



July 29, 2021

Chairman Mike Barnes
Co-Chairman Paul Vinovich
Office of Congressional Ethics
425 3rd Street, SW Suite 1110
Washington, DC 20024

Sent via email (oce@mail.house.gov)

Dear Chairman Barnes and Co-Chairman Vinovich:

Campaign Legal Center (“CLC”) respectfully requests that the Office of Congressional Ethics (“OCE”) investigate Rep. Blake Moore for a possible violation of the STOCK Act and House rules. From January to May of 2021, Rep. Moore made more than 70 stock trades¹ with a total value ranging from approximately \$70,000 to \$1.1 million.² Rep. Moore did not timely file periodic transaction reports (“PTRs”), which are required for each transaction pursuant to the STOCK Act and House rules. An OCE investigation is necessary to determine whether his failure to file was knowing and willful.

Members of Congress can avoid real accountability for failing to disclose their stock trading by exploiting the nominal late filing penalties provided for in the STOCK Act. In order to avoid any meaningful investigation into the nature of their stock trades, they can simply not disclose the trades, claiming that they were unaware of the transactions because of a financial adviser or a late notification. The only penalty is a

¹ Dave Levinthal, *Republican Rep. Blake Moore violated federal transparency law by failing to properly disclose stock transactions worth up to \$1.1 million*, INSIDER (July 26, 2021), <https://www.businessinsider.com/rep-blake-moore-violated-federal-law-with-late-stock-disclosures-2021-7> (attached as Exhibit A); The Honorable Blake Moore, Periodic Transaction Report, Clerk of the House of Representatives (filed July 17, 2021), https://disclosures-clerk.house.gov/public_disc/ptr-pdfs/2021/20019092.pdf (attached as Exhibit B).

² Levinthal, *supra* note 1; Rep. Moore PTR, *supra* note 1.

\$200 late filing fee. The harm is that this exploitation could quickly erase the requirement for prompt disclosure of stock trading. If members are not held accountable for late filing of PTRs, many may wait until their annual financial disclosures to reveal stock trades and pay nominal late fees, thereby circumventing the STOCK Act.

The STOCK Act has bipartisan support, but without ethics enforcement the law will not accomplish its intended purpose: to provide more and timely disclosure of congressional stock trading to root out conflicts of interest and combat insider trading. The STOCK Act requires accountability for any member of Congress who fails to report stock trades within 45 days of the transaction, and Rep. Moore failed to comply with this requirement.

When members of Congress trade individual stocks and fail to disclose those trades, they break the law and diminish the public's trust in government. The recent prevalence of STOCK Act violations in the House shows that merely the threat of a fine is not deterring members of Congress from breaking the law; real accountability is necessary. As members of Congress craft laws that directly impact the lives of all Americans, the public must be able to trust that representatives are acting in the public's interest, and not in their own financial interest.

The STOCK Act and House Rules Require Members of Congress to Timely Report All Individual Stock Transactions

The STOCK Act amended the Ethics in Government Act of 1978 (“EIGA”) to require members of Congress to report their individual stock transactions no “later than 30 days after receiving notification of any transaction required to be reported under section 102(a)(5)(B), but in no case later than 45 days after such transaction”³

House rules incorporate these reporting requirements. House Rule 26, clause 2 states, “[f]or the purposes of this rule, the provisions of title I of the Ethics in Government Act of 1978 shall be considered Rules of the House as they pertain to Members, Delegates, the Resident Commissioner, officers, and employees of the House.”⁴

The House Committee on Ethics trains and reminds members of Congress annually in writing of the consequences of failing to file PTRs. Specifically, the Committee on Ethics advises:

³ P.L. 112-105, Section 6; 5 U.S.C. App. 4 § 103(l).

⁴ RULES OF THE HOUSE OF REPRESENTATIVES OF THE U.S. 116TH CONG. (2019), Rule 26, cl. 2.

