FOIA Number: 2018-0764-F

FOIA MARKER

This is not a textual record. This is used as an administrative marker by the William J. Clinton Presidential Library Staff.

Collection/Record Group: Clinton Presidential Records

Subgroup/Office of Origin: National AIDS Policy Office

Series/Staff Member:

Subseries:

OA/ID Number: 19405

FolderID:

Folder Title:
Financial Disclosure Report

Stack:	Row:	Section:	Shelf:	Position:
S	66	7	1	2

Withdrawal/Redaction Sheet
Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
001. form	re: Sandra Thurman's financial disclosure report (6 pages)	04/22/1997	b(6)
002. form	re: Sandra Thurman's financial disclosure report (5 pages)	05/15/1997	b(6)

COLLECTION:
Clinton Presidential Records
National AIDS Policy Office

OA/Box Number: 19405

FOLDER TITLE:
Financial Disclosure Report

2018-0764-F
jm2153

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

P1 National Security Classified Information [(a)(1) of the PRA]
P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
P3 Release would violate a Federal statute [(a)(3) of the PRA]
P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [a)(5) of the PRA]
P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.
PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).
RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

b(1) National security classified information [(b)(1) of the FOIA]
b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

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THE WHITE HOUSE

WASHINGTON

April 15, 1998

MEMORANDUM FOR PUBLIC FINANCIAL DISCLOSURE REPORT FILERS

FROM: VIRGINIA R. CANTER VRC
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Annual Public Financial Disclosure Report (SF 278)

As you know, you are required annually to file a public financial disclosure report (SF 278). Your SF 278 is due to me (room 136) by Friday, May 15, 1998. Extensions of time to file will be granted only in extreme circumstances and only in advance. Forms that are filed late may be subject to a statutorily imposed $200 late fee.

To assist you in completing your SF 278, attached are a blank SF 278, a continuation page for Schedule A, supplemental instructions and a copy of your most recent SF 278. Before completing the form, you may wish to make copies of certain schedules if you anticipate more entries than there are spaces.

This year an electronic version of the form will also be available for your use. The form uses the Lotus 1-2-3 application available on the NT desktop network. Please note that the report must be submitted in printed form with an original signature; it cannot be filed electronically. Please see the enclosed information sheet for more details.

If you choose to use the Lotus 1-2-3 version of the SF 278, computer questions can be directed to the Help Desk at 5-7370. Any substantive questions regarding the SF 278 should be directed to the Counsel's Office at 6-6229.

HOW TO FILL OUT
THE EXECUTIVE BRANCH PERSONNEL
PUBLIC FINANCIAL DISCLOSURE REPORT (SF 278)

Supplemental Instructions for Annual Filers

Officials who are required to file public financial disclosure reports (i.e., SF 278) must file a report by May 15 of each year. Your report will be reviewed and certified by the Counsel's Office. Incomplete or incorrectly filled out forms cannot be certified. You should, therefore, complete the form carefully in accordance with the printed instructions. The additional instructions below are intended to help you avoid the most common problems.

If you have any questions about filling out this form, please contact Ginny Canter, at 6-6229.

GENERAL INSTRUCTIONS

You may wish to photocopy the blank form (or at least schedules A and B) before you begin to ensure that you have enough space to report your assets, sources of income, transactions, and gifts.

Please type or print your responses. Complete all sections in Schedules A, B, C, and D, except for Schedule D, Part II.

You should check the "NONE" box if you have nothing to report. Please do not leave any section blank. If you do not check the "NONE" box, someone will have to contact you for clarification.

Be sure to provide required information for your spouse and dependent children.

SPECIFIC INSTRUCTIONS

1. Cover Page

You must sign and date page 1. (An attorney, accountant or other person may not sign for you.) Please provide a current telephone number where you can be contacted for additional or clarifying information.

2. Schedule A - Assets and Income

a. Reporting Period -- The reporting period for Schedule A is the preceding calendar year.

b. Assets and Income Sources

Report all assets that are owned by you, your spouse or dependent children for investment or income-producing purposes which had a fair market value as of December 31 of more than $1,000. ALSO report all sources of earned, investment and non-investment income that yielded more than $200 in income during the year.

For assets or income greater than $1,000,000 additional disclosure may be necessary. See the special instructions at page 6, which apply to disclosure of assets and income that exceed $1,000,000.

The reporting threshold for your spouse's earned income is $1,000. The name and address of your spouse's employer and the type of work performed should be identified. **You need not report the amount of a spouse's salary**. You do, however, need to report the actual amount of any honoraria received by your spouse in excess of $200.

Some examples of reportable items:

--stocks
--bonds
--real property
--gold
--art bought for investment purposes
--debts owed to you, except by relatives
--a vested beneficial interest in a trust
--futures contracts
--mutual funds

-- assets in your IRA
-- commercial animals
-- crops
-- annuities
-- fees
-- salaries
-- commissions
-- honoraria
-- partnership income

Interest-bearing checking and savings accounts and other bank deposits or certificates of deposit must be reported if the interest exceeds $200 in the reporting period OR if the total in any one institution is over $5,000.

c. What to show on the form

(1) Give a description of the asset or source of income and check the type of income and the category of amount of income. For financial institutions, real property and partnerships, include an address (city, state). Where a partnership is reported, you should indicate if you are a limited or general partner, and identify the nature of the business.

