

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

### Filer's Information

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**Pendley, William P**

Deputy Director, Policy and Programs, Bureau of Land Management, Department of the Interior

Date of Appointment: 07/15/2019

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Other Federal Government Positions Held During the Preceding 12 Months:

Member, Colorado State Advisory Committee, U.S. Commission on Civil Rights (7/2010 - 7/2019)

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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/ Pendley, William P [electronically signed on 08/29/2019 by Pendley, William P in Integrity.gov] - Filer received a 30 day filing extension.**

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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/ de la Vega, Scott, Certifying Official [electronically signed on 09/06/2019 by de la Vega, Scott in Integrity.gov]**

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Other review conducted by

**/s/ McDonnell, Edward F, Ethics Official [electronically signed on 09/06/2019 by McDonnell, Edward F in Integrity.gov]**

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U.S. Office of Government Ethics Certification

Data Revised 09/05/2019

Data Revised 09/06/2019

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Mountain States Legal Foundation		Lakewood, Colorado	Non-Profit	President	3/1989	12/2018
2	Pendley Law Firm	See Endnote	Evergreen, Colorado	Law Firm	Partner	12/2018	7/2019

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Mountain States Legal Foundation	See Endnote	N/A		Salary	\$224,370
2	Mountain States Legal Foundation, legal agreement for wages and employment related claims arising on December 4, 2018.		N/A	\$250,001 - \$500,000		None (or less than \$201)
3	Property Rights Foundation of America - October 20, 2018		N/A		Honorarium	\$1,500
4	Regnery Publishing - Book royalties	See Endnote	N/A			None (or less than \$201)
5	IRA Rollover FBO					
5.1	Invesco BulletShares 2021 Corporate Bond ETF (BSCL)		Yes	\$50,001 - \$100,000		None (or less than \$201)
5.2	Invesco BulletShares 2022 Corporate Bond ETF (BSCM)		Yes	\$100,001 - \$250,000		None (or less than \$201)
5.3	Invesco BulletShares 2023 Corporate Bond ETF (BSCN)		Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.4	Invesco BulletShares 2024 Corporate Bond ETF (BSCO)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.5	Invesco BulletShares 2021 High Yield Corporate Bond ETF (BSJL)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.6	Invesco BulletShares 2022 High Yield Corporate Bond ETF (BSJM)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.7	Invesco BulletShares 2023 High Yield Corporate Bond ETF (BSJN)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.8	Invesco BulletShares 2024 High Yield Corporate Bond ETF (BSJO)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.9	Schwab Emerging Markets Equity ETF (SCHE)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.10	Schwab International Equity ETF (SCHF)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.11	Schwab U.S. Broad Market ETF (SCHB)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.12	Schwab U.S. REIT ETF (SCHH)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.13	VictoryShares US EQ Income Enhanced Volatility Wtd ETF (CDC)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.14	cash	N/A	\$1,001 - \$15,000		None (or less than \$201)
6	MSLF Retirement Account	See Endnote		Cash distribution	\$100,074
6.1	Principal Financial Group (PFG)	See Endnote			None (or less than \$1,001)
6.1.1	Principal LifeTime 2015 Fund R-3 Class (LTAPX)	Yes			None (or less than \$1,001)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.1.2	Columbus Circle Investors Large Cap Growth R3 Fund	Yes	None (or less than \$1,001)		
6.1.3	Principal Equity Income R3 (PEIOX)	Yes	None (or less than \$1,001)		
6.1.4	Principal Large Cap Value III R3 (PPSFX)	Yes	None (or less than \$1,001)		
6.1.5	Columbus Circle Investors Mid Cap Growth R3 Fund	Yes	None (or less than \$1,001)		
6.1.6	LA Capital Mgmt/Victory Mid Cap Value I R3 Fund	Yes	None (or less than \$1,001)		
6.1.7	Principal SmallCap S&P 600 Index R3 (PSSMX)	Yes	None (or less than \$1,001)		
6.1.8	Principal MidCap Growth III R3 (PPQMX)	Yes	None (or less than \$1,001)		
6.1.9	Principal Diversified Intl R3 (PINRX)	Yes	None (or less than \$1,001)		
6.1.10	Principal Intl Emerging Markets R3 (PEAPX)	Yes	None (or less than \$1,001)		
6.2	One America	See Endnote	No	None (or less than \$1,001)	
6.2.1	Thornburg Limited Term Income R5 (THRRX)	Yes	None (or less than \$1,001)		
6.2.2	Pioneer Bond Y (PICYX)	Yes	None (or less than \$1,001)		
6.2.3	Virtus Ceredex Large-Cap Value Equity I (STVTX)	Yes	None (or less than \$1,001)		
6.2.4	Goldman Sachs Large Cap Gr Insights Instl (GCGIX)	Yes	None (or less than \$1,001)		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.2.5	MFS Mid Cap Value Fund Class R3 (MVCHX)	Yes	None (or less than \$1,001)		
6.2.6	Columbia Mid Cap Index A (NTIAX)	Yes	None (or less than \$1,001)		
6.2.7	Goldman Sachs Small Cap Value Fund Institutional Class (GSSIX)	Yes	None (or less than \$1,001)		
6.2.8	Lord Abbett International Opp R5 (LINTX)	Yes	None (or less than \$1,001)		