“[e]ach Member, officer, and senior staffer is responsible for the completeness and accuracy of the information contained in the individual’s PTR, even if someone else prepared, or assisted in preparing, all or part of it. The EIGA provides that the Attorney General may pursue either civil or criminal penalties against an individual who knowingly and willfully falsifies a statement or fails to file a statement required by the EIGA. The maximum civil penalty is \$61,585. The maximum criminal penalty is up to one year in prison and a fine of up to \$61,585.”⁵

In addition, the Committee on Ethics advises that 18 U.S.C. § 1001 is applicable to PTRs. “That criminal statute provides for a fine of up to \$250,000 and/or imprisonment for up to five years for knowingly and willfully making any materially false, fictitious, or fraudulent statement or representation, or falsifying, concealing, or covering up a material fact, in a filing under the EIGA.”⁶

Rep. Moore Failed to File Timely Periodic Transaction Reports for 70 Stock Trades from January to May 2021

For roughly five months, Rep. Moore traded stocks frequently, but did not file timely PTRs as required. In the first five months of 2021, Rep. Moore made approximately 70 stock trades with a total value ranging from \$70,000 to \$1.1 million.⁷ He disclosed these transactions in a PTR in July of 2021. Some trades were not reported until six months after the transaction occurred.

Rep. Moore’s trade activity occurred over several months and with significant frequency and volume. With regard to Rep. Moore’s failure to timely report this trading activity, his office acknowledged the late filing and blamed his financial advisory firm which “commonly traded stocks on [Rep. Moore’s] behalf.”⁸ The spokesperson said that the firm had since “trained a compliance advisor to submit reports on trades, and a system has now been set up to ensure that periodic transaction reports are filed on time.”

⁵ U.S. HOUSE OF REPRESENTATIVES COMM. ON ETHICS 116TH CONG., Memorandum from Committee on Ethics for All Members, Officers, and Employees Regarding Reminder of STOCK Act Requirements, Prohibition Against Insider Trading & New Certification Requirement at 3 (June 11, 2020), https://ethics.house.gov/sites/ethics.house.gov/files/wysiwyg_uploaded/STOCK%20Act%206.1.2020%20Final.pdf.

⁶ *Id.* at 3.

⁷ Rep. Moore’s PTR, *supra* note 1.

⁸ Levinthal, *supra* note 1.

Rep. Moore May Have Knowingly Violated the STOCK Act

The trades Rep. Moore failed to report include the purchase and sale of Raytheon,⁹ a defense contractor, at a time when he was overseeing the government’s relationship with defense contractors as a member of the House Armed Services Committee. Based on publicly available information, it is unclear whether one reason for the late filings was an attempt to avoid scrutiny of trades connected with non-public information or with potential conflicts of interest.

Rep. Moore’s spokesperson claims Rep. Moore’s financial adviser was responsible for the trades, and insinuated that the late filing was the consequence of not having a trained “compliance advisor to submit reports on trades.” Accepting his failure to timely file his PTRs as merely an oversight requires an assumption that he both did not receive notification of the trades and that he had not received any training on his requirements under the STOCK Act. However, it appears that Rep. Moore both received contemporaneous notification of the stock trades, and that he was in fact aware of the requirement prior to the filing of his PTRs—meaning Rep. Moore may have knowingly avoided disclosing his stock trades at the time they were made.

First, Rep. Moore was notified of the stock trades when they occurred, even in the absence of the “trained compliance adviser” at his advisory firm. The PTR form requires filers to list the “notification date”—the date on which the filer was notified a trade occurred. Each transaction going back to January 2021 on Rep. Moore’s July 17 PTR includes a notification date within 30 days of the trade.¹⁰ That means Rep. Moore’s financial advisers did seem to timely notify him of the trades, giving him ample time to file a PTR within the requisite 45-day window.

Second, Rep. Moore was required to attend mandatory ethics training for new members of Congress in 2021.¹¹ The training includes discussion of financial disclosures and the STOCK Act. While Rep. Moore’s office did not confirm that Rep. Moore completed the training, members of Congress are required to complete it within 60 days of their start date,¹² meaning Rep. Moore would have been required to complete the training no later than March 4, 2021.¹³ The Committee on Ethics does not grant extensions for

⁹ *Id.*

¹⁰ Rep. Moore’s PTR, *supra* note 1.