(2) DO NOT USE ABBREVIATIONS. Mutual funds, company names and names of stocks should be spelled out completely.

(3) Rental property - Gross rental income (before any deductions for depreciation/maintenance) should be reported. **Mortgages over $10,000 on rental property must be reported on Schedule C**. If the mortgage is below the reporting limit or if there is no mortgage, please so indicate.

(4) Mutual Funds - the name of the investment firm as well as the specific fund must be reported (*e.g.*, Merrill Lynch Basic Value Fund). If a fund is devoted to a particular economic or geographic sector, the sector should be indicated.

(5) IRAs - If an IRA contains other than cash, the assets must be identified. Although interest/dividend income is reinvested rather than distributed to you, it must nonetheless be reported as income to you.

(6) Keoghs - In most cases, you will need to list and value separately each of the assets held in the plan. You will also need to indicate whether you determine the investments in the Keogh or whether the plan is independently managed. If it is independently managed, indicate if you can, the entity that manages the plan. If a plan is both independently managed and widely diversified (such that not more than 5 percent of its holdings are issued by any one non-U.S.-government issuer and not more than 20 percent of its holdings are in any one economic or geographic sector), then you will not be required to list the sub-assets of the plan but should instead state that the plan is independently managed and widely diversified.

(7) Accounts with Stockbrokers - Each individual security in the account must be reported separately.

(8) Private investment pools - Each portfolio holding should be specifically identified and valued.

(9) Trusts - The individual holdings and income of any trust in which there is a vested beneficial income or remainder interest must be reported, unless the trust is an excepted trust or specifically approved by the Office of Government Ethics as a qualified trust.

(10) Assets that Have Been Sold - You are reporting the value or the asset at the end of the year. If you no longer hold the asset, but you did receive more than $200 in income from the asset during the year, check the "none (or less than $1,001)" box in block B and indicate that the item was sold. Also complete block C (see (12) below).

(11) "Other" Income - If you are reporting income that is not from dividends, rent, interest, capital gains, or an excepted or qualified trust, indicate the type of income in the "Other" column, and give the exact amount of income in the column labeled "Actual Amount Only if 'Other' Specified" (*e.g.*, Partnership income - $9,382).

(12) More Than One Type of Income - Some items may generate more than one type of income (*e.g.*, rent and capital gain income for a rental property sold during the reporting period). Check two (or more) boxes for the category of income and one box for the total amount of income.

(13) Employee benefit plans - Each plan must be specifically identified. For each plan, indicate if it is independently managed or self-directed. If it is independently managed, include if you can the name of the managing institution. Most employee benefit plans also need to be listed on Schedule C, Part II.

3. Schedule B - Transactions and Gifts, Reimbursements and Travel Expenses

As an annual filer, you are required to complete Schedule B. The reporting period for Schedule B is the preceding calendar year.

a. Part I - Transactions

Describe any purchase, sale or exchange by you, your spouse or dependent children of any investment or income-producing asset during the reporting period if the value of the transaction exceeded $1,000. If an exchange was made, indicate which assets were involved.

If an asset was sold and there was no reportable (*i.e.*, over $200) capital gain or other income to include on Schedule A, you should indicate "no reportable income" after the entry on Schedule B. Also indicate whether it was a total or partial sale.

In addition, you should explain why any assets reported in your last report are not reported this year, to make it clear that you did not simply forget them. It is sufficient to say: "ABC and XYZ stock are not reportable because income and value are below reporting limits."

b. Part II - Gifts, Reimbursements and Travel Expenses

For you, your spouse and dependent children, report any gifts and/or non-official travel-related reimbursements received from any one source totaling $250 or more.

In the description of the gift/reimbursement: identify the source (if a company or organization is involved, describe the nature of its business); indicate the purpose of any travel; provide the title or subject of any speech; describe the donor's relationship to you and whether the donor has any connection with a foreign government or your agency; describe the occasion or purpose for which any gift was given.

You do not need to report travel reimbursements that have been accepted by the government for official travel, provided that you received advance approval from the Counsel's Office.

4. Schedule C - Liabilities and Agreements and Arrangements

The reporting period for Schedule C, Part I is the preceding calendar year. The reporting period for Schedule C, Part II is the preceding calendar year and the current year up to the date you file your form.

a. Part I - Liabilities

You must include the name and address of the creditor, the type of liability, the date, term and interest rate, and the highest value of the liability during the reporting period. When reporting a mortgage (**for rental or business property; not for personal residences that are not rented out**), you should indicate for which property listed on Schedule A the mortgage is held.

For any liability that exceeds $1,000,000, additional disclosure may be required. See the special instructions, at pages 6 and 7, which apply to reporting liabilities greater than $1,000,000.

b. Part II - Agreements or Arrangements

(1) Describe all agreements or arrangements (not just those entered into during the reporting period) concerning future employment, leaves of absence, severance payments, continuing payments from a former employer, or continuing participation in employee pension, welfare or benefit plans (except those with the United States Government).

