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Rules for Thee: Stephen Miller's Paperwork Problem

Miller's disclosures appear to misreport stock sales and leave \$1.4 million unexplained

By Zach Everson

In the past seven weeks, Donald Trump's Justice Department has charged dozens of immigrants, nearly all of them green-card holders, with making false statements on voter-registration forms or citizenship applications.¹ And on Oct. 12, federal agents searched a sitting U.S. representative's Washington home as part of what the Justice Department called "an ongoing federal criminal investigation"—one that, according to the *Wall Street Journal*, involves whether the lawmaker's age was misstated on immigration paperwork 26 years ago.²

Yet White House Deputy Chief of Staff Stephen Miller—who wrote in 2023 that the "denaturalization project" begun under Trump, which can strip Americans of citizenship over misstatements on their immigration paperwork, would be "turbocharged" in 2025—ironically appears to have filed inaccurate disclosures of his own.³

A Public Citizen analysis compared the certificates of divestiture⁴ the U.S. Office of Government Ethics (OGE) issued to Miller's family with three of his filings, all of which were certified by a White House ethics official:

¹ Information compiled from Department of Justice press releases ([justice.gov](https://www.justice.gov)) and charging documents (found at storage.courtlistener.com).

² McCormick, John, et al. "Ilhan Omar Investigation Aims to Build Case for Stripping Her Citizenship." *The Wall Street Journal*, 14 Oct. 2026, [wsj.com/politics/policy/ilhan-omar-investigation-aims-to-build-case-for-stripping-her-citizenship-6adf1edc](https://www.wsj.com/politics/policy/ilhan-omar-investigation-aims-to-build-case-for-stripping-her-citizenship-6adf1edc); United States, Department of Justice. *Consolidated Memorandum of Law in Opposition to Requests to Access Sealed Search Warrant Records*. In re Application of Fourteen Press Organizations for Access to Sealed Search Warrant Records, no. 1:26-mc-00144, U.S. District Court for the District of Columbia, 27 Oct. 2026, ECF no. 12, p. 10. *CourtListener*, storage.courtlistener.com/recap/gov.uscourts.dcd.297666/gov.uscourts.dcd.297666.12.0.pdf.

³ Miller, Stephen [@StephenM]. "Yes. We started a new denaturalization project under Trump. In 2025, expect it to be turbocharged." X, 11 Oct. 2023, 9:16 a.m., x.com/StephenM/status/1712094935820780029; "Revocation of Naturalization." *United States Code*, title 8, section 1451, 2024. *GovInfo*, govinfo.gov/content/pkg/USCODE-2024-title8/html/USCODE-2024-title8-chap12-subchapIII-partII-sec1451.htm. Miller's filings are documented in notes 6–10.

⁴ United States, Office of Government Ethics. *Certificates of Divestiture OGE-2025-174 through OGE-2025-178*. 12 Aug. 2025. *DocumentCloud*, documentcloud.org/documents/28834330-miller-stephen-oge-2025-174-175-176-177-178-cdiv/.

- his initial financial disclosure, filed in March 2025, which lists the family's holdings⁵
- his report of the stock sales the family made on Aug. 14, 2025, two days after the certificates were issued⁶
- his annual financial disclosure for all of 2025, which was filed in June 2026⁷

The analysis found several inconsistencies:

Reported sale values don't match the certified share counts. In at least 10 of the 27 sales on Miller's Aug. 29, 2025, transaction report, the reported proceeds are too low to match the shares listed on the certificates of divestiture at any price those stocks traded on Aug. 14, the day of the sales (see the appendix for a comparison of all 27 trades). The largest gap is MP Materials: 3,000 shares were worth at least \$223,000 that day but were reported in just the \$50,000 to \$100,000 range. (The Pentagon became the company's largest shareholder five weeks before the sale.)⁸

None of these stocks appears on Miller's annual financial disclosure for 2025 that covers through the year's end, so the family did not keep any of the shares. No other transaction reports from Miller are available in OGE's online collection of disclosures, and an OGE staff member told Public Citizen that everything the agency has received for Miller is online.⁹ The

⁵ Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): New Entrant Report*. 14 Mar. 2025. DocumentCloud, documentcloud.org/documents/28834328-stephen-miller-2025-278nedraft/.

⁶ Miller, Stephen N. *Periodic Transaction Report (OGE Form 278-T)*. 29 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834332-stephen-n-miller-08292025-278t/.

⁷ Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025*. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/.