¹¹ U.S. HOUSE OF REPRESENTATIVES COMM. ON ETHICS, *Training*, <https://ethics.house.gov/training>.

¹² U.S. HOUSE OF REPRESENTATIVES COMM. ON ETHICS, *FAQs About Training*, <https://ethics.house.gov/legislation/schedule/faqs-about-training>.

¹³ Rep. Moore’s first day in office was Jan. 3, 2021.

completing ethics training.¹⁴ Therefore, it seems likely that Rep. Moore knew about the requirement to file PTRs far sooner than July 2021, when he disclosed trades that occurred as far back as January.¹⁵

Third, even if Rep. Moore asserts that he did not know of the PTR requirements at the time of the trades, despite having undergone training that explained the requirements, he *should have known* about the disclosure requirements. High profile insider trading allegations engulfed several senators in March 2020 and became widely publicized.¹⁶ These allegations of STOCK Act violations were all based on information disclosed in PTRs. Then, shortly after Rep. Moore filed his candidate financial disclosure report, which requires disclosure of assets,¹⁷ another scandal involving STOCK Act violations came to light: Rep. Donna Shalala failed to file PTRs for numerous transactions.¹⁸ Considering that the requirement for PTRs in Congress was headline news throughout 2020 while Rep. Moore was campaigning, it seems unlikely that he was unaware of the disclosure requirements at the time of the transactions.

For these reasons, Rep. Moore cannot excuse his failure to report with a claim that it he was unfamiliar with the financial disclosure requirements. An OCE preliminary review can gather information to determine whether Rep. Moore knowingly violated the STOCK Act.

Conclusion

The STOCK Act requires members of Congress to timely file PTRs for any individual stock trades.¹⁹ Based on the available facts, there is probable

¹⁴ U.S. HOUSE OF REPRESENTATIVES COMM. ON ETHICS, *FAQs About Training*, *supra* note 12.

¹⁵ Rep. Moore's PTR, *supra* note 1.

¹⁶ See e.g., Aruna Viswanatha & Dave Michaels, *Justice Department Investigating Lawmakers for Possible Insider Trading*, WALL ST. J (Mar. 31, 2020), https://www.wsj.com/articles/justice-department-investigating-lawmakers-for-possible-insider-trading-11585586365?mod=article_inline.

¹⁷ https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2020/10035766.pdf

¹⁸ Alex Daugherty, *Donna Shalala, again, failed to disclose stock sales in violation of federal law*, MIAMI HERALD (Sept. 28, 2020), <https://www.miamiherald.com/news/politics-government/article246072375.html>. Rep. Shalala reportedly paid a \$1,200 fine after describing the omission as the result of trades made to establish a blind trust in coordination with the Committee on Ethics. In contrast, the current evidence does not suggest that Rep. Moore's failure to report should only result in a small fine because he does not have a blind trust and has not stated that he made trades in connection with advice from the Committee on Ethics.

¹⁹ P.L. 112-105, *supra* note 3; see U.S. HOUSE COMM. ON ETHICS, Instruction Guide, Financial Disclosure Statements and Periodic Transaction Reports Calendar Year 2019 at 41, *available at* <https://ethics.house.gov/sites/ethics.house.gov/files/documents/CY%202019%20Instruction%20Guide%20for%20Financial%20Disclosure%20Statements%20and%20PTRs.pdf> (Stating that

cause to believe that Rep. Moore was aware of this requirement, and his failure to timely file the transaction reports violates the STOCK Act.

CLC respectfully requests that OCE open a preliminary review to determine whether Rep. Moore's nondisclosure was an intentional violation of the STOCK Act and House rules.

We acknowledge that 18 U.S.C. § 1001 applies to the information provided.

Sincerely,

_____/s/____

Kedric L. Payne
General Counsel and Senior Director,
Ethics

_____/s/____

Delaney N. Marsco
Senior Legal Counsel, Ethics

the relevant factor for disclosure is ownership of the stock: "In general, you must report on a PTR each purchase, sale, or exchange involving stocks, bonds, commodities futures, or other securities **owned wholly or in part by you**, your spouse, or your dependent child when the amount of the transaction exceeds \$1,000." (emphasis added).