(2) Note that any such payments must also be reported on Schedule A.

5. Schedule D - Positions Held Outside U.S. Government and Compensation in Excess of $5,000 Paid by One Source

The reporting period for Schedule D, Part I is the preceding calendar year and the current year up to the date you file your form.

a. Part I - Positions Held Outside U.S. Government

Report and describe positions held by you in any for-profit or non-profit organization at any time during the reporting period (preceding calendar year and the current year up to the filing date). Be sure to include any partnership position you may hold. Include both paid and unpaid positions and indicate whether each one is paid or unpaid. If you received more than $200 in compensation, you must report this income on Schedule A.

Positions with a religious, social, fraternal, or political entity and positions of a solely honorary nature do not have to be reported.

6. Assets, Income, or Liabilities Valued at Greater than $1,000,000

a. Assets and Income Greater than $1,000,000 --

Recent changes to the financial disclosure law added new categories of value and amount that are not shown on the SF 278. If you have an asset which has a value or produced an income greater than $1 million, you must annotate Schedule A as follows. Your annotation can be made by a footnote or other notation directly on the form, or by separate attachment.

For VALUATION OF ASSETS (Block B of Schedule A), indicate whether the value is:

- between $1,000,001 and $5,000,000;
- between $5,000,001 and $25,000,000;
- between $25,000,001 and $50,000,000; or
- over $50,000,000.

For AMOUNT (Block C of Schedule A), indicate whether the amount is:

- between $1,000,001 and $5,000,000; or
- over $5,000,000.

EXCEPTION: For assets or income of your spouse or dependent children, you are only required to specify these additional categories of value and/or amount if the assets or income are held jointly with you.

b. Liabilities Greater than $1,000,000

If you have an entry in the "Over $1,000,000" box in the "Category of Amount or Value" box of Schedule C, Part I, you must annotate your form as follows. Your annotation can be made by a footnote or other notation directly on the form, or by a separate attachment.

Is the amount or value of the LIABILITY:

- between $1,000,001 and $5,000,000;
- between $5,000,001 and $25,000,000;
- between $25,000,001 and $50,000,000; or
- over $50,000,000.

EXCEPTION: For liabilities of your spouse or dependent children, you are only required to specify these additional categories of amount or value if the liabilities are held jointly with you.

Introducing: The Computerized SF 278!

Who? It's for adventurous WHO staff who are required to file the SF 278 and who would like to try out this new option.

What? This year, for the first time, a computerized version of the SF 278 form is available. It uses the Lotus 1-2-3 application. It should be fairly easy to use, *but it's by no means required*.

When? The form is available now. See the attached sheet entitled, "Getting Started."

Where? Cyberspace, of course.

Why? Our hope is that the form will be easier to fill out, easier to read, and easier to revise the next time staff are required to file. Ideally, someone who fills out a computerized form will only have to edit their most recent version the next time they have to file the SF 278 -- rather than starting over again from scratch.

We predict it will make life easier for those who feel comfortable with the computerized form. However, *it's just an option* -- feel free to use the traditional form.

How? Follow the attached instructions on "Getting Started." Detailed instructions on how to use the computerized form will also be provided for those who decide to try it out.

Also, note that the form must still be submitted *on paper* and with an *original signature*. Filers using the computerized form will need to print it out and sign it in order to file.

Help?! Computer questions should be directed to the Help Desk at 5-7370. Substantive questions about the SF 278 form should be directed to the Counsel's Office at 6-6229.

Getting Started

We will send you the blank forms via e-mail. You can save the blank forms on a disk, and they'll be ready and available for you to use. Here's how:

① **Obtain the blank forms**. Send an e-mail to Tanya Miller requesting the electronic SF 278 form. She will send you a return e-mail, with the blank pages of the form as attachments.

② **Open the e-mail with the blank forms attached**. In the e-mails from Tanya, you will see 5 icons with a "Lotus 1-2-3" graphic, and one with a "WordPerfect" graphic. You should have **six** total attachments:

1. "Readme"
2. "Cover.wt4"
3. "Scheda1.wt4"
4. "Schedb1.wt4"
5. "Schedc1.wt4"
6. "Schedd1.wt4"

Not surprisingly, they correspond to the **5 parts of the SF 278 form** (cover page, Schedule A, Schedule B, Schedule C, and Schedule D), plus a document containing instructions. The pages of the form are in **Lotus** format, and the instruction document is a **WordPerfect** document. However, "detaching" them from the e-mail is the same for all of them.

③ **Detach the documents**. In the e-mail, click on the icon for the document you want to detach. We suggest you go in the order above.

You'll see: "Properties for Attachment"

Click: **"Detach"**

You'll see: "Save Attachment" screen

Place a **clean disk** in your **floppy disk drive**.

You'll see: **"File name"** should be highlighted, with the name **"Scheda1.wt4"**.

"Drives" should show the **"a:"** drive, or whichever drive is **the floppy disk drive** on your computer.

If all this is in order, click "detach." The computer will save the document under the name that was highlighted, on the drive that was highlighted.

The blank form is now saved to your disk, ready for use.

Click: The **"x"** button on the gray "Properties for Attachment" box.

