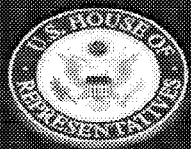


EXHIBIT 1



U.S. House of Representatives

COMMITTEE ON ETHICS

Training for Members on Ethics Laws, Rules, and Standards of Conduct

Presented by the
Committee on Ethics
U.S. House of Representatives

117th Congress

COE.OCEREQUEST.000230

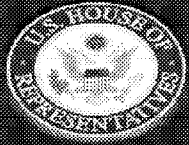


U.S. House of Representatives

COMMITTEE ON ETHICS

The Ethics Committee and its Functions

- Constitutional Authority: Article I, Section 5 of the U.S. Constitution: “Each House may . . . Punish its Members for disorderly Behavior . . .”
- 10-Members of Congress on a bipartisan committee
- Non-partisan staff:
 - Advise and provide training and guidance on ethics laws, rules, and standards of conduct
 - Seeking advice insulates you from an investigation
 - We keep a record of all inquiries
 - Review Financial Disclosure filings (staff are available to perform prescreens)
 - Investigate possible violations by Members, officers, and employees
 - You can contact the Committee by phone, e-mail, mail, or by walking in person



U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources



COE.OCEREQUEST.000232



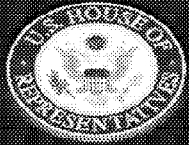
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources

- Official resource is anything paid for with an appropriation (including your staff)
- No personal use of official resources (except *de minimus*)
- No use for campaign activity unless expressly permitted

- Official expenses or activities may only be paid from:
 - Appropriated funds (MRA);
 - Member's personal funds; or
 - Member's campaign funds (with certain limits)
- No private donations, funds, or in-kind goods or services are allowed in support of official House activities or expenses.



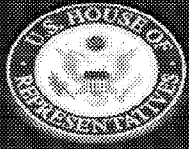
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources: Maintain A Bright Line

Your Official Staff Cannot—

- Contribute to your campaign
- Do campaign work on official time or in official buildings
- Work for free (exceptions for interns, etc.)
- Use their personal funds for official purposes
- Give you gifts (including running personal errands)
- Be required or pressured to volunteer for anything, including your campaign
- Use official resources or position for their own personal benefit, or yours
- Take official actions that would create a conflict for you
- Represent others (unofficially) to the federal government



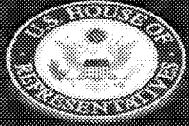
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources and Events

An event can only ever be an official congressional event or an outside group's event

- **Cannot** co-sponsor an official congressional event with any outside group, including a non-profit
- **No** private subsidy for official congressional events
 - **But:** assistance from domestic governmental entities, including public universities is permitted
- No use of official resources for an event sponsored by an outside group
 - **But:** your name may sometimes be used in connection with an outside group's event
- **No** solicitation of an outside group to hold an event for you



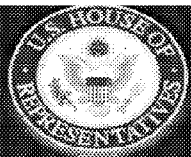
U.S. House of Representatives

COMMITTEE ON ETHICS

General Casework



- Members have *broad* discretion in deciding whether and how to assist constituents
- *No* special treatment or “access” for supporters, contributors, or friends
- Avoid *ex parte* communications
- Communications between Members and constituents are considered *confidential*

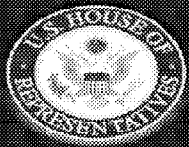


U.S. House of Representatives

COMMITTEE ON ETHICS

Sexual Harassment and Employment Discrimination

- House Rule 23, clause 9 prohibits discharging or refusing to hire an individual, or otherwise discriminating against an individual on the basis of race, color, religion, sex (including marital or parental status), sexual orientation, gender identity, disability, age, or national origin of such individual, including by committing an act of sexual harassment against such individual.
- House Rule 23, clause 18(a) prohibits Members from engaging in a sexual relationship with any employee of the House who works under the supervision of the Member, or who is an employee of a committee on which the Member, serves.
- House Rule 23, clause 18(b) prohibits Members from in unwelcome sexual advances or conduct towards another Member, Delegate, Resident Commissioner, officer, or employee of the House.



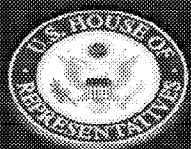
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts



COE.OCEREQUEST.000238

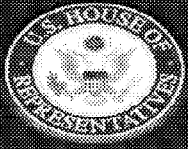


U.S. House of Representatives

COMMITTEE ON ETHICS

Bribes and Illegal Gratuities

- You *may not* accept a gift that is offered in connection with an official action taken or asked to be taken
 - May be deemed a bribe or improper gratuity under federal criminal law (18 U.S.C. § 201)
 - Items of nominal value are allowed as thank you gifts (*e.g.*, flowers, baked goods, or decorative items)

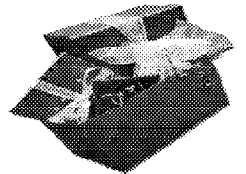


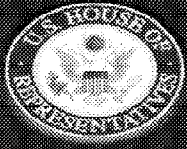
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts

- A gift is almost anything of value, including a discount, tickets to a game, a cup of coffee, a gift card
- The gift rule is written in the negative—cannot accept a gift unless an exception permits acceptance
 - More than 20 exceptions—far fewer exceptions for gifts from federal registered lobbyists or foreign agents
- Before you accept a gift, ask yourself:
 - Can I accept the gift?
 - Do I need prior approval from the Ethics Committee?
 - Do I need to disclose or report the gift (*e.g.*, the Ethics Committee, Clerk, or an FD Statement, etc.)?
- Prior Ethics approval may be required, such as for gifts of personal friendship of more than \$250



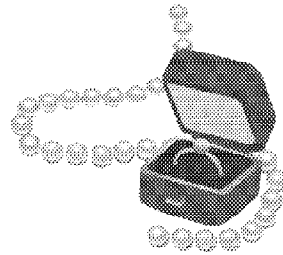


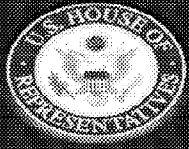
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts

- Gifts from relatives
 - Includes fiancés and in-laws
- Gifts from personal friends
 - Must meet certain criteria
- Gifts from other Members and staff
 - Gifts from employees up the chain only on special occasions
- Gifts related to outside activities
 - May not be offered or enhanced due to House employment
- Gifts from federal, state, or local government
 - Includes public universities





U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts from Foreign Governments

- Foreign Gifts and Decorations Act (FGDA) allows Members and staff to accept a gift of **\$415 or less** from a foreign government
- If the gift is worth more than \$415, you must turn the gift over to the Clerk within 60 days for disposal and file a disclosure form with the Ethics Committee
- With Committee permission, you may be able to retain the gift for official use

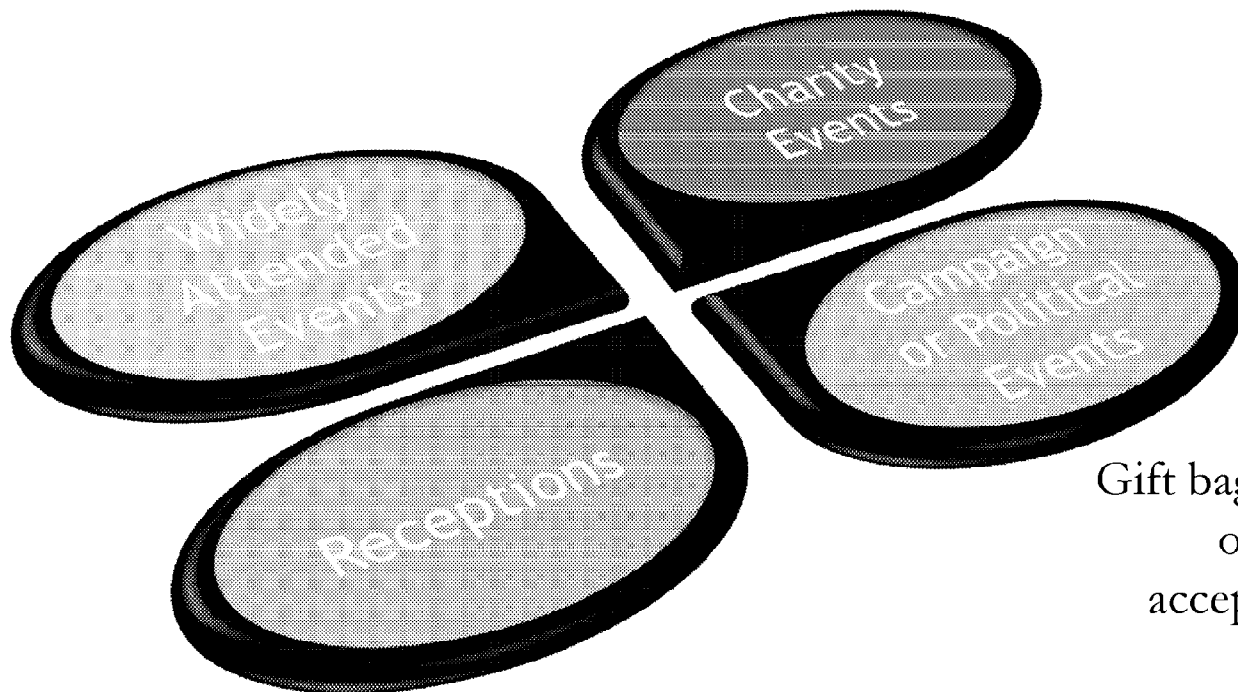


U.S. House of Representatives

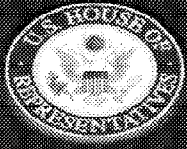
COMMITTEE ON ETHICS

Attendance at Events

“Free attendance” at certain types of events may be accepted under the rule:



Gift bags are permitted only if otherwise acceptable under the gift rule



U.S. House of Representatives

COMMITTEE ON ETHICS

Widely Attended & Charity Events



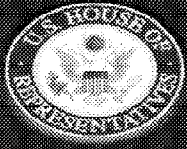
Widely Attended Events

- Attendance connected to official duties
- Open to the public or at least 25 non-Hill attendees



Charity Events

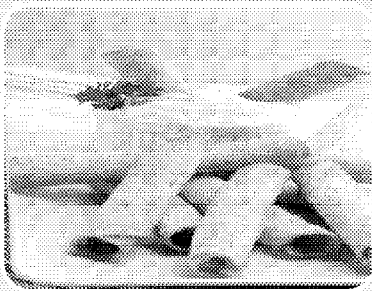
- Sponsored by a 501(c)(3) non-profit
- May accept free attendance only from the sponsor



U.S. House of Representatives

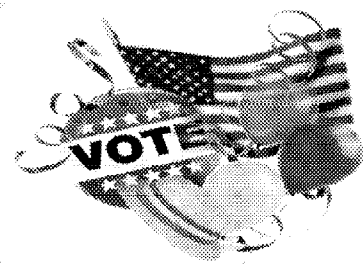
COMMITTEE ON ETHICS

Receptions & Campaign Events



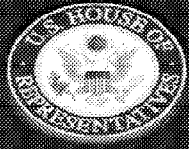
Receptions

- Food or refreshments of a nominal value
- Cannot constitute a meal



Campaign or Political Events

- Sponsored by a 527 organization
- Invitation must come directly from the 527



U.S. House of Representatives

COMMITTEE ON ETHICS

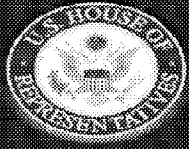
Solicitations

▪ General prohibition *against* most solicitations (5 U.S.C. § 7353)

▪ Permissible charitable solicitations

- Must be in your personal capacity
- On your own time
- Not using official resources
- No solicitations of lobbyists or foreign agents
- No implied official endorsement
- No direct personal benefit to soliciting individual

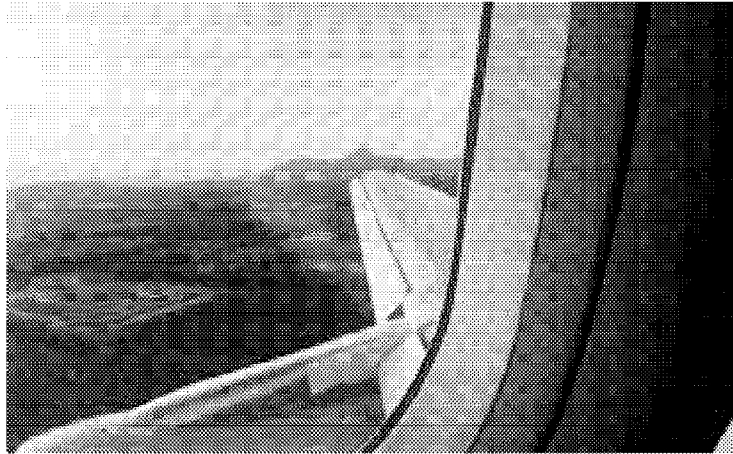




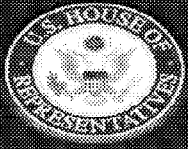
U.S. House of Representatives

COMMITTEE ON ETHICS

Travel



COE.OCEREQUEST.000247



U.S. House of Representatives

COMMITTEE ON ETHICS

Privately-sponsored Travel

- *Each* traveler must obtain prior, written approval from the Ethics Committee
- Request must be submitted at least *30 days* before start date of the trip



- There are significant restrictions on accepting travel expenses from private entities that *retain or employ* lobbyists or foreign



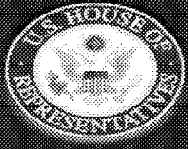
U.S. House of Representatives

COMMITTEE ON ETHICS

Pre-Approval Exceptions

Committee pre-approval not required for travel paid for using:

- House funds (MRA or committee funds)
- Federal campaign funds, provided your travel is reported to the FEC
- U.S. federal, state, or local government funds
 - Public (state) university funds



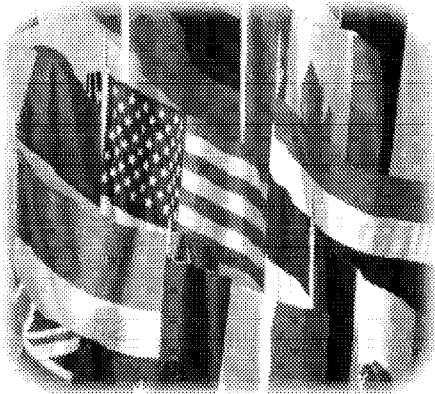
U.S. House of Representatives

COMMITTEE ON ETHICS

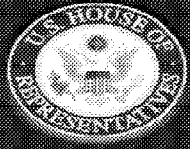
Travel from Foreign Government

Special rules and disclosure requirements for travel funded by *foreign* governments:

- MECEA (Mutual Educational and Cultural Exchange Act)
- FGDA (Foreign Gifts and Decorations Act)
 - Committee pre-approval not required for either
 - FGDA travel must be reported to Committee on special form within 30 days



COE.OCEREQUEST.000250



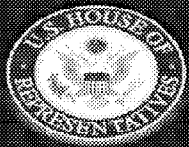
U.S. House of Representatives

COMMITTEE ON ETHICS

Private Planes

- Significant restrictions on the use of campaign or personal funds to pay for flights on privately-owned aircraft
- Call the Ethics Committee before flying
- Prior Ethics approval may be required to accept a gift of private plane travel
- Disclosure may be required

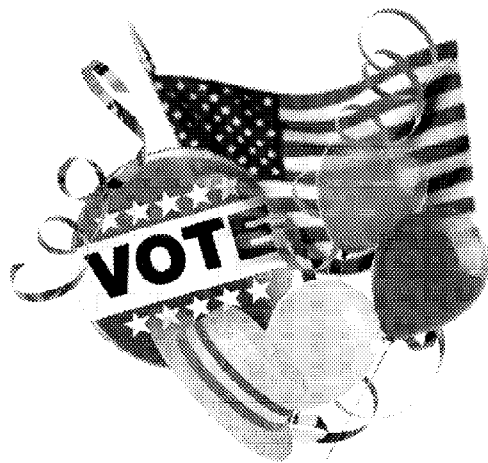




U.S. House of Representatives

COMMITTEE ON ETHICS

Campaign Activity



COE.OCEREQUEST.000252



U.S. House of Representatives

COMMITTEE ON ETHICS

Campaign Activity

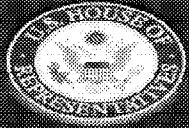


Same Rules
apply to all
Members and
House staff

Rules apply in
both election
and
non-election
years

Rules generally
apply to *any*
campaign
(Presidential,
House, local,
etc.)

Rules apply to
paid and
volunteer
campaign staff



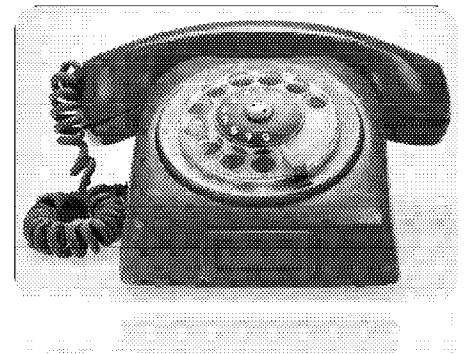
U.S. House of Representatives

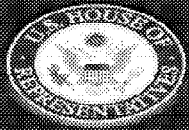
COMMITTEE ON ETHICS

Exceptions for Certain Campaign-Related Activities

Common sense exceptions to the prohibition on use of official resources:

- scheduling
- handling press calls
- referrals to campaign office
- providing official materials





U.S. House of Representatives

COMMITTEE ON ETHICS

Official Use of Campaign Funds

- **General rule:** Campaign funds may be used for some expenses of a Member's personal office or a committee on which the Member serves
- **Permitted official uses:**



Food at Member office events



Officially-connected travel for Member or staff



Travel for guest speaker at Member office event



Cell phone or BlackBerry



Car



U.S. House of Representatives

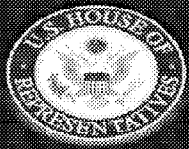
COMMITTEE ON ETHICS

Impermissible Use of Campaign Funds

Some clearly prohibited personal expenses:

- Normal living expenses (food, clothing, shelter)
- Vacation expenses
- Tickets to shows and sporting events
(unless part of a bona fide campaign event)
- Country club or health club dues

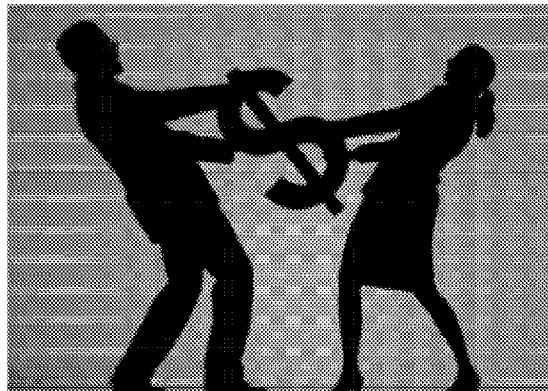
Members may never borrow from their campaign account



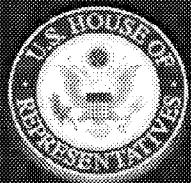
U.S. House of Representatives

COMMITTEE ON ETHICS

Conflict of Interest



COE.OCEREQUEST.000257

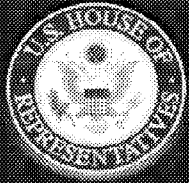


U.S. House of Representatives

COMMITTEE ON ETHICS

General Principles

- Do not allow compensation to accrue to your personal benefit from improper use of House position.- House Rule 23, clause 3
- Do not accept benefits for you or your family under circumstances that appear to influence your governmental duties. - Code of Ethics for Government Service ¶5
- No “special favors” to anyone, based on personal, business, or political relationships. - Code of Ethics for Government Service ¶ 5
- Do not use official position or confidential information for personal gain. - Code of Ethics for Government Service ¶ 8
- Do not use official House resources for personal or campaign activities. - 31 U.S.C. § 1301



U.S. House of Representatives
COMMITTEE ON ETHICS

Personal Activity

Do Not Contract with Federal Government

EXCEPT: Certain farm programs excluded. - *Code of Ethics for Government Service* ¶ 7; *18 U.S.C. §§ 431 & 433*; *41 U.S.C. § 6306(a) & (b)*.

No Lobbying or Representational Contacts

Do NOT represent an outside organization in a matter if the Federal government is a party or has an interest.

Do NOT lobby or aid outside organizations in the lobbying of Congress or the Executive Branch.- *18 U.S.C. §§ 203 & 205*; *House Rule 25, clause 6*.

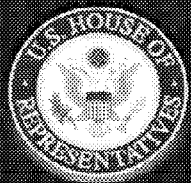
SPOUSE CANNOT lobby you or your staff if, spouse is a registered federal lobbyist. - *House Rule 25, clause 7*.