⁸ Miller, Stephen N. *Periodic Transaction Report (OGE Form 278-T)*. 29 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834332-stephen-n-miller-08292025-278t/; United States, Office of Government Ethics. *Certificates of Divestiture OGE-2025-174 through OGE-2025-178*. 12 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834330-miller-stephen-oge-2025-174-175-176-177-178-cdiv/; Nasdaq. Historical stock price data for AB, AMZN, ARM, BX, CCJ, COST, CRWD, FIZZ, GE, GEHC, GEV, INTC, IONQ, MP, MSFT, MU, PANW, PLTR, SCHW and SMCI, 14 Aug. 2025. Nasdaq, [nasdaq.com/market-activity/stocks/\[ticker\]/historical](https://nasdaq.com/market-activity/stocks/[ticker]/historical). Accessed 10 Oct. 2027; MP Materials. "MP Materials Announces Transformational Public-Private Partnership with the Department of Defense to Accelerate U.S. Rare Earth Magnet Independence." MP Materials, 10 July 2025, mpmaterials.com/news/mp-materials-announces-transformational-public-private-partnership-with-the-department-of-defense-to-accelerate-u-s-rare-earth-magnet-independence/. All documents in this report posted on DocumentCloud were originally made through requests to the Office of Government Ethics at oge.gov/web/oge.nsf/Officials%20Individual%20Disclosures%20Search%20Collection and received from OGE via email 7 Oct. 2026.

⁹ United States, Office of Government Ethics. Search results for "Stephen Miller." *Officials' Individual Disclosures Search Collection*, oge.gov/web/oge.nsf/Officials%20Individual%20Disclosures%20Search%20Collection?OpenForm. Accessed 29 Oct. 2026, 2:30 p.m. Archived at DocumentCloud, documentcloud.org/documents/28858141-search-for-stephen-miller-in-oges-officials-individual-disclosures-search



White House's own disclosures web page also lists just one transaction report for Miller, identical to the one OGE provided.¹⁰ Officials must report sales of individual stocks by their spouses and dependent children within 45 days.¹¹

FIGURE 1

How Miller's Numbers Don't Add Up

MP Materials, line 9 of Miller's transaction report

Shares Miller was certified to sell	3,000
Lowest trading price on the day of the sale (Aug. 14, 2025)	\$74.35
Minimum value of the sale (3,000 × \$74.35)	\$223,050
Value Miller reported	\$50,000 to \$100,000

Even at the day's lowest price, the sale was worth more than twice the top of the range Miller reported. All 27 sales on the report are listed in the appendix.

Note: Reported value ranges are rounded; on the disclosure forms, each range begins \$1 higher (e.g., \$50,001 to \$100,000).

Sources: United States, Office of Government Ethics. Certificates of Divestiture OGE-2025-174 through OGE-2025-178. 12 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834330-miller-stephen-oge-2025-174-175-176-177-178-cdiv/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): New Entrant Report. 14 Mar. 2025. DocumentCloud, documentcloud.org/documents/28834328-stephen-miller-2025-278nedraft/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/. Miller, Stephen N. Periodic Transaction Report (OGE Form 278-T). 29 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834332-stephen-n-miller-08292025-278t/. Nasdaq historical stock price data for each company, Aug. 14, 2025 ([nasdaq.com/market-activity/stocks/\[ticker\]/historical](https://nasdaq.com/market-activity/stocks/[ticker]/historical)). Public Citizen analysis.

Where did the kids' money go? The shares OGE certified for sale from the three children's custodial accounts were worth roughly \$443,000 to \$507,000 per child on Aug. 14, 2025—about \$1.4 million in all. The children's accounts also held \$165,000 to \$400,000 in

h-collection-ogegov-web-ogensf-of-usoge-2026-10-29-14-30-40/. Staff member, United States Office of Government Ethics. Telephone conversation with author. 27 Oct. 2026.

¹⁰ United States, White House. "Public Disclosures." *The White House*, whitehouse.gov/disclosures/. Accessed 29 Oct. 2026, 2:40 p.m. ET. Archived at DocumentCloud, documentcloud.org/documents/28858166-public-disclosures-the-white-house-whitehousegovdisclosures-2026-10-29-1440-et.

¹¹ "General Requirements, Filing Dates, and Extensions." *Code of Federal Regulations*, title 5, section 2634.201(f). eCFR, ecfr.gov/current/title-5/chapter-XVI/subchapter-B/part-2634/subpart-B/section-2634.201. Accessed 29 Oct. 2026.



other investments on Miller's March 2025 disclosure, two investment funds and Spotify shares. By the end of 2025, according to Miller's annual report, each account held just \$1,000 to \$15,000 in cash, plus, in one account, Spotify shares it already owned. None of the other investments appears, and the report doesn't explain where the money went.¹²

FIGURE 2

Where Did the Children's Money Go?

