Divestiture (“CD”) by OGE on Nov. 14, 2025, but none of the assets disclosed on Stuart’s CD are the same assets listed here. *See* Ex. W, Michael Stuart Certificate of Divestiture, Cert. No. OGE-2025-246 (Nov. 14, 2025).

<sup>16</sup> *See* Ex. C.

<sup>17</sup> *See id.*

<sup>18</sup> *See id.*

<sup>19</sup> *See* Ex. B at Sec. 7.

## Assets Apparently Not Divested as Required by the Ethics Agreement

Asset	Sector/Industry	FDA SRO <sup>20</sup>	Value <sup>21</sup>
AbbVie, Inc.	Healthcare – Pharmaceutical	Yes	\$65,002 - \$150,000
Cadre Holdings, Inc.	Healthcare – Equipment & Supplies	Yes	\$1,001 - \$15,000
Caterpillar, Inc.	Industrials – Construction	No	\$15,001 - \$50,000
iPower, Inc.	Technology	No	\$3,003 - \$45,000
Leidos Holdings, Inc.	Technology	Yes	\$15,001 - \$50,000
Norwegian Cruise Line Holdings Ltd.	Commercial Ship Line	No	\$1,001 - \$15,000
Precipio, Inc.	Healthcare – Equipment & Supplies	Yes	\$1,001 - \$15,000
QUALCOMM, Inc.	Technology; Wireless Communications	No	\$1,001 - \$15,000
Viking Holdings Ltd.	Commercial Ship Line	Yes	\$16,002 - \$45,000
Walt Disney Company	Communications Media; Commercial Ship Line	No	\$65,002 - \$150,000
<b>TOTAL</b>			<b>\$183,015 - \$550,000</b>

One significant asset that Stuart never reported divesting is his AbbVie, Inc. stock. AbbVie is a large pharmaceutical company that is directly regulated by HHS. Ownership of AbbVie stock is prohibited both by Stuart’s ethics agreement and by the FDA SRO list.<sup>22</sup> Despite this, Stuart disclosed that he owns \$65,002 - \$150,000 of AbbVie stock in his nomination financial disclosure report on February 22, 2025, and never confirmed that he divested any of it.<sup>23</sup> This is especially problematic considering AbbVie’s ongoing litigation with HHS regarding pharmaceutical pricing and discount programs.<sup>24</sup>

Another problematic asset that Stuart may have owned throughout his tenure as general counsel is Leidos Holdings, Inc. stock. Leidos is an information technology company that provides services to HHS. Leidos was awarded a significant Artificial Intelligence contract with HHS in 2019,<sup>25</sup> and it has had a large ongoing delivery order contract with HHS since 2022.<sup>26</sup> Stuart was explicitly required to divest his Leidos stock in his ethics agreement, and the company is identified as a prohibited holding on the FDA SRO List.<sup>27</sup> Nevertheless, there are no public records of Stuart divesting his Leidos, Inc. stock by the January 5, 2026, deadline or thereafter.

<sup>20</sup> These companies are listed on the FDA SRO List as of June 12, 2026. See U.S. Food & Drug Admin., *SRO List* (last updated Apr. 14, 2026), <https://www.accessdata.fda.gov/scripts/SDA/sdNavigation.cfm?sd=srolist>.

<sup>21</sup> The total value of each stock that Stuart was required to divest were disclosed in his Nominee 278 report filed on Feb. 22, 2025. The values are reported in ranges. See Ex. A, Michael Stuart Nominee 278 Report (Feb. 22, 2025).

<sup>22</sup> See Ex. B at Sec. 7, Michael Stuart Ethics Agreement (Mar. 17, 2025); U.S. Food & Drug Admin., *SRO List* (last updated Apr. 14, 2026), <https://www.accessdata.fda.gov/scripts/SDA/sdNavigation.cfm?sd=srolist>.

<sup>23</sup> See Ex. A at 5, 7, Michael Stuart Public Financial Disclosure Report 278e (Feb. 22, 2025)

<sup>24</sup> Becker, Zoey, *AbbVie Challenges 'Outdated' 340B Drug Discount Program Guidance in New LawsUIT*, FIERCE PHARMA (Apr. 9, 2026), <https://www.fiercepharma.com/pharma/abbvie-challenges-outdated-340b-drug-discount-program-guidance-new-suit>.

<sup>25</sup> Media Relations, *Leidos Awarded HHS Artificial Intelligence Contract*, LEIDOS (Jun. 24, 2019), <https://www.leidos.com/insights/leidos-awarded-hhs-artificial-intelligence-contract>.

<sup>26</sup> Delivery Order Contract PIID 75A50323F80001, USA SPENDING, [https://www.usaspending.gov/award/CONT\\_AWD\\_75A50323F80001\\_7505\\_GS00F022CA\\_4732?glossary=delivery-order-contract](https://www.usaspending.gov/award/CONT_AWD_75A50323F80001_7505_GS00F022CA_4732?glossary=delivery-order-contract) (last visited July 7, 2026).

<sup>27</sup> See Ex. B at Sec. 8; U.S. Food & Drug Admin., *SRO List* (last updated Apr. 14, 2026), <https://www.accessdata.fda.gov/scripts/SDA/sdNavigation.cfm?sd=srolist>.

In addition to the above stocks that were disclosed in Stuart’s Nominee 278 report but may not have been divested, Stuart appears to have repurchased stock he was required to divest in his ethics agreement *after* the divestment deadline. Specifically, Stuart repurchased and sold Honeywell International, Inc. and Benchmark Electronics, Inc. stock after January 5, 2026, both of which were identified as assets that Stuart was required to divest in his ethics agreement.<sup>28</sup> The table below details the transactional history of Stuart’s Honeywell and Benchmark Electronics stock.<sup>29</sup>

### Apparent Repurchases of Divested Stocks

Asset <sup>30</sup>	Transaction Date	Transaction	Transaction Value
Honeywell International, Inc.	2/26/2026	Purchase	\$15,001 - \$50,000
Honeywell International, Inc.	2/26/2026	Purchase	\$15,001 - \$50,000
Honeywell International, Inc.	3/11/2026	Sale	\$15,001 - \$50,000
Honeywell International, Inc.	3/11/2026	Sale	\$15,001 - \$50,000
Benchmark Electronics, Inc.	5/8/2026	Purchase	\$1,001 - \$15,000
Benchmark Electronics, Inc.	5/8/2026	Purchase	\$15,001 - \$50,000
Benchmark Electronics, Inc.	5/12/2026	Sale	\$15,001 - \$50,000
Benchmark Electronics, Inc.	5/12/2026	Sale	\$1,001 - \$15,000

Stuart’s failure to report divesting from all of his prohibited financial interests, coupled with his repurchasing of prohibited stock after the divestiture deadline, raise serious alarms about his compliance with federal ethics rules. Government officials are required to divest from specific holdings to prevent them from prioritizing their financial interests over the public good. Public disclosure of these divestments helps to ensure that government officials are complying with federal ethics laws. By failing to confirm if he divested from all of these prohibited holdings, Stuart appears to have run afoul of financial disclosure laws and his ethics obligations while serving as HHS general counsel.

Furthermore, if Stuart failed to divest these prohibited holdings, then there is a strong possibility that he violated criminal ethics laws. Under 18 U.S.C. § 208(a), government officials are prohibited from taking official action on particular matters<sup>31</sup> where they hold a financial interest. As discussed above, Stuart was explicitly prohibited from holding financial interests in a variety of sectors and industries under the pretense that he would be working on particular matters that could have a direct and predictable effect on businesses in those industries. An investigation is needed to determine whether Stuart’s failure to report divesting

<sup>28</sup> See Ex. B at Sec. 8.

<sup>29</sup> See Ex. E, Michael Stuart Periodic Transaction Report 278-T (Dec. 31, 2025); Ex. H, Michael Stuart Periodic Transaction Report 278-T (Mar. 5, 2026)(2); Ex. I, Michael Stuart Periodic Transaction Report 278-T (Mar. 11, 2026); Ex. S, Michael Stuart Periodic Transaction Report 278-T (May 8, 2026)(2); Ex. T, Michael Stuart Periodic Transaction Report 278-T (May 12, 2026).

<sup>30</sup> The HHS ethics official reviewing Stuart’s periodic transaction reports noted that Stuart was recused from all particular matters “involving or affecting [these entities] during the period of ownership.” See Ex. H and Ex. S.

<sup>31</sup> “Particular matters” under 18 U.S.C. § 208(a) include “a judicial or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, charge, accusation, [and] arrest.” 18 U.S.C. § 208(a). In the context of 18 U.S.C. § 208, the term “particular matter” includes matters that involve deliberation, decision, or action that is focused upon the interests of specific persons or a discrete and identifiable class of persons. The term extends to legislation or policy making that is narrowly focused on the interests of a discrete and identifiable class of persons. 5 C.F.R. § 2640.103(a)(1).

from all of his prohibited assets is connected to him taking official actions on particular matters that affected his personal financial interests.

### III. Stuart Reported Purchasing Prohibited Stock Holdings

In addition to failing to report divestments from prohibited financial interests by the January 5, 2026, deadline, Stuart’s periodic transaction reports indicate that he continued to acquire prohibited financial interests while serving as general counsel. Specifically, Stuart continued to purchase stock in the technology, energy, industrials, aerospace and defense, cosmetics, food and beverage, and entertainment industries between November 2025 and May 2026. Stuart also purchased sector mutual funds and sector exchange-traded funds (“ETFs”) concentrated in these prohibited industries and in countries outside of the United States. These purchases were in direct contradiction with Stuart’s ethics agreement.<sup>32</sup> The table below and Attachment A detail the prohibited stocks purchased by Stuart throughout his tenure as general counsel.

**Stuart’s Purchases of Prohibited Stocks**

Asset	Sector/ Industry	FDA SRO <sup>33</sup>	Purchase Date(s)	Total Amount Purchased
Aberdeen Standard Physical Silver Shares <sup>34</sup>	Sector Fund – Silver	No	12/26/2025	\$1,001 - \$15,000
Amaero International Ltd. <sup>35</sup>	Industrials; Aerospace & Defense	No	4/16/2026	\$1,001 - \$15,000
Blackberry Ltd. <sup>36</sup>	Technology; Wireless Communications	No	4/23/2026	\$1,001 - \$15,000
Brookfield Renewable Partners LP	Energy	No	4/8/2026	\$15,001 - \$50,000
Cava Group, Inc. <sup>37</sup>	Food & Beverage Production	No	12/23/2026	\$1,001 - \$15,000
CommScope Holding Company, Inc. <sup>38</sup>	Technology; Wireless Communications	No	12/2/2025	\$16,002 - \$65,000
Corning, Inc. <sup>39</sup>	Industrials – Medical Supplies	No	3/24/2026 4/8/2026 5/8/2026	\$230,005 - \$550,000
Estee Lauder <sup>40</sup>	Cosmetics	Yes	1/5/2026	\$1,001 - \$15,000
Fox Corp. <sup>41</sup>	Communications Media	No	12/2/2025	\$15,001 - \$50,000
General Electric	Industrials	No	4/21/2026 5/12/2026	\$201,004 - \$465,000

<sup>32</sup> See Ex. B at Sec. 8.