Exhibit A



INSIDER



US MARKETS OPEN

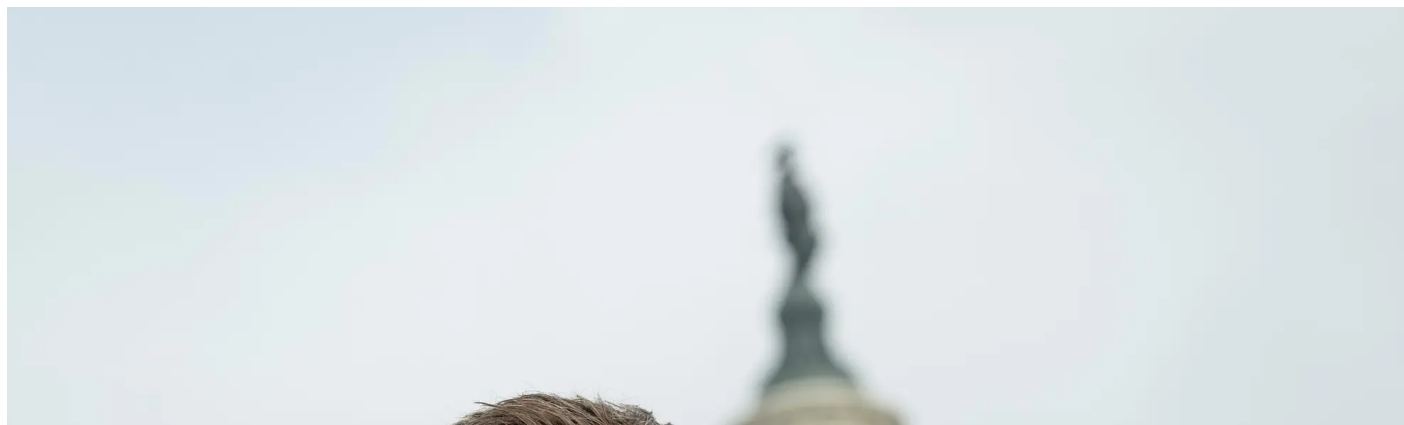
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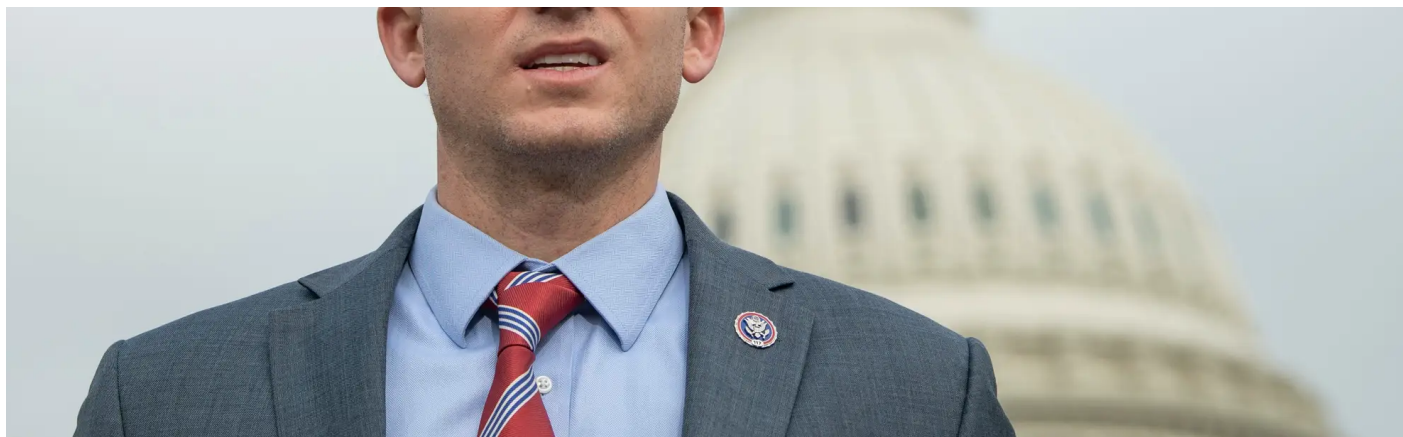
▼ Dow Jones	▼ Nasdaq	▼ S&P 500	▼ TSLA	▲ FB	▼ BABA
+0.61%	+0.33%	+0.62%	+4.91%	-0.41%	+1.31%