Do Not Use Material, Nonpublic Information

May constitute INSIDER TRADING.

SEC definition of “public” not obvious or clear.

Do NOT Participate in an IPO



U.S. House of Representatives

COMMITTEE ON ETHICS

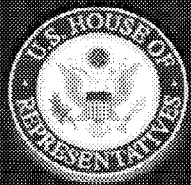
Prohibitions on Outside Positions

Members ***may not*** serve as an officer or director of any:

- Public company, defined by the Securities and Exchange Act of 1934; or
- Company traded on a foreign market.
- There are NO exceptions to these restrictions.

Members ***may not*** serve as an officer or director of any:

- Entity that receives funding from a federal agency, jurisdiction of which falls within a committee on which a Member sits; or
- Entity that is regulated by a federal agency, jurisdiction of which falls within a committee on which a Member sits.
- There are several exceptions to these restrictions.



U.S. House of Representatives

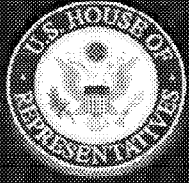
COMMITTEE ON ETHICS

Earned Income and Other Restrictions

Members may not—

- All Members are limited in the amount of outside income they may earn (2021: \$29,595)
- Permit a firm that provides fiduciary services to *use your name*
- Receive —
 - compensation for serving as an *officer or director* of any entity
 - Includes both for-profit and non-profit organizations
 - payment for performing services involving a *fiduciary relationship*
- Fiduciary Professions: *Legal, real estate, consulting and advising (including lobbying), insurance, medicine,* financial services, and similar positions where you hold a position of trust*

**Note: There are special rules for Members who are also medical doctors*



U.S. House of Representatives

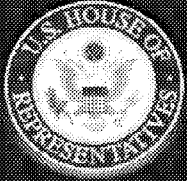
COMMITTEE ON ETHICS

Other Outside Activities

Honoraria: Members may not receive an honorarium (*i.e.*, payment for a speech, article, or appearance), but may have up to \$2,000 donated directly to a charity.

Teaching: Members may not teach for compensation unless they first get written permission from the Ethics Committee for each semester of teaching

Writing: Members must receive prior Committee approval for any book contract. Members may not receive an advance on copyright royalties.



U.S. House of Representatives

COMMITTEE ON ETHICS

Official Activity

▪ Voting in the House

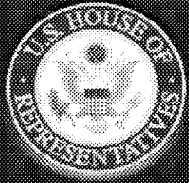
- You **MUST** vote on each question put, **UNLESS** you have a direct
 - personal or pecuniary interest in the matter. - House Rule 3, clause 1.

▪ Other House Actions

- You **MUST** use “added circumspection” on all other official actions (sponsoring a bill, advocating for or participating in House committee action, contacting an executive branch agency, etc...).
- Possible Solutions include *recusal or referral to another Member office, committee with jurisdiction, or Senate office.*
- **BUT: do NOT** advocate to that other office.
- **REMINDER: Your staff acts on your behalf and you may be held liable for their actions.**

▪ Earmarks & Financial Interest Certification

- You **MUST** certify that neither you nor your spouse has a personal financial interest in a requested earmark or limited tax or tariff benefit. The Committee of jurisdiction over the bill determines if earmark or tariff benefit.

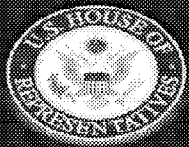


U.S. House of Representatives

COMMITTEE ON ETHICS

Post Employment Restrictions

- Former Members may not communicate or appear before the House or Senate on behalf of third party seeking official action for a year
- Current Members and staff *may not* aid former Members and staff in violating the post-employment restrictions
- Members and senior staff must disclose negotiations with private entities
- Members and senior staff may be required to recuse from related official matters



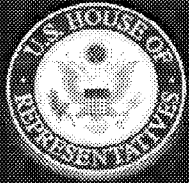
U.S. House of Representatives

COMMITTEE ON ETHICS

Financial Disclosure



COE.OCEREQUEST.000265

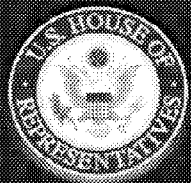


U.S. House of Representatives

COMMITTEE ON ETHICS

Financial Disclosure Statements

- Due date is May 15th
- You must have at least one employee in your personal office who files an FD. Must be either –
 - senior staff rate (\$132,552) for 60 days or more, or
 - A Principal Assistant: An employee you select to file a financial disclosure (if no employee paid at senior staff rate)
- Committee staff are able to prescreen your FD prior to filing
- You may use your MRA to compensate someone to prepare your FD



U.S. House of Representatives

COMMITTEE ON ETHICS

FD and PTR: Whose Assets Must be Reported?

On both annual FD and PTR, report assets (and transactions in assets) owned

wholly or in part by:

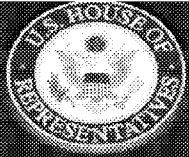
You

Your spouse, or

Your dependent children

Under age 21, unmarried, & living with you (or in college) *or*

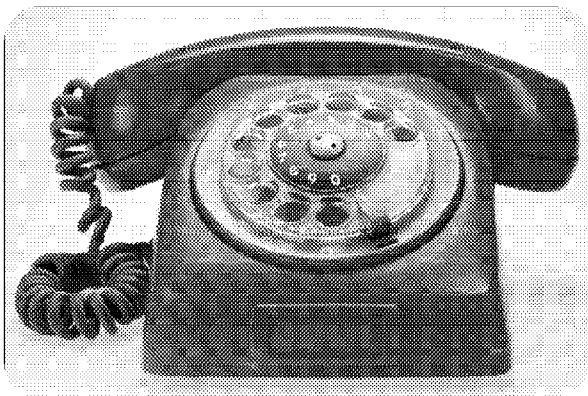
Claimed as dependent on your federal taxes



U.S. House of Representatives

COMMITTEE ON ETHICS

Call or Write Before Acting



Committee on Ethics
1015 Longworth HOB
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (fax)
website: ethics.house.gov

*All communications are confidential
Good faith reliance on written Committee opinions
protects you from sanctions under House rules*

EXHIBIT 2

Ethics Training for Members-Elect

**Presented by the Staff of the
Committee on Ethics
U.S. House of Representatives**

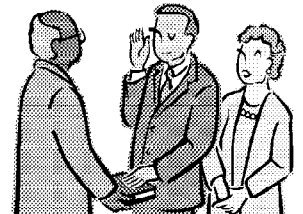
COE.OCEREQUEST.000305

What is the Ethics Committee and What Does it Do?

- Constitutional Authority: Article I, Section 5 of the U.S. Constitution: “Each House may . . . Punish its Members for disorderly Behavior . . .”
- 10-Members of Congress on a bipartisan committee
- Non-partisan staff:
 - Advise and provide training and guidance on ethics laws, rules, and standards of conduct
 - Seeking advice insulates you from an investigation
 - We keep a record of all inquiries
 - Review Financial Disclosure filings (staff are available to perform prescreens)
 - Investigate possible violations by Members, officers, and employees
 - You can contact the Committee by phone, e-mail, mail, or by walking in person

Important Benchmarks for New Members

- Members ARE subject to the federal bribery and illegal gratuity statutes BEFORE swearing in
- Members are subject to the House ethics rules and the STOCK ACT UPON swearing in
- Wind down outside business within 90 days
- Staff must complete ethics training within first 60 days
- Annual Financial Disclosure Statement due May 17th



OFFICIAL RESOURCES



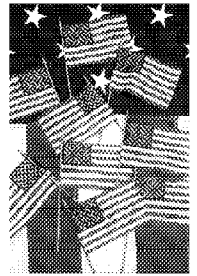
COE.OCEREQUEST.000308

Official Resources

- Official resource is anything paid for with an appropriation (including your staff)
- No personal use of official resources (except *de minimus*)
- No use for campaign activity unless expressly permitted

- Official expenses or activities may only be paid from:
 - Appropriated funds (MRA);
 - Member's personal funds; or
 - Member's campaign funds (with certain limits)
- No private donations, funds, or in-kind goods or services are allowed in support of official House activities or expenses.

Official Resources: Maintain A Bright Line



Your Official Staff Cannot—

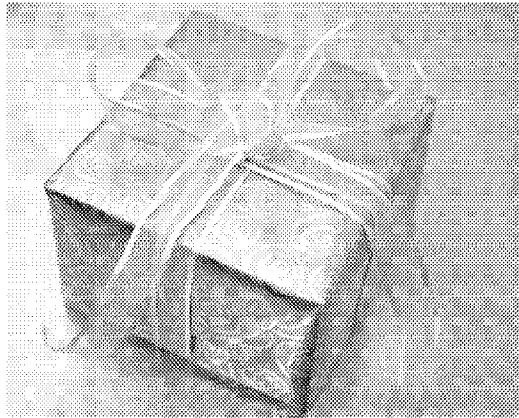
- Contribute to your campaign
- Provide an outlay to your campaign
- Do campaign work on official time or in official buildings
- Work for free (exceptions for interns, etc.)
- Use their personal funds for official purposes
- Give you gifts (including running personal errands)
- Be required or pressured to volunteer for anything, including your campaign
- Use official resources or position for their own personal benefit, or yours
- Take official actions that would create a conflict for you
- Represent others (unofficially) to the federal government

Official Resources and Events

An event can only ever be an official congressional event or an outside group's event

- **Cannot** co-sponsor an official congressional event with any outside group, including a non-profit
- **No** private subsidy for official congressional events
 - **But:** assistance from domestic governmental entities, including public universities is permitted
- No use of official resources for an event sponsored by an outside group
 - **But:** your name may sometimes be used in connection with an outside group's event
- **No** solicitation of an outside group to hold an event for you

GIFTS



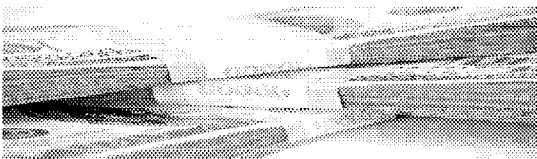
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Bribes and Illegal Gratuities

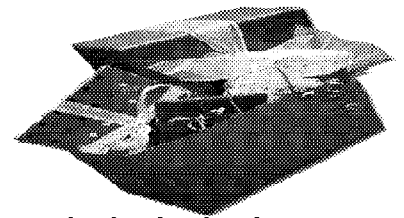
Benchmark: Applies prior to swearing in

You ***may not*** accept a gift that is offered in connection with an official action taken or asked to be taken

- May be deemed a bribe or improper gratuity under federal criminal law (18 U.S.C. § 201)
- Items of nominal value are allowed as thank you gifts (*e.g.*, flowers, baked goods, or decorative items)



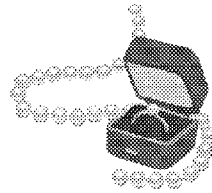
Gifts



- A gift is almost anything of value, including a discount, tickets to a game, a cup of coffee, a gift card
- The gift rule is written in the negative—cannot accept a gift unless an exception permits acceptance
 - More than 20 exceptions—far fewer exceptions for gifts from federal registered lobbyists or foreign agents
- Before you accept a gift, ask yourself:
 1. Can I accept the gift?
 2. Do I need prior approval from the Ethics Committee?
 3. Do I need to disclose or report the gift (*e.g.*, the Ethics Committee, Clerk, or an FD Statement, etc.)?
- Prior Ethics approval may be required, such as for gifts of personal friendship of more than \$250

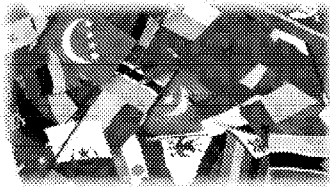
Categories of Permissible Gifts

- Gifts from relatives
 - Includes fiancés and in-laws
- Gifts from personal friends
 - Must meet certain criteria
- Gifts from other Members and staff
 - Gifts from employees up the chain only on special occasions
- Gifts related to outside activities
 - May not be offered or enhanced due to House employment
- Gifts from federal, state, or local government
 - Includes public universities



Gifts from Foreign Governments

- Foreign Gifts and Decorations Act (FGDA) allows Members and staff to accept a gift of **\$415 or less** from a foreign government
- If the gift is worth more than \$415, you must turn the gift over to the Clerk within 60 days for disposal and file a disclosure form with the Ethics Committee
- With Committee permission, you may be able to retain the gift for official use



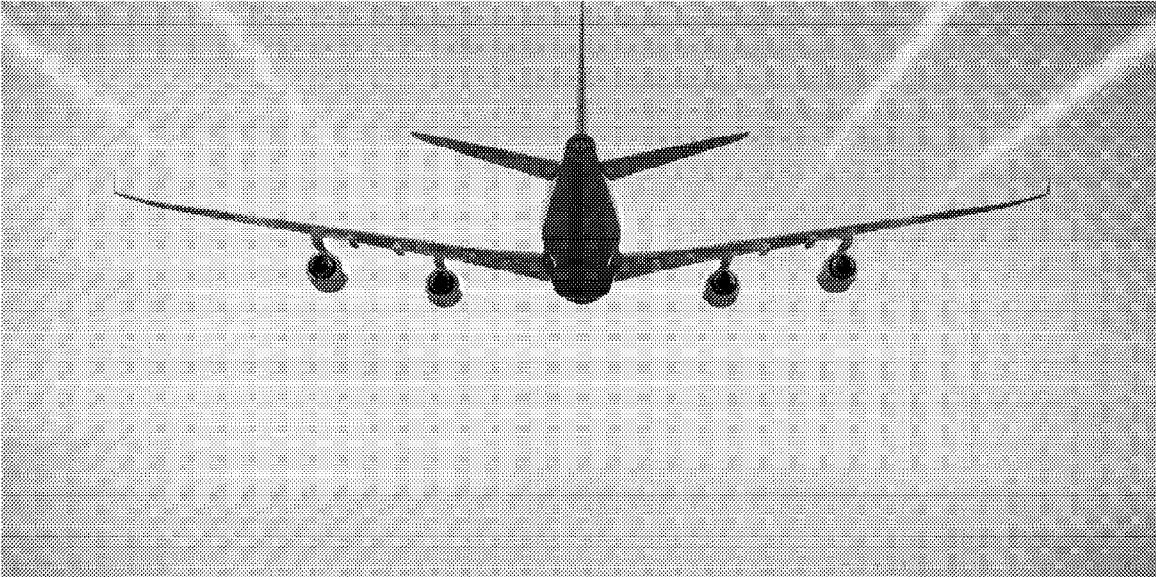
Solicitations

- General prohibition *against* most solicitations (5 U.S.C. § 7353)



- Permissible charitable solicitations
 - Must be in your personal capacity
 - On your own time
 - Not using official resources
 - No solicitations of lobbyists or foreign agents
 - No implied official endorsement
 - No direct personal benefit to soliciting individual

TRAVEL



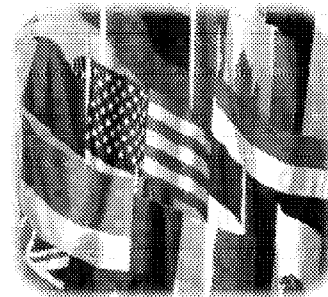
COE.OCEREQUEST.000318

Privately-Sponsored Travel

- Each traveler must obtain **prior, written approval** from the House Ethics Committee
- Request must be submitted 30 days prior to the trip
- Travel Rules and Forms available on the Committee's Web site
- Committee pre-approval not required for travel paid for using:
 - House funds (MRA or committee funds)
 - Federal, state, or local government funds (includes domestic public university funds)
 - Campaign funds
 - Foreign government funds (only as authorized by law)
 - Travel related to outside employment or activities

Foreign Government Travel

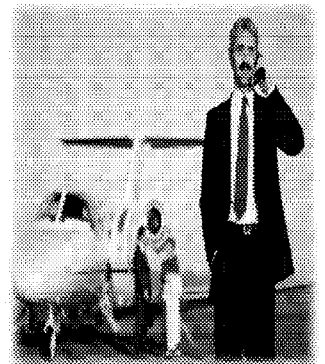
- Special rules and disclosure requirements for travel funded by foreign governments
- Statutes permitting:
 - Mutual Educational and Cultural Exchange Act (MECEA)
 - Foreign Gifts and Decorations Act (FGDA)



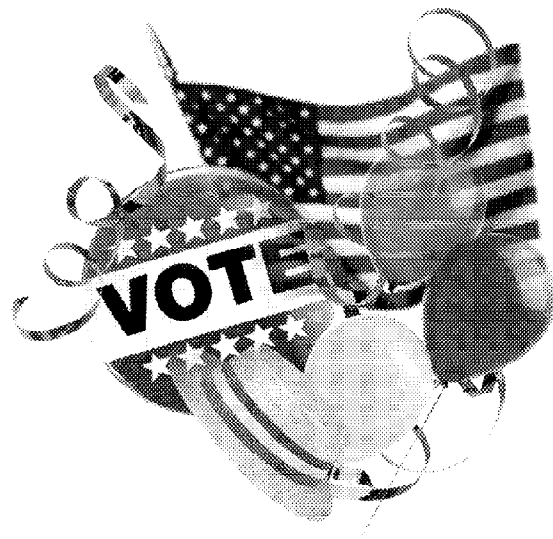
Contact Ethics before accepting any foreign government travel

Private Planes

- Significant restrictions on the use of campaign or personal funds to pay for flights on privately-owned aircraft
- Call the Ethics Committee before flying
- Prior Ethics approval may be required to accept a gift of private plan travel
- Disclosure may be required



CAMPAIGN ACTIVITY



COE.OCEREQUEST.000322

Permissible Uses of Campaign Funds During Your Transition

- As a general rule, you may continue to use your campaign funds for *bona fide* expenses you incur in preparing to take office. (Always check with the FEC regarding proper use of campaign funds.)
- Such expenses may include those for
 - Transition staff
 - Transition supplies & equipment
 - Transition office space
 - Travel
 - Expenses incurred in moving to Washington, DC (both office and personal effects)



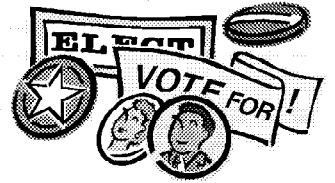
Campaign Rules Overview

Maintain a bright line between House office and campaign activity

Limited overlap exceptions:

- 1. Staff that handle the Member's schedule may coordinate with campaign*
- 2. Press team may answer incidental campaign questions during official interview, but should not initiate discussion of campaign issues*

Call if ever in doubt

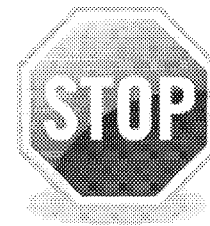


Official Use of Campaign Funds

General rule: Campaign funds may be used for some official expenses—*however*





House Rules specifically **prohibit** Members from using campaign funds for the following official expenses:

- Mail or other communications
- Compensation for services
- Office space
- Furniture
- Equipment & IT services



Improper Personal Use

Some clearly prohibited personal expenses:

- Normal living expenses (food, clothing, shelter) 
- Vacation expenses 
- Tickets to shows and sporting events (unless part of a bona fide campaign event) 
- Country club or health club dues 

Members may never borrow from their campaign account

OUTSIDE BUSINESS OR ACTIVITIES



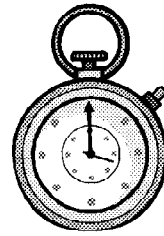
COE.OCEREQUEST.000327

Business Interests: Begin Wind-Down NOW

Benchmark: Within first 90 days

Start planning your transition now

- *May* need to
 - Change business name,
 - Change business structure, or
 - Sell or divest from a business
- Committee counsel available to discuss your particular situation and requirements



Prohibitions on Outside Positions

Members *may not* serve as an officer or director of any:

- Public company, defined by the Securities and Exchange Act of 1934; or
- Company traded on a foreign market.
- There are NO exceptions to these restrictions.

Members *may not* serve as an officer or director of any:

- Entity that receives funding from a federal agency, jurisdiction of which falls within a committee on which a Member sits; or
- Entity that is regulated by a federal agency, jurisdiction of which falls within a committee on which a Member sits.
- There are several exceptions to these restrictions.