<sup>33</sup> See *supra* note 20.

<sup>34</sup> The HHS ethics official certifying Stuart’s periodic transaction report noted that Stuart was recused from “all particular matters involving or affecting [this entity] during the period of ownership.” See Ex. E. This same note was included on multiple periodic transaction reports.

<sup>35</sup> See *supra* note 34; Ex. M, Michael Stuart Periodic Transaction Report 278-T (Apr. 16, 2026).

<sup>36</sup> See *supra* note 34; Ex. P, Michael Stuart Periodic Transaction Report 278-T (Apr. 23, 2026).

<sup>37</sup> See *supra* note 34; Ex. E.

<sup>38</sup> *Id.*

<sup>39</sup> See *supra* note 34; Ex. J, Michael Stuart Periodic Transaction Report 278-T (Mar. 24, 2026); Ex. S; Ex. T.

<sup>40</sup> The certifying HHS ethics official included the following note in Stuart’s transaction report: “Filer has divested [the Estee Lauder stock]. Although the interest was valued below regulatory de minimis thresholds at the time of acquisition, filer was recused from all particular matters involving or affecting [Estee Lauder] during the period of ownership.” See Ex. F, Michael Stuart Periodic Transaction Report 278-T (Feb. 10, 2026).

<sup>41</sup> See *supra* note 34; Ex. E.

Asset	Sector/ Industry	FDA SRO <sup>33</sup>	Purchase Date(s)	Total Amount Purchased
[trading as GE Aerospace] <sup>42</sup>				
Global X U.S. Electrification ETF	Sector Fund – Technology	No	4/16/2026	\$15,001 - \$50,000
Grupo Televisa S.A. <sup>43</sup>	Communications Media	No	12/2/2025	\$50,001 - \$100,000
Hecla Mining <sup>44</sup>	Energy	No	12/26/2025	\$2,002 - \$30,000
iShares Future AI & Tech ETF	Sector Fund – Technology	No	4/16/2026	\$15,001 - \$50,000
iShares MSCI South Korea ETF <sup>45</sup>	Sector Fund – South Korea	No	5/8/2026	\$15,001 - \$50,000
Keel Infrastructure Corp.	Industrials; Energy	No	5/13/2026	\$1,001 - \$15,000
Kratos Defense & Security Solutions, Inc.	Aerospace & Defense	No	3/5/2026 3/6/2026	\$46,003 - \$165,000
L3Harris Technologies, Inc.	Technology; Aerospace & Defense	No	3/5/2026	\$50,001 - \$100,000
Lantronix, Inc.	Technology	No	5/8/2026	\$2,002 - \$30,000
Lightwave Logic, Inc.	Technology	No	5/8/2026 5/12/2026	\$101,002 - \$265,000
Limbach Holdings, Inc.	Industrials	No	1/5/2026	\$1,001 - \$15,000
LVMUY LVMH Moet Hennessy Louis Vuitton	Food & Beverage Production; Cosmetics	Yes	1/5/2026	\$15,001 - \$50,000
Netflix, Inc.	Communications Media	No	4/8/2026	\$15,001 - \$50,000
Nokia Corp.	Technology; Wireless Communications	No	4/14/2026	\$1,001 - \$15,000
Procure Space ETF	Sector Fund – Aerospace; Industrials	No	4/16/2026	\$15,001 - \$50,000
Qnity Electronics, Inc.	Technology	No	2/26/2026 3/5/2026	\$2,002 - \$30,000
QXO, Inc.	Industrials – Construction	No	11/28/2025 12/9/2025 4/17/2026	\$110,005 - \$300,000
Ramaco Resources, Inc. <sup>46</sup>	Energy	No	12/2/2025 12/9/2025	\$100,002 - \$200,000
Yesway, Inc.	Food & Beverage Distribution	No	4/22/2026 4/24/2026 5/8/2026	\$20,006 - \$125,000
<b>TOTAL</b>				\$1,058,053 - \$2,945,000

Stuart’s periodic transaction reports reflect a clear pattern of persistent purchases of prohibited financial interests. Stuart continued to trade stock in entities involved in prohibited industries while serving as general counsel from 2025-2026. There are even instances of Stuart divesting prohibited financial interests and then *repurchasing* the same prohibited asset at a later date.

For example, Stuart’s ownership history of CommScope stock shows that he divested the prohibited interest and then subsequently repurchased it five weeks later. CommScope Holding Company, Inc. is a technology and telecommunications company that falls squarely within the “internet technology” and “wireless

<sup>42</sup> The certifying HHS ethics official included a note on Stuart’s periodic transaction report: “Filer has confirmed that ‘GE’ is the correct ticker symbol for the acquired asset reported at lines 4, 6, and 10, GE Aerospace (not General Electric Co.)” See Ex. T.

<sup>43</sup> See *supra* note 34; Ex. E.

<sup>44</sup> *Id.*

<sup>45</sup> See *supra* note 34; Ex. R, Michael Stuart Periodic Transaction Report 278-T (May 8, 2026).

<sup>46</sup> See *supra* note 34; Ex. E.

communications” industries that Stuart was prohibited from owning.<sup>47</sup> Despite this, Stuart disclosed that he divested \$16,002 - \$65,000 of CommScope stock on October 27, 2025, but subsequently reported purchasing the same amount of CommScope stock on December 2, 2025.<sup>48</sup> The HHS ethics official certifying Stuart’s periodic transaction reports noted that Stuart was “recused from all particular matters involving or affecting [CommScope] during the period of ownership.”<sup>49</sup> This is a clear example of Stuart flouting his ethics agreement requirements by continuing to purchase prohibited holdings while serving as general counsel.

Another concerning example is Stuart’s ownership history of Ramaco Resources equity. Ramaco Resources, Inc. is a prohibited financial interest under Stuart’s ethics agreement due to its involvement in the mining and energy industries.<sup>50</sup> Stuart disclosed that he purchased between \$100,002 - \$200,000 of Ramaco stock on December 2 and December 9, 2025, and then subsequently sold the Ramaco stock at an increased value of \$131,004 - \$315,000 between February 10 and March 5, 2026.<sup>51</sup> Stuart’s ownership of Ramaco stock was also identified as problematic by the HHS Ethics Office, and the certifying ethics official specifically made a note that Stuart was recused from all particular matters “involving or affecting [Ramaco Resources] during the period of ownership.”<sup>52</sup>

A third prominent example is Stuart’s ownership of Estee Lauder stock. Estee Lauder is a cosmetics company that is on the FDA SRO list and therefore prohibited under both Stuart’s ethics agreement and HHS ethics regulations.<sup>53</sup> Stuart reported that he purchased \$1,001 - \$15,000 of Estee Lauder stock on January 5, 2026, and later sold \$15,001 - \$50,000 of Estee Lauder stock on February 10, 2026.<sup>54</sup> Like the Ramaco Resources and CommScope stock, the certifying ethics official noted that Stuart was recused from all particular matters “involving or affecting [Estee Lauder] during the period of ownership.”<sup>55</sup> Nevertheless, it is concerning that Stuart purchased and then sold Estee Lauder stock at a significant profit while serving as general counsel of HHS, an agency that is directly responsible for regulating the cosmetics industry.

Stuart’s continued purchasing of prohibited financial holdings while serving as general counsel appears to have violated federal ethics laws. Although some of the prohibited holdings were purportedly divested, the fact that Stuart acquired them in the first place is enough to be considered a violation of federal ethics laws. HHS OIG should investigate the circumstances surrounding Stuart’s purchases of these prohibited financial holdings, including whether Stuart took any official action in particular matters that would have had a direct and predictable effect on these entities.

#### **IV. Conclusion**

The foregoing facts establish a possible violation of Stuart’s ethics agreement, federal ethics laws, and 18 U.S.C. § 1001. An OIG investigation is needed to determine if Stuart’s continued purchasing of prohibited financial interests was in violation of 18 U.S.C. § 208(a) and federal ethics rules. Further investigation is also needed to determine if Stuart made false statements on his Ethics Compliance Certification by claiming that he had divested all his prohibited holdings by the required deadline.

---

<sup>47</sup> See Ex. B at Sec. 8.

<sup>48</sup> See Ex. D; Ex. E.

<sup>49</sup> See Ex. E at 2.

<sup>50</sup> See Ex. B at Sec. 8.

<sup>51</sup> See Ex. E; Ex. G, Michael Stuart Periodic Transaction Report 278-T (Mar. 5, 2026); Ex. H, Michael Stuart Periodic Transaction Report 278-T (Mar. 5, 2026)(2).

<sup>52</sup> See Ex. E.

<sup>53</sup> See *supra* note 20; Ex. B at Sec. 8.

<sup>54</sup> See Ex. F; Ex. G.

<sup>55</sup> See Ex. F.



**Attachment A:**

**Prohibited Financial Interests Apparently Purchased in Violation of the Ethics Agreement**

<b>Asset</b>	<b>Sector/ Industry</b>	<b>FDA SRO</b>	<b>Purchase Date(s)</b>	<b>Total Amount Purchased</b>	<b>Divestment Date(s)</b>	<b>Total Amount Divested</b>
Aberdeen Standard Physical Silver Shares	Sector Fund – Silver	No	12/26/2025	\$1,001 - \$15,000	3/5/2026	\$1,001 - \$15,000
Amaero International Ltd.	Industrials; Aerospace & Defense	No	4/16/2026	\$1,001 - \$15,000	5/12/2026	\$1,001 - \$15,000
Blackberry, Ltd.	Technology; Wireless Communications	No	4/23/2026	\$1,001 - \$15,000	5/12/2026	\$1,001 - \$15,000
Boeing <sup>56</sup>	Aerospace & Defense	No	None reported	N/A	4/16/2026	\$15,001 - \$50,000
Brookfield Renewable Partners LP	Energy	No	4/8/2026	\$15,001 - \$50,000	None reported	N/A
Cava Group, Inc.	Food & Beverage Production	No	12/23/2026	\$1,001 - \$15,000	3/5/2026	\$15,001 - \$50,000
CommScope Holding Company, Inc.	Technology; Wireless Communications	No	12/2/2025	\$16,002 - \$65,000	10/27/2025	\$16,002 - \$65,000
Corning, Inc.	Industrials – Medical Supplies	No	3/24/2026 4/8/2026 5/8/2026	\$230,005 - \$550,000	5/12/2026	\$301,003- \$615,000
Estee Lauder	Cosmetics	Yes	1/5/2026	\$1,001 - \$15,000	2/10/2026	\$15,001 - \$50,000
Fox Corp.	Communications Media	No	12/2/2025	\$15,001 - \$50,000	3/5/2026	\$16,002 - \$65,000
General Electric [trading as GE Aerospace]	Industrials	No	4/21/2026 5/12/2026	\$201,004 - \$465,000	10/27/2025	\$50,001 - \$100,000
Global X U.S. Electrification ETF	Sector Fund – Technology	No	4/16/2026	\$15,001 - \$50,000	5/8/2026	\$15,001 - \$50,000
Grupo Televisa S.A.	Communications Media	No	12/2/2025	\$50,001 - \$100,000	3/5/2026	\$66,003 - \$165,000
Hecla Mining	Energy	No	12/26/2025	\$2,002 - \$30,000	3/5/2026	\$1,001 - \$15,000
iShares Future AI & Tech ETF	Sector Fund – Technology	No	4/16/2026	\$15,001 - \$50,000	None reported	N/A
iShares MSCI South Korea ETF	Sector Fund – South Korea	No	5/8/2026	\$15,001 - \$50,000	5/12/2026	\$15,001 - \$50,000

<sup>56</sup> While there are no purchases of Boeing stock included in this table, Stuart reported divesting \$15,001 - \$50,000 worth of Boeing stock on April 16, 2026. See Ex. M at 2. This indicates that he owned Boeing stock at some point while serving as General Counsel.

