

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

---

Milgram, Anne

Administrator, Drug Enforcement Administration, Department of Justice

---

Other Federal Government Positions Held During the Preceding 12 Months:

None

---

Names of Congressional Committees Considering Nomination:

- Committee on the Judiciary
- 

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/ Milgram, Anne [electronically signed on 03/11/2021 by Milgram, Anne 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/ Lofthus, Lee, Certifying Official [electronically signed on 05/06/2021 by Lofthus, Lee in Integrity.gov]

---

Other review conducted by

/s/ Shaw, Cynthia K, Ethics Official [electronically signed on 05/05/2021 by Shaw, Cynthia K in Integrity.gov]

---

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 05/10/2021 by Apol, David in Integrity.gov]

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

#	ORGANIZATION NAME		CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	NYU School of Law		New York, New York	University/College	Professor of Practice & Executive Director Criminal Justice Lab	2/2016	Present
2	Lowenstein Sandler LLP		New York, New York	Law Firm	Special Counsel	7/2017	Present
3	NBC Universal		New York, New York	Corporation	Technical Advisor	6/2011	Present
4	Lionsgate		Los Angeles, California	Corporation	Technical Advisor	9/2016	Present
5	Some Spider Studios - Cafe (media company)		New York, New York	Corporation	Co-host, Insider podcast	11/2018	Present
6	Showtime		Los Angeles, California	Corporation	Consultant	3/2019	4/2019
7	Papayero LLC (consulting)		New York, New York	Corporation	Founder/CEO	2/2018	Present
8	Turner Broadcasting System	See Endnote	New York, New York	Corporation	Legal Analyst	2/2018	Present
9	Century Foundation	See Endnote	New York, New York	Non-Profit	Board Member	3/2016	Present
10	John Jay College Foundation		New York, New York	University/College	Board Member	12/2016	Present
11	Covenant House International		New York, New York	Non-Profit	Board Member	5/2011	Present
12	Center for Policing Equity		New York, New York	Non-Profit	Board Member	6/2020	Present

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
13	State Energy & Environmental Impact Center at NYU Law	New York, New York	University/College	Advisory Council Member	8/2017	Present
14	Prosecutor Impact	New York, New York	Non-Profit	Board Member	7/2020	11/2020

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	NYU School of Law	N/A		Salary	\$252,390
2	Lowenstein Sandler LLP (law firm)	N/A		Salary	\$205,051
3	Lowenstein Sandler LLP (law firm), anticipated bonus	See Endnote	\$100,001 - \$250,000		None (or less than \$201)
4	Papayero, LLC (consulting)	No	\$250,001 - \$500,000		
4.1	CNN, Warner Media, Turner Broadcasting System	N/A		Consulting Fees	\$145,119
4.2	Lionsgate	See Endnote		Consulting Fees	\$17,615
4.3	NBC Universal	See Endnote		Consulting Fees	\$33,840
4.4	Some Spider Cafe	N/A		Consulting Fees	\$103,500
5	Simplified Employee Pension Plan (SEP IRA)	No			
5.1	Fidelity 500 Index Fund (FXAIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.2	Fidelity International Discovery Fund (FIGRX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.3	Fidelity Overseas Fund (FOSFX)	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.4	Fidelity FDIC Insured Deposit Sweep (cash)	N/A	None (or less than \$1,001)		None (or less than \$201)
6	Rollover IRA	No			
6.1	Johnson & Johnson (JNJ)	N/A	\$15,001 - \$50,000		None (or less than \$201)
6.2	Pfizer Inc. (PFE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.3	Viatis (VTRS)	N/A	None (or less than \$1,001)		None (or less than \$201)
6.4	Merck & Co., Inc. (MRK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6.5	Fidelity 500 Index Fund (FXAIX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
6.6	Fidelity FDIC Insured Deposit Sweep (cash)	N/A	None (or less than \$1,001)		None (or less than \$201)
7	New York University Supplemental Tax Deferred Annuity (STDA) Plan 403(b)	No			
7.1	Vanguard Institutional Target Retirement 2035 (VITFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
8	New York University Retirement Plan 403(b)	No			
8.1	Vanguard Institutional Target Retirement 2035 (VITFX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
9	Warner Media, Turner Broadcasting System	N/A		Consulting Fees	\$252,243
10	Observatory Group - October 7, 2020	N/A		Speech honorarium	\$4,500
11	Human Trafficking Textbook, Carolina Academic Press (value not readily ascertainable)	See Endnote	N/A	Rent or Royalties	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12	Some Spider Studios, stock options (value not readily ascertainable): 2,500 vested shares, strike price \$1.40, vested 12/1/2018, exp. 4/22/29; 5,000 vested shares, strike price \$1.40, vested 6/1/2019, exp. 7/25/29	N/A			None (or less than \$201)
13	CAFE Studios, Inc., vested stock options (value not readily ascertainable): 213,250 shares, strike price \$.02	See Endnote	N/A		None (or less than \$201)

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Lowenstein Sandler LLP See Endnote	New York, New York	Pursuant to my employment agreement, I will receive a performance-based bonus for services rendered in 2020. This bonus will be paid prior to my assuming the duties of the position of Administrator.	7/2017
2	Some Spider - Cafe	New York, New York	I will retain my vested stock options. I have the following options, which I have not exercised at this time: Some Spider 7500 shares (strike price is currently \$1.40); Cafe 213,250 shares (strike price is currently \$.02).	11/2018
3	New York University Retirement Plan 403(b)	New York, New York	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	4/2010
4	New York University Supplemental Tax Deferred Annuity (STDA) Plan 403(b)	New York, New York	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	4/2010
5	Papayero LLC	New York, New York	My consulting business will be inactive during my appointment and all outstanding client fees will be fixed before I enter government service.	3/2021

