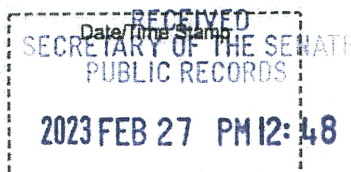


RE-2 Employee Post Travel Disclosure of Travel Expenses

Post Travel Filing Instructions: Complete this form within **30 days** of returning from travel. Submit all forms to the Office of Public Records in 232 Hart Building. This form is a public disclosure. The form and all attachments will be made publicly available.



Certification: In compliance with the Regulations Governing Privately Sponsored Travel, Senate Rule 35, and the Honest Leadership and Open Government Act of 2007, I certify that I accepted the following gift of privately sponsored travel:

Private Sponsor(s):

Florida East Coast Industries

Travel Dates:

February 22-23, 2023

Name of accompanying family member (if any):

NA

Relationship to Traveler:

NA

Total Expenses

Transportation Expenses	Lodging Expenses	Meals Expenses	Other Expenses (Amount & Description)
\$773.80	\$215	\$33	

I also certify that attached to this form are all required documents for post travel disclosure, including:

- The final Employee Pre-Travel Authorization (Form RE-1)
- The final Private Sponsor Travel Certification Form with all attachments
- The final invitation
- The final approved itinerary

Finally, I certify that all trip information reflected in the attachments above accurately reflects the travel that I accepted. If there were any changes to the trip after I received approval from the Committee, the changes are described in ATTACHMENT 1.

2/27/23

Zachary Commins

Date

Printed Name of Traveler

Signature of Traveler**TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER**

I have made a determination that the expenses set out above in connections with travel described in the Employee Pre-Travel Authorization form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

2/27/2023
Date
Signature of Supervising Senator/Officer

ATTACHMENT 1 – CHANGES FROM APPROVED PRE-TRAVEL

Note: Material changes to a trip that occur after the Committee has issued an approval letter may invalidate the Committee's approval. Please contact the Committee with any questions regarding changes to an approved trip.

Were there any changes to the pre-approved travel expenses? (Transportation, Meals, Lodging, Other)?

☒ Yes

☐ No

Expense Change	Revised Amount	Explanation
Transportation	773.80	Cost of flight increased to \$698.80

Were there any changes to the pre-approved itinerary?

☒ Yes

☐ No

Explanation:

Minor logistical changes and the Mayor of Miami was unable to join the morning briefing

Were there any additional changes to the pre-approved trip?

☐ Yes

☒ No

Explanation:

Minor logistical changes and the Mayor of Miami was unable to join the morning briefing

**FLORIDA EAST COAST
INDUSTRIES**

January 6, 2023

Zac Commins
Policy Advisor
Senator Padilla
112 Hart Senate Building
Washington, DC 20510

Dear Zac,

Florida East Coast Industries cordially invites you to participate in a senior staff delegation trip to South Florida on February 23, 2023 to experience the *Brightline* intercity passenger rail system connecting Miami, Fort Lauderdale, and West Palm Beach. In late 2021, the U.S. Congress passed the Infrastructure Investment and Jobs Act that included discretionary funding for significant investments in passenger rail. This trip will offer background on the history of the project and a first-hand look at our state-of-the-art trains and stations.

Your itinerary will include briefings on *Brightline's* economic impact and grade crossing safety infrastructure and technology enhancements. It will also include a comprehensive overview of our station security and passenger screening systems and our public safety education program through Operation Lifesaver.

In addition, you will have an opportunity to tour our vehicle maintenance facility and experience our locomotives and passenger cars. *Brightline* is one of the first U.S. rail systems to receive these new Siemens-built "Charger" locomotives, which meet EPA Tier IV emission standards.

This trip, which includes one overnight stay, will familiarize Congressional staff on the planned extension to Orlando, now 88% completed, and our next *Brightline* project, *Brightline West*, connecting Las Vegas to Southern California. We will also provide a briefing on the recent CRISI grant to support an additional expansion segment between Orlando and Tampa.

To accept this invitation, or if you have additional questions, please call Stacey Rinaldi at 904-996-2813, or respond by email to Stacey.Rinaldi@FECI.com.