Asset	Sector/ Industry	FDA SRO	Purchase Date(s)	Total Amount Purchased	Divestment Date(s)	Total Amount Divested
Keel Infrastructure Corp.	Industrials; Energy	No	5/13/2026	\$1,001 - \$15,000	None reported	N/A
Kratos Defense & Security Solutions, Inc.	Aerospace & Defense	No	3/5/2026 3/6/2026	\$46,003 - \$165,000	None reported	N/A
L3Harris Technologies, Inc.	Technology; Aerospace & Defense	No	3/5/2026	\$50,001 - \$100,000	None reported	N/A
Lantronix, Inc.	Technology	No	5/8/2026	\$2,002 - \$30,000	None reported	N/A
Lightwave Logic, Inc.	Technology	No	5/8/2026 5/12/2026	\$101,002 - \$265,000	None reported	N/A
Limbach Holdings, Inc.	Industrials	No	1/5/2026	\$1,001 - \$15,000	5/8/2026	\$1,001 - \$15,000
LVMUY LVMH Moet Hennessy Louis Vuitton	Food & Beverage Production; Cosmetics	Yes	1/5/2026	\$15,001 - \$50,000	2/10/2026	\$1,001 - \$15,000
Netflix, Inc.	Communications Media	No	4/8/2026	\$15,001 - \$50,000	None reported	N/A
Nokia Corp.	Technology; Wireless Communications	No	4/14/2026	\$1,001 - \$15,000	None reported	N/A
Procure Space ETF	Sector Fund – Aerospace; Industrials	No	4/16/2026	\$15,001 - \$50,000	None reported	N/A
Qnity Electronics, Inc.	Technology	No	2/26/2026 3/5/2026	\$2,002 - \$30,000	None reported	N/A
QXO, Inc.	Industrials – Construction	No	11/28/2025 12/9/2025 4/17/2026	\$110,005 - \$300,000	None reported	N/A
Ramaco Resources, Inc.	Energy	No	12/2/2025 12/9/2025	\$100,002 - \$200,000	2/10/2026 2/26/2026 3/5/2026	\$131,004 - \$315,000
Yesway, Inc.	Food & Beverage Distribution	No	4/22/2026 4/24/2026 5/8/2026	\$20,006 - \$125,000	None reported	N/A
<b>TOTAL</b>				\$1,058,053 - \$2,945,000		\$661,026 - \$1,665,000

# EXHIBIT A

Report Type: Nominee Report

Year (Annual Report only):

Date of Appointment:

Date of Termination:

## Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

---

Stuart, Michael

General Counsel, Department of Health & Human Services

---

Other Federal Government Positions Held During the Preceding 12 Months:

None

---

Names of Congressional Committees Considering Nomination:

- Committee on Finance
- 

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

/s/ Stuart, Michael [electronically signed on 02/22/2025 by Stuart, Michael in Integrity.gov]

---

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

/s/ Hall, Randall, Certifying Official [electronically signed on 03/18/2025 by Hall, Randall in Integrity.gov]

---

Other review conducted by

/s/ Hall, Randall, Ethics Official [electronically signed on 03/18/2025 by Hall, Randall in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Jaffe, Seth, Certifying Official [electronically signed on 03/18/2025 by Jaffe, Seth in Integrity.gov]

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	West Virginia Legislature	Charleston, West Virginia	State Government	Chair, Senate Judiciary Committee, West Virginia State Senate	1/2025	Present
2	West Virginia Legislature	Charleston, West Virginia	State Government	Vice-Chair, Senate Transportation & Infrastructure Committee, West Virginia State Senate	1/2023	1/2025
3	West Virginia Legislature	Charleston, West Virginia	State Government	State Senator (7th District), West Virginia State Senate	1/2023	Present
4	Vandalia Law, PLLC	Charleston, West Virginia	Law Firm	Responsible Member	7/2024	Present
5	Dinsmore & Shohl, LLP	Charleston, West Virginia	Law Firm	Partner	3/2021	6/2024

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	West Virginia Legislature (West Virginia State Senate)	N/A		Salary	\$30,295
2	Vandalia Law, PLLC, S-Corp (law firm)	N/A	\$50,001 - \$100,000	LLC Distribution	\$63,650

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Vandalia Law, PLLC, S-Corp	N/A		Salary	\$22,579
4	Dinsmore & Shohl, LLP (law firm) See Endnote	N/A		Partnership Share	\$51,000
5	Mike for WV Committee (campaign committee), promissory note	N/A	\$15,001 - \$50,000		None (or less than \$201)
6	Vandalia Law, PLLC, traditional Individual 401(k) plan	No			
6.1	Hertz Global Holdings, Inc. (HTZ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.2	NVIDIA Corporation (NVDA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.3	Palantir Technologies, Inc. (PLTR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.4	Quantum Computing, Inc. (QUBT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	Vandalia Law, PLLC, Roth Individual 401(k) plan	No			
7.1	Hertz Global Holdings, Inc. (HTZ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.2	Palantir Technologies, Inc. (PLTR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.3	Quantum Computing, Inc. (QUBT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.4	Robinhood Markets, Inc. (HOOD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
7.5	Wells Fargo & Co. (WFC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	Rollover IRA	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.1	AbbVie, Inc. (ABBV)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.2	Adaptive Biotechnologies Corporation (ADPT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.3	Advanced Micro Devices, Inc. (AMD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.4	Amazon.com, Inc. (AMZN)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.5	Apple, Inc. (AAPL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.6	Axsome Therapeutics, Inc. (AXSM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.7	BWX Technologies, Inc. (BWXT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.8	Cadre Holdings, Inc. (CDRE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.9	Cheniere Energy, Inc. (LNG)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.10	Commvault Systems, Inc. (CVLT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.11	CrowdStrike Holdings, Inc. (CRWD)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.12	Devon Energy Corporation (DVN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.13	Drive Shack, Inc. (golf-related leisure and entertainment)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.14	GE HealthCare Technologies, Inc. (GEHC)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.15	GE Vernova, Inc. (GEV)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.16	General Electric Co. (GE)	See Endnote	\$50,001 - \$100,000		None (or less than \$201)
8.17	GoDaddy, Inc. (GDDY)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.18	Hertz Global Holdings, Inc. (HTZ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.19	Honeywell International, Inc. (HON)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.20	Intel Corporation (INTC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.21	iPower, Inc. (IPW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.22	Kratos Defense & Security Solutions, Inc. (KTOS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.23	L3Harris Technologies, Inc. (LHX)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.24	Leidos Holdings, Inc. (LDOS)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.25	Lemonade, Inc. (LMND)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.26	MARA Holdings, Inc. (MARA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.27	McDonald's Corporation (MCD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.28	Meta Platforms, Inc. (META)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8.29	Microsoft Corporation (MSFT)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.30	NVIDIA Corporation (NVDA)	N/A	\$250,001 - \$500,000		None (or less than \$201)
8.31	Palantir Technologies, Inc. (PLTR)	N/A	\$100,001 - \$250,000		None (or less than \$201)
8.32	Precipio, Inc. (PRPO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.33	QUALCOMM, Inc. (QCOM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.34	Quantum Computing, Inc. (QUBT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.35	Robinhood Markets, Inc. (HOOD)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.36	RTX Corporation (RTX)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.37	Spotify Technology, SA (SPOT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.38	Take-Two Interactive Software, Inc. (TTWO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.39	Viking Holdings Limited (VIK)	N/A	\$15,001 - \$50,000		None (or less than \$201)
8.40	Walt Disney Co. (DIS)	N/A	\$50,001 - \$100,000		None (or less than \$201)
8.41	Warner Bros. Discovery, Inc. (WBD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	Filer's Contributory Roth IRA	No			
9.1	AbbVie, Inc. (ABBV)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.2	Amazon.com, Inc. (AMZN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.3	Apple, Inc. (AAPL)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.4	Caterpillar, Inc. (CAT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.5	Commvault Systems, Inc. (CVLT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.6	Core Natural Resources, Inc. (CNR)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.7	GoDaddy, Inc. (GDDY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.8	HUHUTECH International Group, Inc. (HUHU)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.9	Intel Corporation (INTC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.10	iPower, Inc. (IPW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.11	Kratos Defense & Security Solutions, Inc. (KTOS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.12	Lemonade, Inc. (LMND)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.13	Meta Platforms, Inc. (META)	N/A	\$50,001 - \$100,000		None (or less than \$201)
9.14	Microsoft Corporation (MSFT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.15	Norwegian Cruise Line Holdings Limited (NCLH)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.16	NVIDIA Corporation (NVDA)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.17	Palantir Technologies, Inc. (PLTR)	N/A	\$100,001 - \$250,000		None (or less than \$201)
9.18	Quantum Computing, Inc. (QUBT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.19	Rubrik, Inc. (RBRK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.20	Viking Holdings Limited (VIK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.21	Walt Disney Co. (DIS)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.22	VanEck Bitcoin ETF (HODL)	Yes	\$1,001 - \$15,000		None (or less than \$201)

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Spilman, Thomas & Battle, PLLC	South Charleston, West Virginia	Upon confirmation, I will cease providing services to my Vandalia Law, PLLC, clients, and I will refer them to Spilman, Thomas & Battle, PLLC, for any ongoing legal matters. I will complete the referral before I assume the duties of the position of General Counsel, and I will receive a referral fee of 10% of realized fees for the transferred clients before I enter government service.	1/2025
2	Vandalia Law, PLLC	South Charleston, West Virginia	My solo legal practice will be inactive during my appointment. All outstanding client fees have been paid to me before I enter government service.	7/2024
3	Vandalia Law, PLLC	South Charleston, West Virginia	I will continue to retain the traditional Individual 401(k) defined contribution plan. The plan sponsor will not make further contributions during my appointment.	7/2024