Repeat the process for all the attachments in the e-mails.

④ **Print out the Instructions.** Open **WordPerfect** as you normally would, from your Program Manager screen. **Then:**

Click: **"File"** and **"Open"**

Choose the **"a:"** drive, or whichever drive contains your Electronic SF 278 floppy disk.

Click: on the "**ReadMe**" file, which contains the instructions.

and then "**OK.**"

You'll see: The instructions. **We suggest printing them out** so you'll have them handy when you're working with the form.

Clinton Presidential Records
Digital Records Marker

This is not a presidential record. This is used as an administrative marker by the William J. Clinton Presidential Library Staff.

This marker identifies the place of a publication.

Publications have not been scanned in their entirety for the purpose of digitization. To see the full publication please search online or visit the Clinton Presidential Library's Research Room.

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT

☆U.S. GOVERNMENT PRINTING OFFICE: 1995 - 393-815

Instructions for Completing SF 278

I. Introduction

Reporting Periods

Incumbents: Complete Schedules A, B, C, and Part I of D. The reporting period is the preceding calendar year, except Part II of Schedule C and Part I of Schedule D where you must also include any positions held and agreements or arrangements made from the beginning of the filing year until the date you file. Schedule B need not include transactions made, or gifts or reimbursements received, during a period when the filer was not a Federal employee.

Termination Filers: Complete Schedules A, B, C, and Part I of D. The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination of Government employment in the position.

Nominees, New Entrants and Candidates for President and Vice President: Complete Schedules A, C, and D (candidates do not file Part II of Schedule D), as follows:

• **Schedule A** - The reporting period for income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets in BLOCK B as of any date you choose that is less than 31 days before the date of filing.

• **Schedule C, Part I** (Liabilities) - The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is less than 31 days before the date of filing.

• **Schedule C, Part II** (Agreements or Arrangements) Show any agreements or arrangements as of the date of filing.

• **Schedule D** - The reporting period is the preceding two calendar years and the current calendar year up to the date of filing.

Scope of Disclosure

The extent of the reporting requirement is noted in each schedule. In addition to your individual financial information, you are required to report information concerning your spouse and dependent children in several schedules of the form. However, no report is required with respect to your spouse if he or she is living separate and apart from you with the intention of terminating the marriage or providing for permanent separation. In addition, no report is required with respect to any income or obligations of an individual arising from the dissolution of marriage or permanent separation from a spouse. There are other exceptions to the reporting of assets and income, transactions, and liabilities of a spouse or dependent child which are discussed in the instructions applicable to those subjects.

A basic premise of the statutory financial disclosure requirements is that those having responsibility for review of reports filed pursuant to the Act or permitted public access to reports must be given sufficient information by reporting individuals concerning the nature of their outside interests and activities so that an informed judgment can be made with respect to compliance with applicable conflict of interest laws and standards of conduct regulations. Therefore, it is important that you carefully complete the attached form. This report is a safeguard for you as well as the Government, in that it provides a mechanism for determining actual or potential conflicts between your public responsibilities and your private interests and activities and allows you and your agency to fashion appropriate protections against such conflicts when they first appear.

A Presidential nominee to a position requiring the advice and consent of the Senate shall file with the Senate committee considering the nomination an amendment to the initial report, which shall update all items of earned income and honoraria through the period ending no earlier than 5 days before the scheduled date of the Senate committee hearing on the nomination. This update shall be provided in the manner requested by the Senate committee considering the nomination. Copies shall be provided to OGE and your agency ethics official.

Definition of Terms

• **Category of Amount**

Reportable financial interests are disclosed either by actual amount or by category of amount, depending on the interest, as specified by the form. You may, but you are not required to, indicate an actual amount where the form provides for a category of amount or value.

• **Dependent Child**

The term "dependent child" means your son, daughter, stepson, or stepdaughter if such person is either: (1) unmarried, under age 21, and living in your household, or (2) a "dependent" of yours within the meaning of section 152 of the Internal Revenue Code of 1986.

• **Excepted Investment Fund**

An excepted investment fund is a mutual fund, common trust fund of a bank, pension or deferred compensation plan, or any other investment fund, which is widely held; publicly traded (or available) or widely-diversified; and under circumstances where you neither exercise control over nor have the ability to exercise control over the financial interests held by the fund. A fund is widely diversified when it holds no more than 5% of the value of its portfolio in the securities of any one issuer (other than the U.S. Government) and no more than 20% in any particular economic or geographic sector.

• **Gifts**

See instructions for Schedule B, Part II.B.

