



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

# Review of Departmental Ethics Office's Assessment of Prohibited Investments

**This is a revised version of the report prepared for public release.**



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**INSPECTOR GENERAL**  
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## PROACTIVE REVIEW

### I. EXECUTIVE SUMMARY

Our office initiated a proactive review of annual Executive Branch Personnel Public Financial Disclosure Reports (OGE Form 278e, hereinafter “Public Financial Disclosure Reports”) to determine whether the U.S. Department of the Interior’s (DOI’s) Departmental Ethics Office (DEO) was identifying and addressing prohibited investments held by DOI employees.

The Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. § 2635, set forth ethics rules applicable to all executive branch employees. With the concurrence of the Office of Government Ethics, the DOI established additional ethics rules applicable to its employees through supplemental ethics regulations. One such supplemental ethics regulation, 5 C.F.R. § 3501.103(b)(1)(ii), restricts “[t]he Secretary and employees of the Office of the Secretary and other Departmental offices reporting directly to a Secretarial officer who are in positions classified at GS-15 and above” from holding “any direct or indirect financial interest in Federal lands or resources administered or controlled by” the DOI absent a waiver issued by the Designated Agency Ethics Official (DAEO). Every year, DOI ethics officials compile and publish a list of financial interests that these employees are prohibited from holding (hereinafter “Prohibited Investments”).

We analyzed data from the annual Public Financial Disclosure Reports filed in calendar years 2020 through 2022 by 207 DOI employees who appeared likely to fall within the scope of the regulation. As described below, some of the employees were required to file Public Financial Disclosure Reports as Schedule C employees but were not subject to the supplemental ethics regulation because of their grade levels.<sup>1</sup> We compared data from the annual Public Financial Disclosure Reports against the lists of Prohibited Investments for the corresponding years to determine how many employees reported owning Prohibited Investments and what, if anything, the DEO did to remedy potential violations of the supplemental ethics regulation.

As discussed in more detail below, we determined that, in all but one instance during the years covered by our review, the DEO identified and took action to address each employee’s Prohibited Investment in the years that the investment was reported by the employee:

- During calendar years 2020 through 2022, 17 of the 207 employees who filed Public Financial Disclosure Reports reported financial interests that were Prohibited Investments.

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<sup>1</sup> A Schedule C appointment is a type of political appointment in the Federal Government for those who serve in confidential or policy roles immediately subordinate to other appointees. U.S. Office of Personnel Mgmt., *Privacy Impact Assessment for Executive and Schedule C System* at 3 (July 22, 2021).

- Of those 17 employees, 6 employees were required to file Public Financial Disclosure Reports because they were Schedule C employees, but, because they were not in positions at the GS-15 level or above, they were not subject to the DOI’s supplemental ethics regulation.
- Of the remaining 11 employees, only 7 reported directly owning Prohibited Investments (as opposed to ownership by a spouse or child), which presented a potential violation of the supplemental ethics regulation.
- Of these 7 employees, the DEO identified and took action regarding 5 employees in the years that the potential violations occurred.
- Of the remaining 2 employees, the DEO did not address one employee’s Prohibited Investment when reviewing the employee’s Public Financial Disclosure Report filed in 2021 but discovered it when reviewing the employee’s report in 2022. The employee sold the investment after the DAEO denied the employee’s request for a waiver. The remaining employee was the subject of a prior OIG investigation and owned Prohibited Investments in 2020 and 2021 despite the DEO’s instruction to sell or transfer the Prohibited Investments.<sup>2</sup>

These findings are summarized in Figure 1 below.

**Figure 1: Review of 207 DOI Employees Who Filed Public Financial Disclosure Reports**



<sup>2</sup> See Summary: Former OHA Administrative Judge Violated Ethics Recusal and Prohibited Holdings Waiver, Report No. 20-0493 (Feb. 14, 2022), <https://www.doi.gov/reports/investigation/summary-former-oha-administrative-judge-violated-ethics-recusal-and>. The issues involving the DEO identified in this report occurred before the time covered by this review, but as summarized above, the individual held the Prohibited Investment during the period of our review.