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
4	Vandalia Law, PLLC	South Charleston, West Virginia	I will continue to retain the Roth Individual 401(k) defined contribution plan. The plan sponsor will not make further contributions during my appointment.	7/2024
5	Mike for WV Committee	South Charleston, West Virginia	Upon confirmation, Mike for WV Committee will become dormant. Any funds associated with this entity will be used only for expenditures related to maintaining it. During my tenure as General Counsel, the campaign committee will not accept or receive any funds. In March 2023, I entered into a promissory agreement with Mike for WV Committee for \$33,707.87 to fund the committee.	1/2022

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	West Virginia Legislature	Charleston, West Virginia	State Senator (7th District), West Virginia State Senate
2	Vandalia Law, PLLC	South Charleston, West Virginia	Responsible Member
3	Drs. Brock, Henderson, Di Prisco, Ravelo & Green, Inc.	Hurricane, West Virginia	Legal services (client of Vandalia Law, PLLC)
4	HealthEdge Investment Partners, LLC	Tampa, Florida	Legal services (client of Vandalia Law, PLLC)
5	Dinsmore & Shohl, LLP	Charleston, West Virginia	Partner
6	Daybrook Development Co.	Fairview, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)
7	Hardy Mid-Ohio Bike Enterprises, LLC	Williamstown, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)
8	High Concrete Group, LLC	Lancaster, Pennsylvania	Legal services (client of Dinsmore & Shohl, LLP)

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
9	Lisa Haywood	Pickerington, Ohio	Legal services (client of Dinsmore & Shohl, LLP)
10	Mine Safety & Consulting, LLC	Verdunville, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)
11	Patsy Hardy and Steve Hardy	Williamstown, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)
12	Premium Towing, LLC	Ethel, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)
13	Soaring Eagle Lodge Master Association, Inc.	Elkins, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)
14	Steve D'Antonio Marine Consulting, Inc.	Ashland, Virginia	Legal services (client of Dinsmore & Shohl, LLP)
15	West Virginia Economic Development Authority	Charleston, West Virginia	Legal services (client of Dinsmore & Shohl, LLP)

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	West Virginia Department of Commerce	N/A		Salary	
2	State of West Virginia, West Virginia Retirement Plus Deferred Compensation Plan	No			
2.1	American Funds Growth Fund of America - Class R-5 (RGAFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	American Funds New Perspective Fund - Class R-5 (RNPFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	Baron Small Cap Fund - Institutional Class (BSFIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.4	JPMorgan Equity Income Fund - Class R6 (OIEJX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.5	PIMCO RAE US Small Fund - Institutional Class (PMJIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	Vanguard Institutional Index Fund - Institutional Shares (VINIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.7	Vanguard Mid-Cap Index Fund - Institutional Shares (VMCIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.8	Vanguard Small-Cap Index Fund - Institutional Shares (VSCIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Spouse's Roth Contributory IRA	No			
3.1	Palantir Technologies, Inc. (PLTR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.2	Royal Caribbean Cruises Limited (RCL)	N/A	\$1,001 - \$15,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank account #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	U.S. bank account #2 (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
3	U.S. bank account #3 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	Northwestern Mutual Life Insurance Co., whole life #1	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Northwestern Mutual Life Insurance Co., whole life #2	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	West Virginia SMART529 College Savings Program - SMART529 WV Direct Plan #1	No		Cash Distributions	\$26,500
6.1	SMART529 WV Direct Balanced Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	SMART529 WV Direct Aggressive Growth Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.3	SMART529 WV Direct 500 Index Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
7	West Virginia SMART529 College Savings Program - SMART529 WV Direct Plan #2	No		Cash Distributions	\$26,500
7.1	SMART529 WV Direct Balanced Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.2	SMART529 WV Direct Aggressive Growth Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.3	SMART529 WV Direct 500 Index Portfolio	Yes	\$1,001 - \$15,000		None (or less than \$201)
8	Coinbase account	No			
8.1	Ethereum	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	U.S. brokerage account	No			
9.1	Benchmark Electronics, Inc. (BHE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.2	Carnival Corporation (CCL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.3	Chipotle Mexican Grill, Inc. (CMG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.4	Cisco Systems, Inc. (CSCO)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.5	Cloudflare, Inc. (NET)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.6	Commvault Systems, Inc. (CVLT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.7	Credo Technology Group Holding Limited (CRDO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.8	Discover Financial Services, Inc. (DFS)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.9	DoorDash, Inc. (DASH)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.10	Ferguson Enterprises, Inc. (FERG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.11	GE Vernova, Inc. (GEV)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.12	General Electric Co. (GE)	See Endnote	\$15,001 - \$50,000		None (or less than \$201)
9.13	GoDaddy, Inc. (GDDY)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.14	Howmet Aerospace, Inc. (HWM)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.15	HUHUTECH International Group, Inc. (HUHU)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.16	Intel Corporation (INTC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.17	iPower, Inc. (IPW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.18	Leonardo DRS, Inc. (DRS)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.19	Liberty Media Corporation - Series A Liberty Live (LLYVA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.20	Nano Nuclear Energy, Inc. (NNE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.21	Nixxy, Inc. (NIXX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.22	Nu Holdings Limited (NU)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.23	NVIDIA Corporation (NVDA)	N/A	\$100,001 - \$250,000		None (or less than \$201)
9.24	Oklo, Inc. (OKLO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.25	On Holding, AG (ONON)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.26	Palantir Technologies, Inc. (PLTR)	N/A	\$100,001 - \$250,000		None (or less than \$201)
9.27	Piedmont Lithium, Inc. (PLL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.28	Quantum Computing, Inc. (QUBT)	N/A	\$15,001 - \$50,000		None (or less than \$201)
9.29	RadNet, Inc. (RDNT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.30	Robinhood Markets, Inc. (HOOD)	N/A	\$50,001 - \$100,000		None (or less than \$201)
9.31	Roblox Corporation (RBLX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.32	Rubrik, Inc. (RBRK)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
9.33	Shopify, Inc. (SHOP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.34	SoFi Technologies, Inc. (SOFI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
9.35	VanEck Bitcoin ETF (HODL)	Yes	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

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

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM	
1	LightStream (Truist Financial Corporation)	Personal Loan	\$10,001 - \$15,000	2022	5.99%	60 Months	
2	J.P. Morgan Chase Bank, N.A.	Mortgage on Personal Residence	\$50,001 - \$100,000	2012	2.75%	15 Years	
3	J.P. Morgan Chase Bank, N.A.	Exercised Home Equity Line of Credit on Personal Residence	\$50,001 - \$100,000	2012	Prime + 2%	Interest Only Then Term Payment at Maturity	
4	Charles Schwab Corporation	See Endnote	Margin Account	\$250,001 - \$500,000	2021	10.825%	N/A

## 9. Gifts and Travel Reimbursements

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

---

### Endnotes

PART	#	ENDNOTE
2.	4	The reported gross income amount is an approximation.
2.	8.16	General Electric Company operates as GE Aerospace.
6.	9.12	General Electric Company operates as GE Aerospace.
8.	4	The margin account agreement was initially entered into with TD Ameritrade, Inc., in 2021. In 2024, TD Ameritrade, Inc., was acquired by Charles Schwab Corporation. The margin account transferred to Charles Schwab Corporation. No new margin account was executed.

# Summary of Contents

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

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

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

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

#### 6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

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

## 8. Liabilities

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

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

## 9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$192 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5 U.S.C. §§ 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

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

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB (that control number 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

---

# EXHIBIT B

March 17, 2025

Randall J. Hall  
Associate General Counsel for Ethics  
Designated Agency Ethics Official  
U.S. Department of Health and Human Services  
Room 710-E, Hubert H. Humphrey Building  
200 Independence Avenue SW  
Washington, DC 20201

Dear Mr. Hall:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of General Counsel of the U.S. Department of Health and Human Services. It is my responsibility to understand and comply with the commitments outlined in this agreement.

#### SECTION 1 – GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the particular matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me:

- Any spouse or minor child of mine;
- Any general partner of a partnership in which I am a limited or general partner;
- Any organization in which I serve as an officer, director, trustee, general partner, or employee, even if uncompensated; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

com

HBO

I will receive a live ethics briefing from a member of the ethics office after my confirmation but not later than 15 days after my appointment pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics (OGE) pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

#### SECTION 2 – VANDALIA LAW, PLLC

I am the sole member of my law firm, which does business as Vandalia Law, PLLC, an S corporation that I formed. Upon confirmation, I will cease providing services to my clients, and I will refer them to Spilman, Thomas & Battle, PLLC, for any ongoing legal matters. I will complete the referral before I assume the duties of the position of General Counsel, and I will receive a referral fee of 10% of realized fees for the transferred clients before I enter government service. Upon confirmation, my law firm will cease engaging in any business, including the representation of clients. During my appointment to the position of General Counsel, the law firm will remain dormant and will not advertise. I will not perform any services for the firm, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the law firm while it is in an inactive status. As General Counsel, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Vandalia Law, PLLC. In addition, pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

#### SECTION 3 – DINSMORE & SHOHL, LLP

I resigned from my position with the law firm of Dinsmore & Shohl, LLP, in June 2024. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know this firm is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

#### SECTION 4 – STATE OF WEST VIRGINIA

Upon confirmation, I will resign from my positions with the West Virginia Legislature. For a period of one year after my resignation, I will have a “covered relationship” under the

0314

mas

impartiality regulation at 5 C.F.R. § 2635.502 with the State of West Virginia. Pursuant to 5 C.F.R. § 2635.502(d), I will seek written authorization to participate personally and substantially in particular matters involving specific parties in which I know the State of West Virginia is a party or represents a party. Until such an authorization is granted, I will recuse pursuant to the impartiality regulation at 5 C.F.R. § 2635.502 for a period of one year after my resignation.

#### SECTION 5 – WEST VIRGINIA DEPARTMENT OF COMMERCE

My spouse is employed by the West Virginia Department of Commerce, from which my spouse receives a fixed salary. For as long as my spouse continues to work for the West Virginia Department of Commerce, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with their employer, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I also will not participate personally and substantially in any particular matter involving specific parties in which I know my spouse's employer is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

#### SECTION 6 – MIKE FOR WV COMMITTEE

I have an active campaign account, Mike for WV Committee. Upon confirmation for the position of General Counsel, Mike for WV Committee will become dormant. During my tenure as General Counsel, any funds associated with this entity will be used only for expenditures related to maintaining it. During my tenure as General Counsel, the campaign committee will not accept or receive any funds. I hold a promissory note from Mike for WV Committee. For as long as I hold this note, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Mike for WV Committee to repay this note, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

#### SECTION 7 – DIVESTITURES

I will divest my interests in the following entities as soon as practicable but not later than 90 days after my confirmation:

- AbbVie, Inc.
- Adaptive Biotechnologies Corporation
- Advanced Micro Devices, Inc.
- Amazon.com, Inc.
- Apple, Inc.
- Axsome Therapeutics, Inc.
- Benchmark Electronics, Inc.
- BWX Technologies, Inc.
- Cadre Holdings, Inc.

