

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

### Filer's Information

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**Charrow, Robert Phillip**

General Counsel , Department of Health & Human Services

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Names of Congressional Committees Considering Nomination:

- **Committee on Finance**
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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/ Charrow, Robert Phillip [electronically signed on 04/06/2017 by Charrow, Robert Phillip in Integrity.gov]**

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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/ Fischmann, Elizabeth, Certifying Official [electronically signed on 06/08/2017 by Fischmann, Elizabeth in Integrity.gov]**

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Other review conducted by

**/s/ Hall, Randall, Ethics Official [electronically signed on 06/08/2017 by Hall, Randall in Integrity.gov]**

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U.S. Office of Government Ethics Certification

**/s/ Apol, David, Certifying Official [electronically signed on 06/12/2017 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	Greenberg Traurig, LLP	Washington, District of Columbia	Law Firm	Principal Shareholder	6/2002	Present
2	University of Maryland, Institute for Human Virology	Baltimore, Maryland	University/College	Board Member	/1996	Present
3	Bloomberg BNA Medical Research Law and Policy Report	Arlington, Virginia	Legal, Tax, and Business News	Editorial Board Member	3/2002	Present
4	Town of Chevy Chase	Chevy Chase, Maryland	Incorporated Town	Election Committee Member	5/2015	9/2015

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Greenberg Traurig, LLP (law firm)	N/A		Salary/Bonus	\$661,548
2	Greenberg Traurig, LLP (law firm) anticipated mid-year distribution	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	Greenberg Traurig, LLP, law firm stock	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	Greenberg Traurig, LLP Defined Contribution Plan	No			
4.1	SSGA Target Retirement 2015 Non-Lending Series Fund Class K	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
4.2	SSgA S&P 500 Index Non-Lending Series Fund Class N	Yes	\$500,001 - \$1,000,000		\$50,001 - \$100,000
4.3	SSgA Russell Small/Mid Cap Non-Lending Series Fund Class C	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
4.4	Dodge & Cox International Stock Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.5	Wells Fargo Stable Value Fund Q (25)	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000

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

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Greenberg Traurig, LLP	Washington, District of Columbia	My mid-year distribution vests on June 30, 2017, and is paid at the end of July 2017. If I leave the firm prior to that date, I will not be entitled to the distribution.	6/2002
2	Greenberg Traurig, LLP	Washington, District of Columbia	Upon my departure, Greenberg Traurig will repurchase my stock shares at same value as I purchased it; under shareholder agreement the stock neither increases in value nor generates dividends.	6/2002
3	Greenberg Traurig, LLP	New York, New York	I will retain my defined contribution plan. Neither I nor Greenberg Traurig, LLP will make further contributions to this plan after my separation.	6/2002