Earned Income and Other Restrictions

- All Members are limited in the amount of outside income they may earn (2020: \$28,845)

Members may not—

- Permit a firm that provides fiduciary services to ***use your name***
- Receive —
 - compensation for serving as an ***officer or director*** of any entity
 - Includes both for-profit and non-profit organizations
 - payment for performing services involving a ***fiduciary relationship***
- Fiduciary Professions: ***Legal, real estate, consulting and advising (including lobbying), insurance, medicine, * financial services, and similar positions where you hold a position of trust***

****Note: There are special rules for Members who are also medical doctors***

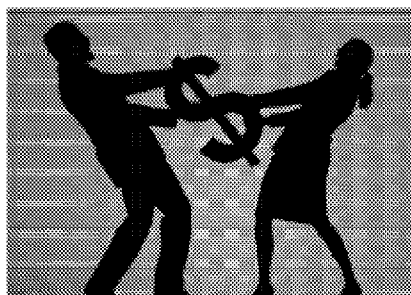
Other Outside Activities

Honoraria: Members may not receive an honorarium (*i.e.*, payment for a speech, article, or appearance), but may have up to \$2,000 donated directly to a charity.

Teaching: Members may not teach for compensation unless they first get written permission from the Ethics Committee for each semester of teaching

Writing: Members must receive prior Committee approval for any book contract. Members may not receive an advance on copyright royalties.

CONFLICTS OF INTEREST



COE.OCEREQUEST.000332

General Principles

- Do not allow compensation to accrue to your personal benefit from improper use of House position.- House Rule 23, clause 3
- Do not accept benefits for you or your family under circumstances that appear to influence your governmental duties. - Code of Ethics for Government Service ¶5
- No "special favors" to anyone, based on personal, business, or political relationships. - Code of Ethics for Government Service ¶ 5
- Do not use official position or confidential information for personal gain. - Code of Ethics for Government Service ¶ 8
- Do not use official House resources for personal or campaign activities. - 31 U.S.C. § 1301

Official Activity

Voting in the House

- You **MUST** vote on each question put, **UNLESS** you have a direct personal or pecuniary interest in the matter. - *House Rule 3, clause 1.*



Other House Actions

- You **MUST** use “added circumspection” on all other official actions (sponsoring a bill, advocating for or participating in House committee action, contacting an executive branch agency, etc...).
- Possible Solutions include *recusal or referral to another Member office, committee with jurisdiction, or Senate office.*
BUT: **do NOT** advocate to that other office.
- REMINDER: **Your staff acts on your behalf and you may be held liable for their actions.**

Earmarks & Financial Interest Certification

- You **MUST** certify that neither you nor your spouse has a personal financial interest in a requested earmark or limited tax or tariff benefit. The Committee of jurisdiction over the bill determines if earmark or tariff benefit.

Personal Activity

Do Not Contract with Federal Government

- EXCEPT: Certain farm programs excluded. - Code of Ethics for Government Service ¶ 7, 18 U.S.C. §§ 431 & 433; 41 U.S.C. § 6306(a) & (b).

No Lobbying or Representational Contacts

- Do NOT represent an outside organization in a matter if the Federal government is a party or has an interest.
- Do NOT lobby or aid outside organizations in the lobbying of Congress or the Executive Branch.- 18 U.S.C. §§ 203 & 205; House Rule 25, clause 6.
- SPOUSE CANNOT lobby you or your staff if, spouse is a registered federal lobbyist. - House Rule 25, clause 7.

Do Not Use Material, Nonpublic Information

- May constitute INSIDER TRADING.
- SEC definition of "public" not obvious or clear.

Do NOT Participate in an IPO

Benchmark: Members are subject to the STOCK ACT UPON swearing in

Post-Employment Restrictions

- Former Members may not communicate or appear before the House or Senate on behalf of third party seeking official action for a year
- Current Members and staff ***may not*** aid former Members and staff in violating the post-employment restrictions
- Members and employees paid at the post-employment rate must disclose negotiations with private entities
- Members and senior staff may be required to recuse from related official matters

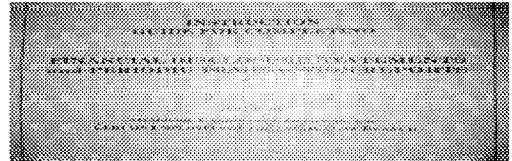
FINANCIAL DISCLOSURE



COE.OCEREQUEST.000337

Financial Disclosure Statements

- **Benchmark: Must file each May 15, (May 17th in 2021)**
- Additional reporting requirements for Member FD versus candidate FD:
 - Transactions
 - Liabilities on personal residence
 - Gifts & travel received *after* sworn in to Congress
- You must have at least one employee in your personal office who files an FD. Must be either -
 - senior staff rate (\$131,239) for 60 days or more, or
 - A Principal Assistant: An employee you select to file a financial disclosure (if no employee paid at the post-employment rate)
- Committee staff are able to prescreen your FD prior to filing
- You may use your MRA to compensate someone to prepare your FD

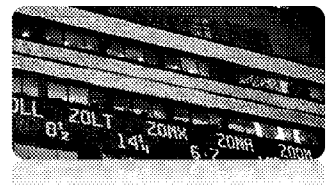


Periodic Transaction Reports (PTRs)

Benchmark: Applies to transactions executed on or after your swearing-in date

- Requirement applies to Members and senior staff
- Reporting of securities transactions only (stocks, bonds, options, futures, other securities) and only transactions valued at more than \$1,000
- Transactions reported on the PTR must also be reported on the annual FD
- You must file a PTR *not more than 45 days* from the date of the transaction
- Graduated late fee structure for late PTRs—can result in thousands of dollars in late fees (!)

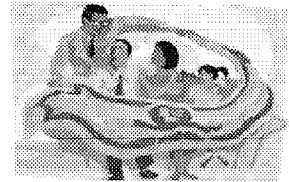
**NO EXTENSIONS ALLOWED!
Do not file a report of "no activity"**



FD and PTR: Whose Assets Must be Reported?

On both annual FD and PTR, report assets (and transactions in assets) owned wholly or in part by:

- You
- Your spouse, or
- Your dependent children
 - Under age 21, unmarried, & living with you (or in college) *or*
 - Claimed as dependent on your federal taxes



Call or Write Before Acting

House Committee on Ethics

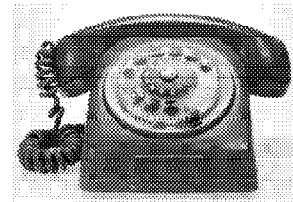
Office of Advice and Education

1015 Longworth House Office Building

Washington, DC 20515

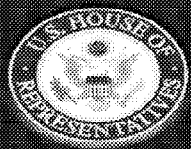
(202) 225-7103 (office) (202) 225-7392 (fax)

www.ethics.house.gov



- All communications are confidential
 - Law states that no one is placed at risk by seeking Committee advice about future conduct
 - Good faith reliance on written Committee opinions protects you from sanctions under House rules

EXHIBIT 3



U.S. House of Representatives

COMMITTEE ON ETHICS

Training for House Members on Ethics Laws, Rules, and Standards of Conduct

Presented by the
Committee on Ethics
U.S. House of Representatives

116th Congress

COE.OCEREQUEST.000152

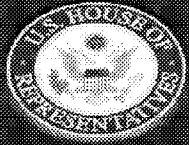


U.S. House of Representatives

COMMITTEE ON ETHICS

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U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources



COE.OCEREQUEST.000154



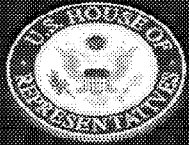
U.S. House of Representatives

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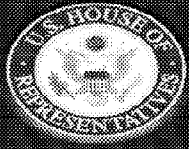
U.S. House of Representatives

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Your Official Staff Cannot—

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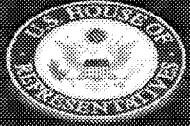
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources and Events

An event can only ever be an official congressional event or an outside group's event

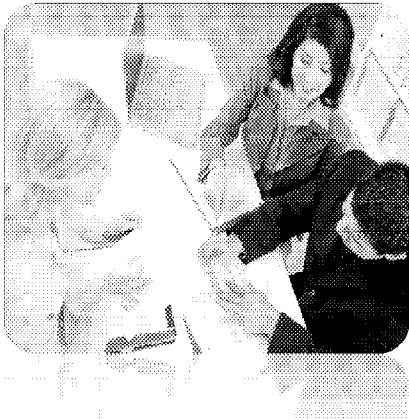
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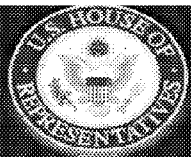
U.S. House of Representatives

COMMITTEE ON ETHICS

General Casework



- Members have *broad* discretion in deciding whether and how to assist constituents
- *No* special treatment or “access” for supporters, contributors, or friends
- Avoid *ex parte* communications
- Communications between Members and constituents are considered *confidential*

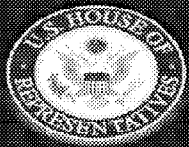


U.S. House of Representatives

COMMITTEE ON ETHICS

Sexual Harassment and Employment Discrimination

- House Rule 23, clause 9 prohibits discharging or refusing to hire an individual, or otherwise discriminating against an individual on the basis of race, color, religion, sex (including marital or parental status), sexual orientation, gender identity, disability, age, or national origin of such individual, including by committing an act of sexual harassment against such individual.
- House Rule 23, clause 18(a) prohibits Members from engaging in a sexual relationship with any employee of the House who works under the supervision of the Member, or who is an employee of a committee on which the Member, serves.
- House Rule 23, clause 18(b) prohibits Members engaging in unwelcome sexual advances or conduct towards another Member, Delegate, Resident Commissioner, officer, or employee of the House.



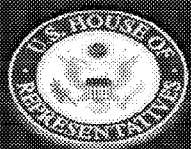
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts



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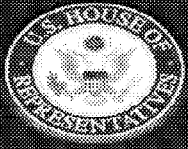


U.S. House of Representatives

COMMITTEE ON ETHICS

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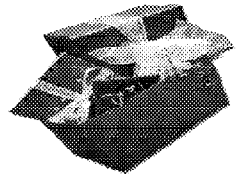


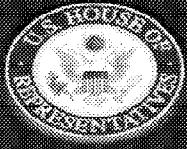
U.S. House of Representatives

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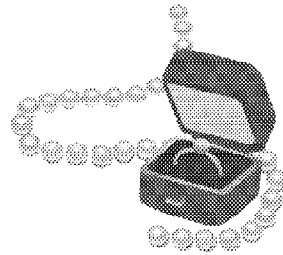


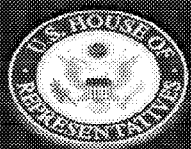
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts

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- Gifts from federal, state, or local government
 - Includes public universities





U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts from Foreign Governments

- Foreign Gifts and Decorations Act (FGDA) allows Members and staff to accept a gift of **\$390 or less** from a foreign government
- If the gift is worth more than \$390, you must turn the gift over to the Clerk within 60 days for disposal and file a disclosure form with the Ethics Committee
- With Committee permission, you may be able to retain the gift for official use

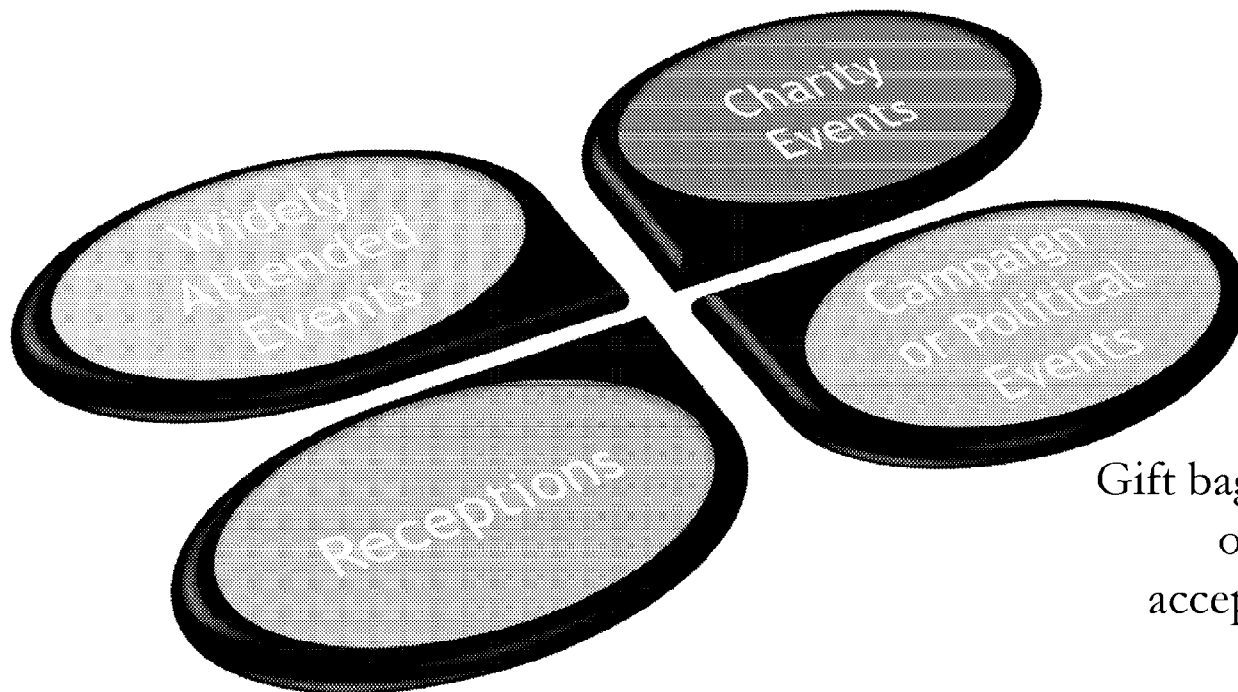


U.S. House of Representatives

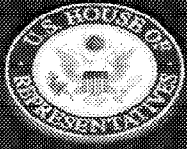
COMMITTEE ON ETHICS

Attendance at Events

“Free attendance” at certain types of events may be accepted under the rule:



Gift bags are permitted only if otherwise acceptable under the gift rule



U.S. House of Representatives

COMMITTEE ON ETHICS

Widely Attended & Charity Events



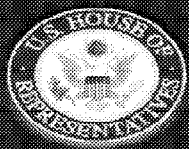
Widely Attended Events

- Attendance connected to official duties
- Open to the public or at least 25 non-Hill attendees



Charity Events

- Sponsored by a 501(c)(3) non-profit
- May accept free attendance only from the sponsor



U.S. House of Representatives

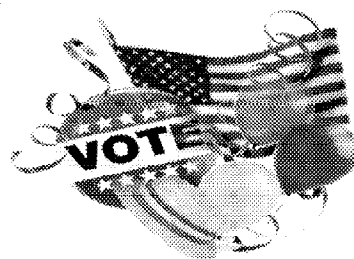
COMMITTEE ON ETHICS

Receptions & Campaign Events



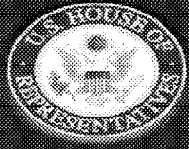
Receptions

- Food or refreshments of a nominal value
- Cannot constitute a meal



Campaign or Political Events

- Sponsored by a 527 organization
- Invitation must come directly from the 527



U.S. House of Representatives

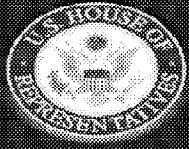
COMMITTEE ON ETHICS

Solicitations

- General prohibition *against* most solicitations (5 U.S.C. § 7353)

- Permissible charitable solicitations
 - Must be in your personal capacity
 - On your own time
 - Not using official resources
 - No solicitations of lobbyists or foreign agents
 - No implied official endorsement
 - No direct personal benefit to soliciting individual

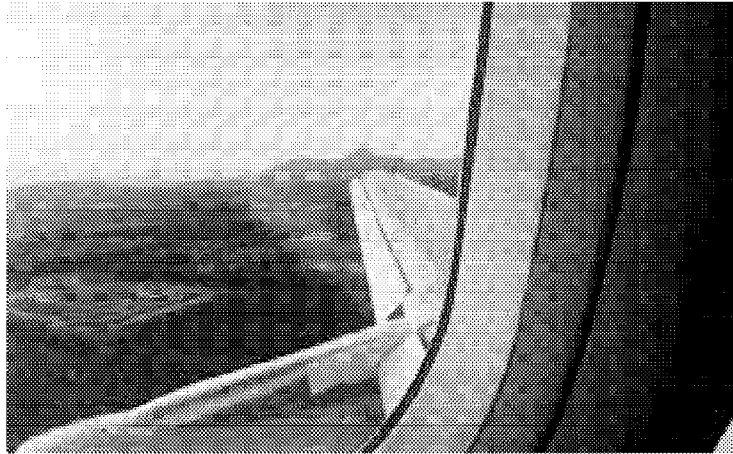




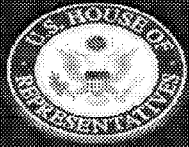
U.S. House of Representatives

COMMITTEE ON ETHICS

Travel



COE.OCEREQUEST.000169



Privately-sponsored Travel

- *Each* traveler must obtain prior, written approval from the Ethics Committee
- Request must be submitted at least *30 days* before start date of the trip



- There are significant restrictions on accepting travel expenses from private entities that *retain or employ* lobbyists or foreign

Slide 19

MS1

the last paragraph here is also for the next slide (and should be with the next slide)

Mutschall, Sarah, 10/23/2019

COE.OCEREQUEST.000171



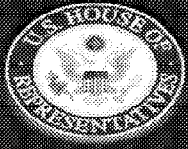
U.S. House of Representatives

COMMITTEE ON ETHICS

Pre-Approval Exceptions

Committee pre-approval not required for travel paid for using:

- House funds (MRA or committee funds)
- Federal campaign funds, provided your travel is reported to the FEC
- U.S. federal, state, or local government funds
 - Public (state) university funds



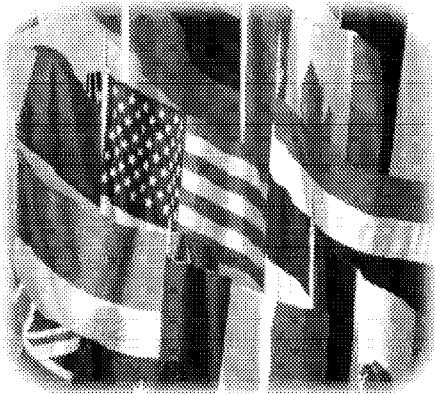
U.S. House of Representatives

COMMITTEE ON ETHICS

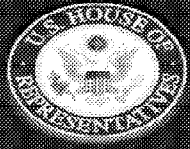
Travel from Foreign Government

Special rules and disclosure requirements for travel funded by *foreign* governments:

- MECEA (Mutual Educational and Cultural Exchange Act)
- FGDA (Foreign Gifts and Decorations Act)
 - Committee pre-approval not required for either
 - FGDA travel must be reported to Committee on special form within 30 days



COE.OCEREQUEST.000173



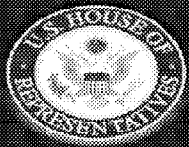
U.S. House of Representatives

COMMITTEE ON ETHICS

Private Planes

- Significant restrictions on the use of campaign or personal funds to pay for flights on privately-owned aircraft
- Call the Ethics Committee before flying
- Prior Ethics approval may be required to accept a gift of private plan travel
- Disclosure may be required

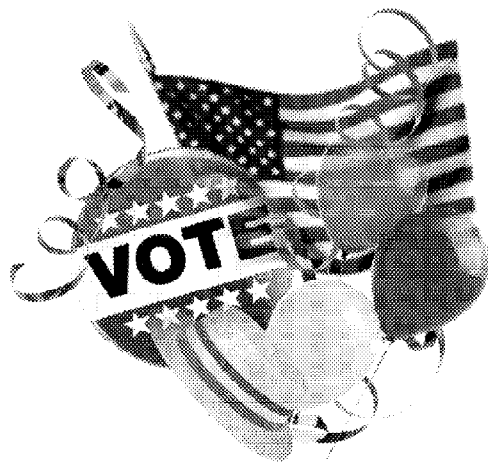




U.S. House of Representatives

COMMITTEE ON ETHICS

Campaign Activity



COE.OCEREQUEST.000175



U.S. House of Representatives

COMMITTEE ON ETHICS

Campaign Activity



Same Rules
apply to all
Members and
House staff

Rules apply in
both election
and
non-election
years

Rules generally
apply to *any*
campaign
(Presidential,
House, local,
etc.)