Your participation must be approved by the Senate Select Committee on Ethics, before you may travel, to be in accordance with the Committee's Rules for privately sponsored trips.

**FLORIDA EAST COAST
INDUSTRIES**

To submit your request for approval to the Committee, please complete the attached Pre-Travel Authorization, signed by your Supervising Senator or Officer, and the additional forms accompanying this invitation, including:

- This letter of invitation
- The Private Sponsor Certification Form
- The detailed, individualized Agenda
- The list of all Senate staff members invited to participate.

In order to complete our advance arrangements for the trip in a timely manner, please submit your request with the above forms to the Committee on Ethics as soon as possible, but before January 23, which is the Committee's deadline to receive approval requests for this trip.

If you cannot attend but wish to designate another person on the staff to participate, please notify Stacey as soon as possible so that we can update our participation list accordingly and submit a new invitation.

Brightline represents the return of private investment in express passenger rail in America and a new era in cost-effective solutions to the challenge of moving people safely and efficiently at reasonably higher speeds across distances that are "too long to drive, too short to fly".

We look forward to welcoming you to South Florida and introducing you to *Brightline*.

Sincerely,

Husein Cumber
Chief Strategy Officer
Florida East Coast Industries

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Date/Time Stamp:

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Zachary Commins

Employing Office/Committee: Senator Alex Padilla

Private Sponsor(s) (list all): Florida East Coast Industries (FECI)

Travel date(s): February 22-23, 2023

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): Miami, Florida (with site visit in West Palm Beach, Florida)

Explain how this trip is specifically connected to the traveler's official or representational duties:

I advise Senator Padilla on transportation issues, including passenger rail and his role on the Senate Committee on Environment and Public Works. FECI is the parent company of Brightline, a privately financed and operated high speed intercity passenger rail project currently operating in South Florida. Because a similar private rail system (Brightline West) is in development between Southern California and Las Vegas, this trip will help inform my advice to Senator Padilla on this issue, in which Senator Padilla is particularly interested given that he represents California.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

2/14/2023
(Date)


(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Senator Alex Padilla hereby authorize Zachary Commins
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

02/14/2023
(Date)


(Signature of Supervising Senator/Officer)

**Florida East Coast Industries –
Brightline Intercity Passenger Rail South Florida System Delegation Visit**

February 22

- 1:44 pm: Depart Washington Reagan Airport (DCA) via AA Flight 1340 (DCA to MIA)
- 4:32 pm: Arrive Miami International Airport
- 5:00 pm: Depart via shuttle to The Langford Hotel: 121 SE 1st Street, Miami
- 5:45 pm: Arrive Langford Hotel

February 23

- 8:00 am: Depart Langford Hotel to Brightline MiamiCentral via shuttle/van
- 8:15 am: Breakfast / settle into Operations Center conference room
- 8:30 am: Background Briefing at MiamiCentral by Patrick Goddard, President Brightline Florida, & Sarah Watterson, President Brightline West
(Overview on Brightline Florida and Brightline West systems, construction progress and economic impacts/benefits.)
- 9:30 am: Tour of Brightline's MiamiCentral Station including the Operations Center
Patrick Goddard & Michael Lefevre, VP of Operations
(Tour includes an overview of Brightline's 9-acre multi-modal station in downtown Miami and general operations of the system, including response and safety)
- 10:30 am: Board Brightline train northbound to West Palm Beach
- 10:48 am: Train departs to West Palm Beach
(While onboard, Brightline representatives will provide overview of Brightline innovations on train and highlight service/guest experience.)
- 12:00 pm: Train arrives at Brightline's West Palm Beach Station
(Tour of West Palm Beach station provided by Brightline representatives)
- 12:30 pm: Board Uber XL to Brightline's Running Repair Facility (RRF)
- 12:45 pm: Lunch and Briefing at RRF