Reporting Individual's Name	SCHEDULE A continued	Page Number

	Block A	Block B								Block C																				
	Assets and Income	Valuation of Assets								Income: Type								Amount												
	Identify each asset held for the production of income which had a fair market value exceeding $1,000 at the close of the reporting period. Identify each asset or source of income which generated over $200 in income during the reporting period.	None (or less than $1,001)	$1,001 - $15,000	$15,001 - $50,000	$50,001 - $100,000	$100,001 - $250,000	$250,001 - $500,000	$500,001 - $1,000,000	Over $1,000,000	Dividends	Rent and Royalties	Interest	Capital Gains	Excepted Investment Fund	Excepted Trust	Qualified Trust	Other (Specify Type)	None (or less than $201)	$201 - $1,000	$1,001 - $2,500	$2,501 - $5,000	$5,001 - $15,000	$15,001 - $50,000	$50,001 - $100,000	$100,001 - $1,000,000	Over $1,000,000	Actual Amount Only if "Other" specified	Date (Mo., Day, Yr.) Only if Honoraria		
1																														
2																														
3																														
4																														
5																														
6																														
7																														
8																														
9																														

THE WHITE HOUSE

WASHINGTON

April 15, 1998

MEMORANDUM FOR PUBLIC FINANCIAL DISCLOSURE REPORT FILERS

FROM: VIRGINIA R. CANTER VC
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Annual Public Financial Disclosure Report (SF 278)

As you know, you are required annually to file a public financial disclosure report (SF 278). Your SF 278 is due to me (room 136) by Friday, May 15, 1998. Extensions of time to file will be granted only in extreme circumstances and only in advance. Forms that are filed late may be subject to a statutorily imposed $200 late fee.

To assist you in completing your SF 278, attached are a blank SF 278, a continuation page for Schedule A, supplemental instructions and a copy of your most recent SF 278. Before completing the form, you may wish to make copies of certain schedules if you anticipate more entries than there are spaces.

This year an electronic version of the form will also be available for your use. The form uses the Lotus 1-2-3 application available on the NT desktop network. Please note that the report must be submitted in printed form with an original signature; it cannot be filed electronically. Please see the enclosed information sheet for more details.

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HOW TO FILL OUT
THE EXECUTIVE BRANCH PERSONNEL
PUBLIC FINANCIAL DISCLOSURE REPORT (SF 278)

Supplemental Instructions for Annual Filers

Officials who are required to file public financial disclosure reports (i.e., SF 278) must file a report by May 15 of each year. Your report will be reviewed and certified by the Counsel's Office. Incomplete or incorrectly filled out forms cannot be certified. You should, therefore, complete the form carefully in accordance with the printed instructions. The additional instructions below are intended to help you avoid the most common problems.

If you have any questions about filling out this form, please contact Ginny Canter, at 6-6229.

GENERAL INSTRUCTIONS

You may wish to photocopy the blank form (or at least schedules A and B) before you begin to ensure that you have enough space to report your assets, sources of income, transactions, and gifts.

Please type or print your responses. Complete all sections in Schedules A, B, C, and D, except for Schedule D, Part II.

You should check the "NONE" box if you have nothing to report. Please do not leave any section blank. If you do not check the "NONE" box, someone will have to contact you for clarification.

Be sure to provide required information for your spouse and dependent children.

SPECIFIC INSTRUCTIONS

1. Cover Page

You must sign and date page 1. (An attorney, accountant or other person may not sign for you.) Please provide a current telephone number where you can be contacted for additional or clarifying information.

2. Schedule A - Assets and Income

a. Reporting Period -- The reporting period for Schedule A is the preceding calendar year.

b. Assets and Income Sources

Report all assets that are owned by you, your spouse or dependent children for investment or income-producing purposes which had a fair market value as of December 31 of more than $1,000. ALSO report all sources of earned, investment and non-investment income that yielded more than $200 in income during the year.

For assets or income greater than $1,000,000 additional disclosure may be necessary. See the special instructions at page 6, which apply to disclosure of assets and income that exceed $1,000,000.

The reporting threshold for your spouse's earned income is $1,000. The name and address of your spouse's employer and the type of work performed should be identified. **You need not report the amount of a spouse's salary**. You do, however, need to report the actual amount of any honoraria received by your spouse in excess of $200.

Some examples of reportable items:

--stocks
--bonds
--real property
--gold
--art bought for investment purposes
--debts owed to you, except by relatives
--a vested beneficial interest in a trust
--futures contracts
--mutual funds

-- assets in your IRA
-- commercial animals
-- crops
-- annuities
-- fees
-- salaries
-- commissions
-- honoraria
-- partnership income

Interest-bearing checking and savings accounts and other bank deposits or certificates of deposit must be reported if the interest exceeds $200 in the reporting period OR if the total in any one institution is over $5,000.

c. What to show on the form

(1) Give a description of the asset or source of income and check the type of income and the category of amount of income. For financial institutions, real property and partnerships, include an address (city, state). Where a partnership is reported, you should indicate if you are a limited or general partner, and identify the nature of the business.

(2) DO NOT USE ABBREVIATIONS. Mutual funds, company names and names of stocks should be spelled out completely.

(3) Rental property - Gross rental income (before any deductions for depreciation/maintenance) should be reported. **Mortgages over $10,000 on rental property must be reported on Schedule C.** If the mortgage is below the reporting limit or if there is no mortgage, please so indicate.

(4) Mutual Funds - the name of the investment firm as well as the specific fund must be reported (*e.g.*, Merrill Lynch Basic Value Fund). If a fund is devoted to a particular economic or geographic sector, the sector should be indicated.

(5) IRAs - If an IRA contains other than cash, the assets must be identified. Although interest/dividend income is reinvested rather than distributed to you, it must nonetheless be reported as income to you.