Rules apply to
paid and
volunteer
campaign staff



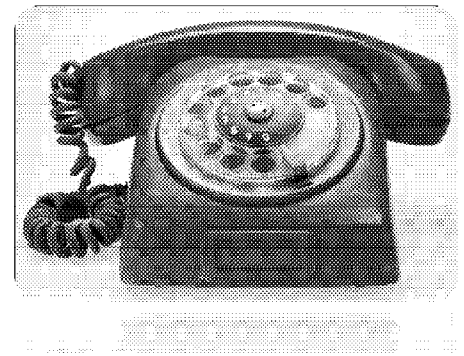
U.S. House of Representatives

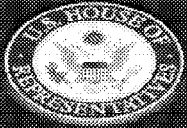
COMMITTEE ON ETHICS

Exceptions for Certain Campaign-Related Activities

Common sense exceptions to the prohibition on use of official resources:

- scheduling
- handling press calls
- referrals to campaign office
- providing official materials





U.S. House of Representatives

COMMITTEE ON ETHICS

Official Use of Campaign Funds

- **General rule:** Campaign funds may be used for some expenses of a Member's personal office or a committee on which the Member serves
- **Permitted official uses:**



Food at Member office events



Officially-connected travel for Member or staff



Travel for guest speaker at Member office event



Cell phone or BlackBerry



Car



U.S. House of Representatives

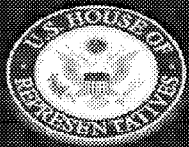
COMMITTEE ON ETHICS

Impermissible Use of Campaign Funds

Some clearly prohibited personal expenses:

- Normal living expenses (food, clothing, shelter)
- Vacation expenses
- Tickets to shows and sporting events
(unless part of a bona fide campaign event)
- Country club or health club dues

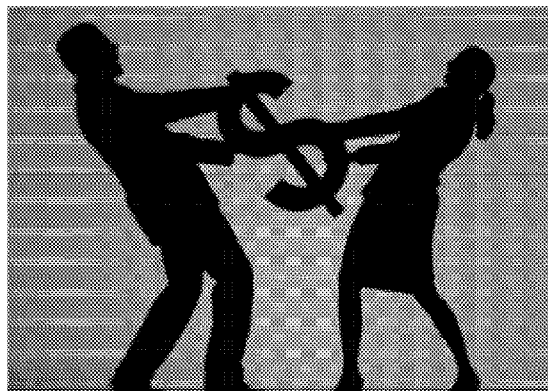
Members may never borrow from their campaign account



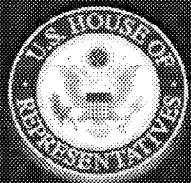
U.S. House of Representatives

COMMITTEE ON ETHICS

Conflict of Interest



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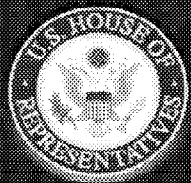


U.S. House of Representatives

COMMITTEE ON ETHICS

General Principles

- Do not allow compensation to accrue to your personal benefit from improper use of House position.- House Rule 23, clause 3
- Do not accept benefits for you or your family under circumstances that appear to influence your governmental duties. - Code of Ethics for Government Service ¶5
- No “special favors” to anyone, based on personal, business, or political relationships. - Code of Ethics for Government Service ¶ 5
- Do not use official position or confidential information for personal gain. - Code of Ethics for Government Service ¶ 8
- Do not use official House resources for personal or campaign activities. - 31 U.S.C. § 1301



U.S. House of Representatives

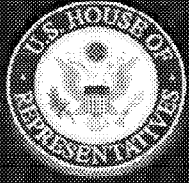
COMMITTEE ON ETHICS

Earned Income and Other Restrictions

Members may not—

- All Members are limited in the amount of outside income they may earn (2019: \$28,440)
- Permit a firm that provides fiduciary services to *use your name*
- Receive —
 - compensation for serving as an *officer or director* of any entity
 - Includes both for-profit and non-profit organizations
 - payment for performing services involving a *fiduciary relationship*
- Fiduciary Professions: *Legal, real estate, consulting and advising (including lobbying), insurance, medicine,* financial services, and similar positions where you hold a position of trust*

**Note: There are special rules for Members who are also medical doctors*



U.S. House of Representatives

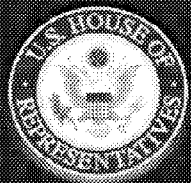
COMMITTEE ON ETHICS

Other Outside Activities

Honoraria: Members may not receive an honorarium (*i.e.*, payment for a speech, article, or appearance), but may have up to \$2,000 donated directly to a charity.

Teaching: Members may not teach for compensation unless they first get written permission from the Ethics Committee for each semester of teaching

Writing: Members must receive prior Committee approval for any book contract. Members may not receive an advance on copyright royalties.



U.S. House of Representatives

COMMITTEE ON ETHICS

Personal Activity

Do Not Contract with Federal Government

EXCEPT: Certain farm programs excluded. - *Code of Ethics for Government Service* ¶ 7; *18 U.S.C. §§ 431 & 433*; *41 U.S.C. § 6306(a) & (b)*.

No Lobbying or Representational Contacts

Do NOT represent an outside organization in a matter if the Federal government is a party or has an interest.

Do NOT lobby or aid outside organizations in the lobbying of Congress or the Executive Branch.- *18 U.S.C. §§ 203 & 205*; *House Rule 25, clause 6*.

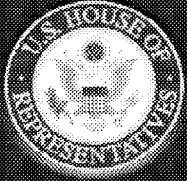
SPOUSE CANNOT lobby you or your staff if, spouse is a registered federal lobbyist. - *House Rule 25, clause 7*.

Do Not Use Material, Nonpublic Information

May constitute INSIDER TRADING.

SEC definition of “public” not obvious or clear.

Do NOT Participate in an IPO



U.S. House of Representatives

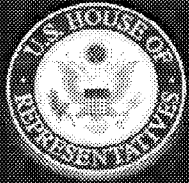
COMMITTEE ON ETHICS

Official Activity

- **Voting in the House**
- You **MUST** vote on each question put, **UNLESS** you have a direct
 - personal or pecuniary interest in the matter. - House Rule 3, clause 1.

- **Other House Actions**
- You **MUST** use “added circumspection” on all other official actions (sponsoring a bill, advocating for or participating in House committee action, contacting an executive branch agency, etc...).
- Possible Solutions include *recusal or referral to another Member office, committee with jurisdiction, or Senate office.*
- **BUT: do NOT** advocate to that other office.
- **REMINDER: Your staff acts on your behalf and you may be held liable for their actions.**

- **Earmarks & Financial Interest Certification**
- You **MUST** certify that neither you nor your spouse has a personal financial interest in a requested earmark or limited tax or tariff benefit. The Committee of jurisdiction over the bill determines if earmark or tariff benefit.

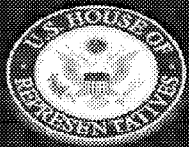


U.S. House of Representatives

COMMITTEE ON ETHICS

Post Employment Restrictions

- Former Members may not communicate or appear before the House or Senate on behalf of third party seeking official action for a year
- Current Members and staff *may not* aid former Members and staff in violating the post-employment restrictions
- Members and senior staff must disclose negotiations with private entities
- Members and senior staff may be required to recuse from related official matters



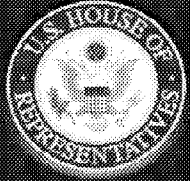
U.S. House of Representatives

COMMITTEE ON ETHICS

Financial Disclosure



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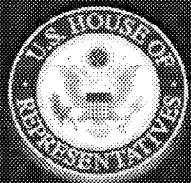


U.S. House of Representatives

COMMITTEE ON ETHICS

Financial Disclosure Statements

- Due date is May 15th
- You must have at least one employee in your personal office who files an FD. Must be either –
 - senior staff rate (\$127,914) for 60 days or more, or
 - A Principal Assistant: An employee you select to file a financial disclosure (if no employee paid at senior staff rate)
- Committee staff are able to prescreen your FD prior to filing
- You may use your MRA to compensate someone to prepare your FD



U.S. House of Representatives

COMMITTEE ON ETHICS

FD and PTR: Whose Assets Must be Reported?

On both annual FD and PTR, report assets (and transactions in assets) owned

wholly or in part by:

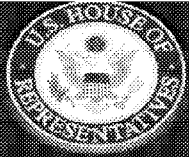
You

Your spouse, or

Your dependent children

Under age 21, unmarried, & living with you (or in college) *or*

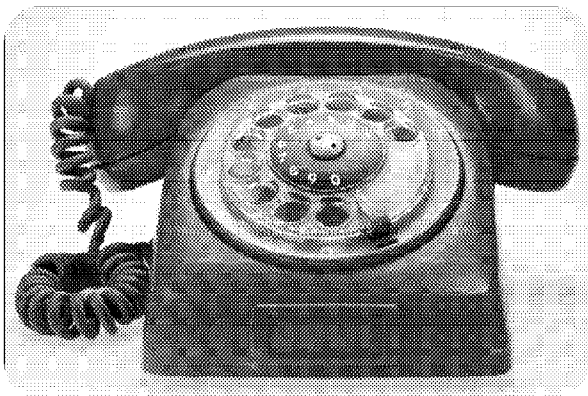
Claimed as dependent on your federal taxes



U.S. House of Representatives

COMMITTEE ON ETHICS

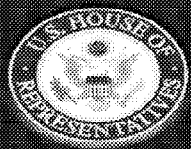
Call or Write Before Acting



Committee on Ethics
1015 Longworth HOB
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (fax)
website: ethics.house.gov

*All communications are confidential
Good faith reliance on written Committee opinions
protects you from sanctions under House rules*

EXHIBIT 4



U.S. House of Representatives

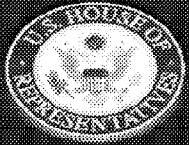
COMMITTEE ON ETHICS

Training for Members on Ethics Laws, Rules, and Standards of Conduct

Presented by the
Committee on Ethics
U.S. House of Representatives

116th Congress

COE.OCEREQUEST.000191

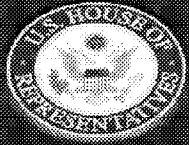


U.S. House of Representatives

COMMITTEE ON ETHICS

The Ethics Committee and its Functions

- Constitutional Authority: Article I, Section 5 of the U.S. Constitution: “Each House may . . . Punish its Members for disorderly Behavior . . .”
- 10-Members of Congress on a bipartisan committee
- Non-partisan staff:
 - Advise and provide training and guidance on ethics laws, rules, and standards of conduct
 - Seeking advice insulates you from an investigation
 - We keep a record of all inquiries
 - Review Financial Disclosure filings (staff are available to perform prescreens)
 - Investigate possible violations by Members, officers, and employees
 - You can contact the Committee by phone, e-mail, mail, or by walking in person



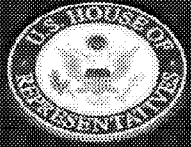
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources



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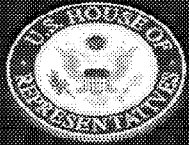
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources

- Official resource is anything paid for with an appropriation (including your staff)
- No personal use of official resources (except *de minimus*)
- No use for campaign activity unless expressly permitted

- Official expenses or activities may only be paid from:
 - Appropriated funds (MRA);
 - Member's personal funds; or
 - Member's campaign funds (with certain limits)
- No private donations, funds, or in-kind goods or services are allowed in support of official House activities or expenses.



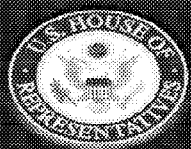
U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources: Maintain A Bright Line

Your Official Staff Cannot—

- Contribute to your campaign
- Do campaign work on official time or in official buildings
- Work for free (exceptions for interns, etc.)
- Use their personal funds for official purposes
- Give you gifts (including running personal errands)
- Be required or pressured to volunteer for anything, including your campaign
- Use official resources or position for their own personal benefit, or yours
- Take official actions that would create a conflict for you
- Represent others (unofficially) to the federal government



U.S. House of Representatives

COMMITTEE ON ETHICS

Official Resources and Events

An event can only ever be an official congressional event or an outside group's event

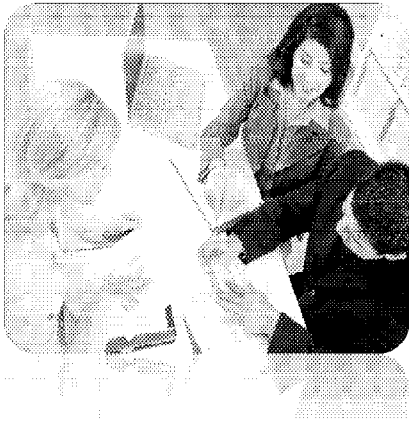
- **Cannot** co-sponsor an official congressional event with any outside group, including a non-profit
- **No** private subsidy for official congressional events
 - **But:** assistance from domestic governmental entities, including public universities is permitted
- No use of official resources for an event sponsored by an outside group
 - **But:** your name may sometimes be used in connection with an outside group's event
- **No** solicitation of an outside group to hold an event for you



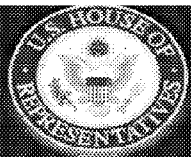
U.S. House of Representatives

COMMITTEE ON ETHICS

General Casework



- Members have *broad* discretion in deciding whether and how to assist constituents
- *No* special treatment or “access” for supporters, contributors, or friends
- Avoid *ex parte* communications
- Communications between Members and constituents are considered *confidential*

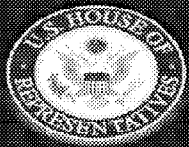


U.S. House of Representatives

COMMITTEE ON ETHICS

Sexual Harassment and Employment Discrimination

- House Rule 23, clause 9 prohibits discharging or refusing to hire an individual, or otherwise discriminating against an individual on the basis of race, color, religion, sex (including marital or parental status), sexual orientation, gender identity, disability, age, or national origin of such individual, including by committing an act of sexual harassment against such individual.
- House Rule 23, clause 18(a) prohibits Members from engaging in a sexual relationship with any employee of the House who works under the supervision of the Member, or who is an employee of a committee on which the Member, serves.
- House Rule 23, clause 18(b) prohibits Members from in unwelcome sexual advances or conduct towards another Member, Delegate, Resident Commissioner, officer, or employee of the House.



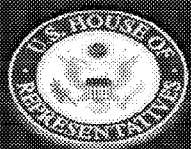
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COMMITTEE ON ETHICS

Gifts



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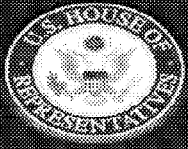


U.S. House of Representatives

COMMITTEE ON ETHICS

Bribes and Illegal Gratuities

- You *may not* accept a gift that is offered in connection with an official action taken or asked to be taken
 - May be deemed a bribe or improper gratuity under federal criminal law (18 U.S.C. § 201)
 - Items of nominal value are allowed as thank you gifts (*e.g.*, flowers, baked goods, or decorative items)

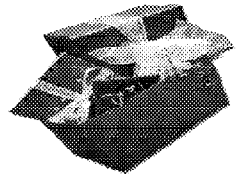


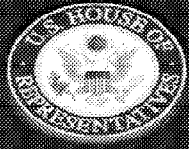
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts

- A gift is almost anything of value, including a discount, tickets to a game, a cup of coffee, a gift card
- The gift rule is written in the negative—cannot accept a gift unless an exception permits acceptance
 - More than 20 exceptions—far fewer exceptions for gifts from federal registered lobbyists or foreign agents
- Before you accept a gift, ask yourself:
 - Can I accept the gift?
 - Do I need prior approval from the Ethics Committee?
 - Do I need to disclose or report the gift (*e.g.*, the Ethics Committee, Clerk, or an FD Statement, etc.)?
- Prior Ethics approval may be required, such as for gifts of personal friendship of more than \$250



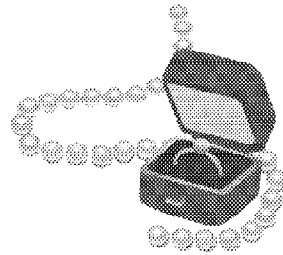


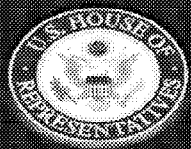
U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts

- Gifts from relatives
 - Includes fiancés and in-laws
- Gifts from personal friends
 - Must meet certain criteria
- Gifts from other Members and staff
 - Gifts from employees up the chain only on special occasions
- Gifts related to outside activities
 - May not be offered or enhanced due to House employment
- Gifts from federal, state, or local government
 - Includes public universities





U.S. House of Representatives

COMMITTEE ON ETHICS

Gifts from Foreign Governments

- Foreign Gifts and Decorations Act (FGDA) allows Members and staff to accept a gift of **\$415 or less** from a foreign government
- If the gift is worth more than \$415, you must turn the gift over to the Clerk within 60 days for disposal and file a disclosure form with the Ethics Committee
- With Committee permission, you may be able to retain the gift for official use

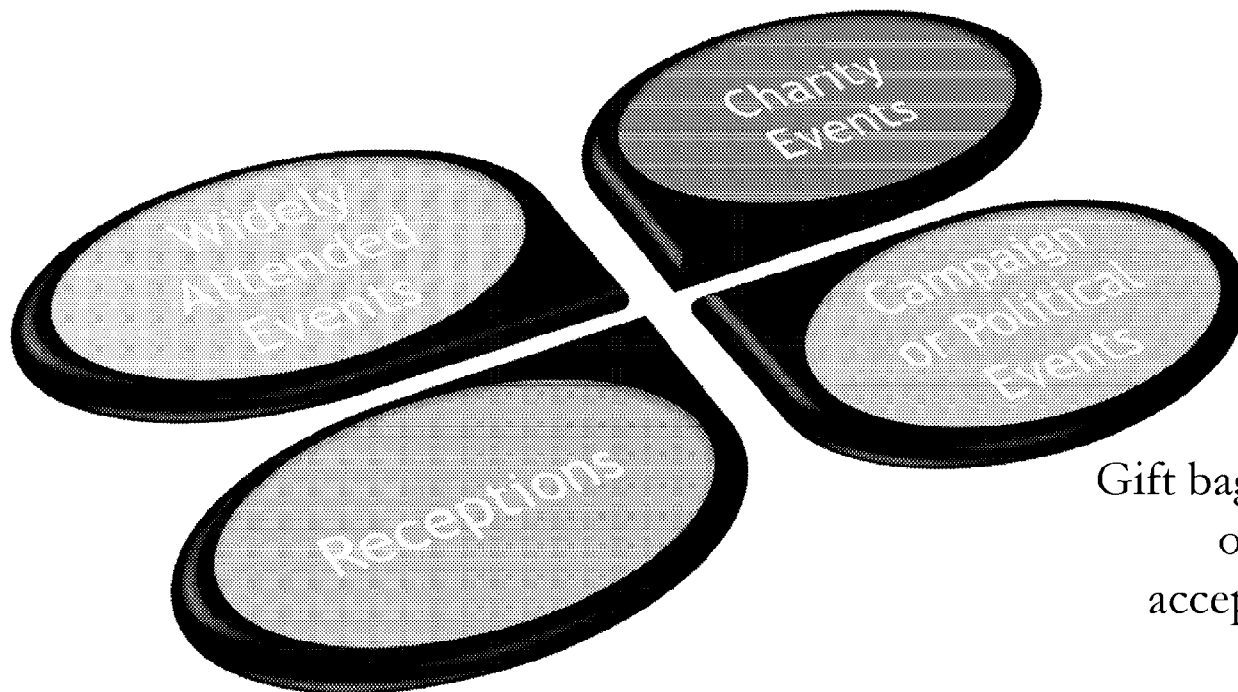


U.S. House of Representatives

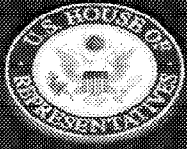
COMMITTEE ON ETHICS

Attendance at Events

“Free attendance” at certain types of events may be accepted under the rule:



Gift bags are permitted only if otherwise acceptable under the gift rule



U.S. House of Representatives

COMMITTEE ON ETHICS

Widely Attended & Charity Events



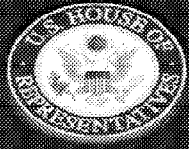
Widely Attended Events

- Attendance connected to official duties
- Open to the public or at least 25 non-Hill attendees



Charity Events

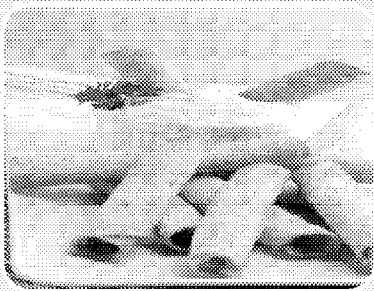
- Sponsored by a 501(c)(3) non-profit
- May accept free attendance only from the sponsor



U.S. House of Representatives

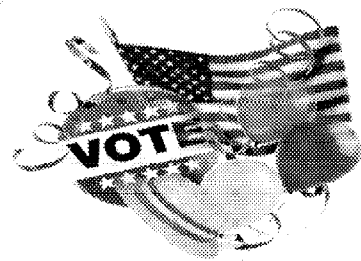
COMMITTEE ON ETHICS

Receptions & Campaign Events



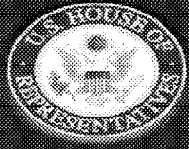
Receptions

- Food or refreshments of a nominal value
- Cannot constitute a meal



Campaign or Political Events

- Sponsored by a 527 organization
- Invitation must come directly from the 527



U.S. House of Representatives

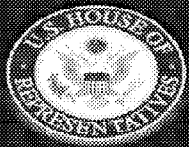
COMMITTEE ON ETHICS

Solicitations

- General prohibition *against* most solicitations (5 U.S.C. § 7353)

