

FINANCIAL DISCLOSURE REPORT FOR CALENDAR YEAR 2018

*Report Required by the Ethics
in Government Act of 1978
(5 U.S.C. app. §§ 101-111)*

1. Person Reporting (last name, first, middle initial) Lettow, Charles F.	2. Court or Organization U.S. Court of Federal Claims	3. Date of Report 05/01/2019
4. Title (Article III judges indicate active or senior status; magistrate judges indicate full- or part-time) U.S. Ct. of Fed. Claims Judge - - Senior	5a. Report Type (check appropriate type) ☐ Nomination ☐ Initial ☒ Annual ☐ Final	6. Reporting Period 01/01/2018 to 12/31/2018
5b. ☐ Amended Report		
7. Chambers or Office Address National Courts Building 717 Madison Place, N.W. Washington, D.C.		
IMPORTANT NOTES: <i>The instructions accompanying this form must be followed. Complete all parts, checking the NONE box for each part where you have no reportable information.</i>		

I. POSITIONS. (Reporting individual only; see pp. 9-13 of filing instructions.)

☐ NONE (No reportable positions.)

<u>POSITION</u>	<u>NAME OF ORGANIZATION/ENTITY</u>
1. President and Director	Busy Way Farms, Inc. (Subchapter S farm entity wholly owned by family members; position is not compensated)
2. Partner	Homestead partnership (small farm entity wholly owned by family members; position is not compensated)
3. Trustee	Family trust (position is not compensated)
4.	
5.	

II. AGREEMENTS. (Reporting individual only; see pp. 14-16 of filing instructions.)

☐ NONE (No reportable agreements.)

<u>DATE</u>	<u>PARTIES AND TERMS</u>
1. 1/1/1993	Cleary, Gottlieb, Steen & Hamilton retirement plan with former law firm, no control
2.	(NOTE: An opinion from the Committee on Codes of Conduct dated June 12, 2003, considers that receipt of the retirement annuity provided under this plan accords
3.	with the Code of Conduct for United States Judges.)

FINANCIAL DISCLOSURE REPORT

Page 2 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

III. NON-INVESTMENT INCOME. *(Reporting individual and spouse; see pp. 17-24 of filing instructions.)***A. Filer's Non-Investment Income**☐ NONE *(No reportable non-investment income.)*

DATE	SOURCE AND TYPE	INCOME (yours, not spouse's)
1. 2018	Cleary, Gottlieb, Steen & Hamilton (retirement annuity)	\$693,998.00
2.		
3.		
4.		

B. Spouse's Non-Investment Income - *If you were married during any portion of the reporting year, complete this section.**(Dollar amount not required except for honoraria.)*☒ NONE *(No reportable non-investment income.)*

DATE	SOURCE AND TYPE
1.	
2.	
3.	
4.	

IV. REIMBURSEMENTS *— transportation, lodging, food, entertainment.**(Includes those to spouse and dependent children; see pp. 25-27 of filing instructions.)*☒ NONE *(No reportable reimbursements.)*

SOURCE	DATES	LOCATION	PURPOSE	ITEMS PAID OR PROVIDED
1.				
2.				
3.				
4.				
5.				

FINANCIAL DISCLOSURE REPORT

Page 3 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

V. GIFTS. (Includes those to spouse and dependent children; see pp. 28-31 of filing instructions.)

☒ NONE (No reportable gifts.)

	SOURCE	DESCRIPTION	VALUE
1.			
2.			
3.			
4.			
5.			

VI. LIABILITIES. (Includes those of spouse and dependent children; see pp. 32-33 of filing instructions.)

☐ NONE (No reportable liabilities.)

	CREDITOR	DESCRIPTION	VALUE CODE
1.	Morgan Stanley	Portfolio Loan Account	O
2.	Pacific Life	Life Policy Loan	O
3.	Morgan Stanley	Portfolio Loan Account	P1
4.			
5.			