## II. BACKGROUND

To promote transparency in government and prevent financial conflicts of interest, senior Government officials, including certain high-level DOI officials, are required to file annual Public Financial Disclosure Reports.<sup>3</sup> These reports contain, among other details, self-reported information relating to an employee's financial holdings and income received during the preceding calendar year.<sup>4</sup> The financial holdings and income of an employee's spouse and dependent children are also reported on the employee's Public Financial Disclosure Report. Employees who file Public Financial Disclosure Reports are also required to file Periodic Transaction Reports (also referred to as OGE Form 278-T) if they, their spouse, or their dependent children engage in certain transactions, such as the purchase, sale, or exchange of a stock, bond, or other security, if the amount of the transaction is over \$1,000.<sup>5</sup> Relevant here, Periodic Transaction Reports need not be filed for transactions that occur "solely by and between the reporting individual, the individual's spouse, or dependent children."<sup>6</sup>

The DOI has a supplemental ethics regulation, 5 C.F.R. § 3501.103(b)(1)(ii), that prohibits high-level DOI employees from holding certain financial interests. The DOI implemented this regulation to help ensure that its employees in positions at GS-15 and above avoid potential financial conflicts of interest or the appearance thereof in the performance of their official duties.<sup>7</sup> Specifically, the supplemental ethics regulation states that "the Secretary and employees of the Office of the Secretary and other Departmental offices reporting directly to a Secretarial officer who are in positions classified at GS-15 and above" may not "acquire or hold any direct or indirect financial interest in Federal lands or resources administered or controlled by" the DOI.<sup>8</sup> The DOI's supplemental ethics regulation does not apply to employees below the GS-15 level.<sup>9</sup> Moreover 5 C.F.R. § 3501.103(b)(1)(ii) restricts only investments owned by an employee and does not cover investments owned by an employee's spouse or minor child.<sup>10</sup> In practice, this means that employees covered by the regulation are generally prohibited

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<sup>3</sup> See 5 U.S.C. § 13103 (listing the individuals required to file Public Financial Disclosure Reports); see also *Public Financial Disclosure Guide: OGE Form 278e*, 11, [https://www.oge.gov/web/OGE.nsf/0/CA85FBF583663FEE85258ABA00668E69/\\$FILE/Public%20Fin%20Disc%20Guide%20Jan%202024.pdf](https://www.oge.gov/web/OGE.nsf/0/CA85FBF583663FEE85258ABA00668E69/$FILE/Public%20Fin%20Disc%20Guide%20Jan%202024.pdf) (Jan. 2024) (stating "[t]ransparency is a critical part of government ethics, and Congress has determined that the citizens should know their leaders' financial interests").

<sup>4</sup> See 5 U.S.C. § 13104 (setting forth the financial information required to be filed).

<sup>5</sup> 5 U.S.C. §§ 13105(a), 13104(a)(5)(B); see also 5 C.F.R. § 2634.309; <https://www.oge.gov/Web/278eGuide.nsf/Content/Definitions~OGE+Form+278-T+Reporting+Instructions> (explaining OGE Form 278-T reporting instructions).

<sup>6</sup> 5 U.S.C. § 13104(a)(5); see also 5 C.F.R. § 2634.309(b)(1).

<sup>7</sup> See Supplemental Standards of Ethical Conduct for Employees of the DOI, Analysis of the Regulations, 62 Fed. Reg. 53713, 53714 (Oct. 16, 1997).