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Republican Rep. Blake Moore violated federal transparency law by failing to properly disclose stock transactions worth up to \$1.1 million

Dave Levinthal and Kimberly Leonard Jul 26, 2021, 4:00 AM

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Rep. Blake Moore, a Republican from Utah, failed to properly disclose dozens of personal stock trades. Caroline Brehman/CQ-Roll Call via Getty Images

The Utah congressman filed more than 70 of his stock disclosures weeks or months late.

He's a member of the House Armed Services Committee and invested in the defense contractor Raytheon.

Moore also invested in the Chinese e-commerce giant Alibaba despite his criticism of China.

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Members of Congress routinely trade stocks, buying and selling shares of companies that often have significant business before the federal government — and sometimes spend a lot of money to lobby lawmakers.

Each week, Insider digs through congressional financial-disclosure records and asks lawmakers questions about their personal finances. Here are the latest highlights from what we've discovered.

Utah congressman violates STOCK Act

Freshman Rep. **Blake Moore**, a Republican from Utah, failed to properly disclose dozens of stock and stock-option trades together worth at least \$70,000 and as much as \$1.1 million, according to an Insider analysis of [newly filed congressional records](#).

Moore was weeks or months late in disclosing more than 70 separate trades he made between mid-January and mid-May. US House lawmakers violate the [STOCK Act's](#) transparency provision if they don't formally disclose a trade in a certified report to the clerk of the House of Representatives within 45 days of a stock trade.

Moore's tardy trade disclosures include seven transactions involving stock or stock-option purchases and sales of Alibaba Group Holding Limited, a Chinese e-commerce company with [reported ties](#) to the Chinese Communist Party, including the [creation](#) of a propaganda app. Alibaba shares are down from highs this year in February.

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[article](#) published in The Hill, Moore wrote that the Chinese Communist Party was a

"strategic adversary" that was "challenging our political, economic, industrial, and educational systems" and that "expertly subverts the international rules-based order."

Read more: [Republican Sen. Tommy Tuberville is a vocal critic of China's government. He also owned stock in a Chinese company with Communist Party ties.](#)

In four purchases from February to May, Moore also bought up to \$60,000 worth of stock shares in Raytheon Technologies Corporation, a major [US government defense contractor](#) that produces missile systems, weapons platforms, and sensors, among other military products. Raytheon stock has [steadily increased](#) in value this year.

Moore is a [member](#) of the House Committee on Armed Services, which has jurisdiction over US military affairs. He is also a member of several military-related congressional caucuses, including the F-35 Caucus, the Hypersonics Caucus, the Military Depot and Industrial Facilities Caucus, the National Guard Caucus, and the Navy and Marine Corps Caucus.

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how much — for filing late. Fines for a first-time STOCK Act violator begin at \$200.



Filing ID #20019092

PERIODIC TRANSACTION REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Hon. Blake Moore
Status: Member
State/District: UT01

TRANSACTIONS

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [OP]	S	02/22/2021	02/28/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: BABA Apr 16 21 215.0 Put Not part of a compensation package or held as an ESOP					
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [OP]	P	02/22/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: BABA Apr 16 21 210.0 Put Not part of a compensation package or held as an ESOP					
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [ST]	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					



retirement account to a financial-management firm in Utah that now buys and sells "commonly traded stocks on his behalf." The firm, which Moore's office did not name, "trained a compliance advisor to submit reports on trades, and a system has now been set up to ensure that periodic transaction reports are filed on time," the statement said.

"Upon entering Congress, Congressman Moore made an intentional effort to learn the new financial requirements and simplify and consolidate his financial investments," the statement added. "Now that Congressman Moore has fully established a financial compliance process with his firm and the Ethics Committee, he will continue to ensure all future filing deadlines are met in accordance with Ethics rules."

Moore's office did not answer Insider's questions about why the lawmaker personally invested in Alibaba and Raytheon and whether he gave his financial-management company direction — and if so, to what degree — on the kinds of investments it should make.