Value of the stock sold from each child's custodial account on Aug. 14, 2025, compared with what each account held at the end of the year.

Account	Stocks sold Aug. 14, 2025 (278-T lines)	Value of shares sold*	Holdings at end of 2025 (annual report)
Child 1	GE HealthCare, GE Vernova, GE Aerospace (lines 13–15)	\$449,000 to \$459,000	Cash, \$1,000 to \$15,000
Child 2	Amazon, Blackstone, Costco, Microsoft (lines 16–19)	\$443,000 to \$451,000	Cash, \$1,000 to \$15,000
Child 3	AllianceBernstein, Amazon, Arm, Cameco, Microsoft, Palantir, Palo Alto Networks, Charles Schwab (lines 20–27)	\$494,000 to \$507,000	Cash, \$1,000 to \$15,000; Spotify, \$15,000 to \$50,000 (held before the sales)
Total		\$1,385,000 to \$1,417,000	

* Shares listed on each child's certificate of divestiture, valued at the low and high trading prices on Aug. 14, 2025. Children are numbered in the order of their certificates. Year-end holdings are matched to each account using the holdings listed on Miller's March 2025 new-entrant report, which labels the accounts "Child Brokerage 1" through "Child Brokerage 3" in a different order. The children's accounts also held \$165,000 to \$400,000 in other investments on the March 2025 report (Child 1: an emerging-markets fund and Spotify shares; Child 3: a bank-stock fund) that do not appear on the annual report.

Figures may not sum due to rounding.

Sources: United States, Office of Government Ethics. Certificates of Divestiture OGE-2025-174 through OGE-2025-178. 12 Aug.

¹² United States, Office of Government Ethics. *Certificates of Divestiture OGE-2025-174 through OGE-2025-178*. 12 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834330-miller-stephen-oge-2025-174-175-176-177-178-cdiv/; Public Citizen. Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025*. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft.



2025. DocumentCloud, documentcloud.org/documents/28834330-miller-stephen-oge-2025-174-175-176-177-178-cdiv/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): New Entrant Report. 14 Mar. 2025. DocumentCloud, documentcloud.org/documents/28834328-stephen-miller-2025-278nedraft/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/. Miller, Stephen N. Periodic Transaction Report (OGE Form 278-T). 29 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834332-stephen-n-miller-08292025-278t/. Nasdaq historical stock price data for each company, Aug. 14, 2025 ([nasdaq.com/market-activity/stocks/\[ticker\]/historical](https://nasdaq.com/market-activity/stocks/[ticker]/historical)). Public Citizen analysis.

Holdings that disappeared with no reported sale. On Miller's March 2025 disclosure, Katie Miller's IRA held shares of Arm Holdings, Spotify, Alphabet, Viking Therapeutics, MP Materials, Apple and Amazon, reported at a combined \$21,000 to \$140,000, as well as \$1,000 to \$15,000 in cash. On Miller's annual report for 2025, the IRA is still listed, but it holds just \$2,000 to \$30,000 in Spotify shares and \$1,000 to \$15,000 in cash. Miller's only transaction report for the year lists no sales of Alphabet, Viking Therapeutics or Apple at all, and its sales of Arm, Amazon and MP Materials match the shares on the certificates of divestiture, which do not include the IRA.¹³ Public Citizen found no transaction report showing any additional sales.¹⁴

¹³ Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): New Entrant Report*. 14 Mar. 2025. DocumentCloud, documentcloud.org/documents/28834328-stephen-miller-2025-278nedraft/; Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025*. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/.

¹⁴ Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025*. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/; United States, Office of Government Ethics. Search results for "Stephen Miller." *Officials' Individual Disclosures Search Collection*, oge.gov/web/oge.nsf/Officials%20Individual%20Disclosures%20Search%20Collection?OpenForm. Accessed 29 Oct. 2026, 2:30 p.m. Archived at DocumentCloud, documentcloud.org/documents/28858141-search-for-stephen-miller-in-oges-officials-individual-disclosures-search-collection-ogegov-web-ogensf-of-usoge-2026-10-29-14-30-40/; United States, White House. "Public Disclosures." *The White House*, whitehouse.gov/disclosures/. Accessed 29 Oct. 2026, 2:40 p.m. ET. Archived at DocumentCloud, [documentcloud.org/documents/28858166-public-disclosures-the-white-house-whitehousegovdisclosures-2026-10-29-1440-et.](https://documentcloud.org/documents/28858166-public-disclosures-the-white-house-whitehousegovdisclosures-2026-10-29-1440-et/)



FIGURE 3

Katie Miller's IRA, Before and After

Highlighting added by Public Citizen. Income columns omitted.