<sup>8</sup> 5 C.F.R. §§ 3501.103(b)(1), (b)(1)(ii). The "Office of the Secretary and other Departmental offices reporting directly to a Secretarial officer" include: the Immediate Office of the Secretary; the Office of the Solicitor; the Office of Inspector General; the Office of Communications; the Office of Congressional and Legislative Affairs; and all Assistant Secretaries, their immediate Office staff, and heads of bureaus that are subordinate to an Assistant Secretary. This includes the following offices under the Office of the Assistant Secretary for Policy, Management and Budget: the Office of Budget; the Office of Hearings and Appeals; the Office of Acquisition and Property Management; the Office of Environmental Policy and Compliance; the Office of Policy Analysis; the Office of Financial Management; and the Office of Information Resources Management. 5 C.F.R. § 3501.103(b)(1)(ii).

<sup>9</sup> 5 C.F.R. § 3501.103(b)(1)(ii) (applying to employees "who are in positions classified at GS-15 and above"); Supplemental Standards of Ethical Conduct for Employees of the DOI, Analysis of the Regulations, 62 Fed. Reg. 53713 at 53714 (Oct. 16, 1997).

<sup>10</sup> The relevant regulation, 5 C.F.R. § 3501.103(b)(1), specifically states that *employees* are prohibited from acquiring or holding any "direct or indirect financial interest in Federal lands or resources administered or controlled by the Department." The regulation does not specifically refer to the financial interests of spouses or minor children of employees and does not define what may constitute an "indirect financial interest." Compare 5 C.F.R. 3501.103(b)(1) with 43 C.F.R. § 20.401(a)(2)(iii)(B) (BLM-specific prohibition that explicitly

from owning stocks, bonds, or other financial interests in most oil, gas, and mining companies that hold leases on Federal lands.<sup>11</sup>

To assist DOI employees in complying with the regulation, DOI ethics officials compile and publish a list of Prohibited Investments every year that sets forth companies in which DOI employees are prohibited from owning stocks, bonds, and other investments.<sup>12</sup> The list identifies the parent company, ticker symbol, and exchange on which each investment is traded. The DEO revises the Prohibited Investments list every year in light of frequent changes to the Department's leasing activity and corporate ownership structures.<sup>13</sup> DOI ethics officials provide the revised list to affected DOI employees every year, usually during the first half of January, for employees to review before they submit their annual financial disclosure reports. As part of its annual review of those reports, the DEO reviews all financial holdings listed in each report and compares the listed financial holdings with the current year's Prohibited Investments.

If the DEO finds that a filer has reported a financial holding that appears on the Prohibited Investments list, it first attempts to obtain voluntary resolution of the violation, which may include the voluntary sale, transfer, or conversion of the Prohibited Investment or the employee's voluntary reassignment to another position.<sup>14</sup> If voluntary resolution is not obtained and the bureau Ethics Counselor<sup>15</sup> decides that remedial action is required, the bureau Ethics Counselor may order such action within that bureau.<sup>16</sup> Remedial actions must be initiated "within a reasonable time, usually 90 days,"<sup>17</sup> and may include reassigning the employee to another job or disqualifying the employee from performing particular duties; ordering the employee to sell or transfer the Prohibited Investment; or granting the employee a waiver, which would allow the employee to continue holding the Prohibited Investment subject to certain conditions.<sup>18</sup> The DAEO may grant a waiver to permit the continued holding of a Prohibited Investment "based on a determination that the waiver is not inconsistent with 5 C.F.R. § 2635 [i.e., the Standards of Ethical Conduct for Employees of the Executive Branch] or otherwise prohibited by law and that, under the particular circumstances, application of the prohibition is not necessary to avoid the appearance of misuse of position or loss of impartiality [sic], or otherwise to ensure confidence in the impartiality and objectivity with which Department programs are administered."<sup>19</sup>

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includes the financial interests of a "spouse or minor child"). We note that this is consistent with the DEO's approach, as both the DAEO and the Alternate DAEO stated that the supplemental ethics regulation applies only to employees.

<sup>11</sup> See 5 C.F.R. § 2635.403(a) (granting agencies the authority to issue supplemental agency regulations prohibiting or restricting the acquisition or holding of a financial interest or a class of financial interests); see also 5 C.F.R. § 2635.403(c) (defining financial interests to include "interests in the nature of stocks, bonds").