Moore's office also did not say whether the congressman and his staff completed required congressional-ethics training where financial-disclosure rules are routinely covered.

Officials for the House Ethics Committee declined to comment.

Read more: [Democratic Rep. Tom Malinowski, a champion for transparency, failed to disclose dozens of stock transactions worth at least \\$671,000 in apparent violation of federal law](#)

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Members of Congress are required to report stock-trade values only in broad ranges. All of Moore's reported trades fell within the range of \$1,001 to \$15,000.

Other stocks or stock options that Moore bought or sold this year include those of Alphabet Inc., Amazon.com Inc., American Express Company, Apple Inc., Bank of America Corp., Berkshire Hathaway Inc., Dollar General Corp., Facebook Inc., the health-savings-account company HealthEquity Inc., the pharmaceutical company Johnson & Johnson, Mastercard Inc., Microsoft Corp., and the computer chip and systems company Nvidia Corp.

Several other members of Congress have this year run into trouble disclosing various stock trades as federal law requires.

They include Sen. [**Dianne Feinstein**](#), a Democrat of California; Rep. [**Tom Malinowski**](#), a Democrat of New Jersey; Rep. [**Pat Fallon**](#), a Republican of Texas; and [**Sean Patrick Maloney**](#), a Democrat of New York.

Former Rep. **Harley Rouda**, a Democrat of California who's attempting a comeback, also [failed to properly disclose](#) stock trades.

Sen. [**Elizabeth Warren**](#), a Massachusetts Democrat, and Rep. [**Demetrius J. L. ...**](#)

[!\[\]\(e1d6102fe77919492c04879c8450f1f5_img.jpg\) **HOMEPAGE**](#)

barring members of Congress from trading individual stocks.

But other similar efforts have failed in recent years, most notably in 2012, when the [STOCK Act](#), which established current congressional stock-disclosure rules, did not outright prohibit members from trading stocks.

Moore's office did not answer a question about whether the congressmen would support or oppose such legislation.

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Rep. Ro Khanna, a Democrat of California, at the Capitol on January 8, 2020. [Tom Williams/CQ-Roll Call, Inc via Getty Images](#)

Khannas invest in movies, dating

Ritu Khanna, a multimillionaire heiress who is the wife of Rep. **Ro Khanna**, a progressive Democrat from California, made [16 trades](#) in June, with all but three valued at \$15,000 or less.

She bought shares in Dollar General Corp., the online-dating service Match Group, [Netflix](#), and Nvidia Corp.

Ritu Khanna has worked as a business executive at companies such as the Macy's department chain and the luxury jeweler Bulgari. Roll Call [lists](#) the couple's net worth at \$27 million, largely because Ritu Khanna's father, Monte Ahuja, is an executive at the investment firm Mura Holdings and Transtar, an automotive transmission-parts company.

[◀](#) [HOMEPAGE](#)

Rep. Kevin Hern, right, a Republican from Oklahoma, made a big investment in Johnson & Johnson, the maker of one of the leading COVID-19 vaccines. AP Photo/Jacquelyn Martin

Hern makes a big J&J play

Rep. **Kevin Hern**, a Republican from Oklahoma, [bought 18 stocks](#) in June as part of a joint account. One of the purchases was for up to \$500,000 in Johnson & Johnson stock.

Johnson & Johnson created the single-shot vaccine that government officials recently warned — in rare instances — was linked to a neurological side effect called [Guillain-Barré syndrome](#). The company also had to [recall](#) five Neutrogena and Aveeno spray-on sunscreen products after finding traces of cancer-causing ingredients.

Rep. **Bill Keating**, a Democrat of Massachusetts, [bought](#) up to \$15,000 in Adobe stock on June 10 and that same day sold up to \$15,000 in Verisign stock.

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Sen. John Boozman, a Republican from Arkansas, invested in the COVID-19 vaccine makers Pfizer and Johnson & Johnson. AP Photo/Danny Johnston

Boozman likes J&J, too. And Pfizer.