3.8.11

mbo

- Carnival Corporation
- Caterpillar, Inc.
- Cheniere Energy, Inc.
- Chipotle Mexican Grill, Inc.
- Cisco Systems, Inc.
- Cloudflare, Inc.
- Commvault Systems, Inc.
- Credo Technology Group Holding Limited
- CrowdStrike Holdings, Inc.
- Devon Energy Corporation
- GE HealthCare Technologies, Inc.
- GE Vernova, Inc.
- Honeywell International, Inc
- Intel Corporation
- iPower, Inc.
- Leidos Holdings, Inc.
- McDonald's Corporation
- Meta Platforms, Inc.
- Microsoft Corporation
- Norwegian Cruise Line Holdings Limited
- NVIDIA Corporation
- Palantir Technologies, Inc.
- Precipio, Inc.
- QUALCOMM, Inc.
- Quantum Computing, Inc.
- RadNet, Inc.
- Royal Caribbean Cruises Limited
- RTX Corporation
- Rubrik, Inc.
- Spotify Technology, SA
- Viking Holdings Limited
- Walt Disney Company

With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I have verified that I will be able to carry out the divestitures within the timeframe described above.

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are

invested in non-conflicting assets. I understand that I must submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture and in order to divest assets within the agreed upon timeframe.

I (including my spouse and minor children if applicable) will not repurchase any asset I was required to divest without consulting with my agency ethics official and OGE.

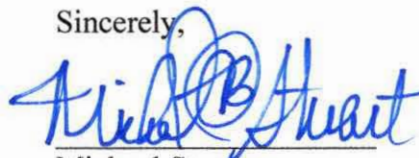
#### SECTION 8 – OTHER COMMITMENTS

In order to avoid potential conflicts of interest during my appointment as General Counsel, I (including my spouse and minor children, if applicable) will not acquire any direct financial interest in entities listed on the Food and Drug Administration's prohibited holdings list or in entities involved, directly or through subsidiaries, in the following industries or businesses: (1) research, development, manufacture, distribution, processing, storage, or sale of pharmaceutical, biotechnology, or medical devices, equipment, preparations, treatments, or products; (2) veterinary products or cosmetics; (3) healthcare management or delivery; (4) food and/or beverage production, processing, storage, or distribution; (5) manufacture, marketing, sale and distribution of tobacco products; (6) health, disability, or workers compensation insurance or related services; (7) communications media; (8) computer hardware, computer software, and related internet technologies; (9) wireless communications; (10) social sciences and economic research organizations; (11) energy or utilities; or (12) commercial airlines, railroads, ship lines, and cargo carriers. In addition, I (including my spouse and minor children, if applicable) will not acquire any interests in any sector mutual fund or sector exchange-traded fund that concentrates its investments the Food and Drug Administration's prohibited holdings list, in any of the aforementioned industries or businesses, in a single country other than the United States, or in bonds of a single State within the United States.

#### SECTION 9 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 5 U.S.C. § 552, on the website of OGE with ethics agreements of other presidential nominees who file public financial disclosure reports.

Sincerely,



Michael Stuart

# EXHIBIT C

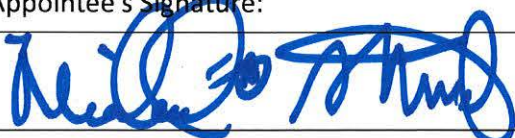
## ETHICS AGREEMENT COMPLIANCE CERTIFICATION

Senate Confirmed Presidential Appointee

1. Appointee's Information	
a. Appointee's Name:	Michael Stuart
b. Position Title:	General Counsel
c. Agency:	Department of Health and Human Services
d. Date Ethics Agreement Signed:	March 17, 2025
e. Date Confirmed:	October 7, 2025
f. Due Date for Submission of Certification of Ethics Agreement Compliance to OGE:	January 12, 2026
2. Resignations	
I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	
a. I completed all of the divestitures indicated in my ethics agreement within the time period specified. I understand that I may not reacquire these assets during my appointment without OGE's prior approval.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
b. I have filed a periodic transaction report, or periodic transaction reports (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report (s): 11/30/2025 and 12/31/2025
c. I completed the divestiture through a means not requiring a periodic transaction report (OGE Form 278-T).	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A

<b>4. Managed Accounts</b>	
If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases to ensure compliance with these limitations.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
<b>5. Interim Recusals</b>	
I have complied with my interim recusal obligations pending the divestitures required by my ethics agreement.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
<b>6. Recusals</b> (Note: These factual statements describe the appointee' current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)	
a. As required by 18 U.S.C. § 208, I will continue to recuse from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I receive a waiver or qualify for a regulatory exemption.	<input checked="" type="radio"/> Yes <input type="radio"/> No
b. I am recusing from particular matters in which any former employer or client of mine for whom I provided services to in the past year, or in which my spouse's employer, or a current client is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

<b>7. Waivers and Authorizations</b> (Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)					
a. I received a waiver pursuant to 18 U.S.C. § 208.  If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	<input type="radio"/> Yes <input checked="" type="radio"/> No  Date: Financial Interest:				
b. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).  If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	<input checked="" type="radio"/> Yes <input type="radio"/> No  Date: November 4, 2025 Covered person(s): State of West Virginia (former employer)				
c. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).  If yes, indicate the date of the waiver and identify the former employer or payer.	<input type="radio"/> Yes <input checked="" type="radio"/> No  Date: Former employer or payer:				
<b>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</b>					
<input checked="" type="checkbox"/> Mark this box if not applicable	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;">                             a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:                         </td> <td style="width: 50%; padding: 5px;"> <input type="radio"/> I received it (or it was accelerated) <u>prior</u> to my assumption of the duties of the position.   <input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.   <input type="radio"/> I forfeited it.                         </td> </tr> <tr> <td style="padding: 5px;">                             b. Financial interest or payment at issue:                         </td> <td style="padding: 5px;"> <!-- Empty space for response --> </td> </tr> </table>	a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:	<input type="radio"/> I received it (or it was accelerated) <u>prior</u> to my assumption of the duties of the position.  <input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.  <input type="radio"/> I forfeited it.	b. Financial interest or payment at issue:	Empty space for response
a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:	<input type="radio"/> I received it (or it was accelerated) <u>prior</u> to my assumption of the duties of the position.  <input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.  <input type="radio"/> I forfeited it.				
b. Financial interest or payment at issue:	Empty space for response				

9. Requirements for Regular Appointees	
I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.  If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
10. Additional Ethics Agreement Requirements	
1. Before my appointment to HHS, I made my law firm, Vandalia Law, PLLC inactive. 2. Before my appointment to HHS, I received the referral fee from Spillman, Thomas & Battle, PLLC, for realized fees for my transferred clients to this law firm.	I am complying with these requirements as described in the adjacent box.  <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
11. Comments of Appointee	
12. Certification-	
Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.	
I certify that the information I have provided is complete and accurate.	
Appointee's Signature:	Date:
	1/13/2026

### **A. Privacy Act Statement**

5 U.S.C. § 13111 requires the reporting of this information. The primary use of the information on this report is for review by Government officials to determine an appointee's compliance with applicable Federal laws and regulations, and the appointee's Ethics Agreement. Failure to provide the requested information may result in notification of lack of compliance to the Senate and the head of the appointee's agency, or the White House, and/or could result in OGE declining to certify the appointee's financial disclosure reports. The appointee could also be required to recuse from matters based on uncertainty as to whether they have divested or resigned from a matter determined to raise potential conflicts.

This information will be publicly posted to the OGE website at [www.oge.gov](http://www.oge.gov) in accordance with [OGE/GOVT-1](#), Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records (routine use "k."). Please see [OGE/GOVT-1](#) for more information about the maintenance and disclosure of this information.

---

### **B. Filing the Certification of Ethics Agreement Compliance**

Your position as one of our government's most senior leaders brings with it extraordinary responsibilities. One of those responsibilities is to serve as a role model for all executive branch employees by demonstrating a commitment to ethical principles and actively seeking to avoid conflicts of interest. This includes compliance with the ethics agreement you signed prior to and as a condition of your confirmation. By signing this Certification of Ethics Agreement Compliance (Certification) you certify that you have complied with the terms of your ethics agreement. The information below is intended to help you timely meet your obligation to complete and submit this form to the U.S. Office of Government Ethics (OGE).

You are required to comply with the provisions of your ethics agreement within three months of the date of your confirmation, unless otherwise specified. Please:

- Review your ethics agreement carefully.
- If your ethics agreement requires you to resign from an outside position, please note that resignations are generally required "upon confirmation."
- Identify any provisions of your ethics agreement that may require coordination with an account manager or other third party.
- Initiate any necessary action early enough to timely comply with your ethics agreement.
- If you qualify for and wish to request a Certificate of Divestiture, please submit your request as soon as possible through your agency's Designated Agency Ethics Official (DAEO).

If your ethics agreement specifies that you have more than 90 days to comply with a particular provision, you must still comply with the remaining provisions within the standard

90 day period and submit a Certification (through your agency's DAEO) within seven days thereafter. If you have not complied with a provision of your ethics agreement, please provide an explanation in Box 11, Comments of Appointee. You will be provided with an additional Certification to complete and submit to OGE to certify that you have complied with all provisions of your ethics agreement.

**Extensions:** OGE may grant an extension of time for complying with a provision of your ethics agreement if, in its sole discretion, it determines that an unusual hardship has/will prevent you from complying timely. Generally, waiting for an account manager to sell an interest, not being able to locate records, or waiting for OGE to process a request for a Certificate of Divestiture are not considered unusual hardships. As noted in the Privacy Act Statement above, not submitting your Certification may result in notification of lack of compliance to the Senate, the head of your agency, or the White House. OGE may also decline to certify your financial disclosure reports. You may also be required to recuse from matters based on uncertainty as to whether you have completed required divestitures and resignations. OGE may also post a notice on its website, in place of your Certification, stating that you have not yet submitted the required certification.