FINANCIAL DISCLOSURE REPORT

Page 4 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VII. INVESTMENTS and TRUSTS – income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)
1. (H) IRA #1									
2. -Morgan Stanley Bank	A	Interest	M	T					
3. -BBT	E	Dividend	O	T					
4. -BGS	E	Dividend	M	T	Sold (part)	05/24/18	M	G	
5.					Sold (part)	06/21/18	L	F	
6.					Sold (part)	07/19/18	K	E	
7.					Sold (part)	08/06/18	J	D	
8. -CVX	D	Dividend	M	T	Sold (part)	06/21/18	L	E	
9.					Sold (part)	07/06/18	M	F	
10.					Sold (part)	07/19/18	M	F	
11.					Sold (part)	08/06/18	L	E	
12. -CL	D	Dividend	N	T					
13. -INGR	C	Dividend			Sold (part)	04/10/18	L	F	
14.					Sold (part)	04/26/18	M	E	
15.					Sold (part)	05/24/18	L	E	
16.					Sold	05/24/18	J		
17. -PKG	E	Dividend	O	T					

1. Income Gain Codes:	A = \$1,000 or less	B = \$1,001 - \$2,500	C = \$2,501 - \$5,000	D = \$5,001 - \$15,000	E = \$15,001 - \$50,000
(See Columns B1 and D4)	F = \$50,001 - \$100,000	G = \$100,001 - \$1,000,000	H1 = \$1,000,001 - \$5,000,000	H2 = More than \$5,000,000	
2. Value Codes	J = \$15,000 or less	K = \$15,001 - \$50,000	L = \$50,001 - \$100,000	M = \$100,001 - \$250,000	
(See Columns C1 and D3)	N = \$250,001 - \$500,000	O = \$500,001 - \$1,000,000	P1 = \$1,000,001 - \$5,000,000	P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes	P3 = \$25,000,001 - \$50,000,000		P4 = More than \$50,000,000		
(See Column C2)	Q = Appraisal	R = Cost (Real Estate Only)	S = Assessment	T = Cash Market	
	U = Book Value	V = Other	W = Estimated		

FINANCIAL DISCLOSURE REPORT

Page 5 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)

18. -PX (merged into LIN)	D	Dividend			Sold (part)	07/19/18	K	E	
19.					Sold (part)	08/06/18	K	E	
20.					Merged (with line 23)	10/31/18	N	G	See Part VIII
21. -SJM	D	Dividend	M	T	Sold (part)	06/21/18	M	E	
22.					Sold (part)	08/06/18	K	E	
23. -LIN (formerly PX)	B	Dividend	N	T	Sold (part)	10/31/18	J		See Part VIII
24. (H) Brokerage Act. #1									
25. -Morgan Stanley Bank	A	Interest	K	T					
26. -BBT	D	Dividend	N	T					
27. -BPT	B	Royalty	J	T					
28. -CL	D	Dividend	N	T					
29. -XOM	D	Dividend	M	T	Sold (part)	10/09/18	J	B	
30. LIN (formerly PX)	B	Dividend	M	T	Sold (part)	10/31/18	J		See Part VIII
31. -PKG	D	Dividend	N	T					
32. -PEP	D	Dividend	M	T	Sold (part)	07/30/18	L	D	
33. -QEP		None			Sold	07/30/18	L		
34. -COF	D	Dividend	O	T					

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$50,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

FINANCIAL DISCLOSURE REPORT

Page 6 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)

35. --SJM	D	Dividend	M	T					
36. -PX (merged into LIN)	C	Dividend			Merged (with line 30)	10/31/18	M	G	See Part VIII
37. (H) Trust #1									
38. -Morgan Stanley Bank	A	Interest	K	T					
39. -MMM (3M)	D	Dividend	M	T	Sold (part)	04/10/18	K	C	
40. -BBT	D	Dividend	N	T					
41. -COF	D	Dividend	O	T					
42. -CL	E	Dividend	O	T	Sold (part)	12/24/18	L		
43. -GIS	D	Dividend	M	T	Sold (part)	04/10/18	J		
44. -LIN (formerly PX)	A	Dividend	M	T	Sold (part)	12/14/18	J		See Part VIII
45. -MDT	A	Dividend	J	T					
46. -PKG	D	Dividend	N	T					
47. -PEP	D	Dividend	M	T	Sold (part)	12/14/18	J	B	
48. -PX (Merged into LIN)	C	Dividend			Merged (with line 44)	10/31/18	N	G	See Part VIII
49. -SJM	D	Dividend	M	T					
50. -WFC	D	Dividend	L	T					
51. -QEP		None			Sold	08/21/18	L		

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$50,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

FINANCIAL DISCLOSURE REPORT

Page 7 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)