During 2020, at the height of the COVID-19 pandemic, Sen. **John Boozman**, a Republican of Arkansas, held stock investments in the pharmaceutical companies Pfizer and Johnson & Johnson, his newly filed [annual financial disclosure](#) indicates.

Both companies developed COVID-19 vaccines that have been widely used in the US and beyond. Each of Boozman's investments was worth \$1,001 to \$15,000, according to his disclosure.

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Separate stock-trade disclosures indicate that Boozman sold Pfizer stock on January

22 and Johnson & Johnson stock on May 3, though it's unclear whether he sold all of his shares or only a portion.

Rep. Raúl Grijalva, an Arizona Democrat, publicly disclosed his wife's investment in gold. One problem: he didn't have to. Photo by Bonnie Cash-Pool/Getty Images

For Grijalva, no gold to see here

Complying with arcane federal transparency laws can be tricky, even for those who make laws.

Rep. **Raúl Grijalva**, a Democrat from Arizona, on July 14 [disclosed](#) that his wife last

[◀ HOMEPAGE](#)

On its face, Grijalva's disclosure appeared to be months late — well beyond the 45 days members of Congress have by law to publicly report their stock trades.

But Grijalva did nothing wrong. SPDR Gold Trust is an exchange-traded fund, not an individual stock. Exchange-traded funds, as well as mutual funds, are exempt from the 45-day disclosure provision. Federal law requires that lawmakers disclose these funds only in their more detailed annual filings, which this year are due in August.

Bottom line? Grijalva disclosed an investment he needn't disclose in the fashion that he did.

The SPDR Gold Trust trades were "reported in error as a stock in Congressman Grijalva's periodic transaction report," the spokesperson **Geoff Nolan** said, adding that the report, "has since been amended to account for the error."

Get the latest Gold price [here](#).

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Exhibit B



Filing ID #20019092

PERIODIC TRANSACTION REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Hon. Blake Moore**Status:** Member**State/District:** UT01

TRANSACTIONS

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [OP] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: BABA Apr 16 21 215.0 Put Not part of a compensation package or held as an ESOP	S	02/22/2021	02/28/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
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ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	05/11/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Alphabet Inc. - Class C Capital Stock (GOOG) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Alphabet Inc. - Class C Capital Stock (GOOG) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Alphabet Inc. - Class C Capital Stock (GOOG) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Amazon.com, Inc. (AMZN) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Amazon.com, Inc. (AMZN) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Amazon.com, Inc. (AMZN) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>

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	Amazon.com, Inc. (AMZN)	[ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
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	Amazon.com, Inc. (AMZN)	[ST]	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Amazon.com, Inc. (AMZN)	[OP]	S	05/03/2021	05/31/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
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	Amazon.com, Inc. (AMZN)	[ST]	P	05/03/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	American Express Company	(AXP) [ST]	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	American Express Company	(AXP) [ST]	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	American Express Company	(AXP) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	American Express Company	(AXP) [ST]	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	American Express Company	(AXP) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New					

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [OP]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: AAPL Mar 17 23 105.0 Call Not part of a compensation package or held as an ESOP					
	Apple Inc. (AAPL) [ST]	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [ST]	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [ST]	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Apple Inc. (AAPL) [ST]	P	05/11/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Bank of America Corporation (BAC) [ST]	P	05/11/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Bank of America Corporation	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	(BAC) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Bank of America Corporation (BAC) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Bank of America Corporation (BAC) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Bank of America Corporation (BAC) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Bank of America Corporation (BAC) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Berkshire Hathaway Inc. New (BRK.B) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Berkshire Hathaway Inc. New (BRK.B) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Berkshire Hathaway Inc. New (BRK.B) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Berkshire Hathaway Inc. New (BRK.B) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Berkshire Hathaway Inc. New	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	(BRK.B) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Berkshire Hathaway Inc. New (BRK.B) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	05/11/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	BlackRock Ultra Short-Term Bond ETF (ICSH) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	S	05/12/2021	05/31/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	Dollar General Corporation (DG) [OP] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: DG Mar 19 21 180.0 Put Not part of a compensation package or held as an ESOP	P	03/18/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Dollar General Corporation (DG) [OP] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: DG Mar 19 21 180.0 Put Not part of a compensation package or held as an ESOP	S	01/27/2021	01/31/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	Dollar General Corporation (DG) [OP] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: DG Mar 19 21 175.0 Put Not part of a compensation package or held as an ESOP	P	01/27/2021	01/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Facebook, Inc. - Class A (FB) [OP] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: Mar 19 21 220.0 Put Not part of a compensation package or held as an ESOP	S	01/20/2021	01/31/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	Facebook, Inc. - Class A (FB) [OP] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: FB Mar 19 21 215.0 Put Not part of a compensation package or held as an ESOP	P	01/20/2021	01/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Facebook, Inc. - Class A (FB) [ST] FILING STATUS: New	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>