<sup>12</sup> See, e.g., Appendix 1 (DOI DEO, *2022 List of Prohibited Investments for Office of the Secretary and Office of the Solicitor Employees (GS-15 and above) and Office of Natural Resources Revenue Employees (at all grades)*).

<sup>13</sup> *Id.* at 1.

<sup>14</sup> 43 C.F.R. § 20.602(a)(1).

<sup>15</sup> "The head of each bureau is the 'Ethics Counselor' for that bureau, except that the Deputy Assistant Secretary for Policy is the Ethics Counselor for employees in the Office of the Secretary and related offices." 43 C.F.R. § 20.201(b).

<sup>16</sup> 43 C.F.R. § 20.602(c).

<sup>17</sup> *Id.* § 20.602(a)(2).

<sup>18</sup> *Id.* § 20.602(b).

<sup>19</sup> 5 C.F.R. § 3501.103(e).

### III. SCOPE AND METHODOLOGY

In conducting our review, we examined data extracted from the annual Public Financial Disclosure Reports filed in calendar years 2020 through 2022 for the 207 DOI employees in offices listed in 5 C.F.R. § 3501.103(b)(1)(ii) who were required to file such reports.

To identify whether an employee, the employee’s spouse, or the employee’s dependent child owned a Prohibited Investment, we reviewed the data using an electronic search program, which compared the employees’ self-reported investments for each calendar year against the companies identified on the lists of Prohibited Investments for the year the report was filed. We assessed all identified matches.

Using the search results, we were able to determine whether a Prohibited Investment was reported on an employee’s Public Financial Disclosure Report, and, if so, whether it was reported as being owned by the employee, the employee’s spouse, or as “other assets and income” that could potentially belong to the employee, the employee’s spouse, or the employee’s dependent child. When a Prohibited Investment was reported as belonging to the employee or as “other assets and income,” we requested additional information from the DEO to determine whether the employee had a personal ownership interest in the reported investment.<sup>20</sup> We also requested documentation showing what, if any, actions the DEO took in circumstances where a financial interest disclosed on the report appeared to violate the DOI’s supplemental ethics regulation.

Through our data matching efforts, we identified 17 DOI employees who reported assets on their Public Financial Disclosure Reports filed during calendar years 2020 through 2022 that were also Prohibited Investments for the corresponding year. The results of our review of these reports are discussed below. In keeping with the overall approach regarding the financial disclosure framework, we relied on the self-reported information and did not independently verify the specific investment holdings or their owners.

We conducted this review in accordance with the “Quality Standards for Investigations” issued by the Council of the Inspectors General on Integrity and Efficiency.

### IV. FINDINGS

We identified 17 DOI employees who reported investments on their Public Financial Disclosure Reports filed in 2020, 2021, and 2022 that were also Prohibited Investments for the corresponding year.

Of the 17 employees who reported Prohibited Investments, we found that 6 of these employees were not at the GS-15 level or higher and therefore were not subject to the supplemental ethics regulation.<sup>21</sup> Accordingly, there was no restriction on their ability to hold these investments.



<sup>20</sup> When an investment was reported as being owned by the employee’s spouse, we did not request additional information or documentation from the DEO because, as discussed above, 5 C.F.R. § 3501.103(b)(1) does not restrict the holdings of employees’ spouses.

<sup>21</sup> As Schedule C appointees, these employees were required to file Public Financial Disclosure Reports.

We next reviewed the Public Financial Disclosure Reports for the 11 employees subject to the supplemental ethics regulation.



For four of these employees, we determined that each potentially Prohibited Investment was reportedly owned or controlled by the filer’s spouse rather than the employee. Because the supplemental ethics regulation’s restriction on investments does not apply to the holdings of spouses or minor children, these employees were not in violation of the supplemental ethics regulation and were not required to sell or transfer those investments or obtain waivers.

We reviewed the Public Financial Disclosure Reports for the remaining seven employees and determined that these employees reported that they personally owned Prohibited Investments.