March 2025 new-entrant report: Katie Miller's IRA

#	DESCRIPTION	EIF	VALUE	
2	IRA	No		
2.1	Arm Holdings PLC - ADR (ARM)	N/A	\$1,001 - \$15,000	Gone by year-end
2.2	Spotify Technology S.A. Ordinary Shares (SPOT)	N/A	\$1,001 - \$15,000	
2.3	Alphabet, Inc. (GOOG)	N/A	\$1,001 - \$15,000	Gone by year-end
2.4	Viking Therapeutics, Inc. (VKTX)	N/A	\$1,001 - \$15,000	Gone by year-end
2.5	MP Materials Corp. Common Stock (MP)	N/A	\$15,001 - \$50,000	Gone by year-end
2.6	Apple, Inc. (AAPL)	N/A	\$1,001 - \$15,000	Gone by year-end
2.7	Amazon.com, Inc. (AMZN)	N/A	\$1,001 - \$15,000	Gone by year-end
2.8	U.S. bank (cash)	N/A	\$1,001 - \$15,000	

2025 annual report: the same IRA at year-end

#	DESCRIPTION	EIF	VALUE
2	IRA	No	
2.1	U.S. bank (cash)	N/A	\$1,001 - \$15,000
2.2	Spotify Technology S.A. Ordinary Shares (SPOT)	N/A	\$1,001 - \$15,000
2.3	Spotify Technology S.A. Ordinary Shares (SPOT)	N/A	\$1,001 - \$15,000

Sources: Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): New Entrant Report. 14 Mar. 2025. DocumentCloud, documentcloud.org/documents/28834328-stephen-miller-2025-278nedraft/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/.



White House Deputy Counsel Scott Gast certified Miller's 2025 annual report on Sept. 3, 2026, despite its inconsistencies with Miller's earlier filings.¹⁵ Asked about the discrepancies, and whether Miller had filed any transaction reports with the White House that weren't forwarded to OGE, White House spokeswoman Lauren Bis said in a statement: "The White House regularly works with appointees to provide ethics guidance and help ensure compliance with applicable federal ethics laws and regulations. Stephen Miller complies with all ethics requirements." Bis did not address any of the specific inconsistencies or say whether any other reports exist.¹⁶

It is unclear whether the discrepancies in Miller's paperwork are due to sloppiness, bureaucratic error or another explanation.

What is clear is that the Trump administration has used alleged errors or inconsistencies in official paperwork to justify criminal investigations and prosecutions against perceived political enemies, immigrants, and others.

Under the Ethics in Government Act, the Justice Department can sue anyone who knowingly and willfully falsifies or fails to report required information on a financial disclosure, seeking a civil penalty of up to \$75,540.¹⁷ Knowingly and willfully falsifying the form is also a crime.¹⁸ It's punishable by up to five years in prison under the federal false-statements statute (coincidentally, the same maximum many of the immigrants charged in recent weeks face).¹⁹ OGE's director and agency heads must refer an official to the attorney general when they have

¹⁵ Miller, Stephen N. *Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025*. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/.

¹⁶ Bis, Lauren. Email to Zach Everson. 29 Oct. 2026.

¹⁷ "Failure to File or Filing False Reports." *United States Code*, title 5, section 13106, 2024. GovInfo, govinfo.gov/content/pkg/USCODE-2024-title5/html/USCODE-2024-title5-partIV-chap131-subchapI-sec13106.htm; United States, Office of Government Ethics. "2025 Civil Monetary Penalties Inflation Adjustments for Ethics in Government Act Violations." *Federal Register*, vol. 90, 15 Jan. 2025, pp. 3610–12, federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations; Vought, Russell T. *Cancellation of Penalty Inflation Adjustments for 2026, Regarding the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015*. Memorandum M-26-11, Office of Management and Budget, 17 Apr. 2026, whitehouse.gov/wp-content/uploads/2026/04/M-26-11-Cancellation-of-Penalty-Inflation-Adjustments-for-2026-Regarding-the-Federal-Civil-Penalties-Inflation-Adjustment-Act-Improvements-Act-of-2015.pdf.