Guest speakers: WPB Mayor Keith James and Boca Mayor Scott Singer
(Guest speakers will provide an overview of impacts Brightline has had on their cities, including economic impacts and business development)
- 1:45 pm: Tour of RRF by Tom Rutkowski, Chief Mechanical Officer
(Overview of operations, including train details, train operations and safety)
- 2:30 pm: Depart RRF to Brightline's West Palm Beach Station via Brightline Train
- 2:43 pm: Train departs for Brightline's MiamiCentral Station
- 4:03 pm: Train arrives at MiamiCentral Station

4:15 pm: Shuttle departure to MIA
5:00 pm: Arrival at MIA
7:34 pm: Depart via AA Flight 2648 (MIA to DCA)
10:15pm: Arrive Washington Reagan International Airport (DCA)

Congressional Attendees:

Alexa Fox, Legislative Assistant, Rep Jim Costa
Ben Kane, Legislative Director, Rep Jimmy Gomez
Ella Khorov, Legislative Assistant, Rep Tony Cardenas
Jamie Thompson, Legislative Assistant, Rep Adam Schiff
LaVontae Brooks, Deputy Chief of Staff, Rep Steven Horsford
Mitch Moonier, Legislative Assistant, Rep Dina Titus
Zac Commins, Policy Advisor, Senator Alex Padilla

Brightline Attendees:

Sarah Watterson, President Brightline West
Irene Skarlatos, Director of Public Affairs, Brightline West
Ben Porritt, SVP Corporate Affairs, Brightline
Ali Soule, VP Community Relations, Brightline
Pat Clark, Asst. Chief of Safety & Security, Brightline

Stacey Rinaldi, FECI: 321-652-7337

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors): Florida East Coast Industries LLC (FECI)
2. Description of the trip: Fact-finding & educational trip to Brightline Trains Florida operations
3. Dates of travel: February 22-23, 2023
4. Place of travel: Miami, Florida and West Palm Beach, Florida
5. Name and title of Senate invitees: See Attached
6. I *certify* that the trip fits one of the following categories:
 - ☐ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 - OR –
 - ☒ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
 - AND –
 - ☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:
 - ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 - AND –
 - ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

- ☒ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

– OR –

- ☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

– OR –

- ☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

FECI, the sponsor, is the sole sponsor organizing the trip. FECI's role involves planning the itinerary

developing the agenda, including curriculum for the educational briefings. FECI will arrange for all travel

and participate in the trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

FECI is the parent co. of Brightline, a privately owned/operated intercity passenger rail system in FL. This

trip will educate staff on Brightline's 1st of its kind private rail system and how the emerging role of private

sector rail can address transportation challenges, including development of a CA-NV intercity rail system.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

FECI has previously sponsored three congressional trips since the project began: one in November 2017,

one in August of 2019, and one in October of 2022. Senate staff only participated in the 2019 trip.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

The sponsor engages in railroad safety programs for the public in partnership with Operation

Lifesaver.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
☒ Good Faith estimate ☐ Actual Amounts	\$439 Air, Rail, Coach Bus	\$215	\$32 Breakfast and lunch briefing sessions	

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation **or** b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

B: The trip is arranged and organized specifically with regard to congressional participation.

18. Reason for selecting the location of the event or trip

The location is the operational site of the intercity passenger rail system and the subject matter of the trip.

19. Name and location of hotel or other lodging facility:

The Langford Hotel: 121 SE 1st Street, Miami, FL 33131

20. Reason(s) for selecting hotel or other lodging facility:

Favorable price and close proximity to the FECI offices, and MiamiCentral Station.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:
- Lodging expenses are equal to per diem rates for official Federal Government Travel. Meal Expenses are less than per diem rates
22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:
- Air transportation is Economy/Coach Class. Train travel is via coach class. Ground transportation is via shuttle van.
23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).
24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:
- None
25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):
- Signature of Travel Sponsor: 
- Name and Title: Husein Cumber, Chief Strategy Officer
- Name of Organization: Florida East Coast Industries
- Address: 700 NW 1st Avenue, Suite 1620, Miami, FL 33136
- Telephone Number: 904-996-2813
- Fax Number:
- E-mail Address: stacey.rinaldi@feci.com (Executive Assistant)