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

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	New York University School of Law		New York, New York	Professor of Practice & Executive Director Criminal Justice Lab
2	Lowenstein Sandler LLP		New York, New York	Special Counsel
3	NBC Universal		New York, New York	Technical Advisor Law & Order: SVU
4	Lionsgate		Los Angeles, California	Technical Advisor for Power and Power Book II. Plus single consulting session for Dirty Thirty, show in development.
5	Some Spider Studios - Cafe		New York, New York	Co-host, Insider podcast
6	Papayero, LLC		New York, New York	Founder/CEO
7	Audible		Newark, New Jersey	Consultant. Co-chair with CEO of Audible Workplace Taskforce (AWT) in 2019.
8	Soundview Paper Holdings LLC		Elmwood Park, New Jersey	Provided legal services as a client of Lowenstein Sandler LLP
9	Gucci America, Inc.		New York, New York	Provided legal services as a client of Lowenstein Sandler LLP
10	Confidential Client	See Endnote	New York, New York	Provided legal services as a client of Lowenstein Sandler LLP
11	Cartier		New York, New York	Provided legal services as a client of Lowenstein Sandler LLP
12	CarePoint Health Management Assoc, LLC		Jersey City, New Jersey	Provided legal services as a client of Lowenstein Sandler LLP
13	PayPal Holdings Inc		New York, New York	Provided legal services as a client of Lowenstein Sandler LLP
14	Dave, Inc.		Los Angeles, California	Provided legal services as a client of Lowenstein Sandler LLP

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
15	Warner Media, Turner Broadcasting System	New York, New York	CNN Legal Analyst
16	Health Catalyst	Salt Lake City, Utah	Speaker honorarium
17	Children's Hospital of Wisconsin	Milwaukee, Wisconsin	Speaker honorarium

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Coding Kidz, Inc. (After-school educational STEM programs)	N/A	\$50,001 - \$100,000	salary and business income	
2	IRA #1	No			
2.1	American Century Heritage Fund I Class (ATHIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.2	Baron Growth Fund Institutional Class Shares (BGRIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.3	Fidelity Independence Fund (FDFFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	Fidelity GNMA Fund (FGMNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	Fidelity International Discovery Fund (FIGRX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.6	Fidelity Low-Priced Stock Fund (FLPSX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.7	Fidelity Mid-Cap Stock Fund (FMCSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.8	Fidelity Overseas Fund (FOSFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.9	Fidelity 500 Index Fund (FXAIX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.10	T. Rowe Price All-Cap Opportunities Fund, Inc (PRWAX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.11	T Rowe Price Value Fund, Inc (TRVLX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
3	IRA #2	No			
3.1	Vanguard PRIMECAP Core Fund (VPCCX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.2	Vanguard Target Retirement 2035 Fund (VTTHX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	Bunge Limited, defined benefit plan (value not readily ascertainable)	N/A		retirement payments	

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank #1 (cash)	N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
2	U.S. bank #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	NYS 529 College Plan #1	No			
3.1	Aggressive Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
4	NYS 529 College Plan #2	See Endnote			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.1	Moderate Growth Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	NYS 529 College Plan #3	See Endnote	No		
5.1	Conservative Growth Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	Fidelity Government Money Market	Yes	\$15,001 - \$50,000		None (or less than \$201)
7	Fidelity Contrafund (FCNTX)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
8	Fidelity Puritan Fund (FPURX)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
9	Intel Corp. (INTC)	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
10	General Electric Co. (GE)	See Endnote	N/A		None (or less than \$201)
11	First Close Partners LLC (all underlying assets are below the reporting threshold).	No	\$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	First Close Partners LLC	See Endnote	Capital contribution on commitment for a fund of funds	\$15,001 - \$50,000	2021	0%	24 months
2	Cross River Bank PPP loan to CodingKidz		CodingKidz Business PPP loan	\$15,001 - \$50,000	2020	1%	18 months
3	Cross River Bank PPP loan to CodingKidz		CodingKidz Business PPP loan	\$15,001 - \$50,000	2021	1%	60 months

## 9. Gifts and Travel Reimbursements

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

## Endnotes

PART	#	ENDNOTE
1.	8	Consulting agreement ended on 3/26/21.
1.	9	Filer was also organization Treasurer from 7/2020 to present.
2.	3	Bonus of \$108,585.00 received on March 15, 2021.
2.	4.2	Outstanding invoice for \$6,500.
2.	4.3	Outstanding invoice for \$9,832.38.
2.	11	Received 2020 royalties of \$107.85
2.	13	There is no current expiration date due to the recent acquisition of Cafe Studios, Inc., by Vox Media. The expiration date that applied during the reporting period cannot be ascertained.

PART	#	ENDNOTE
3.	1	Bonus of \$108,585.00 received on March 15, 2021.
4.	10	Confidential client not disclosed because they are subject to a non-public investigation. The client is an individual.
6.	4	NYS 529 College Plan #2 is not for filer's dependent child.
6.	5	NYS 529 College Plan #3 is not for filer's dependent child.
6.	10	Stock sold on 3/15/2021.
8.	1	Filer is divesting from First Close Partners.

# Summary of Contents

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

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

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

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

Part 2 discloses the following:

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

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

## 3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

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

Part 5 discloses the following:

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

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

#### 6. Other Assets and Income

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

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

## 7. Transactions

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

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

## 8. Liabilities

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

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (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 \$415 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$415 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 \$166 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. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 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 a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, N.W., 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).

---