After making this determination, we requested documentation from the DEO showing what, if any, actions the DEO took to address the employees’ Prohibited Investments. The DEO provided documentation showing that four employees reported owning Prohibited Investments on their annual Public Financial Disclosure Reports but had already reported the sale of any Prohibited Investments before the DEO’s review of their respective reports. Thus, we concluded that the employees had cured the violations and were in compliance with the DOI supplemental ethics regulation. Accordingly, no further action was required by the DEO.



The DEO also provided documentation showing that one of the seven employees voluntarily transferred the Prohibited Investments within 90 days after the investments were reported following the DEO’s review of the annual Public Financial Disclosure Report and subsequent discussions between the employee and the DEO. The employee acted in accordance with the DEO’s instructions and transferred the Prohibited Investment to the employee’s spouse, which—as discussed above—removed the investment from the restrictions contained in the supplemental ethics regulation.

Of the remaining two employees, one employee reported on their 2020 Public Financial Disclosure Report owning a Prohibited Investment, but the DEO did not advise the employee to sell the investment or take any other action at that time.

In reviewing the employee’s 2021 Public Financial Disclosure Report, however, the DEO noticed the Prohibited Investment and advised the employee to sell or transfer the investment. The employee requested a waiver under 5 C.F.R. § 3501.103(e) that, if granted by the DAEO, would have allowed the employee to continue holding the Prohibited Investment.<sup>22</sup> The DAEO determined that “allowing [the employee] to hold Prohibited Investments risks the appearance of a loss of impartiality in the Department’s programs and operations” and that “divestiture is necessary to ensure public confidence in the impartiality and objectivity of DOI’s programs.”<sup>23</sup> The DAEO thus did not grant the requested waiver and instructed the employee to sell or transfer the investment within 30 days. The employee sold the Prohibited Investment the following day.<sup>24</sup>



The final employee owned a Prohibited Investment but had been granted a waiver by the DAEO. The waiver allowed the employee to retain ownership of the Prohibited Investment so long as the employee refrained from participating in any matter involving the relevant entity or its affiliates. Subsequently, the DEO discovered that the employee had not complied with the waiver. The DAEO revoked the employee’s waiver in April 2020 and reported the matter to our office and the Office of the Secretary. The DEO then instructed the employee to voluntarily sell or transfer the Prohibited Investment, which the employee did not do. In December 2021, 18 months after the employee’s waiver had been revoked and unable to obtain the employee’s voluntary compliance, the DOI directed the employee to sell or transfer the Prohibited Investment.<sup>25</sup>

## V. CONCLUSION

Our review covering calendar years 2020 through 2022 identified seven employees who were subject to the DOI’s supplemental ethics regulation and reported personally owning Prohibited Investments. In all but one of these cases during the years covered by our review, we determined that the DEO identified and took action to address each employee’s Prohibited Investment in the years that the potential violations occurred.

<sup>22</sup> See 5 C.F.R. § 3501.103(e) (describing the waiver process).

<sup>23</sup> Memorandum from the DAEO to the Director, Office of Hearing and Appeals, *Denial of Request for Waiver of Supplemental Ethics Restrictions*, 5 C.F.R. § 3501.103(e) (July 5, 2022).

<sup>24</sup> The DEO provided us with a Periodic Transaction Report documenting the sale of the Prohibited Investment.

<sup>25</sup> This employee was the subject of a prior investigation by our office. With respect to the employee, our investigation found, among other things, that once the employee’s waiver had been revoked, the employee’s ownership of the Prohibited Investment violated the DOI’s supplemental ethics regulation, 5 C.F.R. § 3501.103(b)(1)(ii). Our investigation also found that the DEO failed to address the employee’s Prohibited Investment for almost 10 years and failed to meet its responsibilities to review and certify the employee’s Public Financial Disclosure Reports from 2010 to 2014 (these issues occurred outside the time period covered by this review). A summary of our investigative report can be found on our website. See Summary: Former OHA Administrative Judge Violated Ethics Recusal and Prohibited Holdings Waiver, Report No. 20-0493 (Feb. 14, 2022), <https://www.doioig.gov/reports/investigation/summary-former-oha-administrative-judge-violated-ethics-recusal-and>.