(6) Keoghs - In most cases, you will need to list and value separately each of the assets held in the plan. You will also need to indicate whether you determine the investments in the Keogh or whether the plan is independently managed. If it is independently managed, indicate if you can, the entity that manages the plan. If a plan is both independently managed and widely diversified (such that not more than 5 percent of its holdings are issued by any one non-U.S.-government issuer and not more than 20 percent of its holdings are in any one economic or geographic sector), then you will not be required to list the sub-assets of the plan but should instead state that the plan is independently managed and widely diversified.

(7) Accounts with Stockbrokers - Each individual security in the account must be reported separately.

(8) Private investment pools - Each portfolio holding should be specifically identified and valued.

(9) Trusts - The individual holdings and income of any trust in which there is a vested beneficial income or remainder interest must be reported, unless the trust is an excepted trust or specifically approved by the Office of Government Ethics as a qualified trust.

(10) Assets that Have Been Sold - You are reporting the value or the asset at the end of the year. If you no longer hold the asset, but you did receive more than $200 in income from the asset during the year, check the "none (or less than $1,001)" box in block B and indicate that the item was sold. Also complete block C (see (12) below).

(11) "Other" Income - If you are reporting income that is not from dividends, rent, interest, capital gains, or an excepted or qualified trust, indicate the type of income in the "Other" column, and give the exact amount of income in the column labeled "Actual Amount Only if 'Other' Specified" (*e.g.*, Partnership income - $9,382).

(12) More Than One Type of Income - Some items may generate more than one type of income (*e.g.*, rent and capital gain income for a rental property sold during the reporting period). Check two (or more) boxes for the category of income and one box for the total amount of income.

(13) Employee benefit plans - Each plan must be specifically identified. For each plan, indicate if it is independently managed or self-directed. If it is independently managed, include if you can the name of the managing institution. Most employee benefit plans also need to be listed on Schedule C, Part II.

3. Schedule B - Transactions and Gifts, Reimbursements and Travel Expenses

As an annual filer, you are required to complete Schedule B. The reporting period for Schedule B is the preceding calendar year.

a. Part I - Transactions

Describe any purchase, sale or exchange by you, your spouse or dependent children of any investment or income-producing asset during the reporting period if the value of the transaction exceeded $1,000. If an exchange was made, indicate which assets were involved.

If an asset was sold and there was no reportable (*i.e.*, over $200) capital gain or other income to include on Schedule A, you should indicate "no reportable income" after the entry on Schedule B. Also indicate whether it was a total or partial sale.

In addition, you should explain why any assets reported in your last report are not reported this year, to make it clear that you did not simply forget them. It is sufficient to say: "ABC and XYZ stock are not reportable because income and value are below reporting limits."

b. Part II - Gifts, Reimbursements and Travel Expenses

For you, your spouse and dependent children, report any gifts and/or non-official travel-related reimbursements received from any one source totaling $250 or more.

In the description of the gift/reimbursement: identify the source (if a company or organization is involved, describe the nature of its business); indicate the purpose of any travel; provide the title or subject of any speech; describe the donor's relationship to you and whether the donor has any connection with a foreign government or your agency; describe the occasion or purpose for which any gift was given.

You do not need to report travel reimbursements that have been accepted by the government for official travel, provided that you received advance approval from the Counsel's Office.

4. Schedule C - Liabilities and Agreements and Arrangements

The reporting period for Schedule C, Part I is the preceding calendar year. The reporting period for Schedule C, Part II is the preceding calendar year and the current year up to the date you file your form.

a. Part I - Liabilities

You must include the name and address of the creditor, the type of liability, the date, term and interest rate, and the highest value of the liability during the reporting period. When reporting a mortgage **(for rental or business property; not for personal residences that are not rented out)**, you should indicate for which property listed on Schedule A the mortgage is held.

For any liability that exceeds $1,000,000, additional disclosure may be required. See the special instructions, at pages 6 and 7, which apply to reporting liabilities greater than $1,000,000.

b. Part II - Agreements or Arrangements

(1) Describe all agreements or arrangements (not just those entered into during the reporting period) concerning future employment, leaves of absence, severance payments, continuing payments from a former employer, or continuing participation in employee pension, welfare or benefit plans (except those with the United States Government).

(2) Note that any such payments must also be reported on Schedule A.

5. Schedule D - Positions Held Outside U.S. Government and Compensation in Excess of $5,000 Paid by One Source

The reporting period for Schedule D, Part I is the preceding calendar year and the current year up to the date you file your form.

a. Part I - Positions Held Outside U.S. Government

Report and describe positions held by you in any for-profit or non-profit organization at any time during the reporting period (preceding calendar year and the current year up to the filing date). Be sure to include any partnership position you may hold. Include both paid and unpaid positions and indicate whether each one is paid or unpaid. If you received more than $200 in compensation, you must report this income on Schedule A.

Positions with a religious, social, fraternal, or political entity and positions of a solely honorary nature do not have to be reported.