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Mountain States Legal Foundation See Endnote	Lakewood, Colorado	Neither my former employer nor I continue to make contributions to this long-existing 403(b) plan. In fact, in June of 2019, the entire amount was converted to an IRA Rollover FBO William Perry Pendley.	3/1992
2	Mountain States Legal Foundation	Lakewood, Colorado	Pursuant to a legal agreement for wages and employment related claims arising on December 4, 2018, I will receive a payment of \$324,000 from Mountain States Legal Foundation on or before September 12, 2019.	8/2019

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Mountain States Legal Foundation	Lakewood, Colorado	President of nonprofit, public-interest law firm organized under IRC 501(c)(3).

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA:	No		cash distributions	\$7,427
1.1	Putnam Money Market Fund (PDDXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	Putnam Equity Income Fund (PEYAX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.3	Putnam High Yield Fund (PHYIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.4	Putnam International Equity Fund (POVSX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	Kinder Morgan, Inc., defined benefit plan (value not readily ascertainable)	N/A		retirement payments	

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Residential real estate, Arlington, Virginia	N/A	\$500,001 - \$1,000,000	Rent or Royalties	\$5,001 - \$15,000
2	Residential real estate, Cheyenne, Wyoming	N/A	\$100,001 - \$250,000	Rent or Royalties	\$2,501 - \$5,000
3	Residential real estate, Evergreen, Colorado	N/A	\$500,001 - \$1,000,000	Rent or Royalties	\$5,001 - \$15,000
4	U.S. bank #1 (cash)	N/A	\$250,001 - \$500,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	U.S. bank #2 (cash)		N/A	\$100,001 - \$250,000		None (or less than \$201)
6	Sirius XM Holdings Inc. (SIRI)	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	Mountain States Legal Foundation, charitable gift annuity	See Endnote	N/A	\$250,001 - \$500,000		None (or less than \$201)

## 7. Transactions

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

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	2	I was a partner with my wife (Elisabeth Y. Pendley, an attorney) in the Pendley Law Firm. We did not have any clients during this period. I did not receive any compensation from the Pendley Law Firm. I did not have any clients who pay more than \$5,000 for my personal services.



PART	#	ENDNOTE
2.	1	Last day of employment was December 3, 2018. Subsequently received a check for pay due and for unused vacation.
2.	4	War on the West: Government Tyranny on America's Great Frontier (1994); Warriors for the West: Fighting Bureaucrats, Radical Groups, And Liberal Judges on America's Frontier (2006); Sagebrush Rebel: Reagan's Battle with Environmental Extremists and Why It Matters Today (2013) - The amount of royalty received in 2018 and 2019 was less than \$201.
2.	6	Both of these accounts were rolled over into the IRA. Neither account now exists.
2.	6.1	Mountain States Legal Foundation 403(b) plan - Principal Financial Group is the custodian. In 2018, \$29,310.25 was distributed as an RMD. In 2019, \$29,265.03 was distributed as part of an RMD.
2.	6.2	Profit sharing plan - One America is the custodian. In 2018, \$20,810.84 was distributed as part of an RMD. In 2019, \$20,688.81 was distributed as part of an RMD.
3.	1	I have no pension or other defined benefit plan with Mountain States Legal Foundation.
6.	6	I own 207 shares of stock, which is valued on August 1, 2019 at \$6.29 for a total value of \$1,302.03.
6.	7	This is a charitable gift annuity on which payment begins in 2025. There is no insurance company involved. Stocks and cash were transferred to Mountain States Legal Foundation in exchange for the lifelong payment to my wife and I, which begins on April 3, 2025.

# Summary of Contents

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

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

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

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

Part 2 discloses the following:

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

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

## 3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

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

Part 5 discloses the following:

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

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

#### **6. Other Assets and Income**

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

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

## 7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during 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 \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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 ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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