## **VI. DISPOSITION**

We are providing this report to the Acting Deputy Secretary of the Department of the Interior for any action deemed appropriate.

## Appendix 1: 2022 List of Prohibited Investments



### Message from Departmental Ethics Office U.S. Department of the Interior

#### **2022 List of Prohibited Investments for Office of the Secretary and Office of the Solicitor Employees (GS-15 and above) and Office of Natural Resources Revenue Employees (at all grades)**

The Departmental Ethics Office (DEO) has issued an updated list of prohibited investments for Office of the Secretary and Office of the Solicitor (OS/SOL) employees for 2022. If you are in a **GS-15 or above** position in OS/SOL, this list of prohibited investments applies to you!

This list of prohibited investments also applies to all Office of Natural Resources Revenue (ONRR) employees, **at all grade levels**.

**Prohibited investments.** All OS/SOL employees GS-15 and above, and all ONRR employees, are prohibited from acquiring or holding “any direct or indirect financial interests in Federal lands or resources administered or controlled by the Department.” Among other things, this prohibition precludes stock or bond investment in many companies that hold Department-granted permits and leases in Federal lands.

Each year, ethics officials compile a list of prohibited investments. The 2022 list of prohibited investments is included below. This list includes publicly traded companies with solar, wind, geothermal, oil, gas, and mineral rights in Federal lands above the following thresholds:

- at least 100,000 acres for oil/gas exploration, development, and production;
- at least 10,000 acres for coal/mineral exploration, development, and production;
- any number of acres for geothermal energy production;
- any number of acres for wind energy production; or
- any number of authorized acres with rights-of-way for solar production.

Note that many publicly traded companies have interests in Federal lands through private subsidiaries. These subsidiaries are not separately listed from their publicly traded parent company. In addition, this list does not include private companies that have interests in Federal lands, although investment in such companies is still prohibited. Please be aware that the Department’s leasing activity and corporate ownership structures change frequently, and as a result this list is revised yearly.

**What if you have prohibited investments?** If you have a prohibited investment, please contact us at once to discuss your options. DOI regulations provide some limited exceptions and waiver authority. If you must sell an investment to comply with ethics laws, you may be able to defer paying capital gains taxes if you obtain a certificate of divestiture from the U.S. Office of Government Ethics *before* you sell.

**What if you are GS-14 or below?** If you are an OS/SOL employee GS-14 or below, you are not restricted from investing in these companies but if you do so, you must comply with the prohibition on participating in certain government actions affecting your personal financial interests for these and any other investments. Note that the list of prohibited investments applies to all ONRR employees, at all grade levels.

**Other ethics requirements.** In addition to complying with all other executive branch ethics requirements, Department employees, their spouses, and their minor children are also prohibited from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands.

We remain available to provide guidance to assist you in complying with this, and all other, ethics requirements.

PARENT COMPANY	TICKER SYMBOL (Exchange)
AES Corporation	AES (NYSE)
American Electric Power Company Incorporated*	AEP (NASDAQ)
APA Corporation (formerly Apache Corporation)	APA (NASDAQ)
Arch Resources Incorporated (formerly Arch Coal)	ARCH (NYSE)
Avangrid Incorporated	AGR (NYSE)
Barrick Gold Corporation	GOLD (NYSE)
BayWa A.G.*	BYWLF (OTC)
Berkshire Hathaway Incorporated	BRK.A & BRK.B (NYSE); PPWLM (OTC)
BP	BP (NYSE)
Brookfield Asset Management Incorporated	BAM (NYSE); BAMGF & BAMKF & BKAMF & BKFAF & BKFPF & BROXF & BXDIF (OTC)
Brookfield Renewable Partners Limited Partnership	BEP (NYSE); BRENF & BROOF (OTC)
Canadian Natural Resources Limited*	CNQ (NYSE)
Chesapeake Energy Corporation	CHK (NASDAQ)
Chevron Corporation	CVX (NYSE)