6. Assets, Income, or Liabilities Valued at Greater than $1,000,000

a. Assets and Income Greater than $1,000,000 --

Recent changes to the financial disclosure law added new categories of value and amount that are not shown on the SF 278. If you have an asset which has a value or produced an income greater than $1 million, you must annotate Schedule A as follows. Your annotation can be made by a footnote or other notation directly on the form, or by separate attachment.

For VALUATION OF ASSETS (Block B of Schedule A), indicate whether the value is:

- between $1,000,001 and $5,000,000;
- between $5,000,001 and $25,000,000;
- between $25,000,001 and $50,000,000; or
- over $50,000,000.

For AMOUNT (Block C of Schedule A), indicate whether the amount is:

- between $1,000,001 and $5,000,000; or
- over $5,000,000.

EXCEPTION: For assets or income of your spouse or dependent children, you are only required to specify these additional categories of value and/or amount if the assets or income are held jointly with you.

b. Liabilities Greater than $1,000,000

If you have an entry in the "Over $1,000,000" box in the "Category of Amount or Value" box of Schedule C, Part I, you must annotate your form as follows. Your annotation can be made by a footnote or other notation directly on the form, or by a separate attachment.

Is the amount or value of the LIABILITY:

- between $1,000,001 and $5,000,000;
- between $5,000,001 and $25,000,000;
- between $25,000,001 and $50,000,000; or
- over $50,000,000.

EXCEPTION: For liabilities of your spouse or dependent children, you are only required to specify these additional categories of amount or value if the liabilities are held jointly with you.

Introducing: The Computerized SF 278!

Who? It's for adventurous WHO staff who are required to file the SF 278 and who would like to try out this new option.

What? This year, for the first time, a computerized version of the SF 278 form is available. It uses the Lotus 1-2-3 application. It should be fairly easy to use, *but it's by no means required*.

When? The form is available now. See the attached sheet entitled, "Getting Started."

Where? Cyberspace, of course.

Why? Our hope is that the form will be easier to fill out, easier to read, and easier to revise the next time staff are required to file. Ideally, someone who fills out a computerized form will only have to edit their most recent version the next time they have to file the SF 278 -- rather than starting over again from scratch.

We predict it will make life easier for those who feel comfortable with the computerized form. However, *it's just an option* -- feel free to use the traditional form.

How? Follow the attached instructions on "Getting Started." Detailed instructions on how to use the computerized form will also be provided for those who decide to try it out.

Also, note that the form must still be submitted *on paper* and with an *original signature*. Filers using the computerized form will need to print it out and sign it in order to file.

Help?! Computer questions should be directed to the Help Desk at 5-7370. Substantive questions about the SF 278 form should be directed to the Counsel's Office at 6-6229.

Getting Started

We will send you the blank forms via e-mail. You can save the blank forms on a disk, and they'll be ready and available for you to use. Here's how:

① **Obtain the blank forms**. Send an e-mail to Tanya Miller requesting the electronic SF 278 form. She will send you a return e-mail, with the blank pages of the form as attachments.

② **Open the e-mail with the blank forms attached**. In the e-mails from Tanya, you will see 5 icons with a "Lotus 1-2-3" graphic, and one with a "WordPerfect" graphic. You should have **six** total attachments:

1. "Readme"
2. "Cover.wt4"
3. "Scheda1.wt4"
4. "Schedb1.wt4"
5. "Schedc1.wt4"
6. "Schedd1.wt4"

Not surprisingly, they correspond to the **5 parts of the SF 278 form** (cover page, Schedule A, Schedule B, Schedule C, and Schedule D), plus a document containing instructions. The pages of the form are in **Lotus** format, and the instruction document is a **WordPerfect** document. However, "detaching" them from the e-mail is the same for all of them.

③ **Detach the documents**. In the e-mail, click on the icon for the document you want to detach. We suggest you go in the order above.

You'll see: "Properties for Attachment"

Click: **"Detach"**

You'll see: "Save Attachment" screen

Place a **clean disk** in your **floppy disk drive**.

You'll see: **"File name"** should be highlighted, with the name **"Scheda1.wt4"**.

"Drives" should show the **"a:"** drive, or whichever drive is **the floppy disk drive** on your computer.

If all this is in order, click "detach." The computer will save the document under the name that was highlighted, on the drive that was highlighted.

The blank form is now saved to your disk, ready for use.

Click: The **"x"** button on the gray "Properties for Attachment" box.

Repeat the process for all the attachments in the e-mails.

④ **Print out the Instructions.** Open **WordPerfect** as you normally would, from your Program Manager screen. **Then:**

Click: **"File"** and **"Open"**

Choose the **"a:"** drive, or whichever drive contains your Electronic SF 278 floppy disk.

Click: on the "**ReadMe**" file, which contains the instructions.

and then "**OK.**"

You'll see: The instructions. **We suggest printing them out** so you'll have them handy when you're working with the form.