**While it is your personal responsibility to take the steps necessary to comply with your ethics agreement, your agency's DAEO is available to assist you in completing this Certification and submitting it to OGE. Any questions you may have should be directed to your agency's DAEO.**

# EXHIBIT D

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 11/30/2025 by Stuart, Michael in Integrity.gov]

---

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

/s/ Hall, Randall, Certifying Official [electronically signed on 12/17/2025 by Hall, Randall in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 12/09/2025 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 01/29/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Quantum Computing Inc. Common Stock (QUBT)	Sale	10/27/2025	No	\$1,001 - \$15,000
2	Jefferies Financial Group, Inc. (JEF)	Purchase	11/28/2025	No	\$50,001 - \$100,000
3	NIKE, Inc. (NKE)	Purchase	11/28/2025	No	\$100,001 - \$250,000
4	Robinhood Markets Inc. Class A Common Stock (HOOD)	Purchase	11/28/2025	No	\$50,001 - \$100,000
5	D-Wave Quantum Inc. Common Shares (QBTS)	Sale	10/27/2025	No	\$1,001 - \$15,000
6	Quantum Computing Inc. Common Stock (QUBT)	Sale	10/27/2025	No	\$1,001 - \$15,000
7	Spotify Technology S.A. Ordinary Shares (SPOT)	Sale	10/27/2025	No	\$50,001 - \$100,000
8	GE Healthcare Technologies common stock (GEHC)	Sale	10/27/2025	No	\$1,001 - \$15,000
9	Cisco Systems, Inc. (CSCO)	Sale	10/27/2025	No	\$1,001 - \$15,000
10	NVIDIA Corp. (NVDA)	Sale	10/27/2025	No	\$250,001 - \$500,000
11	Meta Platforms Inc. Class A Common Stock (META)	Sale	10/27/2025	No	\$15,001 - \$50,000
12	Commvault Systems, Inc. (CVLT)	Sale	10/27/2025	No	\$15,001 - \$50,000
13	CrowdStrike Holdings Inc. Class A Common Stock (CRWD)	Sale	10/27/2025	No	\$50,001 - \$100,000
14	Advanced Micro Devices, Inc. (AMD)	Sale	10/27/2025	No	\$15,001 - \$50,000
15	GE Aerospace common stock (GE)	Sale	10/27/2025	No	\$50,001 - \$100,000
16	Microsoft Corp. (MSFT)	Sale	10/27/2025	No	\$50,001 - \$100,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
17	Axsome Therapeutics, Inc. (AXSM)	Sale	10/27/2025	No	\$1,001 - \$15,000
18	Reddit Inc Class A (RDDT)	Sale	10/27/2025	No	\$15,001 - \$50,000
19	Amazon.com, Inc. (AMZN)	Sale	10/27/2025	No	\$50,001 - \$100,000
20	Alphabet, Inc. (GOOG)	Sale	10/27/2025	No	\$50,001 - \$100,000
21	Apple, Inc. (AAPL)	Sale	10/27/2025	No	\$50,001 - \$100,000
22	Uber Technologies, Inc. (UBER)	Sale	10/27/2025	No	\$15,001 - \$50,000
23	CommScope Holding Co., Inc. (COMM)	Sale	10/27/2025	No	\$1,001 - \$15,000
24	Palantir Technologies Inc. Class A Common Stock (PLTR)	Sale	10/27/2025	No	\$100,001 - \$250,000
25	Intel Corp. (INTC)	Sale	10/27/2025	No	\$50,001 - \$100,000
26	Quantum Computing Inc. Common Stock (QUBT)	Sale	10/27/2025	No	\$1,001 - \$15,000
27	Jefferies Financial Group, Inc. (JEF)	Purchase	11/28/2025	No	\$15,001 - \$50,000
28	SoFi Technologies Inc. Common Stock (SOFI)	Purchase	11/28/2025	No	\$15,001 - \$50,000
29	NIKE, Inc. (NKE)	Purchase	11/28/2025	No	\$15,001 - \$50,000
30	iShares Ethereum Trust ETF IV (ETHA)	Purchase	11/28/2025	No	\$15,001 - \$50,000
31	iShares Bitcoin ETF (IBIT)	Purchase	11/28/2025	No	\$15,001 - \$50,000
32	QXO Inc (QXO)	Purchase	11/28/2025	No	\$15,001 - \$50,000
33	Robinhood Markets Inc. Class A Common Stock (HOOD)	Purchase	11/28/2025	No	\$50,001 - \$100,000
34	Uber Technologies, Inc. (UBER)	Sale	10/27/2025	No	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
35	CommScope Holding Co., Inc. (COMM)	Sale	10/27/2025	No	\$15,001 - \$50,000
36	Rubrik Inc. Class A	Sale	10/27/2025	No	\$1,001 - \$15,000
37	Reddit Inc Class A (RDDT)	Sale	10/27/2025	No	\$50,001 - \$100,000
38	Prothena Corp. Plc (PRTA)	Sale	10/27/2025	No	\$1,001 - \$15,000
39	Microsoft Corp. (MSFT)	Sale	10/27/2025	No	\$15,001 - \$50,000
40	Alphabet, Inc. (GOOG)	Sale	10/27/2025	No	\$15,001 - \$50,000
41	Amazon.com, Inc. (AMZN)	Sale	10/27/2025	No	\$1,001 - \$15,000
42	Apple, Inc. (AAPL)	Sale	10/27/2025	No	\$1,001 - \$15,000
43	Quantum Computing Inc. Common Stock (QUBT)	Sale	10/27/2025	No	\$1,001 - \$15,000
44	Intel Corp. (INTC)	Sale	10/27/2025	No	\$15,001 - \$50,000
45	Rigetti Computing Inc. Common Stock (RGTI)	Sale	10/27/2025	No	\$1,001 - \$15,000
46	Hims & Hers Health Inc Class A (HIMS)	Sale	10/27/2025	No	\$15,001 - \$50,000
47	Palantir Technologies Inc. Class A Common Stock (PLTR)	Sale	10/27/2025	No	\$250,001 - \$500,000
48	Intel Corp. (INTC)	Sale	10/27/2025	No	\$15,001 - \$50,000
49	Quantum Computing Inc. Common Stock (QUBT)	Sale	10/27/2025	No	\$50,001 - \$100,000
50	Rigetti Computing Inc. Common Stock (RGTI)	Sale	10/27/2025	No	\$1,001 - \$15,000
51	Hims & Hers Health Inc Class A (HIMS)	Sale	10/27/2025	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

### Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT E

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 12/31/2025 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 01/06/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 01/02/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 03/23/2026 by Granahan, Megan in Integrity.gov]

---

Data Revised

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(03/19/2026, Weaver, Gretchen H): Filer has divested the interests reported at lines 8, 9, 26, 28, 29, 30, 33, 34, 36 and 38. Although certain of these holdings were valued below regulatory de minimis levels, filer was recused from all particular matters involving or affecting these entities during the period of ownership.

Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	iShares Ethereum Trust ETF	Purchase	12/03/2025	No	\$1,001 - \$15,000
2	iShares Ethereum Trust ETF IV	Purchase	12/26/2025	No	\$1,001 - \$15,000
3	Robinhood Markets Inc. Class A Common Stock (HOOD)	Purchase	12/09/2025	No	\$1,001 - \$15,000
4	QXO Inc common stock	Purchase	12/09/2025	No	\$15,001 - \$50,000
5	Loop Industries, Inc. (LOOP) common stock	Sale	12/09/2025	No	\$1,001 - \$15,000
6	Lemonade Inc. Common Stock (LMND)	Sale	12/09/2025	No	\$15,001 - \$50,000
7	KraneShares CSI China Internet ETF (KWEB)	Sale	12/09/2025	No	\$1,001 - \$15,000
8	Ramaco Resources, Inc. (METC)	Purchase	12/09/2025	No	\$50,001 - \$100,000
9	Hecla Mining Co. (HL)	Purchase	12/26/2025	No	\$1,001 - \$15,000
10	Citigroup, Inc. (C)	Purchase	12/12/2025	No	\$15,001 - \$50,000
11	lululemon athletica, Inc. (LULU)	Purchase	12/12/2025	No	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
12	iShares Bitcoin ETF (IBIT)	Purchase	12/12/2025	No	\$50,001 - \$100,000
13	Bitwise Solana Staking ETF (BSOL)	Purchase	12/09/2025	No	\$15,001 - \$50,000
14	Robinhood Markets Inc. Class A Common Stock (HOOD)	Purchase	12/09/2025	No	\$50,001 - \$100,000
15	QXO Inc (QXO)	Purchase	12/09/2025	No	\$50,001 - \$100,000
16	Devon Energy Corp. (DVN)	Sale	12/09/2025	No	\$1,001 - \$15,000
17	RTX Corp (RTX)	Sale	12/09/2025	No	\$15,001 - \$50,000
18	BWX Technologies, Inc. (BWXT)	Sale	12/09/2025	No	\$15,001 - \$50,000
19	Adaptive Biotechnologies Corporation Common Stock (ADPT)	Sale	12/09/2025	No	\$1,001 - \$15,000
20	GE Vernova Inc (GEV) Common Stock	Sale	12/09/2025	No	\$15,001 - \$50,000
21	Cheniere Energy, Inc. (LNG)	Sale	12/09/2025	No	\$50,001 - \$100,000
22	Lemonade Inc. Common Stock (LMND)	Sale	12/09/2025	No	\$50,001 - \$100,000
23	Honeywell International, Inc. (HON)	Sale	12/08/2025	No	\$50,001 - \$100,000
24	Sportradar Group AG Class A Ordinary Shares (SRAD)	Purchase	12/02/2025	No	\$1,001 - \$15,000
25	Loop Industries, Inc. (LOOP)	Sale	12/08/2025	No	\$1,001 - \$15,000
26	Grupo Televisa S.A. Common Stock (TV)	Purchase	12/02/2025	No	\$50,001 - \$100,000
27	iShares Bitcoin ETF (IBIT) Common Stock	Purchase	12/02/2025	No	\$500,001 - \$1,000,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
28	Ramaco Resources, Inc. (METC)	Purchase	12/02/2025	No	\$50,001 - \$100,000
29	CommScope Holding Co., Inc. (COMM)	Purchase	12/02/2025	No	\$15,001 - \$50,000
30	Fox Corp. (FOX)	Purchase	12/02/2025	No	\$15,001 - \$50,000
31	Aritzia Inc (ATZAF) Common Stock	Purchase	12/19/2025	No	\$1,001 - \$15,000
32	KraneShares CSI China Internet ETF (KWEB)	Sale	12/09/2025	No	\$1,001 - \$15,000
33	CommScope Holding Co., Inc. (COMM)	Purchase	12/02/2025	No	\$1,001 - \$15,000
34	Aberdeen Standard Physical Silver Shares ETF (SIVR)	Purchase	12/26/2025	No	\$1,001 - \$15,000
35	Live Nation Entertainment, Inc. (LYV)	Purchase	12/26/2025	No	\$1,001 - \$15,000
36	Hecla Mining Co. (HL)	Purchase	12/26/2025	No	\$1,001 - \$15,000
37	NIKE, Inc. (NKE)	Purchase	12/24/2025	No	\$15,001 - \$50,000
38	Cava Group Inc (CAVA) Common Stock	Purchase	12/23/2025	No	\$1,001 - \$15,000
39	Royal Bank Of Canada Common Stock (RY)	Purchase	12/23/2025	No	\$15,001 - \$50,000
40	Live Nation Entertainment, Inc. (LYV)	Purchase	12/23/2025	No	\$15,001 - \$50,000
41	Airbnb Inc. Class A Common Stock (ABNB)	Purchase	12/23/2025	No	\$15,001 - \$50,000
42	Aritzia Inc F (ATZAF)	Purchase	12/19/2025	No	\$15,001 - \$50,000
43	Credo Technology Group Holding Ltd Ordinary Shares (CRDO)	Sale	12/11/2025	No	\$15,001 - \$50,000
44	GE Vernova (GEV) Common Stock	Sale	12/09/2025	No	\$50,001 - \$100,000
45	Commvault Systems, Inc. (CVLT)	Sale	12/08/2025	No	\$1,001 - \$15,000
46	Carnival Corp. (CCL)	Sale	12/08/2025	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
47	Rubrik Inc, Class A (RBRK)	Sale	12/08/2025	No	\$1,001 - \$15,000
48	Amazon.com, Inc. (AMZN)	Sale	12/08/2025	No	\$1,001 - \$15,000
49	RadNet, Inc. (RDNT)	Sale	12/08/2025	No	\$1,001 - \$15,000
50	Uber Technologies, Inc. (UBER)	Sale	12/08/2025	No	\$15,001 - \$50,000
51	Apple, Inc. (AAPL)	Sale	12/08/2025	No	\$1,001 - \$15,000
52	NVIDIA Corp. (NVDA)	Sale	12/08/2025	No	\$100,001 - \$250,000
53	IonQ Inc. Common Stock (IONQ)	Sale	12/08/2025	No	\$1,001 - \$15,000
54	D-Wave Quantum Inc. Common Shares (QBTS)	Sale	12/08/2025	No	\$1,001 - \$15,000
55	Cisco Systems, Inc. (CSCO)	Sale	12/08/2025	No	\$15,001 - \$50,000
56	Loop Industries, Inc. (LOOP)	Sale	12/08/2025	No	\$1,001 - \$15,000
57	KraneShares CSI China Internet ETF (KWEB)	Sale	12/02/2025	No	\$1,001 - \$15,000
58	iShares Bitcoin ETF (IBIT) Common Stock	Purchase	12/03/2025	No	\$50,001 - \$100,000
59	Palantir Technologies Inc. Class A Common Stock (PLTR)	Sale	12/09/2025	No	\$1,001 - \$15,000
60	Royal Caribbean Cruises Ltd. (RCL)	Sale	12/09/2025	No	\$1,001 - \$15,000
61	QXO Inc (QXO) Common Stock	Purchase	12/09/2025	No	\$15,001 - \$50,000
62	Interactive Brokers Group, Inc. (IBKR)	Sale	12/31/2025	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

### Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT F

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 02/10/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 02/13/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 02/12/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 03/23/2026 by Granahan, Megan in Integrity.gov]

---

Data Revised

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(03/19/2026, Weaver, Gretchen H): Filer has divested the investment reported at line 1. Although the interest was valued below regulatory de minimis thresholds at the time of acquisition, filer was recused from all particular matters involving or affecting the entity during the period of ownership.

Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Estee Lauder Cos. (EL) common stock	Purchase	01/05/2026	No	\$1,001 - \$15,000
2	Affirm Holdings Inc. Class A Common Stock (AFRM)	Purchase	01/05/2026	No	\$15,001 - \$50,000
3	LVMUY LVMH Moet Hennessy Lou F Sponsored ADR common stock	Purchase	01/05/2026	No	\$15,001 - \$50,000
4	Citigroup, Inc. (C) common stock	Purchase	01/05/2026	No	\$15,001 - \$50,000
5	Limbach Holdings Inc. Common Stock (LMB)	Purchase	01/05/2026	No	\$1,001 - \$15,000
6	Grupo Supervielle S.A. American Depositary Shares each Representing five Class B shares (SUPV)	Purchase	01/05/2026	No	\$1,001 - \$15,000
7	NIKE, Inc. (NKE) common stock	Purchase	01/02/2026	No	\$50,001 - \$100,000
8	The Trade Desk, Inc. (TTD) common stock	Purchase	01/02/2026	No	\$15,001 - \$50,000
9	Digital Brands Group Inc. Common Stock (DBGI)	Purchase	01/02/2026	No	\$1,001 - \$15,000
10	Jefferies Financial Group, Inc. (JEF)	Purchase	01/02/2026	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
11	Digital Brands Group Inc. Common Stock (DBGI)	Purchase	01/02/2026	No	\$50,001 - \$100,000
12	The Trade Desk, Inc. (TTD) common stock	Purchase	01/02/2026	No	\$15,001 - \$50,000
13	NIKE, Inc. (NKE) common stock	Purchase	01/02/2026	No	\$50,001 - \$100,000
14	IShares Bitcoin ETF (IBIT) common stock	Sale	01/02/2026	No	\$100,001 - \$250,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an

inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT G

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 03/05/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 03/19/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 03/09/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 03/30/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Schwab S&P 500 Index Fund (SWPPX)	Purchase	02/06/2026	No	\$100,001 - \$250,000
2	Royal Bank Of Canada Common Stock (RY)	Sale	02/10/2026	No	\$15,001 - \$50,000
3	Aritzia Inc (ATZAF)	Sale	02/10/2026	No	\$15,001 - \$50,000
4	LVMH Moet Hennessey (LVMUY)	Sale	02/10/2026	No	\$1,001 - \$15,000
5	Estee Lauder Cos. (EL)	Sale	02/10/2026	No	\$15,001 - \$50,000
6	Ramaco Resources, Inc. (METC)	Sale	02/10/2026	No	\$1,001 - \$15,000
7	DoorDash Inc. Class A Common Stock (DASH)	Sale	02/10/2026	No	\$1,001 - \$15,000
8	Citigroup, Inc. (C)	Sale	02/10/2026	No	\$15,001 - \$50,000
9	Grupo Supervielle S.A. American Depositary Shares each Representing five Class B shares (SUPV)	Sale	02/10/2026	No	\$1,001 - \$15,000
10	Digital Brands Group Inc. Common Stock (DBGI)	Sale	02/10/2026	No	\$1,001 - \$15,000
11	The Trade Desk (TTD)	Sale	02/10/2026	No	\$1,001 - \$15,000
12	Affirm Holdings Inc. Class A Common Stock (AFRM)	Sale	02/10/2026	No	\$15,001 - \$50,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT H

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

GC HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 03/05/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 03/19/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 03/09/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 05/15/2026 by Granahan, Megan in Integrity.gov]

---

Data Revised

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(03/19/2026, Weaver, Gretchen H): Filer has divested of investment reported at lines 12 and 17, and was recused during the period of ownership from all particular matters involving or affecting the entity.

Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Hecla Mining Co. (HL)	Sale	03/05/2026	No	\$1,001 - \$15,000
2	Aberdeen Standard Physical Silver Shares ETF (SIVR)	Sale	03/05/2026	No	\$1,001 - \$15,000
3	Cava Group Inc (CAVA)	Sale	03/05/2026	No	\$15,001 - \$50,000
4	Hecla Mining Co. (HL)	Sale	03/05/2026	No	\$1,001 - \$15,000
5	ARITZIA INC (ATZAF)	Sale	02/26/2026	No	\$1,001 - \$15,000
6	QNTY ELECTRONICS (Q) Common shares	Purchase	03/05/2026	No	\$1,001 - \$15,000
7	L3Harris Technologies, Inc. (LHX)	Purchase	03/05/2026	No	\$50,001 - \$100,000
8	Ramaco Resources, Inc. (METC)	Sale	03/05/2026	No	\$50,001 - \$100,000
9	Grupo Televisa S.A. Common Stock (TV)	Sale	03/05/2026	No	\$50,001 - \$100,000
10	Fox Corp. (FOX)	Sale	03/05/2026	No	\$15,001 - \$50,000
11	QNTY ELECTRONICS (Q)	Purchase	02/26/2026	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
12	Honeywell International, Inc. (HON)	Purchase	02/26/2026	Yes	\$15,001 - \$50,000
13	Ramaco Resources, Inc. (METC)	Sale	02/26/2026	No	\$50,001 - \$100,000
14	Huntington Bancshares, Inc. (HBAN)	Sale	02/26/2026	No	\$1,001 - \$15,000
15	Ramaco Resources, Inc. (METC)	Sale	03/05/2026	No	\$15,001 - \$50,000
16	Grupo Televisa S.A. Common Stock (TV)	Sale	03/05/2026	No	\$15,001 - \$50,000
17	Honeywell International, Inc. (HON)	Purchase	02/26/2026	No	\$15,001 - \$50,000
18	Ramaco Resources, Inc. (METC)	Sale	02/26/2026	No	\$15,001 - \$50,000
19	Fox Corp. (FOX)	Sale	03/05/2026	No	\$1,001 - \$15,000
20	Grupo Televisa S.A. Common Stock (TV)	Sale	03/05/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of

violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT I

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 03/11/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 03/19/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Weaver, Gretchen H, Ethics Official [electronically signed on 03/19/2026 by Weaver, Gretchen H in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 03/30/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Honeywell International, Inc. (HON) Common stock	Sale	03/11/2026	No	\$15,001 - \$50,000
2	Honeywell International, Inc. (HON) Common stock	Sale	03/11/2026	No	\$15,001 - \$50,000
3	Kratos Defense & Security Solutions, Inc. (KTOS) Common stock	Purchase	03/05/2026	No	\$15,001 - \$50,000
4	Kratos Defense & Security Solutions, Inc. (KTOS) Common stock	Purchase	03/06/2026	No	\$50,001 - \$100,000
5	Kratos Defense & Security Solutions, Inc. (KTOS) Common stock	Purchase	03/06/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public

financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT J

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 03/24/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 03/26/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Weaver, Gretchen H, Ethics Official [electronically signed on 03/26/2026 by Weaver, Gretchen H in Integrity.gov]

---

U.S. Office of Government Ethics Certification

Certification Declined on 5/20/26 by Granahan, Megan.

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/20/2026, Granahan, Megan): OGE declines to certify due to continued non-compliance with ethics agreement.

---

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Corning, Inc. (GLW) Common shares	Purchase	03/24/2026	No	\$50,001 - \$100,000
2	Corning, Inc. (GLW) Common shares	Purchase	03/24/2026	No	\$50,001 - \$100,000

---

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the

information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT K

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/14/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/06/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 05/20/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Schwab S&P 500 Index Fund (SWPPX)	Sale	04/13/2026	No	\$100,001 - \$250,000
2	NIKE, Inc. (NKE) common shares	Sale	04/13/2026	No	\$50,001 - \$100,000
3	Airbnb Inc. Class A Common Stock (ABNB)	Sale	04/13/2026	No	\$15,001 - \$50,000
4	iShares Bitcoin Trust ETF (IBIT)	Sale	04/13/2026	No	\$15,001 - \$50,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract,

service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT L

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/15/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/06/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 05/20/2026 by Granahan, Megan in Integrity.gov]

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/06/2026, Weaver, Gretchen H): Acquired investment determined to fall outside of applicable limitations on filer's investments.

