New Entrant Report | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (March 2014)

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

### Filer's Information

Wood, Rebecca

Chief Counsel, FDA, Department of Health & Human Services

Date of Appointment: 07/10/2017

Other Federal Government Positions Held During the Preceding 12 Months:

None

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/ Wood, Rebecca [electronically signed on 06/29/2017 by Wood, Rebecca 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/ Olesh, Stanley, Certifying Official [electronically signed on 08/07/2017 by Olesh, Stanley in Integrity.gov]

Other review conducted by

/s/ Olesh, Stanley, Ethics Official [electronically signed on 08/07/2017 by Olesh, Stanley in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 08/07/2017

### Data Revised 07/26/2017

### Data Revised 07/05/2017

# Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(07/05/2017, Olesh, Stanley): 7/5 - OK'd draft Ethics Agreement SO
N/A	N/A	General	(08/07/2017, Olesh, Stanley): 8/7/17 - rec'd signed Ethics Agreement SO
4.	2	AbbVie, Inc.	(07/26/2017, Olesh, Stanley): Prior to 7/10/15 not subject to Pledge recusal SO
4.	7	Baker & McKenzie LLP	(08/07/2017, Olesh, Stanley): Prior to 7/10/15 not subject to Pledge recusal SO
6.	2	Acumentrics Holding Corporation (privately held), Series A preferred shares	(08/07/2017, Olesh, Stanley): Power solutions & battery backup systems for harsh environments.

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

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Sidley Austin LLP	Washington, District of Columbia	Law Firm	Partner	7/2006	7/2017

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Sidley Austin LLP Retirement Differential, deferred compensation: cash receivable	N/A	\$50,001 - \$100,000		None (or less than \$201)
2	Sidley Austin LLP (partnership share)	N/A			\$100,001 - \$1,000,000
3	Sidley Austin LLP (anticipated partnership share)	N/A	\$250,001 - \$500,000		None (or less than \$201)
4	Sidley Austin LLP (capital account)	N/A	\$50,001 - \$100,000		None (or less than \$201)
5	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: American Funds Europacific Growth R6	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: Vanguard Extended Market Index Institutional	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Vangaurd Extended Market Index Institutional	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
8	Sidley Austin LLP Cash Balance Pension Plan	N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE INCOME	TYPE INCOME AMOUNT
9	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Vanguard Equity-Income Adm	Yes	\$15,001 - \$50,000	\$1,001 - \$2,500
10	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Vanguard Emerging Mkts Stock Index Institutional	Yes	\$1,001 - \$15,000	\$201 - \$1,000
11	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Touchstone International Small Cap Institutional	Yes	\$1,001 - \$15,000	None (or less than \$201)
12	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: PIMCO All Asset Institutional	Yes	\$15,001 - \$50,000	\$1,001 - \$2,500
13	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Harbor International Institutional	Yes	\$15,001 - \$50,000	\$201 - \$1,000
14	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Harbor Capital Appreciation Institutional	Yes	\$15,001 - \$50,000	\$2,501 - \$5,000
15	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: American Funds Europacific Growth R6	Yes	\$15,001 - \$50,000	\$1,001 - \$2,500
16	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: Vanguard EquityIncome Adm	Yes	\$15,001 - \$50,000	\$2,501 - \$5,000
17	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: Vanguard Emerging Mkts Stock Index Institutional	Yes	\$15,001 - \$50,000	\$201 - \$1,000
18	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: Touchstone International Small Cap Institutional	Yes	\$15,001 - \$50,000	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
19	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: PIMCO All Asset International	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
20	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: Harbor International Institutional	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
21	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: Harbor Capital Appreciation Institutional	Yes	\$15,001 - \$50,000		
22	Sidley Austin LLP Defined Contribution Plan: Retirement Plan for Partners: American Funds Europacific Growth R6	Yes	\$15,001 - \$50,000		
23	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: Harbor Capital Appreciation Institutional	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
24	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: Harbor International Institutional	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
25	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: PIMCO All Asset Institutional	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
26	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: Touchstone International Small Cap Institutional	Yes	\$15,001 - \$50,000		\$201 - \$1,000
27	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: Vanguard Emerging Markets Stock Index Institutional	Yes	\$15,001 - \$50,000		\$201 - \$1,000
28	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: Vanguard Equity Income Adm	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
29	Sidley Austin LLP Defined Contribution Plan: Savings and Investment Plan: 401(k) Mandatory Account: Vanguard Extended Market Index Institutional	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