Withdrawal/Redaction Marker
Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
002. form	re: Sandra Thurman's financial disclosure report (5 pages)	05/15/1997	b(6)

COLLECTION:
Clinton Presidential Records
National AIDS Policy Office

OA/Box Number: 19405

FOLDER TITLE:
Financial Disclosure Report

2018-0764-F
jm2153

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

P1 National Security Classified Information [(a)(1) of the PRA]
P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
P3 Release would violate a Federal statute [(a)(3) of the PRA]
P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [a)(5) of the PRA]
P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.
PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).
RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

b(1) National security classified information [(b)(1) of the FOIA]
b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

Clinton Presidential Records
Digital Records Marker

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Executive Branch Personnel
PUBLIC FINANCIAL
DISCLOSURE REPORT

Instructions for Completing SF 278

I. Introduction

Reporting Periods

Incumbents: Complete Schedules A, B, C, and Part I of D. The reporting period is the preceding calendar year, except Part II of Schedule C and Part I of Schedule D where you must also include any positions held and agreements or arrangements made from the beginning of the filing year until the date you file. Schedule B need not include transactions made, or gifts or reimbursements received, during a period when the filer was not a Federal employee.

Termination Filers: Complete Schedules A, B, C, and Part I of D. The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination of Government employment in the position.

Nominees, New Entrants and Candidates for President and Vice President: Complete Schedules A, C, and D (candidates do not file Part II of Schedule D), as follows:

• **Schedule A** - The reporting period for income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets in BLOCK B as of any date you choose that is less than 31 days before the date of filing.

• **Schedule C, Part I** (Liabilities) - The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is less than 31 days before the date of filing.

• **Schedule C, Part II** (Agreements or Arrangements) Show any agreements or arrangements as of the date of filing.

• **Schedule D** - The reporting period is the preceding two calendar years and the current calendar year up to the date of filing.

Scope of Disclosure

The extent of the reporting requirement is noted in each schedule. In addition to your individual financial information, you are required to report information concerning your spouse and dependent children in several schedules of the form. However, no report is required with respect to your spouse if he or she is living separate and apart from you with the intention of terminating the marriage or providing for permanent separation. In addition, no report is required with respect to any income or obligations of an individual arising from the dissolution of marriage or permanent separation from a spouse. There are other exceptions to the reporting of assets and income, transactions, and liabilities of a spouse or dependent child which are discussed in the instructions applicable to those subjects.

A basic premise of the statutory financial disclosure requirements is that those having responsibility for review of reports filed pursuant to the Act or permitted public access to reports must be given sufficient information by reporting individuals concerning the nature of their outside interests and activities so that an informed judgment can be made with respect to compliance with applicable conflict of interest laws and standards of conduct regulations. Therefore, it is important that you carefully complete the attached form. This report is a safeguard for you as well as the Government, in that it provides a mechanism for determining actual or potential conflicts between your public responsibilities and your private interests and activities and allows you and your agency to fashion appropriate protections against such conflicts when they first appear.

A Presidential nominee to a position requiring the advice and consent of the Senate shall file with the Senate committee considering the nomination an amendment to the initial report, which shall update all items of earned income and honoraria through the period ending no earlier than 5 days before the scheduled date of the Senate committee hearing on the nomination. This update shall be provided in the manner requested by the Senate committee considering the nomination. Copies shall be provided to OGE and your agency ethics official.

Definition of Terms

• **Category of Amount**

Reportable financial interests are disclosed either by actual amount or by category of amount, depending on the interest, as specified by the form. You may, but you are not required to, indicate an actual amount where the form provides for a category of amount or value.

• **Dependent Child**

The term "dependent child" means your son, daughter, stepson, or stepdaughter if such person is either: (1) unmarried, under age 21, and living in your household, or (2) a "dependent" of yours within the meaning of section 152 of the Internal Revenue Code of 1986.

• **Excepted Investment Fund**

An excepted investment fund is a mutual fund, common trust fund of a bank, pension or deferred compensation plan, or any other investment fund, which is widely held; publicly traded (or available) or widely-diversified; and under circumstances where you neither exercise control over nor have the ability to exercise control over the financial interests held by the fund. A fund is widely diversified when it holds no more than 5% of the value of its portfolio in the securities of any one issuer (other than the U.S. Government) and no more than 20% in any particular economic or geographic sector.

• **Gifts**

See instructions for Schedule B, Part II.B.

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SF 278 (Rev. 6/94)
5 CFR Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name

SCHEDULE A continued

Page Number

Block A — **Assets and Income**

Identify each asset held for the production of income which had a fair market value exceeding $1,000 at the close of the reporting period.

Identify each asset or source of income which generated over $200 in income during the reporting period.

Block B — **Valuation of Assets**

Block C — **Income: Type** / **Amount**

	Assets and Income	None (or less than $1,001)	$1,001 - $15,000	$15,001 - $50,000	$50,001 - $100,000	$100,001 - $250,000	$250,001 - $500,000	$500,001 - $1,000,000	Over $1,000,000	Dividends	Rent and Royalties	Interest	Capital Gains	Excepted Investment Fund	Excepted Trust	Qualified Trust	Other *(Specify Type)*	None (or less than $201)	$201 - $1,000	$1,001 - $2,500	$2,501 - $5,000	$5,001 - $15,000	$15,001 - $50,000	$50,001 - $100,000	$100,001 - $1,000,000	Over $1,000,000	Actual Amount Only if "Other" specified	Date *(Mo., Day, Yr.)* Only if Honoraria
1																												
2																												
3																												
4																												
5																												
6																												
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