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Greenberg Traurig, LLP	Washington, District of Columbia	Shareholder providing legal services
2	Advantage Care Physicians, PC	Garden City, New York	Legal Services
3	American Psychiatric Assn	Arlington, Virginia	Legal Services
4	American Renal Associates, Inc	Beverly, Massachusetts	Legal Services
5	AmeriHealth Caritas	Philadelphia, Pennsylvania	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	AmeriHealth Caritas Partnership Foundation	Philadelphia, Pennsylvania	Legal Services
7	AonHewitt	Lincolnshire, Illinois	Legal Services
8	AVIA Health	Chicago, Illinois	Legal Services
9	Bank of Beirut, S.A.L.	Beirut, Lebanon, Outside U.S.	Legal Services
10	Beiersdorf, Inc	Wilton, Connecticut	Legal Services
11	Bluemke, MD. PhD, MsB, David	Bethesda, Maryland	Legal Services
12	Bracco Diagnostic Inc	Princeton, New Jersey	Legal Services
13	Business Roundtable, The	Washington, District of Columbia	Legal Services
14	C&S Wholesale Grocers, Inc	Keene, New Hampshire	Legal Services
15	Camara Nacional de las Industrias Azucar	Mexico, Outside U.S.	Legal Services
16	Centerbridge Capital Partnerships, LP	New York, New York	Legal Services
17	Cowen and Company	New York City, New York	Legal Services
18	CRH Medical Corporation	Vancouver, Canada, Outside U.S.	Legal Services
19	Cure Medical	Newport Beach, California	Legal Services
20	CVS Pharmacy, Inc	Woonsocket, Rhode Island	Legal Services
21	E&I - Ethical and Independent Review Services	Independence, Missouri	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
22	EB-5 Investment Coalition	Washington, District of Columbia	Legal Services
23	Elmendorf Ryan	Washington, District of Columbia	Legal Services
24	Embassy of the State of Qatar	Washington, District of Columbia	Legal Services
25	Ethiopian Ministry of Foreign Affairs	Addis Ababa, Ethiopia, Outside U.S.	Legal Services
26	FBR Capital Markets	Arlington, Virginia	Legal Services
27	Fig & Olive USA, Inc	New York, New York	Legal Services
28	Fontem U.S., Inc	Charlotte, North Carolina	Legal Services
29	Galmed Pharmaceuticals Ltd	Israel, Outside U.S.	Legal Services
30	Genetic Technologies Ltd	Fitzroy, Australia, Outside U.S.	Legal Services
31	Government of the Republic of Equatorial Guinea	Malabo, Outside U.S.	Legal Services
32	Hilltop Securities Inc	Dallas, Texas	Legal Services
33	Hologic, Inc	Bedford, Massachusetts	Legal Services
34	Institute of Cardiovascular Excellence	Ocala, Florida	Legal Services
35	Intec Pharma Ltd	Israel, Outside U.S.	Legal Services
36	Intrexon Corporation	Germantown, Maryland	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
37	Itamar Medical Inc	Franklin, Massachusetts	Legal Services
38	ITG Brands, LLC Gov Affairs	Greensboro, North Carolina	Legal Services
39	KI Liquidation, Inc (F/K/A/ Kullman Ind	New York, New York	Legal Services
40	Kurdistan Regional Government	Erbil, Iraq, Outside U.S.	Legal Services
41	L'Oreal USA, Corp	New York, New York	Legal Services
42	LGC Limited	Teddington, Outside U.S.	Legal Services
43	Lifebond Inc	Caesarea, Israel, Outside U.S.	Legal Services
44	Linden LLC	Chicago, Illinois	Legal Services
45	Manhattan Tower	New York, New York	Legal Services
46	MedBridge Healthcare, LLC	Greenville, South Carolina	Legal Services
47	MEDIVIZOR.COM	New York, New York	Legal Services
48	Medtronic Inc	Washington, District of Columbia	Legal Services
49	Molina Healthcare	Washington, District of Columbia	Legal Services
50	National Academy of Recording Arts & Science	Santa Monica, California	Legal Services
51	National Fisheries Institute, Inc	McLean, Virginia	Legal Services
52	Onsite OHS, Inc	Princeton, Indiana	Legal Services
53	Opko Health, Inc	Miami, Florida	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
54	OrSense Ltd	Israel, Outside U.S.	Legal Services
55	Partnership for Quality Home Healthcare	Washington, District of Columbia	Legal Services
56	PHBH, LLC	Palm Beach Garden, Florida	Legal Services
57	Playtex Products, LLC	Dover, Delaware	Legal Services
58	Political Advocacy Network	Chicago, Illinois	Legal Services
59	Preferred Medical Plan, Inc	Coral Gables, Florida	Legal Services
60	Public Health Trust/Jackson Health System	Miami, Florida	Legal Services
61	Qualcomm Incorporated	Washington, District of Columbia	Legal Services
62	Safeway, Inc	Pleasanton, California	Legal Services
63	Samsung Electronics Co., Ltd	Suwon South Korea, Outside U.S.	Legal Services
64	Sanofi US	Bridgewater Township, New Jersey	Legal Services
65	Save Mart Supermarkets	Modesto, California	Legal Services
66	SCL Health System	Broomfield, Colorado	Legal Services
67	Sears Holding Corporation	Hoffman Estates, Illinois	Legal Services
68	Seniorlink, Inc	Boston, Massachusetts	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
69	Teva Pharmaceutical Industries, Inc	Washington, District of Columbia	Legal Services
70	The Atkins North America Holdings Corporation	Tampa, Florida	Legal Services
71	The Brooklyn Hospital Center	New York, New York	Legal Services
72	The Related Companies, L.P.	New York City, New York	Legal Services
73	TherapeuticsMD, Inc	Boca Raton, Florida	Legal Services
74	Toshiba Corporation	Tokyo, Japan, Outside U.S.	Legal Services
75	Visiting Nurse Association of Hudson Valley	Tarrytown, New York	Legal Services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	American Institutes for Research Retirement Plan	No			
1.1	TIAA Traditional Annuity	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
1.2	CREF Stock Account R2	Yes	\$100,001 - \$250,000		None (or less than \$201)
2	IRA	No			
2.1	The Walt Disney Company	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$201 - \$1,000
2.2	Microsemi Corp.	N/A	\$1,001 - \$15,000		None (or less than \$201)



## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	US Bank Account #1 (Cash Account)	N/A	\$250,001 - \$500,000	Interest	\$2,501 - \$5,000
2	United Bankshares, Inc.	N/A	\$500,001 - \$1,000,000	Dividends	\$5,001 - \$15,000
3	US Bank Account #2 (Cash Account)	N/A	\$50,001 - \$100,000		None (or less than \$201)
4	International Business Machines Corporation (IBM)	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
5	FirstEnergy Corp	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
6	Premier Financial Bancorp, Inc. - Common Stock	N/A	\$1,001 - \$15,000		None (or less than \$201)
7	Vanguard Intermediate-Term Tax-Exempt Fund Admiral Shares	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
8	Vanguard Long-Term Tax-Exempt Fund Admiral Shares	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
9	Vanguard Prime Money Market Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
10	Vanguard Target Retirement 2020 Fund	Yes	\$500,001 - \$1,000,000		\$5,001 - \$15,000
11	Vanguard Target Retirement Income Fund	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
12	Vanguard U.S. Growth Fund Admiral Shares	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
13	U.S. Gov't I- Savings Bond	N/A	\$1,001 - \$15,000		None (or less than \$201)
14	US Brokerage Account #1 (Cash Account)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15	University of Chicago Press	See Endnote	N/A	\$1,001 - \$15,000	Rent or Royalties	\$201 - \$1,000
16	Wolters Kluwer	See Endnote	N/A	\$1,001 - \$15,000	Rent or Royalties	\$201 - \$1,000
17	ThomsonReuters	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
18	US Brokerage Account #2		No			
18.1	Apple Inc. - Common Stock		N/A	\$1,001 - \$15,000		None (or less than \$201)
18.2	Cisco Systems, Inc. - Common Stock		N/A	\$1,001 - \$15,000		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
6.	15	Royalty income for text that I authored entitled "Law in the Laboratory: A Guide to the Ethics of Federally Funded Science Research" (U. Chicago Press, 2010)
6.	16	Co-author of text (with Veda R. Charrow and Myra K. Erhardt) entitled "Clear and Effective Legal Writing" (5th ed.) (Wolter Kluwer, Maryland, 2013)
6.	17	Co-author of text (with Laura Klaus) entitled "A Short Book on Standing: A Practical Primer for the Practitioner" (ThomsonReuters 2015)

# 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).

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