- Permissible charitable solicitations
 - Must be in your personal capacity
 - On your own time
 - Not using official resources
 - No solicitations of lobbyists or foreign agents
 - No implied official endorsement
 - No direct personal benefit to soliciting individual

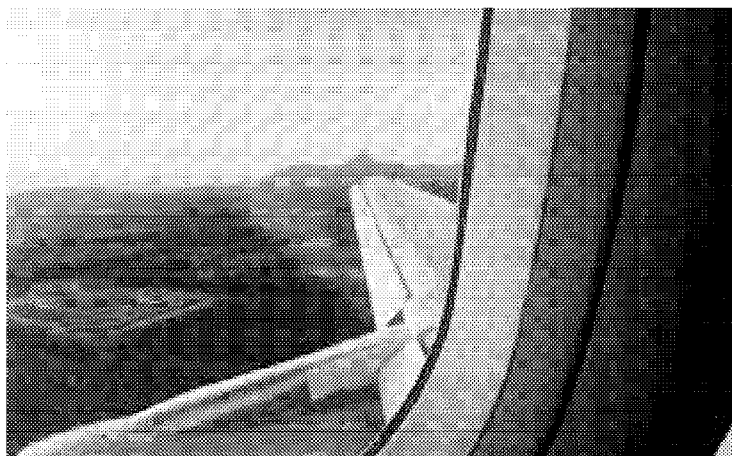




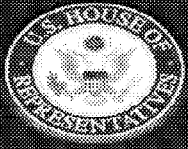
U.S. House of Representatives

COMMITTEE ON ETHICS

Travel



COE.OCEREQUEST.000208



U.S. House of Representatives

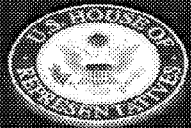
COMMITTEE ON ETHICS

Privately-sponsored Travel

- *Each* traveler must obtain prior, written approval from the Ethics Committee
- Request must be submitted at least *30 days* before start date of the trip



- There are significant restrictions on accepting travel expenses from private entities that *retain or employ* lobbyists or foreign



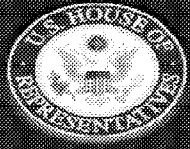
U.S. House of Representatives

COMMITTEE ON ETHICS

Pre-Approval Exceptions

Committee pre-approval not required for travel paid for using:

- House funds (MRA or committee funds)
- Federal campaign funds, provided your travel is reported to the FEC
- U.S. federal, state, or local government funds
 - Public (state) university funds



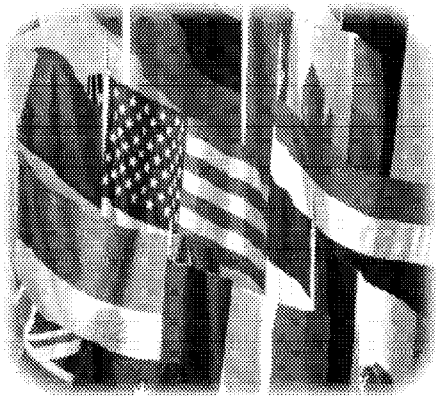
U.S. House of Representatives

COMMITTEE ON ETHICS

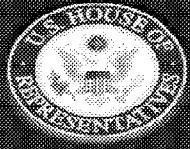
Travel from Foreign Government

Special rules and disclosure requirements for travel funded by *foreign* governments:

- MECEA (Mutual Educational and Cultural Exchange Act)
- FGDA (Foreign Gifts and Decorations Act)
 - Committee pre-approval not required for either
 - FGDA travel must be reported to Committee on special form within 30 days



COE.OCEREQUEST.000211



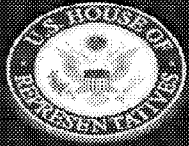
U.S. House of Representatives

COMMITTEE ON ETHICS

Private Planes

- Significant restrictions on the use of campaign or personal funds to pay for flights on privately-owned aircraft
- Call the Ethics Committee before flying
- Prior Ethics approval may be required to accept a gift of private plane travel
- Disclosure may be required

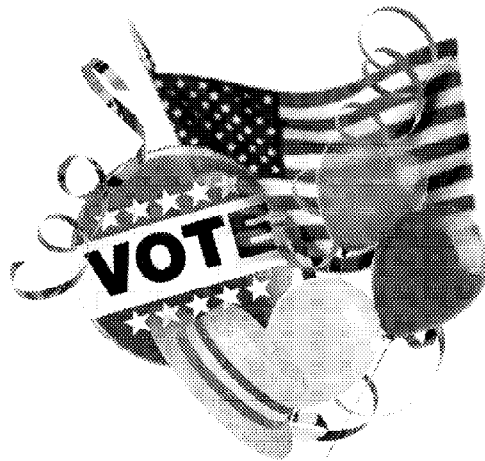




U.S. House of Representatives

COMMITTEE ON ETHICS

Campaign Activity



COE.OCEREQUEST.000213



U.S. House of Representatives

COMMITTEE ON ETHICS

Campaign Activity



Same Rules
apply to all
Members and
House staff

Rules apply in
both election
and
non-election
years

Rules generally
apply to *any*
campaign
(Presidential,
House, local,
etc.)

Rules apply to
paid and
volunteer
campaign staff



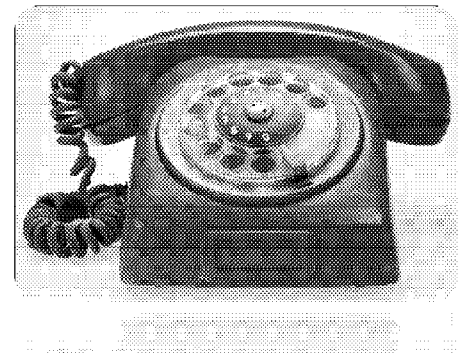
U.S. House of Representatives

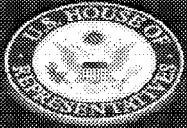
COMMITTEE ON ETHICS

Exceptions for Certain Campaign-Related Activities

Common sense exceptions to the prohibition on use of official resources:

- scheduling
- handling press calls
- referrals to campaign office
- providing official materials





U.S. House of Representatives

COMMITTEE ON ETHICS

Official Use of Campaign Funds

- **General rule:** Campaign funds may be used for some expenses of a Member's personal office or a committee on which the Member serves
- **Permitted official uses:**



Food at Member office events



Officially-connected travel for Member or staff



Travel for guest speaker at Member office event



Cell phone or BlackBerry



Car



U.S. House of Representatives

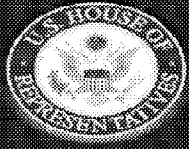
COMMITTEE ON ETHICS

Impermissible Use of Campaign Funds

Some clearly prohibited personal expenses:

- Normal living expenses (food, clothing, shelter)
- Vacation expenses
- Tickets to shows and sporting events
(unless part of a bona fide campaign event)
- Country club or health club dues

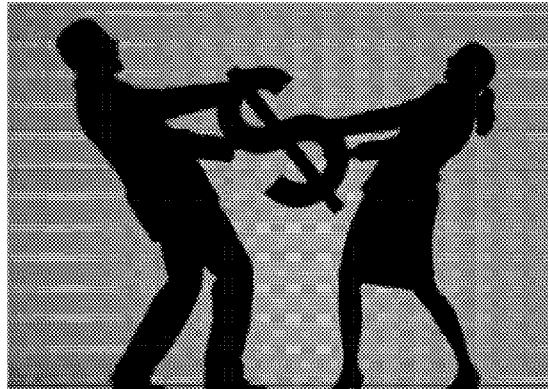
Members may never borrow from their campaign account



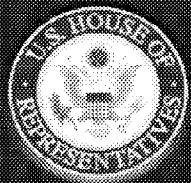
U.S. House of Representatives

COMMITTEE ON ETHICS

Conflict of Interest



COE.OCEREQUEST.000218

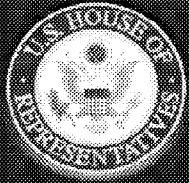


U.S. House of Representatives

COMMITTEE ON ETHICS

General Principles

- Do not allow compensation to accrue to your personal benefit from improper use of House position.- House Rule 23, clause 3
- Do not accept benefits for you or your family under circumstances that appear to influence your governmental duties. - Code of Ethics for Government Service ¶5
- No “special favors” to anyone, based on personal, business, or political relationships. - Code of Ethics for Government Service ¶ 5
- Do not use official position or confidential information for personal gain. - Code of Ethics for Government Service ¶ 8
- Do not use official House resources for personal or campaign activities. - 31 U.S.C. § 1301



U.S. House of Representatives
COMMITTEE ON ETHICS

Personal Activity

Do Not Contract with Federal Government

EXCEPT: Certain farm programs excluded. - *Code of Ethics for Government Service* ¶ 7; *18 U.S.C. §§ 431 & 433*; *41 U.S.C. § 6306(a) & (b)*.

No Lobbying or Representational Contacts

Do NOT represent an outside organization in a matter if the Federal government is a party or has an interest.

Do NOT lobby or aid outside organizations in the lobbying of Congress or the Executive Branch.- *18 U.S.C. §§ 203 & 205*; *House Rule 25, clause 6*.

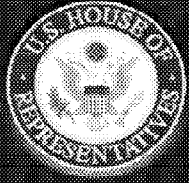
SPOUSE CANNOT lobby you or your staff if, spouse is a registered federal lobbyist. - *House Rule 25, clause 7*.

Do Not Use Material, Nonpublic Information

May constitute INSIDER TRADING.

SEC definition of “public” not obvious or clear.

Do NOT Participate in an IPO



U.S. House of Representatives

COMMITTEE ON ETHICS

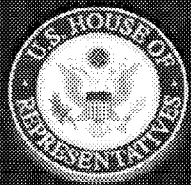
Prohibitions on Outside Positions

Members ***may not*** serve as an officer or director of any:

- Public company, defined by the Securities and Exchange Act of 1934; or
- Company traded on a foreign market.
- There are NO exceptions to these restrictions.

Members ***may not*** serve as an officer or director of any:

- Entity that receives funding from a federal agency, jurisdiction of which falls within a committee on which a Member sits; or
- Entity that is regulated by a federal agency, jurisdiction of which falls within a committee on which a Member sits.
- There are several exceptions to these restrictions.



U.S. House of Representatives

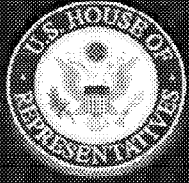
COMMITTEE ON ETHICS

Earned Income and Other Restrictions

Members may not—

- All Members are limited in the amount of outside income they may earn (2020: \$28,845)
- Permit a firm that provides fiduciary services to *use your name*
- Receive —
 - compensation for serving as an *officer or director* of any entity
 - Includes both for-profit and non-profit organizations
 - payment for performing services involving a *fiduciary relationship*
- Fiduciary Professions: *Legal, real estate, consulting and advising (including lobbying), insurance, medicine,* financial services, and similar positions where you hold a position of trust*

**Note: There are special rules for Members who are also medical doctors*



U.S. House of Representatives

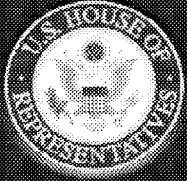
COMMITTEE ON ETHICS

Other Outside Activities

Honoraria: Members may not receive an honorarium (*i.e.*, payment for a speech, article, or appearance), but may have up to \$2,000 donated directly to a charity.

Teaching: Members may not teach for compensation unless they first get written permission from the Ethics Committee for each semester of teaching

Writing: Members must receive prior Committee approval for any book contract. Members may not receive an advance on copyright royalties.



U.S. House of Representatives

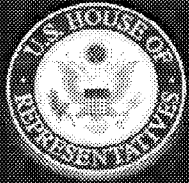
COMMITTEE ON ETHICS

Official Activity

- **Voting in the House**
- You **MUST** vote on each question put, **UNLESS** you have a direct
 - personal or pecuniary interest in the matter. - House Rule 3, clause 1.

- **Other House Actions**
- You **MUST** use “added circumspection” on all other official actions (sponsoring a bill, advocating for or participating in House committee action, contacting an executive branch agency, etc...).
- Possible Solutions include *recusal or referral to another Member office, committee with jurisdiction, or Senate office.*
- **BUT: do NOT** advocate to that other office.
- **REMINDER: Your staff acts on your behalf and you may be held liable for their actions.**

- **Earmarks & Financial Interest Certification**
- You **MUST** certify that neither you nor your spouse has a personal financial interest in a requested earmark or limited tax or tariff benefit. The Committee of jurisdiction over the bill determines if earmark or tariff benefit.

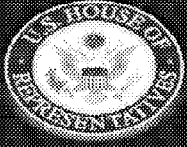


U.S. House of Representatives

COMMITTEE ON ETHICS

Post Employment Restrictions

- Former Members may not communicate or appear before the House or Senate on behalf of third party seeking official action for a year
- Current Members and staff *may not* aid former Members and staff in violating the post-employment restrictions
- Members and senior staff must disclose negotiations with private entities
- Members and senior staff may be required to recuse from related official matters



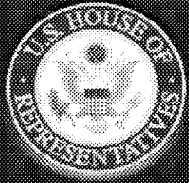
U.S. House of Representatives

COMMITTEE ON ETHICS

Financial Disclosure



COE.OCEREQUEST.000226

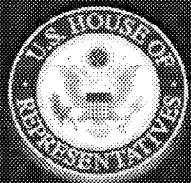


U.S. House of Representatives

COMMITTEE ON ETHICS

Financial Disclosure Statements

- Due date is May 15th
- You must have at least one employee in your personal office who files an FD. Must be either –
 - senior staff rate (\$131,239) for 60 days or more, or
 - A Principal Assistant: An employee you select to file a financial disclosure (if no employee paid at senior staff rate)
- Committee staff are able to prescreen your FD prior to filing
- You may use your MRA to compensate someone to prepare your FD



U.S. House of Representatives

COMMITTEE ON ETHICS

FD and PTR: Whose Assets Must be Reported?

On both annual FD and PTR, report assets (and transactions in assets) owned

wholly or in part by:

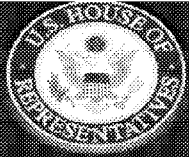
You

Your spouse, or

Your dependent children

Under age 21, unmarried, & living with you (or in college) or

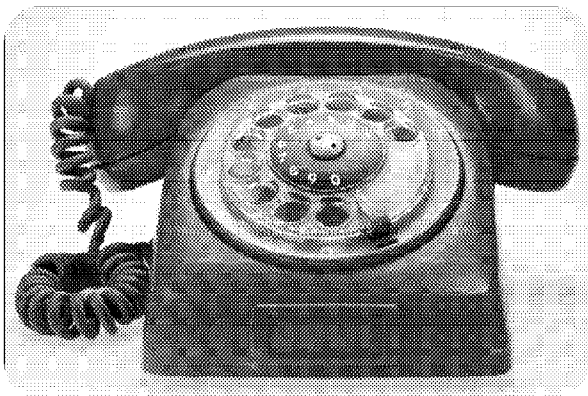
Claimed as dependent on your federal taxes



U.S. House of Representatives

COMMITTEE ON ETHICS

Call or Write Before Acting



Committee on Ethics
1015 Longworth HOB
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (fax)
website: ethics.house.gov

*All communications are confidential
Good faith reliance on written Committee opinions
protects you from sanctions under House rules*

EXHIBIT 5

Ethics Training for Members-Elect

**Presented by the Staff of the
Committee on Ethics
U.S. House of Representatives**

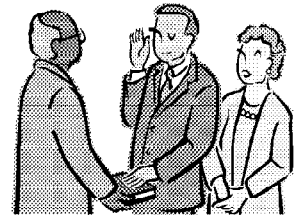
COE.OCEREQUEST.000269

What is the Ethics Committee and What Does it Do?

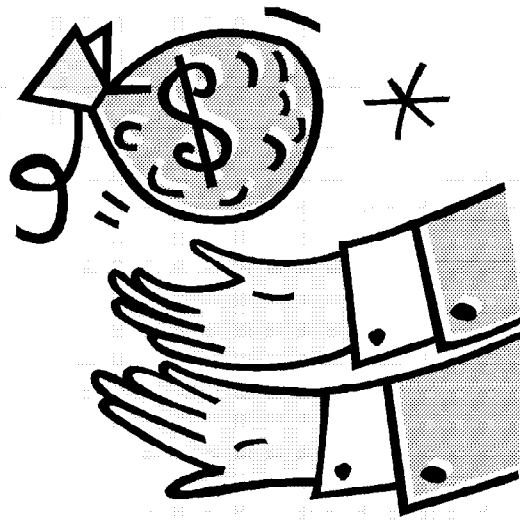
- Constitutional Authority: Article I, Section 5 of the U.S. Constitution: “Each House may . . . Punish its Members for disorderly Behavior . . .”
- 10-Members of Congress on a bipartisan committee
- Non-partisan staff:
 - Advise and provide training and guidance on ethics laws, rules, and standards of conduct
 - Seeking advice insulates you from an investigation
 - We keep a record of all inquiries
 - Review Financial Disclosure filings (staff are available to perform prescreens)
 - Investigate possible violations by Members, officers, and employees
 - You can contact the Committee by phone, e-mail, mail, or by walking in person

Important Benchmarks for New Members

- Members ARE subject to the federal bribery and illegal gratuity statutes BEFORE swearing in
- Members are subject to the House ethics rules and the STOCK ACT UPON swearing in
- Wind down outside business within 90 days
- Staff must attend ethics training within first 60 days
 - We encourage you to request an in-office training for you and your staff
- Annual Financial Disclosure Statement due May 15th



OFFICIAL RESOURCES



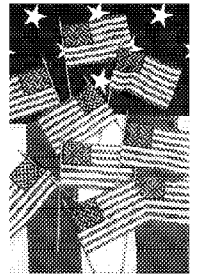
COE.OCEREQUEST.0002/2

Official Resources

- Official resource is anything paid for with an appropriation (including your staff)
- No personal use of official resources (except *de minimus*)
- No use for campaign activity unless expressly permitted

- Official expenses or activities may only be paid from:
 - Appropriated funds (MRA);
 - Member's personal funds; or
 - Member's campaign funds (with certain limits)
- No private donations, funds, or in-kind goods or services are allowed in support of official House activities or expenses.