---

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Nokia Corporation Sponsored American Depository Shares (NOK)	Purchase	04/14/2026	No	\$1,001 - \$15,000

---

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of

violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT M

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/16/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 06/08/2026 by Granahan, Megan in Integrity.gov]

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has divested the interest reported at line 2. Filer was recused from all particular matters involving or affecting this entity during the period of ownership. Other acquired interest determined to fall outside of limitations of filer's investments.

---

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Boeing Co (BA) common stock	Sale	04/16/2026	No	\$15,001 - \$50,000
2	Amaero International Ltd. (AMROF) common stock	Purchase	04/16/2026	No	\$1,001 - \$15,000
3	Procure Space ETF (UFO)	Purchase	04/16/2026	No	\$15,001 - \$50,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C §

13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT N

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/22/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/06/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 05/20/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Yesway Inc. (YSWY) common shares	Purchase	04/22/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency

maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT O

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/22/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/06/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 05/20/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Yesway Inc. (YSWY) common stock	Purchase	04/22/2026	No	\$15,001 - \$50,000
2	Lowe's Company Inc. (LOW) common shares	Sale	04/22/2026	No	\$15,001 - \$50,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's

efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT P

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/23/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 05/01/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 06/08/2026 by Granahan, Megan in Integrity.gov]

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has divested the interest reported at line 1. Filer was recused from all particular matters involving or affecting this entity during the period of ownership. Other acquired interests determined to fall outside of limitations of filer's investments.

---

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	BlackBerry Limited Common Stock (BB)	Purchase	04/23/2026	No	\$1,001 - \$15,000
2	Grayscale Bitcoin Mini TR ETF (BTC)	Purchase	04/23/2026	No	\$15,001 - \$50,000
3	Bitmine Immersion TE	Purchase	04/23/2026	No	\$15,001 - \$50,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C §

13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT Q

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel - HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 05/07/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 05/12/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 06/11/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Yesway Inc (YSWY)	Purchase	04/24/2026	No	\$1,001 - \$15,000
2	Yesway Inc (YSWY)	Purchase	04/24/2026	No	\$1,001 - \$15,000
3	Yesway Inc (YSWY)	Purchase	04/24/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate

agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT R

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel - HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 05/08/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 05/12/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has divested the interest reported at line 1. Filer was recused from all particular matters involving or affecting all relevant entities during the period of ownership. Other acquired interest determined to fall outside of limitations of filer's investments.

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	iShares MSCI South Korea ETF (EWY)	Purchase	05/08/2026	No	\$15,001 - \$50,000
2	PACCAR, Inc. (PCAR)	Purchase	05/08/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to

the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT S

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel - HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 05/08/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 05/12/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has divested the interest reported at lines 15, 16, 17 and 21. Filer was recused from all particular matters involving or affecting these entities during the period of ownership. Other acquired interests determined to fall outside of limitations of filer's investments.

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Limbach Holdings Inc. Common Stock (LMB)	Sale	05/08/2026	No	\$1,001 - \$15,000
2	Global X U.S. Electrification ETF (ZAP)	Sale	05/08/2026	No	\$15,001 - \$50,000
3	Roblox Corporation Class A Common Stock (RBLX)	Sale	05/08/2026	No	\$1,001 - \$15,000
4	iShares Ethereum Trust ETF (ETHA)	Sale	05/08/2026	No	\$1,001 - \$15,000
5	Grayscale Bitcoin Mini Trust ETF (BTC)	Sale	05/08/2026	No	\$15,001 - \$50,000
6	Bitmine Immersion Technologies Inc (BMNR)	Sale	05/08/2026	No	\$1,001 - \$15,000
7	The Trade Desk, Inc. (TTD)	Sale	05/08/2026	No	\$15,001 - \$50,000
8	Sportradar Group AG Class A Ordinary Shares (SRAD)	Sale	05/08/2026	No	\$1,001 - \$15,000
9	iShares Bitcoin Trust ETF (IBIT)	Sale	05/08/2026	No	\$100,001 - \$250,000
10	Bitwise Solana Staking ETF (BSOL)	Sale	05/08/2026	No	\$15,001 - \$50,000
11	iShares Ethereum Trust ETF (ETHA)	Sale	05/08/2026	No	\$15,001 - \$50,000
12	VanEck Bitcoin ETF (HODL)	Sale	05/08/2026	No	\$1,001 - \$15,000
13	Yesway Inc (YSWY)	Purchase	05/08/2026	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
14	Lantronix, Inc. (LTRX)	Purchase	05/08/2026	No	\$1,001 - \$15,000
15	Corning, Inc. (GLW)	Purchase	05/08/2026	No	\$15,001 - \$50,000
16	Benchmark Electronics, Inc. (BHE)	Purchase	05/08/2026	No	\$1,001 - \$15,000
17	Benchmark Electronics, Inc. (BHE)	Purchase	05/08/2026	No	\$15,001 - \$50,000
18	Lightwave Logic Inc. Common Stock (LWLG)	Purchase	05/08/2026	No	\$1,001 - \$15,000
19	Lantronix, Inc. (LTRX)	Purchase	05/08/2026	No	\$1,001 - \$15,000
20	Pagaya Technologies Ltd. Class A Ordinary Shares (PGY)	Purchase	05/08/2026	No	\$1,001 - \$15,000
21	Corning, Inc. (GLW)	Purchase	05/08/2026	No	\$100,001 - \$250,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to

the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT T

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 05/12/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Weaver, Gretchen H, Ethics Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has confirmed that "GE" is the correct ticker symbol for the acquired asset reported at lines 4, 6 and 10, GE Aerospace (not General Electric Co.). Other acquired interest determined to fall outside of limitations on filer's investments.

Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Amaero Ltd (AMROF)	Sale	05/12/2026	No	\$1,001 - \$15,000
2	BlackBerry Limited Common Stock (BB)	Sale	05/12/2026	No	\$1,001 - \$15,000
3	iShares MSCI South Korea ETF (EWY)	Sale	05/12/2026	No	\$15,001 - \$50,000
4	General Electric Co. (GE)	Purchase	05/12/2026	No	\$1,001 - \$15,000
5	Corning, Inc. (GLW)	Sale	05/12/2026	No	\$1,001 - \$15,000
6	General Electric Co. (GE)	Purchase	05/12/2026	No	\$100,001 - \$250,000
7	Lightwave Logic Inc. Common Stock (LWLG)	Purchase	05/12/2026	No	\$100,001 - \$250,000
8	Benchmark Electronics, Inc. (BHE)	Sale	05/12/2026	No	\$15,001 - \$50,000
9	Corning, Inc. (GLW)	Sale	05/12/2026	No	\$250,001 - \$500,000
10	General Electric Co. (GE)	Purchase	05/12/2026	No	\$50,001 - \$100,000
11	Benchmark Electronics, Inc. (BHE)	Sale	05/12/2026	No	\$1,001 - \$15,000
12	Corning, Inc. (GLW)	Sale	05/12/2026	No	\$50,001 - \$100,000

## Endnotes

### Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

### Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT U

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 05/13/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/14/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Weaver, Gretchen H, Ethics Official [electronically signed on 05/14/2026 by Weaver, Gretchen H in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Keel Infrastructure common shares (KEEL)	Purchase	05/13/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency

maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT V

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 05/14/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/14/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Weaver, Gretchen H, Ethics Official [electronically signed on 05/14/2026 by Weaver, Gretchen H in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 06/08/2026 by Granahan, Megan in Integrity.gov]

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	Bitmine Immersion Tech (BMNR)	Purchase	05/14/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency

maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT W



**CERTIFICATE OF DIVESTITURE**

**CERTIFICATE NO:** OGE-2025-246

**DATE OF ISSUANCE:** November 14, 2025

**ELIGIBLE PERSON:** Michael Stuart, Department of Health and Human Services

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

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

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

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

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

**MAURA  
LEARY**

Maura K. Leary  
Acting Chief, Ethics Law Branch

Digitally signed by  
MAURA LEARY  
Date: 2025.11.14 08:42:16  
-05'00'

Attachment





# EXHIBIT X

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/20/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has divested the interest reported at line 2. Filer was recused from all particular matters involving or affecting relevant entities during the period of ownership. Other acquired interests determined to fall outside of limitations of filer's investments.

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	iShares Future AI & Tech ETF (ARTY)	Purchase	04/16/2026	No	\$15,001 - \$50,000
2	Global X U.S. Electrification ETF (ZAP)	Purchase	04/16/2026	No	\$15,001 - \$50,000
3	Jefferies Financial Group, Inc. (JEF)	Purchase	04/17/2026	No	\$15,001 - \$50,000
4	SoFi Technologies Inc. Common Stock (SOFI)	Purchase	04/17/2026	No	\$15,001 - \$50,000
5	QXO, Inc. Common Shares (QXO)	Purchase	04/17/2026	No	\$15,001 - \$50,000
6	Robinhood Markets Inc. Class A Common Stock (HOOD)	Purchase	04/17/2026	No	\$15,001 - \$50,000
7	Affirm Holdings Inc. Class A Common Stock (AFRM)	Purchase	04/17/2026	No	\$15,001 - \$50,000
8	Rolls-Royce Holdings (RYCEF)	Purchase	04/17/2026	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift

Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT Y

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/21/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/22/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has confirmed that "GE" is the correct ticker symbol for the acquired asset, GE Aerospace (not General Electric Co.). Accordingly, acquired asset is not prohibited under filer's ethics agreement and does not represent a potential conflict of interest in current position.

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	General Electric Co. (GE) common shares	Purchase	04/21/2026	No	\$50,001 - \$100,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C § 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to

the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---

# EXHIBIT Z

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Stuart, Michael

General Counsel HHS, Department of Health & Human Services

---

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

/s/ Stuart, Michael [electronically signed on 04/08/2026 by Stuart, Michael in Integrity.gov]

---

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

/s/ Weaver, Gretchen H, Certifying Official [electronically signed on 05/12/2026 by Weaver, Gretchen H in Integrity.gov]

---

Other review conducted by

/s/ Hancock, Glenn R, Ethics Official [electronically signed on 04/09/2026 by Hancock, Glenn R in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

Data Revised

---

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(05/12/2026, Weaver, Gretchen H): Filer has divested the interest reported at line 3. Filer was recused from all particular matters involving or affecting this entity during the period of ownership. Other acquired interests determined to fall outside of limitations on filer's investments.

## Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	iShares Bitcoin Trust (IBIT) shares	Sale	04/08/2026	No	\$50,001 - \$100,000
2	Brookfield Renewable Partners L.P. (BEP)	Purchase	04/08/2026	No	\$15,001 - \$50,000
3	Corning Incorporated (GLW) common shares	Purchase	04/08/2026	No	\$15,001 - \$50,000
4	Netflix, Inc. (NFLX)	Purchase	04/08/2026	No	\$15,001 - \$50,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5. U.S.C §

13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

---