52. -LNT	A	Dividend	J	T					
53. -BPT	B	Royalty	J	T					
54. -XOM	D	Dividend	M	T					
55. -KMI		None							See Part VIII
56. -Stoneham Partners		None	P1	Q					See Part VIII
57. -Vorbeck Materials pfd. stock		None	N	Q					See Part VIII
58. -Vorbeck Materials bridge loan		None	P1	Q	Buy	01/22/18	N		See Part VIII
59.					Buy	09/05/18	M		See Part VIII
60. USAA Money Mkt. Fund	A	Dividend	L	T					
61. Thrivent Whole Life	A	Distribution	J	U					
62. USAA Whole Life 1	B	Distribution	K	U					
63. USAA Whole Life 2	B	Distribution	L	U					
64. Pacific Life Variable (Fixed LT Account)	D	Distribution	O	U					
65. USAA Subsc. Sav. Act.	C	Distribution	K	U					
66. Busy Way Farms	E	Int./Div.	O	U					
67. B&T Bank Act.		None	J	T					
68. Homestead Partnership	B	Distribution	L	U					

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	P3 = \$25,000,001 - \$50,000,000
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	P4 = More than \$50,000,000 S = Assessment W = Estimated	T = Cash Market	

FINANCIAL DISCLOSURE REPORT

Page 8 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)

69. Stoneham Partners	A	Interest	P1	U					
70. Vorbeck Materials pfd. stock		None	O	U					
71. Vorbeck Materials bridge loan		None	P1	U	Buy	01/03/18	K		
72.					Buy	01/11/18	K		
73.					Buy	03/19/18	L		
74.					Buy	04/02/18	L		
75.					Buy	04/16/18	M		
76.					Buy	05/02/18	M		
77.					Buy	05/29/18	L		
78.					Buy	06/13/18	L		
79.					Buy	06/26/18	L		
80.					Buy	06/29/18	K		
81.					Buy	07/10/18	L		
82.					Buy	07/16/18	K		
83.					Buy	07/24/18	M		
84.					Buy	08/08/18	L		
85.					Buy	08/15/18	K		

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$5,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

FINANCIAL DISCLOSURE REPORT

Page 9 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)
86.					Buy	08/22/18	L		
87.					Buy	08/18/18	K		
88.					Buy	09/27/18	J		
89.					Buy	10/02/18	M		
90.					Buy	10/18/18	L		
91.					Buy	10/31/18	K		

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$50,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

FINANCIAL DISCLOSURE REPORT

Page 10 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

VIII. ADDITIONAL INFORMATION OR EXPLANATIONS. *(Indicate part of report.)*

Regarding lines 56, 57, 58, and 59, appraisals for estate purposes were made in late 2016, as of June 12, 2016. There have been no material changes in the pertinent assets since then, except for the cash purchases listed for lines 58 and 59.

Regarding line 55, a sale of KMI stock on 12/14/17 (reported for the 2017 year) actually disposed of all of the holdings in that entity.

Regarding lines 18, 23, 30, 36, 44, and 48, the merger of PX into LIN, a German company, was a stock-for-stock exchange. Nonetheless, the exchange was not tax free. The Internal Revenue Service required that gain in value of the LIN stock received over the cost basis in the PX stock exchanged be recognized, but losses were not recognized. Thus, gain codes appear in column D.4.

FINANCIAL DISCLOSURE REPORT

Page 11 of 11

Name of Person Reporting

Lettow, Charles F.

Date of Report

05/01/2019

IX. CERTIFICATION.

I certify that all information given above (including information pertaining to my spouse and minor or dependent children, if any) is accurate, true, and complete to the best of my knowledge and belief, and that any information not reported was withheld because it met applicable statutory provisions permitting non-disclosure.

I further certify that earned income from outside employment and honoraria and the acceptance of gifts which have been reported are in compliance with the provisions of 5 U.S.C. app. § 501 et. seq., 5 U.S.C. § 7353, and Judicial Conference regulations.

Signature: s/ Charles F. Lettow

NOTE: ANY INDIVIDUAL WHO KNOWINGLY AND WILLFULLY FALSIFIES OR FAILS TO FILE THIS REPORT MAY BE SUBJECT TO CIVIL AND CRIMINAL SANCTIONS (5 U.S.C. app. § 104)

Committee on Financial Disclosure
Administrative Office of the United States Courts
Suite 2-301
One Columbus Circle, N.E.
Washington, D.C. 20544