¹⁸ "Failure to File or Falsifying Reports." *Code of Federal Regulations*, title 5, section 2634.701. eCFR, ecfr.gov/current/title-5/chapter-XVI/subchapter-B/part-2634/subpart-G/section-2634.701. Accessed 29 Oct. 2026.

¹⁹ "Statements or Entries Generally." *United States Code*, title 18, section 1001, 2024. GovInfo, govinfo.gov/content/pkg/USCODE-2024-title18/html/USCODE-2024-title18-partI-chap47-sec1001.htm; "Naturalization, Citizenship or Alien Registry." *United States Code*, title 18, section 1015, 2024. GovInfo, govinfo.gov/content/pkg/USCODE-2024-title18/html/USCODE-2024-title18-partI-chap47-sec1015.htm.



“reasonable cause to believe” the official willfully falsified a report, and the president can discipline officials who fail to report required information.²⁰

Nobody is asking for federal agents to search Miller’s home. But Public Citizen is asking OGE to review Miller’s filings, require him to explain the discrepancies, and make sure his financial holdings are dutifully reported.

²⁰ “Failure to File or Filing False Reports.” *United States Code*, title 5, section 13106, 2024. GovInfo, [govinfo.gov/content/pkg/USCODE-2024-title5/html/USCODE-2024-title5-partIV-chap131-subchapl-sec13106.htm](https://www.govinfo.gov/content/pkg/USCODE-2024-title5/html/USCODE-2024-title5-partIV-chap131-subchapl-sec13106.htm)



Appendix: Miller's Reported Sale Values vs. Certified Share Counts

Value of each Aug. 14, 2025, sale at that day's low and high trading prices, compared with the range Miller reported on his Aug. 29, 2025, periodic transaction report. Rows shaded red don't match the certified share counts; rows shaded amber don't match as filed but would if swapped with another line.

Line in 278-T	Stock	Owner (as matched)*	Shares certified for sale	Price range, Aug. 14, 2025	Value of shares sold	Range reported on 278-T	Does it match?
1	AllianceBernstein (AB)	Stephen Miller	1,000	\$40.965 to \$41.60	\$40,965 to \$41,600	\$1,000 to \$15,000	No; too low
2	Amazon (AMZN)	Stephen Miller	500	\$227.02 to \$233.11	\$113,510 to \$116,555	\$1,000 to \$15,000	No; too low
3	Arm Holdings (ARM)	Stephen Miller	500	\$138.27 to \$140.68	\$69,135 to \$70,340	\$1,000 to \$15,000	Too low; would match if swapped with line 10
4	CrowdStrike (CRWD)	Stephen Miller	400	\$419.81 to \$435.00†	\$167,924 to \$174,000	\$100,000 to \$250,000	Yes
5	Intel (INTC)	Stephen Miller	5,000	\$21.90 to \$24.20	\$109,500 to \$121,000	\$100,000 to \$250,000	Yes
6	IonQ (IONQ)	Stephen Miller	2,000	\$39.28 to \$41.12	\$78,560 to \$82,240	\$15,000 to \$50,000	No; too low
7	Micron (MU)	Stephen Miller	1,000	\$121.40 to \$125.74	\$121,400 to \$125,740	\$50,000 to \$100,000	No; too low
8	Super Micro (SMCI)	Stephen Miller	2,000	\$44.67 to \$45.6682	\$89,340 to \$91,336	\$50,000 to \$100,000	Yes
9	MP Materials (MP)	Stephen Miller	3,000	\$74.35 to \$78.159	\$223,050 to \$234,477	\$50,000 to \$100,000	No; too low