ID	Owner	Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
		SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		Facebook, Inc. - Class A (FB) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		Facebook, Inc. - Class A (FB) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		Facebook, Inc. - Class A (FB) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		HealthEquity, Inc. (HQY) [ST]	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		HealthEquity, Inc. (HQY) [ST]	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		HealthEquity, Inc. (HQY) [ST]	P	05/11/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		HealthEquity, Inc. (HQY) [ST]	P	05/12/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		Johnson & Johnson (JNJ) [ST]	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		Johnson & Johnson (JNJ) [ST]	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
		Johnson & Johnson (JNJ) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
		FILING STATUS: New					

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Johnson & Johnson (JNJ) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Johnson & Johnson (JNJ) [ST]	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Mastercard Incorporated (MA) [OP]	S	06/03/2021	06/30/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: MA Jul 16 21 325.0 Put Not part of a compensation package or held as an ESOP					
	Mastercard Incorporated (MA) [OP]	P	06/03/2021	06/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: MA Jul 16 21 320.0 Put Not part of a compensation package or held as an ESOP					
	Microsoft Corporation (MSFT) [ST]	P	05/12/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Microsoft Corporation (MSFT) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Microsoft Corporation (MSFT) [ST]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Microsoft Corporation (MSFT) [ST]	P	03/04/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Microsoft Corporation (MSFT) [ST]	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Microsoft Corporation (MSFT) [ST]	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	NVIDIA Corporation (NVDA) [OP]	S	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: NVDA Apr 16 21 405.0 Put Not part of a compensation package or held as an ESOP					
	NVIDIA Corporation (NVDA) [OP]	P	02/25/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: NVDA Apr 16 21 400.0 Put Not part of a compensation package or held as an ESOP					
	NVIDIA Corporation (NVDA) [OP]	S	01/20/2021	01/31/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: Mar 19 21 425.0 Put Not part of a compensation package or held as an ESOP					
	NVIDIA Corporation (NVDA) [OP]	P	01/20/2021	01/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio DESCRIPTION: Mar 19 21 420.0 Put Not part of a compensation package or held as an ESOP					
	Raytheon Technologies Corporation (RTX) [ST]	P	02/24/2021	02/28/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Raytheon Technologies Corporation (RTX) [ST]	P	04/30/2021	04/30/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					
	Raytheon Technologies Corporation (RTX) [ST]	P	05/11/2021	05/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio					

ID	Owner Asset	Transaction Type	Date	Notification Date	Amount	Cap. Gains > \$200?
	Raytheon Technologies Corporation (RTX) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	P	03/26/2021	03/31/2021	\$1,001 - \$15,000	<input type="checkbox"/>
	Vanguard S&P 500 ETF (VOO) [ST] FILING STATUS: New SUBHOLDING OF: Iron Gate GA Brokerage Portfolio	S	05/12/2021	05/31/2021	\$1,001 - \$15,000	<input checked="" type="checkbox"/>

* For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

ASSET CLASS DETAILS

- o Iron Gate GA Brokerage Portfolio
LOCATION: US

INITIAL PUBLIC OFFERINGS

☐ Yes ☒ No

CERTIFICATION AND SIGNATURE

☒ I CERTIFY that the statements I have made on the attached Periodic Transaction Report are true, complete, and correct to the best of my knowledge and belief. Further, I CERTIFY that I have disclosed all transactions as required by the STOCK Act.

Digitally Signed: Hon. Blake Moore , 07/17/2021