First Name	Last Name	Title	Office Representing	Building	Email	Reason for Invitation
Alex	De Bianchi	Senior Policy Adviser	Senator Jacky Rosen	713 Hart Senate Office Building	alexandrine_debianchi@rosen.senate.gov	Senator Represents project's California-Nevada Expansion
Angela	Ebiner	Policy Adviser	Senator Alex Padilla	112 Hart Senate Office Building	angela_ebiner@padilla.senate.gov	Senator Represents project's California-Nevada Expansion
Freda	Hawver Pachter	Legislative Assistant	Senator Dianne Feinstein	331 Hart Senate Office Building	freda_pachter@feinstein.senate.gov	Senator Represents project's California-Nevada Expansion
Kurt	Lynch	Legislative Assistant	Senator Catherine Cortez Masto	313 Hart Senate Office Building	kurt_lynch@cortezmasto.senate.gov	Senator Represents project's California-Nevada Expansion
Olga	Zoraqi	Legislative Assistant	Senator Jacky Rosen	713 Hart Senate Office Building	olga_zoraqi@rosen.senate.gov	Senator Represents project's California-Nevada Expansion
Trevor	Dean	Senior Policy Adviser	Senator Catherine Cortez Masto	313 Hart Senate Office Building	trevor_dean@cortezmasto.senate.gov	Senator Represents project's California-Nevada Expansion
Zac	Commins	Policy Adviser	Senator Alex Padilla	112 Hart Senate Office Building	zac_commins@padilla.senate.gov	Senator Represents project's California-Nevada Expansion

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

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JEANNE SHAHEEN, NEW HAMPSHIRE

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DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR
WILLIAM B. CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981
FACSIMILE: (202) 224-7416
TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

February 15, 2023

Zachary Commins
Office of Senator Alex Padilla
United States Senate
Washington, DC 20510

Dear Mr. Commins:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel on a fact-finding trip to Miami and West Palm Beach, Florida, on February 22–23, 2023, sponsored by Florida East Coast Industries (FECI). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from FECI in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as a Policy Advisor in the Office of Senator Alex Padilla. FECI invited you to travel on a fact-finding trip to Miami and West Palm Beach, Florida, on February 22–23, 2023. FECI certified to the Committee that it will pay the necessary expenses² related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. Although FECI is a private entity that retains or employs a federally registered lobbyist or foreign agent, FECI has certified that no registered lobbyist or agent of a foreign principal will accompany you on any segment of your trip.³

Discussion

Privately sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly, from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110–81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately sponsored travel only with the prior written approval of the Committee.

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² The term “necessary expenses” has a specific definition. *See Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel – Glossary of Terms* at 8.

³ The term “any segment of your trip” has a specific definition. *See id.* at 3.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately Sponsored Travel and Glossary of Terms* (collectively, *Travel Regulations*). The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Trips sponsored by private entities that retain or employ a lobbyist or foreign agent may not exceed one day, exclusive of travel time and one overnight stay. A second overnight stay may be allowed if the sponsor establishes in writing that a two-night stay is practically required and necessary to accomplish the purpose of the trip. The Committee examines these requests on a case-by-case basis and will consider the distance of travel, the availability of transportation to or from the location of the one-day event, the start and end time of the day's official activities, and any other exceptional circumstances described in writing prior to the trip. Regardless of whether one or two overnight stays are approved, all scheduled officially-connected activities must take place on one calendar day. The sponsor may pay for meals and expenses for the overnight stays but may not plan or sponsor any substantive activities for the Senate invitee on those days. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee on any segment of the trip.⁴

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately Sponsored Travel.**

Consistent with these standards and Committee precedent, FECI's factual representations, it appears that it is permissible for you to accept necessary expenses from FECI in connection with this trip, provided that the actual travel and travel-related expenses for this one-day trip (exclusive of travel time and one overnight stay) conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

⁴ See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 4-5; see also *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel – Glossary of Terms* at 3.

Finally, Senate Rule 34 requires a reporting individual,⁵ on their financial disclosure report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$415 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their financial disclosure report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin
Chief Counsel and Staff Director

Enclosure: Travel Checklist

⁵ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$141,022 for CY 2023) or is a political fund designee and is required to file financial disclosure reports.