Line in 278-T	Stock	Owner (as matched)*	Shares certified for sale	Price range, Aug. 14, 2025	Value of shares sold	Range reported on 278-T	Does it match?
10	Arm Holdings (ARM)	Katie Miller	55	\$138.27 to \$140.68	\$7,605 to \$7,737	\$50,000 to \$100,000	Too high; would match if swapped with line 3
11	Intel (INTC)	Katie Miller	1,000	\$21.90 to \$24.20	\$21,900 to \$24,200	\$15,000 to \$50,000	Yes
12	National Beverage (FIZZ)	Katie Miller	100	\$44.98 to \$46.37	\$4,498 to \$4,637	\$1,000 to \$15,000	Yes
13	GE HealthCare (GEHC)	Child 1	333	\$73.25 to \$75.12	\$24,392 to \$25,015	\$15,000 to \$50,000	Yes
14	GE Vernova (GEV)	Child 1	250	\$620.28 to \$640.2799	\$155,070 to \$160,070	\$50,000 to \$100,000	No; too low
15	GE Aerospace (GE)	Child 1	1,000	\$269.48 to \$274.16	\$269,480 to \$274,160	\$100,000 to \$250,000	No; too low
16	Amazon (AMZN)	Child 2	500	\$227.02 to \$233.11	\$113,510 to \$116,555	\$100,000 to \$250,000	Yes
17	Blackstone (BX)	Child 2	550.164	\$172.49 to \$176.045	\$94,898 to \$96,854	\$50,000 to \$100,000	Yes
18	Costco (COST)	Child 2	104.024	\$975.18 to \$988.2925	\$101,442 to \$102,806	\$50,000 to \$100,000	No; too low
19	Microsoft (MSFT)	Child 2	255.602	\$520.14 to \$525.9499	\$132,949 to \$134,434	\$15,000 to \$50,000	No; too low
20	AllianceBernstein (AB)	Child 3	835	\$40.965 to \$41.60	\$34,206 to \$34,736	\$15,000 to \$50,000	Yes
21	Amazon (AMZN)	Child 3	165	\$227.02 to \$233.11	\$37,458 to \$38,463	\$100,000 to \$250,000	Too high; would match if swapped with line 2†



Line in 278-T	Stock	Owner (as matched)*	Shares certified for sale	Price range, Aug. 14, 2025	Value of shares sold	Range reported on 278-T	Does it match?
22	Arm Holdings (ARM)	Child 3	225	\$138.27 to \$140.68	\$31,111 to \$31,653	\$15,000 to \$50,000	Yes
23	Cameco (CCJ)	Child 3	710	\$75.18 to \$77.145	\$53,378 to \$54,773	\$15,000 to \$50,000	No; too low
24	Microsoft (MSFT)	Child 3	70	\$520.14 to \$525.9499	\$36,410 to \$36,816	\$15,000 to \$50,000	Yes
25	Palantir (PLTR)	Child 3	1,200	\$179.20 to \$185.33	\$215,040 to \$222,396	\$100,000 to \$250,000	Yes
26	Palo Alto Networks (PANW)	Child 3	220	\$173.455 to \$177.85	\$38,160 to \$39,127	\$15,000 to \$50,000	Yes
27	Charles Schwab (SCHW)	Child 3	500	\$95.60 to \$98.21	\$47,800 to \$49,105	\$15,000 to \$50,000	Yes

Note: Reported value ranges are rounded; on the disclosure forms, each range begins \$1 higher (e.g., \$1,001 to \$15,000).

* The 278-T does not identify which family member's account each sale came from. Public Citizen matched sales to owners using the certificates of divestiture, which list the shares each family member had to sell. The 278-T appears to list the sales in the same order as the certificates, and children are numbered in the order of their certificates. Five stocks were sold by more than one family member. Under any assignment of those sales among family members, at least 10 of the 27 reported values cannot match the certified share counts. If both documents followed the same order, 13 of the 27 reported values do not match.

† CrowdStrike split its stock 4-for-1 in July 2026. Historical prices published after the split are adjusted for it, so the published Aug. 14, 2025, low and high (\$104.9525 and \$108.75) have been multiplied by four to reflect the prices at which the shares actually traded that day.

* Swapping lines 2 and 21 would resolve line 21, but line 2's reported range (\$1,000 to \$15,000) would still be too low for the shares in either sale.

Sources: United States, Office of Government Ethics. Certificates of Divestiture OGE-2025-174 through OGE-2025-178. 12 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834330-miller-stephen-oge-2025-174-175-176-177-178-cdiv/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): New Entrant Report. 14 Mar. 2025. DocumentCloud, documentcloud.org/documents/28834328-stephen-miller-2025-278nedraft/. Miller, Stephen N. Public Financial Disclosure Report (OGE Form 278e): Annual Report, Calendar Year 2025. 28 June 2026. DocumentCloud, documentcloud.org/documents/28834327-stephen-miller-2026-278annudraft/. Miller, Stephen N. Periodic Transaction Report (OGE Form 278-T). 29 Aug. 2025. DocumentCloud, documentcloud.org/documents/28834332-stephen-n-miller-08292025-278t/. Nasdaq historical stock price data for each company, Aug. 14, 2025 ([nasdaq.com/market-activity/stocks/\[ticker\]/historical](https://nasdaq.com/market-activity/stocks/[ticker]/historical)). Public Citizen analysis.



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