ConocoPhillips	COP (NYSE)
Crystal Peak Minerals Incorporated	CPMMF (OTC)
Devon Energy Corporation	DVN (NYSE)
Dominion Energy Incorporated	D (NYSE)
EDF Group/ Électricité de France S.A./ EDF Renewables*	ECIFF & ECIFY (OTC)
Enbridge Incorporated*	ENB (NYSE)
Enel S.p.A.	ENIA (NYSE)
Eni S.p.A.	E (NYSE); EIPAF (OTC)
Equinor ASA	EQNR (NYSE)
Eversource Energy	ES (NYSE)
Exxon Mobil Corporation	XOM (NYSE)
First Solar Incorporated	FSLR (NYSE)
Genesis Energy Limited Partnership	GEL (NYSE)
Hess Corporation	HES (NYSE)
Iberdrola S.A.	IBDSF & IBDRY (OTC)
Innergex Renewable Energy Incorporated	INGXF (OTC)
Intrepid Potash Incorporated	IPI (NYSE)
Itafos Incorporated	MBCF (OTC)
KKR & Co. Incorporated*	KKR (NYSE)
Kosmos Energy Limited	KOS (NYSE)
Macquarie Infrastructure Holdings Limited Liability Company*	MIC (NYSE)
Marathon Oil Corporation	MRO (NYSE)
Mosaic Company	MOS (NYSE)
Murphy Oil Corporation	MUR (NYSE)
National Grid Public Limited Company	NGG (NYSE)
NextEra Energy Incorporated	NEE (NYSE)
Occidental Petroleum Corporation	OXY (NYSE)
Ormat Technologies Incorporated	ORA (NYSE)
Ørsted AS	DOGEF & DNNGY (OTC)

Ovintiv Incorporated (formerly Encana Corporation)	OVV (NYSE)
Peabody Energy Company	BTU (NYSE)
Royal Dutch Shell Public Limited Company	RDS.A & RDS.B (NYSE); RYDBF & RYDAF (OTC)
Solvay SA	SLVYY & SVYSF (OTC)
Talos Energy Incorporated	TALO (NYSE)
Tata Chemicals Limited	TATACHEM (NSI, BSE, NSE)
TotalEnergies SE (formerly TotalSE)	TTE (NYSE); TTFNF (OTC)
W&T Offshore Incorporated	WTI (NYSE)

\*New to the list in 2022

**Questions?** Please contact an ethics official for more information.

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*We are also available on MS Teams.*



# REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT

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If you wish to file a complaint about potential fraud, waste, abuse, or mismanagement in the DOI, please visit the OIG's online hotline at [www.doioig.gov/hotline](http://www.doioig.gov/hotline) or call the OIG hotline's toll-free number: **1-800-424-5081**

## Who Can Report?

Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement involving the DOI should contact the OIG hotline. This includes knowledge of potential misuse involving DOI grants and contracts.

## How Does it Help?

Every day, DOI employees and non-employees alike contact the OIG, and the information they share can lead to reviews and investigations that result in accountability and positive change for the DOI, its employees, and the public.

## Who Is Protected?

Anyone may request confidentiality. The Privacy Act, the Inspector General Act, and other applicable laws protect complainants. Section 7(b) of the Inspector General Act of 1978 states that the Inspector General shall not disclose the identity of a DOI employee who reports an allegation or provides information without the employee's consent, unless the Inspector General determines that disclosure is unavoidable during the course of the investigation. By law, Federal employees may not take or threaten to take a personnel action because of whistleblowing or the exercise of a lawful appeal, complaint, or grievance right. Non-DOI employees who report allegations may also specifically request confidentiality.