# 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Sidley Austin LLP	Washington, District of Columbia	Deferred compensation relating to Sidley Austin LLP Retirement Differential - non-qualified retirement plan (cash receivable referenced in Part 2): Unfunded benefit accrued throughout partner's tenure in the partnership and payable upon the later of withdrawal from the firm or retirement age as defined in partnership agreement. I will receive a discounted net present value lump sum payment of the account balance before starting employment with the government.	7/2006
2	Sidley Austin LLP	Washington, District of Columbia	Partnership distribution: Following my withdrawal from the firm, I will receive my final partnership distribution before starting employment with the government. My final partnership distributions will be calculated as of the date of my withdrawal.	7/2006
3	Sidley Austin LLP	Washington, District of Columbia	Return of capital: Pursuant to the partnership agreement and my separation agreement with the firm, following my withdrawal from the firm, I will receive a lump sum payment of my capital account net of any estimated expenses pursuant to my compensation such as final composite tax payments and retirement plan contributions. This payment will be calculated as of the date of my withdrawal.	7/2006
4	Sidley Austin LLP	Washington, District of Columbia	Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Mandatory Account: Contributions funded while at Sidley Austin LLP will be held in trust until distributed at age 55 or older. The plan sponsor will not make any contribution beyond those required under the terms of the plan based on my compensation as of my withdrawal date.	7/2006

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
5	Sidley Austin LLP	Washington, District of Columbia	Defined Contribution Plan: Retirement Plan for Partners: Contributions funded while at Sidley Austin LLP will be held in trust until distributed at age 55 or older. The plan sponsor will not make any further contributions beyond those required under the terms of the plan based on my compensation as of my withdrawal date.	7/2006
6	Sidley Austin LLP	Washington, District of Columbia	Defined Contribution Plan: Savings and Investment Plan 401(k): 401(k) Voluntary Plan: Contributions funded while at Sidley Austin LLP can be distributed upon separation from the Firm. The plan sponsor will not make any contributions beyond those required under the terms of the plan based on my compensation as of my withdrawal date.	12/2001
7	Sidley Austin LLP	Wasington, District of Columbia	Cash Balance Pension Plan: Partner Cash Balance Plan: The assets under the defined benefit plan funded while at Sidley Austin LLP will be held in trust. I will continue to participate in the cash balance pension plan. The plan sponsor will continue to credit my account with an annual interest credit after my withdrawal date.	7/2006

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Sidly Austin LLP	Washington, District of Columbia	Legal services
2	AbbVie, Inc.	North Chicago, Illinois	Legal services
3	American Chemistry Council	Washington, District of Columbia	Legal services
4	Arthrex, Inc.	Naples, Florida	Legal services
5	Association Of American Railroads	Washington, District of Columbia	Legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	AT&T Corp.	Dallas, Texas	Legal services
7	Baker & McKenzie LLP	Chicago, Illinois	Legal services
8	Bayer Pharma	Pittsburgh, Pennsylvania	Legal services
9	Bayer USA	Pittsburgh, Pennsylvania	Legal services
10	CSX Transportation, Inc.	Jacksonville, Florida	Legal services
11	Duke Energy Corporation	Charlotte, North Carolina	Legal services
12	Electric Insurance Company	Beverly, Massachusetts	Legal services
13	Helmerich & Payne, Incorporated	Tulsa, Oklahoma	Legal services
14	Medical Information Working Group	Thousand Oaks, California	Legal services
15	New Enterprise Asociates	Menlo Park, California	Legal services
16	NII Holdings	Reston, Virginia	Legal services
_17	Norfolk Southern Corp.	Norfolk, Virginia	Legal services
18	PhRMA	Washington, District of Columbia	Legal services
19	St. Jude Medical, Inc.	St. Paul, Minnesota	Legal services
20	The Timberland Company	Stratham, New Hampshire	Legal services
21	Union Pacific Railroad Company	Omaha, Nebraska	Legal services

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

None

# 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Citibank Checking Account	N/A	\$15,001 - \$50,000		None (or less than \$201)
2	Acumentrics Holding Corporation (privately held), Series A preferred shares	N/A	\$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	Citibank	Note	\$15,001 - \$50,000	2015	5.5	3-year
2	Citibank	Note	\$50,001 - \$100,000	2016	5.5	3-year
3	JP Morgan	Exercised Line of Credit	\$100,001 - \$250,000	2007	5.00	annual renewal
4	Citibank	Credit Card	\$15,001 - \$50,000	2000	12.00	revolving
5	First Bank	Credit Card	\$15,001 - \$50,000	1998	9.99	revolving

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
6	AES	Student Loan	\$15,001 - \$50,000	2006	4.25	360 months
7	AES	Student Loan	\$15,001 - \$50,000	2006	4.25	360 months
8	NBT Bank	Student Loan	\$15,001 - \$50,000	2017	9.99	7-year

# 9. Gifts and Travel Reimbursements

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

# Endnotes

### Summary of Contents

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

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

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

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

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 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 (limitations apply for PAS filers); (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 \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 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**

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. 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 sections 105 and 402(b)(1) of the Act 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 another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another: (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) 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 an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. 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 three 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), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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