Official Resources: Maintain A Bright Line



Your Official Staff Cannot—

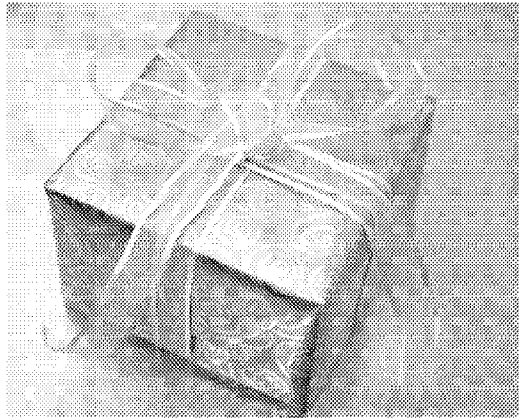
- Contribute to your campaign
- Do campaign work on official time or in official buildings
- Work for free (exceptions for interns, etc.)
- Use their personal funds for official purposes
- Give you gifts (including running personal errands)
- Be required or pressured to volunteer for anything, including your campaign
- Use official resources or position for their own personal benefit, or yours
- Take official actions that would create a conflict for you
- Represent others (unofficially) to the federal government

Official Resources and Events

An event can only ever be an official congressional event or an outside group's event

- ***Cannot*** co-sponsor an official congressional event with any outside group, including a non-profit
- ***No*** private subsidy for official congressional events
 - ***But:*** assistance from domestic governmental entities, including public universities is permitted
- No use of official resources for an event sponsored by an outside group
 - ***But:*** your name may sometimes be used in connection with an outside group's event
- ***No*** solicitation of an outside group to hold an event for you

GIFTS



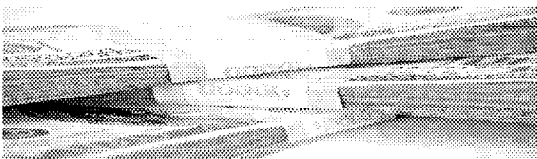
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Bribes and Illegal Gratuities

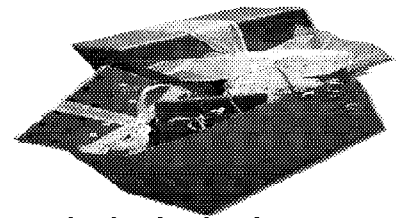
Benchmark: Applies prior to swearing in

You ***may not*** accept a gift that is offered in connection with an official action taken or asked to be taken

- May be deemed a bribe or improper gratuity under federal criminal law (18 U.S.C. § 201)
- Items of nominal value are allowed as thank you gifts (*e.g.*, flowers, baked goods, or decorative items)



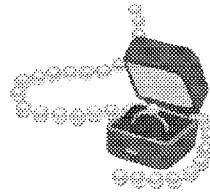
Gifts



- A gift is almost anything of value, including a discount, tickets to a game, a cup of coffee, a gift card
- The gift rule is written in the negative—cannot accept a gift unless an exception permits acceptance
 - More than 20 exceptions—far fewer exceptions for gifts from federal registered lobbyists or foreign agents
- Before you accept a gift, ask yourself:
 1. Can I accept the gift?
 2. Do I need prior approval from the Ethics Committee?
 3. Do I need to disclose or report the gift (*e.g.*, the Ethics Committee, Clerk, or an FD Statement, etc.)?
- Prior Ethics approval may be required, such as for gifts of personal friendship of more than \$250

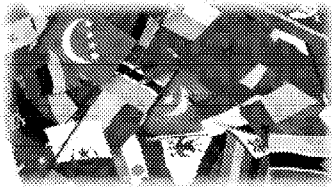
Categories of Permissible Gifts

- Gifts from relatives
 - Includes fiancés and in-laws
- Gifts from personal friends
 - Must meet certain criteria
- Gifts from other Members and staff
 - Gifts from employees up the chain only on special occasions
- Gifts related to outside activities
 - May not be offered or enhanced due to House employment
- Gifts from federal, state, or local government
 - Includes public universities



Gifts from Foreign Governments

- Foreign Gifts and Decorations Act (FGDA) allows Members and staff to accept a gift of **\$390 or less** from a foreign government
- If the gift is worth more than \$390, you must turn the gift over to the Clerk within 60 days for disposal and file a disclosure form with the Ethics Committee
- With Committee permission, you may be able to retain the gift for official use



Solicitations

- General prohibition *against* most solicitations (5 U.S.C. § 7353)



- Permissible charitable solicitations
 - Must be in your personal capacity
 - On your own time
 - Not using official resources
 - No solicitations of lobbyists or foreign agents
 - No implied official endorsement
 - No direct personal benefit to soliciting individual

TRAVEL



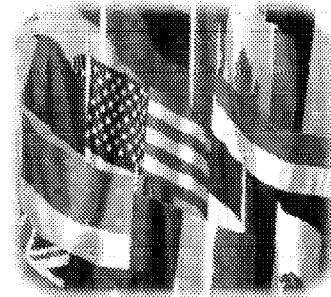
COE.OCEREQUEST.000282

Privately-Sponsored Travel

- Each traveler must obtain **prior, written approval** from the House Ethics Committee
- Request must be submitted 30 days prior to the trip
- Travel Rules and Forms available on the Committee's Web site
- Committee pre-approval not required for travel paid for using:
 - House funds (MRA or committee funds)
 - Federal, state, or local government funds (includes domestic public university funds)
 - Campaign funds
 - Foreign government funds (only as authorized by law)
 - Travel related to outside employment or activities

Foreign Government Travel

- Special rules and disclosure requirements for travel funded by foreign governments
- Statutes permitting:
 - Mutual Educational and Cultural Exchange Act (MECEA)
 - Foreign Gifts and Decorations Act (FGDA)



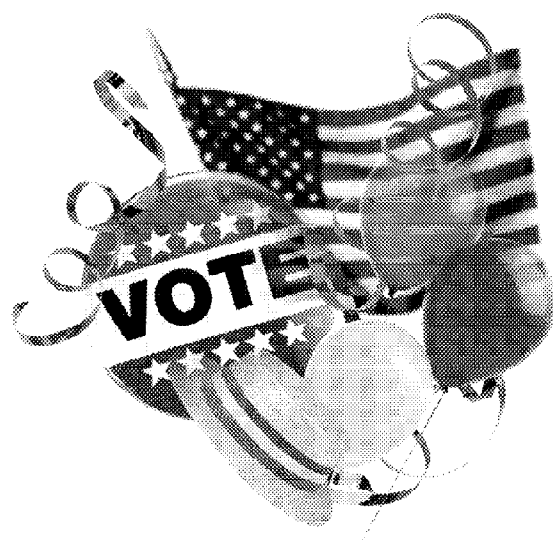
Contact Ethics before accepting any foreign government travel

Private Planes

- Significant restrictions on the use of campaign or personal funds to pay for flights on privately-owned aircraft
- Call the Ethics Committee before flying
- Prior Ethics approval may be required to accept a gift of private plan travel
- Disclosure may be required



CAMPAIGN ACTIVITY



COE.OCEREQUEST.000286

Permissible Uses of Campaign Funds During Your Transition

- As a general rule, you may continue to use your campaign funds for *bona fide* expenses you incur in preparing to take office. (Always check with the FEC regarding proper use of campaign funds.)
- Such expenses may include those for
 - Transition staff
 - Transition supplies & equipment
 - Transition office space
 - Travel
 - Expenses incurred in moving to Washington, DC (both office and personal effects)



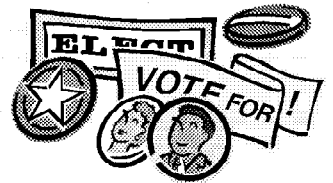
Campaign Rules Overview

Maintain a bright line between House office and campaign activity

Limited overlap exceptions:

- 1. Staff that handle the Member's schedule may coordinate with campaign*
- 2. Press team may answer incidental campaign questions during official interview, but should not initiate discussion of campaign issues*

Call if ever in doubt

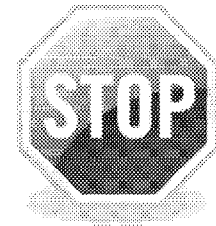


Official Use of Campaign Funds

General rule: Campaign funds may be used for some official expenses—*however*





House Rules specifically **prohibit** Members from using campaign funds for the following official expenses:

- Mail or other communications
- Compensation for services
- Office space
- Furniture
- Equipment & IT services



Improper Personal Use

Some clearly prohibited personal expenses:

- Normal living expenses (food, clothing, shelter) 
- Vacation expenses 
- Tickets to shows and sporting events (unless part of a bona fide campaign event) 
- Country club or health club dues 

Members may never borrow from their campaign account

OUTSIDE BUSINESS OR ACTIVITIES



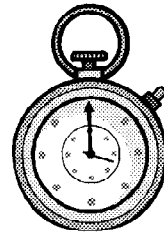
COE.OCEREQUEST.000291

Business Interests: Begin Wind-Down NOW

Benchmark: Within first 90 days

Start planning your transition now

- *May* need to
 - Change business name,
 - Change business structure, or
 - Sell or divest from a business
- Committee counsel available to discuss your particular situation and requirements



Earned Income and Other Restrictions

- All Members are limited in the amount of outside income they may earn (2018: \$28,050)

Members may not—

- Permit a firm that provides fiduciary services to ***use your name***
- Receive —
 - compensation for serving as an ***officer or director*** of any entity
 - Includes both for-profit and non-profit organizations
 - payment for performing services involving a ***fiduciary relationship***
- Fiduciary Professions: ***Legal, real estate, consulting and advising (including lobbying), insurance, medicine, * financial services, and similar positions where you hold a position of trust***

****Note: There are special rules for Members who are also medical doctors***

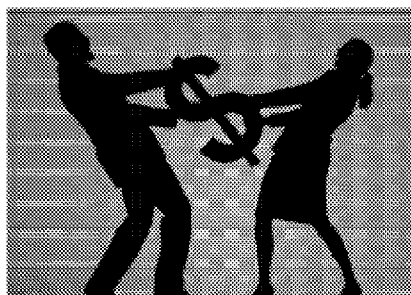
Other Outside Activities

Honoraria: Members may not receive an honorarium (*i.e.*, payment for a speech, article, or appearance), but may have up to \$2,000 donated directly to a charity.

Teaching: Members may not teach for compensation unless they first get written permission from the Ethics Committee for each semester of teaching

Writing: Members must receive prior Committee approval for any book contract. Members may not receive an advance on copyright royalties.

CONFLICTS OF INTEREST



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General Principles

- Do not allow compensation to accrue to your personal benefit from improper use of House position.- House Rule 23, clause 3
- Do not accept benefits for you or your family under circumstances that appear to influence your governmental duties. - Code of Ethics for Government Service ¶5
- No "special favors" to anyone, based on personal, business, or political relationships. - Code of Ethics for Government Service ¶ 5
- Do not use official position or confidential information for personal gain. - Code of Ethics for Government Service ¶ 8
- Do not use official House resources for personal or campaign activities. - 31 U.S.C. § 1301

Official Activity

Voting in the House

- You **MUST** vote on each question put, **UNLESS** you have a direct personal or pecuniary interest in the matter. - *House Rule 3, clause 1.*



Other House Actions

- You **MUST** use “added circumspection” on all other official actions (sponsoring a bill, advocating for or participating in House committee action, contacting an executive branch agency, etc...).
- Possible Solutions include *recusal or referral to another Member office, committee with jurisdiction, or Senate office.*
BUT: **do NOT** advocate to that other office.
- REMINDER: **Your staff acts on your behalf and you may be held liable for their actions.**

Earmarks & Financial Interest Certification

- You **MUST** certify that neither you nor your spouse has a personal financial interest in a requested earmark or limited tax or tariff benefit. The Committee of jurisdiction over the bill determines if earmark or tariff benefit.

Personal Activity

Do Not Contract with Federal Government

- EXCEPT: Certain farm programs excluded. - Code of Ethics for Government Service ¶ 7, 18 U.S.C. §§ 431 & 433; 41 U.S.C. § 6306(a) & (b).

No Lobbying or Representational Contacts

- Do NOT represent an outside organization in a matter if the Federal government is a party or has an interest.
- Do NOT lobby or aid outside organizations in the lobbying of Congress or the Executive Branch.- 18 U.S.C. §§ 203 & 205; House Rule 25, clause 6.
- SPOUSE CANNOT lobby you or your staff if, spouse is a registered federal lobbyist. - House Rule 25, clause 7.

Do Not Use Material, Nonpublic Information

- May constitute INSIDER TRADING.
- SEC definition of "public" not obvious or clear.

Do NOT Participate in an IPO

Benchmark: Members are subject to the STOCK ACT UPON swearing in

Post-Employment Restrictions

- Former Members may not communicate or appear before the House or Senate on behalf of third party seeking official action for a year
- Current Members and staff *may not* aid former Members and staff in violating the post-employment restrictions
- Members and senior staff must disclose negotiations with private entities
- Members and senior staff may be required to recuse from related official matters

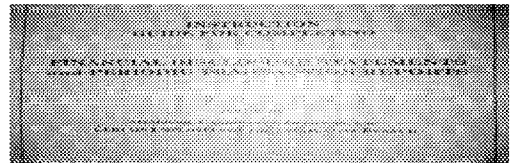
FINANCIAL DISCLOSURE



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Financial Disclosure Statements

- **Benchmark: Must file each May 15**
- Additional reporting requirements for Member FD versus candidate FD:
 - Transactions
 - Liabilities on personal residence
 - Gifts & travel received *after* sworn in to Congress
- You must have at least one employee in your personal office who files an FD. Must be either -
 - senior staff rate (\$126,148) for 60 days or more, or
 - A Principal Assistant: An employee you select to file a financial disclosure (if no employee paid at senior staff rate)
- Committee staff are able to prescreen your FD prior to filing
- You may use your MRA to compensate someone to prepare your FD

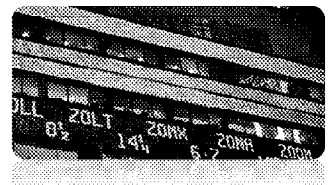


Periodic Transaction Reports (PTRs)

Benchmark: Applies to transactions executed on or after your swearing-in date

- Requirement applies to Members and senior staff
- Reporting of securities transactions only (stocks, bonds, options, futures, other securities) and only transactions valued at more than \$1,000
- Transactions reported on the PTR must also be reported on the annual FD
- You must file a PTR *not more than 45 days* from the date of the transaction
- Graduated late fee structure for late PTRs—can result in thousands of dollars in late fees (!)

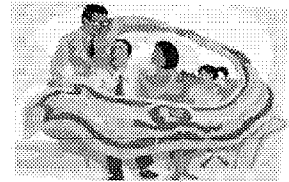
NO EXTENSIONS ALLOWED!
Do not file a report of "no activity"



FD and PTR: Whose Assets Must be Reported?

On both annual FD and PTR, report assets (and transactions in assets) owned wholly or in part by:

- You
- Your spouse, or
- Your dependent children
 - Under age 21, unmarried, & living with you (or in college) *or*
 - Claimed as dependent on your federal taxes



Call or Write Before Acting

House Committee on Ethics

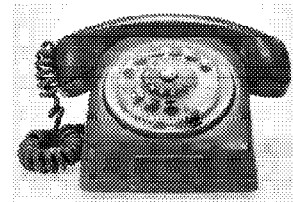
Office of Advice and Education

1015 Longworth House Office Building

Washington, DC 20515

(202) 225-7103 (office) (202) 225-7392 (fax)

www.ethics.house.gov



- All communications are confidential
 - Law states that no one is placed at risk by seeking Committee advice about future conduct
 - Good faith reliance on written Committee opinions protects you from sanctions under House rules

EXHIBIT 6

| Periodic Transaction Report Data | | | | | | | PTR Date Analysis | | | | | Updated Date Analysis Statement Dates | | | |
|----------------------------------|---|------------------|------------------|-------------------|--------------------|---|--------------------------|---|---|--|-------|---------------------------------------|---|-------|-------------------------|
| Filing Date | Asset | Transaction Type | Transaction Date | Notification Date | Amount | Subholding Of | Updated Transaction Date | Days From Transaction Date to Notification Date | Days From Transaction Date to Filing Date | Days From Notification Date to Filing Date | Late? | Grace Period Violation? | Days From Updated Transaction Date to Filing Date | Late? | Grace Period Violation? |
| 8/20/2018 | ABB Ltd (ABB) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | AbbVie Inc. (ABBV) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | AFLAC Incorporated (AFL) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Air Products and Chemicals, Inc. (APD) [ST] | Purchase | 11/13/2017 | 11/30/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 17 | 280 | 263 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Air Products and Chemicals, Inc. (APD) [ST] | Purchase | 11/13/2017 | 11/30/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 17 | 280 | 263 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Alianz SE ADS (AZSEY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Atria group, Inc. (Mo) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | American Electric Power Company, Inc. (AEP) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Ameriprise Financial, Inc. (AMP)[ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Amgen Inc. (AMGN) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Arthur J. Gallagher & Co. (AJG)[ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | ASE Technology Holding Co., Ltd. American Depository Shares (ASX)[ST] | Purchase | 8/14/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 371 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Astrazeneca PIC (AZN) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | AT&T Inc. (T) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BAE SYSTEMS Plc Sponsored ADR (BAESY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BB&T Corporation (BBT) [ST] | Purchase | 3/19/2018 | 3/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 12 | 154 | 142 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BCE, Inc. (BCE) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BCE, Inc. (BCE) [ST] | Sale | 8/14/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 371 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BlackRock, Inc. (BLK) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BNP Paribas American Depository Shares (BNPOY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | BOC Hong Kong (BHKLY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Bristol-Myers Squibb Company (BMY) [ST] | Purchase | 8/16/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 15 | 369 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | British American Tobacco Industries, P.L.c. Common Stock ADR (BTI) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Chevron Corporation (CVX) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | China Petroleum & Chemical Corporation (SNP) [ST] | Purchase | 2/21/2018 | 2/28/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 7 | 180 | 173 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Cisco Systems, Inc. (CSCO) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Coca-Cola Company (KO) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Crown Castle International Corp. (CCI) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Delta Air Lines, Inc. (DAL) [ST] | Purchase | 12/28/2017 | 12/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 3 | 235 | 232 | Y | Y | n/a | n/a | n/a |

| | | | | | | | | | | | | | | | |
|-----------|---|----------|------------|------------|-----------------------|---|-----|----|-----|-----|---|---|-----|-----|-----|
| 8/20/2018 | Delta Air Lines, Inc. (DAL) [ST] | Purchase | 12/28/2017 | 12/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 3 | 235 | 232 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Delta Air Lines, Inc. (DAL) [ST] | Sale | 4/19/2018 | 4/30/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 11 | 123 | 112 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Deutsche Telekom AG (DEGY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Deutsche Telekom AG (DEGY) [ST] | Sale | 8/14/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 371 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Diageo Plc (DEO) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | DMRY - Daimler AG UNSP ADR [OT] | Purchase | 10/2/2017 | 10/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 29 | 322 | 293 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | DMRY - Daimler AG UNSP ADR [OT] | Purchase | 12/21/2017 | 12/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 10 | 242 | 232 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Eaton Corporation, PIC Ordinary Shares (ETN) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | ENGIY - Engie Spon ADR [OT] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Exelon Corporation (EXC) [ST] | Purchase | 10/25/2017 | 10/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 6 | 299 | 293 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Exelon Corporation (EXC) [ST] | Sale | 6/20/2018 | 6/30/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 10 | 61 | 51 | Y | N | n/a | n/a | n/a |
| 8/20/2018 | Exxon Mobil Corporation (XOM) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Fidelity Govt MMKT Daily Money Class @ 1 [OT] | Purchase | 7/14/2017 | 7/31/2017 | \$100,001 - \$250,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 17 | 402 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Fidelity Govt MMKT Daily Money Class @ 1 [OT] | Purchase | 7/14/2017 | 7/31/2017 | \$100,001 - \$250,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 402 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Fidelity Govt MMKT Daily Money Class @ 1 [OT] | Sale | 7/20/2017 | 7/31/2017 | \$100,001 - \$250,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 11 | 396 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Fidelity Govt MMKT Daily Money Class @ 1 [OT] | Purchase | 7/20/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 11 | 396 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Fidelity Govt MMKT Daily Money Class @ 1 [OT] | Sale | 7/20/2017 | 7/31/2017 | \$100,001 - \$250,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 11 | 396 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | FirstEnergy Corp. (FE) [ST] | Sale | 8/16/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 15 | 369 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Ford Motor Company (F) [ST] | Purchase | 11/13/2017 | 11/30/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 17 | 280 | 263 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | General Electric Company (GE)[ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | General Electric Company (GE)[ST] | Sale | 11/13/2017 | 11/30/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 17 | 280 | 263 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Gilead Sciences, Inc. (GILD) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | GlaxoSmithKline PIC (GSK) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Home Depot, Inc. (HD) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Honda Motor Company, Ltd. (HMC) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | HP Inc. (HPQ) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | HSBC Holdings, Plc. (HSBC) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Huntington Bancshares Incorporated (HBAN) [ST] | Purchase | 6/21/2018 | 6/30/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 9 | 60 | 51 | Y | N | n/a | n/a | n/a |

| | | | | | | | | | | | | | | | |
|-----------|---|----------|------------|------------|-----------------------|--|-----|----|-----|-----|---|---|-----|-----|-----|
| 8/20/2018 | Imperial Brands PLC (IMBBY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Imperial Brands PLC (IMBBY) [ST] | Purchase | 5/1/2018 | 5/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 30 | 111 | 81 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | ING group, N.V. (ING) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Intel Corporation (INTC) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | International Paper Company (IP) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Japan Tobacco Un-sponsored American Depository Receipt (JAPAY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Japan Tobacco Un-sponsored American Depository Receipt (JAPAY) [ST] | Sale | 4/30/2018 | 5/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 31 | 112 | 81 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Jefferson National One Year Fixed Account [OT] | Exchange | 7/10/2017 | 7/31/2017 | \$100,001 - \$250,000 | National Financial Services/Fidelity - Traditional IRA / Jefferson National 457B | n/a | 21 | 406 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Johnson & Johnson (JNJ) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | JP Morgan Chase & Co. (JPM) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | JSC MMC Norilsk Nickel Spons ADR (NILSY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | JSC MMC Norilsk Nickel Spons ADR (NILSY) [ST] | Purchase | 1/29/2018 | 1/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 2 | 203 | 201 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Kimberly-Clark Corporation (KMB) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Kimberly-Clark Corporation (KMB) [ST] | Sale | 12/28/2017 | 12/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 3 | 235 | 232 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Liberty Property Trust (LPT) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Lloyds Banking Group Plc American Depository Shares (LYG) [ST] | Purchase | 2/21/2018 | 2/28/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 7 | 180 | 173 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Lockheed Martin Corporation (LMT) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Manuife Financial Corporation (MFC) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Marathon Petroleum Corporation (MPC) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Marathon Petroleum Corporation (MPC) [ST] | Sale | 5/16/2018 | 5/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 15 | 96 | 81 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Marsh & McLennan Companies, Inc. (MMC) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Medtronic Plc, Ordinary Shares (MDT) [ST] | Purchase | 5/16/2018 | 5/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 15 | 96 | 81 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Merck & Company, Inc. Common Stock (MRK) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Mettife, Inc. (MET) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Miche in Compagnie Generale des Etablissements Michelin Un-sponsored ADR Representing Nom Shares (MGDDY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Miche in Compagnie Generale des Etablissements Michelin Un-sponsored ADR Representing Nom Shares (MGDDY) [ST] | Sale | 8/14/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 371 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Microsoft Corporation (MSFT) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Mondelez International, Inc. - Class A (MDIZ) [ST] | Purchase | 2/14/2018 | 2/28/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 187 | 173 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Muenchener Re Group AG Un-sponsored ADR (MURGY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Nestle SA Sponsored ADR Representing Registered Share Series B (NSRGY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |

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|-----------|---|----------|------------|------------|--------------------|---|-----|----|-----|-----|---|---|-----|-----|-----|
| 8/20/2018 | Nippon Telegraph and Telephone Corpora ion ADR (NTTY) [OT] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | NGRY - NN Group NV UNSPADR [OT] | Purchase | 8/9/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 22 | 376 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | NGRY - NN Group NV UNSPADR [OT] | Purchase | 12/21/2017 | 12/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 10 | 242 | 232 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Norfolk Southern Corporation (NSC) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Norfolk Southern Corporation (NSC) [ST] | Sale | 10/25/2017 | 10/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 6 | 299 | 293 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Novartis AG (NVS) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Occidental Petroleum Corporation (OXY) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | OGE Energy Corp (OGE) [ST] | Purchase | 4/18/2018 | 4/30/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 12 | 124 | 112 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Orkla AS Sponsored American Depositary Shares (ORKV) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Pfizer, Inc. (PFE) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Phillips 66 (PSX) [ST] | Purchase | 8/16/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 15 | 369 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | PNC Financial Services group, Inc. (PNC) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Prologis, Inc. (PD) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | ProSiebenSat.1 Media AG Muenchen Un-sponsored ADR (PBSFY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Prudential Financial, Inc. (PRU) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | QUALCOMM Incorporated (QCOM) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Roche Holdings AG Basel American Depositary Shares (RHHBY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Royal Dutch Shell PLC Royal Dutch Shell American Depositary Shares (RDS.B) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Sanofi American Depositary Shares (SNY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Schlumberger N.V. (SB) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Siemens AG American Depositary Shares (SIEGY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Singapore Telecommunications Limited Sponsored ADR New 2006 (SGAPY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Singapore Telecommunications Limited Sponsored ADR New 2006 (SGAPY) [ST] | Purchase | 8/14/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 371 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Smiths Group Plc Sponsored ADR (SMGZY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Smiths Group Plc Sponsored ADR (SMGZY) [ST] | Sale | 8/14/2017 | 8/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 17 | 371 | 354 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Smurfit Kappa Group Plc American Depositary Shares (SMFKY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Smurfit Kappa Group Plc American Depositary Shares (SMFKY) [ST] | Purchase | 9/5/2017 | 9/30/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 25 | 349 | 324 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Sonic Healthcare Ltd un-sponsored ADR (SKHNY) [OT] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | SSE Plc Sponsored ADR (SSEZY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Telefonica Brasil, S.A. ADS (VIV) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Thomson Reuters Corp Ordinary Shares (TRI) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |

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|------------|---|----------|------------|------------|--------------------|---|------------|----|-----|-----|---|---|-----|-----|-----|
| 8/20/2018 | Total S.A. (TOT) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Total S.A. (TOT) [ST] | Sale | 2/21/2018 | 2/28/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 7 | 180 | 173 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | U.S. Bancorp (USB) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | U.S. Bancorp (USB) [ST] | Purchase | 1/29/2018 | 1/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 2 | 203 | 201 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | UBS group AG Registered Ordinary Shares (UBS) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Unilever NV (UN) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | United Overseas Bk Singapore American Depository Shares (UOVEY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | United Technologies Corporation (UTX) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | United Technologies Corporation (UTX) [ST] | Sale | 1/29/2018 | 1/31/2018 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 2 | 203 | 201 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Verizon Communications Inc. (VZ) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Vermilion Energy Inc. Common(VET) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Vodafone Group Plc - American Depository Shares Each Representing Ten Ordinary Shares (VOD) [ST] es | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Walmart Inc. (WMT) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Wells Fargo & Company (WFC) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Williams Companies, Inc. (WMB) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Xerox Corporation (XRX) [ST] | Purchase | 7/17/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 14 | 399 | 385 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Xerox Corporation (XRX) [ST] | Sale | 11/13/2017 | 11/30/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | n/a | 17 | 280 | 263 | Y | Y | n/a | n/a | n/a |
| 8/20/2018 | Zurich Insurance Group Limited Sponsored American Depository Shares (ZURVY) [ST] | Purchase | 7/11/2017 | 7/31/2017 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | n/a | 20 | 405 | 385 | Y | Y | n/a | n/a | n/a |
| 8/9/2019 | BB&T Corporation (BBT) [ST] | Sale | 5/17/2019 | 5/21/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 5/21/2019 | 4 | 84 | 80 | Y | Y | 80 | Y | Y |
| 8/9/2019 | Deutsche Telekom AG (DTEGY) [ST] | Purchase | 5/30/2019 | 6/3/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 6/3/2019 | 4 | 71 | 67 | Y | Y | 67 | Y | Y |
| 8/9/2019 | Roche Holdings AG Basel American Depository Shares (RH#BY) [ST] | Sale | 7/5/2019 | 7/9/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 7/9/2019 | 4 | 35 | 31 | Y | N | 31 | Y | N |
| 8/9/2019 | Sniiths Group Plc Sponsored ADR (SMSZY) [ST] | Sale | 6/21/2019 | 6/25/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 6/25/2019 | 4 | 49 | 45 | Y | N | 45 | Y | N |
| 8/9/2019 | UPM-Kymmene OYJ (UPMKY) [ST] | Purchase | 6/21/2019 | 6/25/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 6/25/2019 | 4 | 49 | 45 | Y | N | 45 | Y | N |
| 8/9/2019 | Vodafone Group Plc - American Depository Shares Each Representing Ten Ordinary Shares (VOD) [ST] es | Sale | 5/30/2019 | 6/3/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 6/3/2019 | 4 | 71 | 67 | Y | Y | 67 | Y | Y |
| 12/18/2019 | Eastman Chemical Company (EMN) [ST] | Purchase | 10/28/2019 | 10/30/2019 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 10/30/2019 | 2 | 51 | 49 | Y | N | 49 | Y | N |
| 5/1/2020 | China Petroleum & Chemical Corporation (SNP) [ST] | Sale | 3/17/2020 | 3/17/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 3/19/2020 | 0 | 45 | 45 | Y | N | 43 | Y | N |
| 5/1/2020 | Las Vegas Sands Corp. (LVS) [ST] | Purchase | 3/17/2020 | 3/17/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 3/19/2020 | 0 | 45 | 45 | Y | N | 43 | Y | N |
| 5/1/2020 | Microsoft Corporation (MSFT) [ST] | Sale | 2/24/2020 | 2/24/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 2/26/2020 | 0 | 67 | 67 | Y | Y | 65 | Y | Y |
| 5/1/2020 | Nestle SA Sponsored ADR Representing Registered Share Series B (NSRGY) [ST]es | Sale | 2/11/2020 | 2/11/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 2/13/2020 | 0 | 80 | 80 | Y | Y | 78 | Y | Y |
| 5/1/2020 | Softbank Corp Un-sponsored ADR (SFTBY) [ST] | Purchase | 3/18/2020 | 3/18/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 3/20/2020 | 0 | 44 | 44 | Y | N | 42 | Y | N |
| 7/29/2020 | Bristol-Myers Squibb Company (BMY) [ST] | Purchase | 6/21/2020 | 6/21/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 7/23/2020 | 0 | 38 | 38 | Y | N | n/a | n/a | n/a |

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| 7/29/2020 | Enel Societa Per Azioni Un-sponsored ADR (ENLAY) [ST] | Purchase | 5/27/2020 | 5/27/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 5/29/2020 | 0 | 63 | 63 | Y | Y | 61 | Y | Y |
| 7/29/2020 | Norwegian Cruise Line Holdings Ltd. Ordinary Shares (NCLH) [ST] | Purchase | 5/11/2020 | 5/11/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Traditional IRA / Jefferson National 457B | 5/13/2020 | 0 | 79 | 79 | Y | Y | 77 | Y | Y |
| 7/29/2020 | VALE S.A. American Depositary Shares Each Representing One Common Share (VALE) [ST] | Purchase | 6/22/2020 | 6/22/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 7/24/2020 | 0 | 37 | 37 | Y | N | n/a | n/a | n/a |
| 10/20/2020 | Comcast Corporation - Class A (CMCSA) [ST] | Purchase | 8/18/2020 | 8/20/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 8/20/2020 | 2 | 63 | 61 | Y | Y | 61 | Y | Y |
| 2/2/2021 | American Electric Power Company, Inc. (AEP) [ST] | Sale | 10/21/2020 | 10/21/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 10/23/2020 | 0 | 104 | 104 | Y | Y | 102 | Y | Y |
| 2/2/2021 | Compagnie de Saint Gobain Un-sponsored ADR (CODYY) [ST] | Purchase | 12/22/2020 | 12/22/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 12/24/2020 | 0 | 42 | 42 | Y | N | 40 | Y | N |
| 2/2/2021 | Deutsche Post AG Sponsored ADR (DPSTGY) [ST] | Purchase | 11/13/2020 | 11/13/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 11/17/2020 | 0 | 81 | 81 | Y | Y | 77 | Y | Y |
| 2/2/2021 | Svenska Handelsbanken Un-sponsored ADR Representing Shares (SVNLY) [ST]A | Purchase | 12/7/2020 | 12/7/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 12/9/2020 | 0 | 57 | 57 | Y | N | 55 | Y | N |
| 2/2/2021 | Tyson Foods, Inc. (TSN) [ST] | Purchase | 10/21/2020 | 10/21/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 10/23/2020 | 0 | 104 | 104 | Y | Y | 102 | Y | Y |
| 11/19/2021 | Bristol-Myers Squibb Company (BMY) [ST] - *Amendment | Purchase | 7/21/2020 | 7/21/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 7/23/2020 | 0 | 486 | 486 | Y | Y | 484 | Y | Y |
| 11/19/2021 | Comcast Corporation - Class A (CMCSA) [ST] | Sale | 2/23/2021 | 2/23/2021 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Domestic | 2/25/2021 | 0 | 269 | 269 | Y | Y | 267 | Y | Y |
| 11/19/2021 | VALE S.A. American Depositary Shares Each Representing One Common Share (VALE) [ST] - *Amendment | Purchase | 7/22/2020 | 7/22/2020 | \$1,001 - \$15,000 | National Financial Services/Fidelity - Premiere Select IRA Intl | 7/24/2020 | 0 | 485 | 485 | Y | Y | 483 | Y | Y |

EXHIBIT 7

Nawrocki Bradley, Jenifer

From: Sloans, Tonya
Sent: Wednesday, August 11, 2021 12:42 PM
To: Nawrocki Bradley, Jenifer
Subject: RE: Committee Member Pre-Screen - Rutherford

You are welcome!

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, August 10, 2021 4:54 PM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

Tonya –

I've updated the FD document to reflect either partial or full sale (attached for approval). Here is what I determined:

- a. Liberty Property Trust -- SOLD
- b. Microsoft Corporation – partial sale
- c. Astrazeneca PLC -- SOLD
- d. BAE Systems plc – partial sale
- e. China Petroleum & Chemical Corp -- SOLD
- f. Diageo plc – partial sale
- g. ENGIY – Engie spon adr -- SOLD
- h. Imperial Brands – partial sale
- i. Lloyds Banking Group - SOLD
- j. Nestle SA – Partial sale
- k. Roche Holdings – partial sale

Thank you so much for your help with getting this correct!
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



From: Sloans, Tonya <[REDACTED]>
Sent: Monday, August 9, 2021 11:20 AM

To: Nawrocki Bradley, Jenifer <[REDACTED]>

Subject: RE: Committee Member Pre-Screen - Rutherford

For each sale that was a partial sale, you must indicate that on Schedule B (by answering “yes” to the partial sale question in the Schedule B entry).

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>

Sent: Monday, August 9, 2021 11:07 AM

To: Sloans, Tonya <[REDACTED]>

Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you! I believe they were partially sold – not fully sold. I will go back and double check these, though, to be fully sure.

From: Sloans, Tonya <[REDACTED]>

Sent: Monday, August 9, 2021 11:05 AM

To: Nawrocki Bradley, Jenifer <[REDACTED]>

Subject: FW: Committee Member Pre-Screen - Rutherford

Jennifer:

One of our auditors reviewed the draft and had the following comments:

The 2019 amendment prescreen looks OK.

The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
 - a. Liberty Property Trust
 - b. Microsoft Corporation
 - c. Astrazeneca PLC
 - d. BAE Systems plc
 - e. China Petroleum & Chemical Corp
 - f. Diageo plc
 - g. ENGIY – Engie spon adr
 - h. Imperial Brands
 - i. Lloyds Banking Group
 - j. Nestle SA
 - k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>

Sent: Tuesday, July 27, 2021 5:56 PM

To: Disclosure, Financial <[REDACTED]>

Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Sloans, Tonya
Sent: Tuesday, August 10, 2021 5:07 PM
To: Nawrocki Bradley, Jenifer
Subject: RE: Committee Member Pre-Screen - Rutherford

Sure thing.

Just make sure that in each instance where 100% of the stock was sold, then the sale is reported on Schedule B (Transactions), and stock is still be listed on Schedule A, with a value of "None" (representing the fact that no value was held in the stock as of 12/31/2020).

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, August 10, 2021 4:54 PM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

Tonya –

I've updated the FD document to reflect either partial or full sale (attached for approval). Here is what I determined:

- a. Liberty Property Trust -- SOLD
- b. Microsoft Corporation – partial sale
- c. Astrazeneca PLC -- SOLD
- d. BAE Systems plc – partial sale
- e. China Petroleum & Chemical Corp -- SOLD
- f. Diageo plc – partial sale
- g. ENGIY – Engie spon adr -- SOLD
- h. Imperial Brands – partial sale
- i. Lloyds Banking Group - SOLD
- j. Nestle SA – Partial sale
- k. Roche Holdings – partial sale

Thank you so much for your help with getting this correct!
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



From: Sloans, Tonya <[REDACTED]>
Sent: Monday, August 9, 2021 11:20 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

For each sale that was a partial sale, you must indicate that on Schedule B (by answering “yes” to the partial sale question in the Schedule B entry).

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Monday, August 9, 2021 11:07 AM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you! I believe they were partially sold – not fully sold. I will go back and double check these, though, to be fully sure.

From: Sloans, Tonya <[REDACTED]>
Sent: Monday, August 9, 2021 11:05 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: FW: Committee Member Pre-Screen - Rutherford

Jennifer:

One of our auditors reviewed the draft and had the following comments:

The 2019 amendment prescreen looks OK.

The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
 - a. Liberty Property Trust
 - b. Microsoft Corporation
 - c. Astrazeneca PLC
 - d. BAE Systems plc
 - e. China Petroleum & Chemical Corp
 - f. Diageo plc
 - g. ENGIY – Engie spon adr
 - h. Imperial Brands
 - i. Lloyds Banking Group
 - j. Nestle SA
 - k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 5:56 PM

To: Disclosure, Financial <[REDACTED]>

Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.

Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Tuesday, August 10, 2021 4:54 PM
To: Sloans, Tonya
Subject: RE: Committee Member Pre-Screen - Rutherford
Attachments: Rutherford - 2020 Annual FD - Preview (updated).pdf

Tonya –

I've updated the FD document to reflect either partial or full sale (attached for approval). Here is what I determined:

- a. Liberty Property Trust -- SOLD
- b. Microsoft Corporation – partial sale
- c. Astrazeneca PLC -- SOLD
- d. BAE Systems plc – partial sale
- e. China Petroleum & Chemical Corp -- SOLD
- f. Diageo plc – partial sale
- g. ENGIY – Engie spon adr -- SOLD
- h. Imperial Brands – partial sale
- i. Lloyds Banking Group - SOLD
- j. Nestle SA – Partial sale
- k. Roche Holdings – partial sale

Thank you so much for your help with getting this correct!
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



From: Sloans, Tonya [REDACTED]
Sent: Monday, August 9, 2021 11:20 AM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: Committee Member Pre-Screen - Rutherford

For each sale that was a partial sale, you must indicate that on Schedule B (by answering “yes” to the partial sale question in the Schedule B entry).

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Monday, August 9, 2021 11:07 AM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you! I believe they were partially sold – not fully sold. I will go back and double check these, though, to be fully sure.

From: Sloans, Tonya <[REDACTED]>
Sent: Monday, August 9, 2021 11:05 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: FW: Committee Member Pre-Screen - Rutherford

Jennifer:

One of our auditors reviewed the draft and had the following comments:

The 2019 amendment prescreen looks OK.

The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
 - a. Liberty Property Trust
 - b. Microsoft Corporation
 - c. Astrazeneca PLC
 - d. BAE Systems plc
 - e. China Petroleum & Chemical Corp
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 - g. ENGIY – Engie spon adr
 - h. Imperial Brands
 - i. Lloyds Banking Group
 - j. Nestle SA
 - k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial <[REDACTED]>
Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.

Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: FDE-Filing
Sent: Monday, August 9, 2021 2:26 PM
To: Nawrocki Bradley, Jenifer
Subject: Financial Disclosure Report is Successful



Financial Disclosure Electronic Filing
U.S. House of Representatives

Filing Status: Success

Your Financial Disclosure Report received on 8/9/2021 2:25:22 PM, has been processed.

Filing/Reference ID: 10041122

Received: 8/9/2021 2:25:22 PM

Filer Name: Jenifer Nawrocki Bradley

Report Year: 2020

<https://fd.house.gov>

Please do not respond to this e-mail. This mail box is unattended.

Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Monday, August 9, 2021 11:20 AM
To: Sloans, Tonya
Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you for noting that – I'll get on that.

From: Sloans, Tonya <[REDACTED]>
Sent: Monday, August 9, 2021 11:20 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

For each sale that was a partial sale, you must indicate that on Schedule B (by answering "yes" to the partial sale question in the Schedule B entry).

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Monday, August 9, 2021 11:07 AM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you! I believe they were partially sold – not fully sold. I will go back and double check these, though, to be fully sure.

From: Sloans, Tonya <[REDACTED]>
Sent: Monday, August 9, 2021 11:05 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: FW: Committee Member Pre-Screen - Rutherford

Jennifer:

One of our auditors reviewed the draft and had the following comments:

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The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
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 - b. Microsoft Corporation
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 - f. Diageo plc
 - g. ENGIY – Engie spon adr
 - h. Imperial Brands

- i. Lloyds Banking Group
- j. Nestle SA
- k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial <[REDACTED]>
Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.

Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Sloans, Tonya
Sent: Monday, August 9, 2021 11:20 AM
To: Nawrocki Bradley, Jenifer
Subject: RE: Committee Member Pre-Screen - Rutherford

For each sale that was a partial sale, you must indicate that on Schedule B (by answering “yes” to the partial sale question in the Schedule B entry).

Tonya

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Monday, August 9, 2021 11:07 AM
To: Sloans, Tonya [REDACTED]
Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you! I believe they were partially sold – not fully sold. I will go back and double check these, though, to be fully sure.

From: Sloans, Tonya [REDACTED]
Sent: Monday, August 9, 2021 11:05 AM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: FW: Committee Member Pre-Screen - Rutherford

Jennifer:

One of our auditors reviewed the draft and had the following comments:

The 2019 amendment prescreen looks OK.

The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
 - a. Liberty Property Trust
 - b. Microsoft Corporation
 - c. Astrazeneca PLC
 - d. BAE Systems plc
 - e. China Petroleum & Chemical Corp
 - f. Diageo plc
 - g. ENGIY – Engie spon adr
 - h. Imperial Brands
 - i. Lloyds Banking Group
 - j. Nestle SA
 - k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial <[REDACTED]>
Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.

Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Monday, August 9, 2021 11:07 AM
To: Sloans, Tonya
Subject: RE: Committee Member Pre-Screen - Rutherford

Thank you! I believe they were partially sold – not fully sold. I will go back and double check these, though, to be fully sure.

From: Sloans, Tonya [REDACTED]
Sent: Monday, August 9, 2021 11:05 AM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: FW: Committee Member Pre-Screen - Rutherford

Jennifer:

One of our auditors reviewed the draft and had the following comments:

The 2019 amendment prescreen looks OK.

The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
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 - b. Microsoft Corporation
 - c. Astrazeneca PLC
 - d. BAE Systems plc
 - e. China Petroleum & Chemical Corp
 - f. Diageo plc
 - g. ENGIY – Engie spon adr
 - h. Imperial Brands
 - i. Lloyds Banking Group
 - j. Nestle SA
 - k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer [REDACTED]
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial [REDACTED]
Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED]

Many thanks.
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Sloans, Tonya
Sent: Monday, August 9, 2021 11:05 AM
To: Nawrocki Bradley, Jenifer
Subject: FW: Committee Member Pre-Screen - Rutherford
Attachments: Rutherford - 2019 Amendment - Preview.pdf; Rutherford - 2020 Annual FD - Preview.pdf

Jennifer:

One of our auditors reviewed the draft and had the following comments:

The 2019 amendment prescreen looks OK.

The 2020 prescreen:

1. If the following assets were fully sold, as indicated on Schedule B, the value should be reported as None:
 - a. Liberty Property Trust
 - b. Microsoft Corporation
 - c. Astrazeneca PLC
 - d. BAE Systems plc
 - e. China Petroleum & Chemical Corp
 - f. Diageo plc
 - g. ENGIY – Engie spon adr
 - h. Imperial Brands
 - i. Lloyds Banking Group
 - j. Nestle SA
 - k. Roche Holdings

Tonya Sloans

From: Nawrocki Bradley, Jenifer [REDACTED]
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial [REDACTED]
Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.

Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Monday, August 9, 2021 10:41 AM
To: Disclosure, Financial
Subject: FW: Committee Member Pre-Screen - Rutherford
Attachments: Rutherford - 2019 Amendment - Preview.pdf; Rutherford - 2020 Annual FD - Preview.pdf

Just following up on this, since we are only a couple days out.

Thank you
Jen

Jenifer Nawrocki Bradley

Chief of Staff
Rep. John Rutherford – FL04
1711 Longworth House Office Building
Washington, D.C. 20515
(202)225-2501 | [REDACTED]



From: Nawrocki Bradley, Jenifer
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial [REDACTED]
Subject: Committee Member Pre-Screen - Rutherford

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

The first is an amendment to the 2019 annual report. Upon entering the 2020 assets in Schedule A, I noticed that some accounts were inadvertently left off 2019 Schedule A, because they did not have any transactions that triggered the Schedule B reporting threshold. The changes in this amendment reflect these additions to 2019 Sched A.

The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED]

Many thanks.
Jen

Jenifer Nawrocki Bradley
Chief of Staff
Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Tuesday, July 27, 2021 5:56 PM
To: Disclosure, Financial
Subject: Committee Member Pre-Screen - Rutherford
Attachments: Rutherford - 2019 Amendment - Preview.pdf; Rutherford - 2020 Annual FD - Preview.pdf

To Whom It May Concern:

Please find attached two FD documents for pre-screening.

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The second is the 2020 annual report.

I may be reached at this email or by phone: [REDACTED] or [REDACTED].

Many thanks.
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Tuesday, July 27, 2021 1:34 PM
To: Sloans, Tonya
Subject: RE: FD Question

Yes – I couldn't find it in the online filing system. I will choose other – thank you!

From: Sloans, Tonya <[REDACTED]>
Sent: Tuesday, July 27, 2021 1:04 PM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: FD Question

What do you mean by you can't find it? Are you meaning that won't appear in the online filing system?

If so, select "Other" as the asset type and list "ENGIY" in the description section.

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 12:44 PM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: FD Question

One more question.... I can't find this stock: (ENGIY) ENGIE SPON ADR EACH REPR 1 SHARE

Any idea?

From: Sloans, Tonya <[REDACTED]>
Sent: Tuesday, July 27, 2021 12:02 PM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: FD Question

[REDACTED]. I just ended a call. I can wait before I place my next call, if you want to talk now.

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 11:40 AM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: FD Question

OK. What is good number to reach you at and when is convenient?

From: Sloans, Tonya <[REDACTED]>
Sent: Tuesday, July 27, 2021 11:33 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: FD Question

Jenifer,

Myself and the entire Financial Disclosure Team work 100% remotely. You can email or call me for assistance with your issue and I will help you.

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 11:28 AM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: FD Question

Got it. Thank you, Tonia. Moving you to bcc.

Tonya, is there any chance you have 5 minutes for me to come see you in person? After our chat yesterday, I'm concerned I made a reporting error in 2019 and I want to make sure I'm doing everything correct.

From: Smith, Tonia <[REDACTED]>
Sent: Tuesday, July 27, 2021 10:17 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Cc: Sloans, Tonya <[REDACTED]>
Subject: RE: FD Question

Good Morning:

I think this email is for my coworker Tonya Sloans. Please feel free to reach out to her. She is copied on this email.

Thanks,

Tonia Smith
Director of Advice and Education
Committee on Ethics
U.S. House of Representatives
1015 Longworth House Office Building
Washington, DC 20515
Phone: (202) 225-7103
Fax: (202) 225-7392

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 9:33 AM
To: Smith, Tonia <[REDACTED]>
Subject: FD Question

Hi Tonia –

I need some help with the boss's FD – should be quick (5 mins) but I'd like to come in-person if possible. I'm concerned I made an error last year and if so, want to be SURE to correct/not remake the same mistake.

Please let me know if I should ask someone else – happy to ask whomever.

Thank you for your help!

Also can be reached: [REDACTED] or [REDACTED]

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Sloans, Tonya
Sent: Tuesday, July 27, 2021 1:04 PM
To: Nawrocki Bradley, Jenifer
Subject: RE: FD Question

What do you mean by you can't find it? Are you meaning that won't appear in the online filing system?

If so, select "Other" as the asset type and list "ENGIY" in the description section.

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 12:44 PM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: FD Question

One more question.... I can't find this stock: (ENGIY) ENGIE SPON ADR EACH REPR 1 SHARE

Any idea?

From: Sloans, Tonya <[REDACTED]>
Sent: Tuesday, July 27, 2021 12:02 PM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: FD Question

[REDACTED]. I just ended a call. I can wait before I place my next call, if you want to talk now.

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 11:40 AM
To: Sloans, Tonya <[REDACTED]>
Subject: RE: FD Question

OK. What is good number to reach you at and when is convenient?

From: Sloans, Tonya <[REDACTED]>
Sent: Tuesday, July 27, 2021 11:33 AM
To: Nawrocki Bradley, Jenifer <[REDACTED]>
Subject: RE: FD Question

Jenifer,

Myself and the entire Financial Disclosure Team work 100% remotely. You can email or call me for assistance with your issue and I will help you.

Tonya Sloans

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Tuesday, July 27, 2021 11:28 AM

To: Sloans, Tonya <[REDACTED]>

Subject: RE: FD Question

Got it. Thank you, Tonia. Moving you to bcc.

Tonya, is there any chance you have 5 minutes for me to come see you in person? After our chat yesterday, I'm concerned I made a reporting error in 2019 and I want to make sure I'm doing everything correct.

From: Smith, Tonia <[REDACTED]>

Sent: Tuesday, July 27, 2021 10:17 AM

To: Nawrocki Bradley, Jenifer <[REDACTED]>

Cc: Sloans, Tonya <[REDACTED]>

Subject: RE: FD Question

Good Morning:

I think this email is for my coworker Tonya Sloans. Please feel free to reach out to her. She is copied on this email.

Thanks,

Tonia Smith
Director of Advice and Education
Committee on Ethics
U.S. House of Representatives
1015 Longworth House Office Building
Washington, DC 20515
Phone: (202) 225-7103
Fax: (202) 225-7392

From: Nawrocki Bradley, Jenifer <[REDACTED]>

Sent: Tuesday, July 27, 2021 9:33 AM

To: Smith, Tonia <[REDACTED]>

Subject: FD Question

Hi Tonia –

I need some help with the boss's FD – should be quick (5 mins) but I'd like to come in-person if possible. I'm concerned I made an error last year and if so, want to be SURE to correct/not remake the same mistake.

Please let me know if I should ask someone else – happy to ask whomever.

Thank you for your help!

Also can be reached: [REDACTED] or [REDACTED]

Jenifer Nawrocki Bradley
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Rep. John Rutherford – FL04
1711 Longworth House Office Building
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(202)225-2501 | [REDACTED]



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Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Tuesday, July 27, 2021 12:03 PM
To: Sloans, Tonya
Subject: RE: FD Question

Calling you now

From: Sloans, Tonya [REDACTED]
Sent: Tuesday, July 27, 2021 12:02 PM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: FD Question

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Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Friday, May 1, 2020 10:10 AM
To: Disclosure, Financial
Subject: Rutherford - Periodic Disclosure Question

To Whom It May Concern –

I have a few questions regarding my boss's required filings. I can be reached by email or cell - [REDACTED]

Thank you!

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Friday, May 1, 2020 10:08 AM
To: Baker, Jessica
Subject: RE: Rutherford FD Amendment

Oh man... a studio is a great way to REALLY bond! You'll never forget this stage in your relationship, that's for sure. Luckily, this weekend is supposed to be gorgeous!! (Thank you JESUS.)

And, thank you – I'll reach out to FD folks there. Appreciate it!

Stay safe and thanks again!

Best,
Jen

From: Baker, Jessica [REDACTED]
Sent: Friday, May 1, 2020 10:01 AM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: Rutherford FD Amendment

Hey! Yes—they're saying we might be working remote until June now?! Crazy! I'd be having a better time if me and my boyfriend weren't both working out of a studio apartment BUT it's been better than I thought.

I've actually moved back to our other advisory office and am supposed to refer FD questions back to the FD team—they're also remote but they're pretty responsive if you want to email Financial.Disclosure@mail.house.gov and ask for help.

Good to hear from you!

Jessica

From: Nawrocki Bradley, Jenifer <[REDACTED]>
Sent: Friday, May 1, 2020 9:38 AM
To: Baker, Jessica <[REDACTED]>
Subject: RE: Rutherford FD Amendment

Hi Jess!

I hope you are doing well! I'm glad that your office is working remotely (mostly at least?). We are finally in a rhythm getting work done on laptops. Honestly, I've gotten pretty comfortable working from my couch!

I had a couple questions on my boss's periodic FD report. Coming to you, just because you helped most recently. But let me know if I should go to someone else!

Thank you!!
Jen

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(202)225-2501 | [REDACTED]



From: Nawrocki Bradley, Jenifer

Sent: Friday, August 2, 2019 2:55 PM

To: Baker, Jessica <[REDACTED]>

Subject: RE: Rutherford FD Amendment

That's so helpful – thank you! OK, so..

BCE - Looks like he only sold SOME of his stock in BCE in 2017, so he still has some. That's the confusion I think. I added a private note.

LLY – Removed it from Schd B, and added the note to Schd A.

FE – He doesn't own and hasn't since Aug 2017. I added a private note – it was sold in Aug 2017, but was inadvertently listed in Schd A of 2017 Annual. An amendment to 2017 removed it from Schd A. However, it somehow reappeared in Schd A of the 2018 Annual. I removed it again.

My latest draft is attached! If it looks good, I'll file it. THANK YOU so much for your help.

From: Baker, Jessica [REDACTED]

Sent: Friday, August 2, 2019 2:11 PM

To: Nawrocki Bradley, Jenifer [REDACTED]

Subject: RE: Rutherford FD Amendment

Okay, I'm back!

I see where the mix-up was about the BCE, Inc. stock. It looks like the Congressman reported it as sold in 2017 (see below), but he also misreported it on Sch. A as still having value in 2018. Unless he actually purchased more in 2018 or still does have some BCE stock, I would recommend changing the value to "none" and adding a public comment to note that it was reported as sold in 2017.

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Domestic

BCE, Inc. (BCE) [ST]

P

07/11/2017

07

FILING STATUS: New

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Int'l

BCE, Inc. (BCE) [ST]

S

08/14/2017

08

FILING STATUS: New

National Financial Services/Fidelity - Premiere Select IRA Int'l =
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None.

Re: Eli Lilly, perfect description on Sch. B *but*, just move that description to a private comment for the asset on Sch. A and delete the entry on Sch. B. You are right, nothing to report if it's below \$1k and the comment will clear up any question we had. I don't see what happened with First Energy Corp, however—it now looks like it's missing from Sch. A.

Looks good overall, though!!

Jess

From: Nawrocki Bradley, Jenifer [REDACTED]
Sent: Friday, August 2, 2019 1:13 PM
To: Baker, Jessica [REDACTED]
Subject: Rutherford FD Amendment

Hi Jessica –

Firstly, a week or so ago you helped talk me through the FD amendment my boss needs to file... and in the middle of the night a few days later I woke up and realized you are JESSICA BAKER, Brittany Govoni's friend! DERP. Sorry I didn't realize it sooner, but hi! I just started as COS a few months ago and still getting my bearings straight. I think we are overdue for coffee or lunch or something of the sort!

Secondly, business. I finally had a couple hours of quiet to delve into this FD stuff. I did my best to fix the issues, but I need some guidance. One major question I have is how to report the instance of an asset increasing over the \$1000 threshold, without any purchase or sale taking place.

I've attached the checklist that we received from Ethics and the PDF of the drafted amendment. Would you be able to take a look in the next few days to help me make sure I do it correctly? My direct is [REDACTED] if talking it through is easier.

Thank you in advance and HAPPY FRIDAY!

Jenifer Nawrocki Bradley
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FILING STATUS: New

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Int'l

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Thank you in advance and HAPPY FRIDAY!

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Friday, May 1, 2020 9:38 AM
To: Baker, Jessica
Subject: RE: Rutherford FD Amendment

Hi Jess!

I hope you are doing well! I'm glad that your office is working remotely (mostly at least?). We are finally in a rhythm getting work done on laptops. Honestly, I've gotten pretty comfortable working from my couch!

I had a couple questions on my boss's periodic FD report. Coming to you, just because you helped most recently. But let me know if I should go to someone else!

Thank you!!
Jen

Jenifer Nawrocki Bradley

Chief of Staff

Rep. John Rutherford – FL04

1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



From: Nawrocki Bradley, Jenifer
Sent: Friday, August 2, 2019 2:55 PM
To: Baker, Jessica [REDACTED]
Subject: RE: Rutherford FD Amendment

That's so helpful – thank you! OK, so..

BCE - Looks like he only sold SOME of his stock in BCE in 2017, so he still has some. That's the confusion I think. I added a private note.

LLY – Removed it from Schd B, and added the note to Schd A.

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My latest draft is attached! If it looks good, I'll file it. THANK YOU so much for your help.

From: Baker, Jessica [REDACTED]
Sent: Friday, August 2, 2019 2:11 PM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: Rutherford FD Amendment

Okay, I'm back!

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SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Domestic

BCE, Inc. (BCE) [ST] P 07/11/2017 07

FILING STATUS: New

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Int'l

BCE, Inc. (BCE) [ST] S 08/14/2017 08

FILING STATUS: New

National Financial Services/Fidelity - Premiere Select IRA Int'l ⇒
BCE, Inc. (BCE) [ST]

None.

Re: Eli Lilly, perfect description on Sch. B *but*, just move that description to a private comment for the asset on Sch. A and delete the entry on Sch. B. You are right, nothing to report if it's below \$1k and the comment will clear up any question we had. I don't see what happened with First Energy Corp, however—it now looks like it's missing from Sch. A.

Looks good overall, though!!

Jess

From: Nawrocki Bradley, Jenifer [REDACTED]
Sent: Friday, August 2, 2019 1:13 PM
To: Baker, Jessica [REDACTED]
Subject: Rutherford FD Amendment

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(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Friday, August 2, 2019 3:32 PM
To: Baker, Jessica
Subject: RE: Rutherford FD Amendment

THANK YOU so much for all of your help. I don't know how you do this every day... my brain feels like it's about to explode.

Not in Jax this week... but soon. Pretty great district, I must say!!

Enjoy your weekend and see you soon!

From: Baker, Jessica [REDACTED]
Sent: Friday, August 2, 2019 3:29 PM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: Rutherford FD Amendment

It looks great—thank you for doing this so quickly!

Have a good weekend (especially if you're in Jax—I love it there 😞)

From: Nawrocki Bradley, Jenifer [REDACTED]
Sent: Friday, August 2, 2019 2:55 PM
To: Baker, Jessica [REDACTED]
Subject: RE: Rutherford FD Amendment

That's so helpful – thank you! OK, so..

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From: Baker, Jessica [REDACTED]
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To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: Rutherford FD Amendment

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SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Domestic

BCE, Inc. (BCE) [ST] P 07/11/2017 07

FILING STATUS: New

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Int'l

BCE, Inc. (BCE) [ST] S 08/14/2017 08

FILING STATUS: New

National Financial Services/Fidelity - Premiere Select IRA Int'l =>
BCE, Inc. (BCE) [ST]

None.

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SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Domestic

BCE, Inc. (BCE) [ST]

P

07/11/2017

07

FILING STATUS: New

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Int'l

BCE, Inc. (BCE) [ST]

S

08/14/2017

08

FILING STATUS: New

National Financial Services/Fidelity - Premiere Select IRA Int'l =>
BCE, Inc. (BCE) [ST]

None.

Re: Eli Lilly, perfect description on Sch. B *but*, just move that description to a private comment for the asset on Sch. A and delete the entry on Sch. B. You are right, nothing to report if it's below \$1k and the comment will clear up any question we had. I don't see what happened with First Energy Corp, however—it now looks like it's missing from Sch. A.

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Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Friday, August 2, 2019 2:55 PM
To: Baker, Jessica
Subject: RE: Rutherford FD Amendment
Attachments: FD_Draft_Preview_Rutherford_John_2019-08-02 (2).pdf

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BCE, Inc. (BCE) [ST] P 07/11/2017 07

FILING STATUS: New

SUBHOLDING OF: National Financial Services/Fidelity - Premiere Select IRA Int'l

BCE, Inc. (BCE) [ST] S 08/14/2017 08

FILING STATUS: New

National Financial Services/Fidelity - Premiere Select IRA Int'l =>
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None.

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Washington, D.C. 20515

(202)225-2501 | [REDACTED]



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FILING STATUS: New

National Financial Services/Fidelity - Premiere Select IRA Int'l =>
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1711 Longworth House Office Building

Washington, D.C. 20515

(202)225-2501 | [REDACTED]



Nawrocki Bradley, Jenifer

From: Nawrocki Bradley, Jenifer
Sent: Friday, August 2, 2019 1:28 PM
To: Baker, Jessica
Subject: RE: Rutherford FD Amendment

Thank you thank you!

From: Baker, Jessica [REDACTED]
Sent: Friday, August 2, 2019 1:23 PM
To: Nawrocki Bradley, Jenifer [REDACTED]
Subject: RE: Rutherford FD Amendment

Hey—Congrats on the promotion, that's exciting (but yes, FD is super overwhelming)!!

Let me take a look and I'll circle back,

Jessica Baker

Counsel

Committee on Ethics

U.S. House of Representatives

1015 Longworth House Office Building

Washington, DC 20515

Phone: (202) 225-7103

Fax: (202) 225-7392

Please note that is informal guidance from the professional staff of the House Committee on Ethics. If you require an official opinion from the Committee, please submit a written request to the Committee addressed to Chairman Theodore E. Deutch and Ranking Member Kenny Marchant.

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To: Baker, Jessica
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Attachments: FD_Draft_Preview_Rutherford_John_2019-08-02.pdf; Ethics Letter - Check Llst.pdf

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EXHIBIT 8

Office of the Clerk — Legislative Resource Center

U.S. House of Representatives

ACKNOWLEDGMENT OF RECEIPT

Hand delivered this date

LEGISLATIVE RESOURCE CENTER

2021 NOV 19 PM 12: 04

For Individual ~~Organization~~
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES
Organization

Rep. John Rutherford

Ethics in Government Act—Financial Disclosure Statement

Amendment

Other Ethics fees (\$800.00)

Travel Disclosure:

Member

Employee

Received by

[Signature]