



July 29, 2021

Chairman Christopher A. Coons  
Vice Chairman James Lankford  
U.S. Senate Select Committee on Ethics  
220 Hart Building  
United States Senate  
Washington, DC 20510

*Submitted via mailbox\_office@ethics.senate.gov*

Dear Chairman Coons and Vice Chairman Lankford:

Campaign Legal Center (“CLC”) respectfully requests that the U.S. Senate Select Committee on Ethics (“Ethics Committee”) investigate Senator Tommy Tuberville for a possible violation of the STOCK Act. From January to May of 2021, Sen. Tuberville made nearly 130 stock trades<sup>1</sup> with a total value ranging from approximately \$894,000 to \$3.56 million.<sup>2</sup> Sen. Tuberville did not timely file periodic transaction reports (“PTRs”), which are required for each transaction pursuant to the STOCK Act. An Ethics Committee investigation is necessary to determine whether his failure to file was knowing and willful.

The STOCK Act does not excuse late filings, yet members of Congress are avoiding investigations into the nature of their stock trades by not disclosing the trades, claiming that they were unaware of the transactions, and paying \$200 for a late filing fee. The harm is that this trend could

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<sup>1</sup> Dave Levinthal, *Republican Sen. Tommy Tuberville violated federal transparency law by failing to properly disclose stock transactions worth up to \$3.56 million*, INSIDER (July 27, 2021), <https://www.businessinsider.com/sen-tommy-tuberville-alabama-violated-federal-law-late-stock-disclosures-2021-7> (attached as Exhibit A); The Honorable Thomas H. Tuberville (Tuberville, Tommy), Periodic Transaction Report, United States Senate Financial Disclosure (filed July 23, 2021), <https://efdsearch.senate.gov/search/view/ptr/3bdd9340-7c8c-4ed0-898d-dad3835940d2/> (Attached as Exhibit B).

<sup>2</sup> Levinthal, *supra* note 1; Sen. Tuberville PTR, *supra* note 1.

quickly defeat one of the purposes of the STOCK Act, which is real time disclosure of potential conflicts of interest. If members are not held accountable for late filing of PTRs, many may simply wait until their annual financial disclosures to reveal stock trades and pay nominal late fees, thereby circumventing the STOCK Act.

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 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 elected officials are acting in the public's interest, and not in their own financial interest.

### **The STOCK Act Requires Senators 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 . . . .”<sup>3</sup> Because the STOCK Act “was intended to require contemporaneous reporting of certain transactions . . . the law does not permit any extensions for PTRs.”<sup>4</sup> It is the senator’s responsibility to monitor their accounts, recognize reportable transactions, and file timely PTRs.<sup>5</sup>

Additionally, 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.”<sup>6</sup>

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

<sup>4</sup> U.S. SENATE SELECT COMM. ON ETHICS, Financial Disclosure Instructions for Calendar Year 2020, at 30 <https://www.ethics.senate.gov/public/cache/files/1d1f7bc9-14f1-404d-ae6d-ba83395e651b/cy-2020-financial-disclosure-instructions-with-cover--final.pdf>

<sup>5</sup> *Id.* at 31.

<sup>6</sup> 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](https://ethics.house.gov/sites/ethics.house.gov/files/wysiwyg_uploaded/STOCK%20Act%206.1.2020%20Final.pdf).

## **Sen. Tuberville Failed to File Timely Periodic Transaction Reports for nearly 130 Stock Trades from January to May 2021**

For roughly four months, Sen. Tuberville traded stocks frequently, but did not file timely PTRs as required. In the first five months of 2021, Sen. Tuberville made approximately 130 stock trades with a total value ranging from approximately \$894,000 to \$3.56 million.<sup>7</sup> He disclosed these transactions in a PTR in July of 2021. Some trades were not reported until six months after the transaction occurred.

Sen. Tuberville's trade activity occurred over several months and with significant frequency and volume. With regard to his failure to timely report this trading activity, a spokesperson for Sen. Tuberville said that he "long had financial advisors who actively manage his portfolio without his day-to-day involvement."<sup>8</sup> Trades worth up to millions of dollars were made while "Senator Tuberville was unaware of the specific transactions reported in this particular periodic transaction report."<sup>9</sup>

## **Sen. Tuberville May Have Knowingly Violated the STOCK Act**

Sen. Tuberville sits on the U.S. Senate Committee on Health, Education, Labor and Pensions, which has been responsible for overseeing the government's response to the COVID-19 pandemic.<sup>10</sup> Sen. Tuberville failed to report stocks and stock options in numerous companies with an interest in the government's COVID-19 response: Regeneron Pharmaceuticals (COVID-19 treatment manufacturer); Johnson and Johnson (COVID-19 vaccine manufacturer), and 3M (personal protective equipment manufacturer).<sup>11</sup>

Sen. Tuberville's spokesperson claims that Sen. Tuberville does not make his own stock trades, and instead uses "financial advisors who actively manage his portfolio without his day-to-day involvement."<sup>12</sup> He was apparently "unaware" that the up to \$3.56 million worth of trades occurred.<sup>13</sup> To accept that Sen. Tuberville mistakenly failed to file timely PTRs requires an assumption that he was not familiar with the requirement and had not

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<sup>7</sup> Sen. Tuberville's PTR, *supra* note 1.

<sup>8</sup> Levinthal, *supra* note 1.

<sup>9</sup> *Id.*

<sup>10</sup> See, e.g., U.S. SENATE COMM. ON HEALTH, EDUCATION, LABOR, AND PENSIONS, Examining Our COVID-19 Response: An Update from Federal Officials (Mar. 18, 2021), <https://www.help.senate.gov/hearings/examining-our-covid-19-response-an-update-from-federal-officials>.

<sup>11</sup> Sen. Tuberville's PTR at lines 69, 77, 84.

<sup>12</sup> Levinthal, *supra* note 1.

<sup>13</sup> *Id.*

received any training. Two factors suggest that Sen. Tuberville was in fact aware of the requirement prior to the filing of his PTRs and may have knowingly avoided disclosing his stock trades at the time they were made.

*First*, Sen. Tuberville was required to attend mandatory ethics training for new Senators in 2021.<sup>14</sup> The training includes discussion of financial disclosures and the STOCK Act.<sup>15</sup> Senators are required to complete the ethics training within 60 days of commencing service,<sup>16</sup> meaning Sen. Tuberville would have been required to complete the training no later than March 4, 2021.<sup>17</sup> The Ethics Committee requires Senators to submit a certification of completion of the training to an ethics certification officer.<sup>18</sup> Sen. Tuberville therefore was almost certainly trained on the legal requirement to be aware of and disclose his stock trades from the start of his Senate service in January 2021.

*Second*, even if Sen. Tuberville asserts that he did not know of the PTR requirements at the time of the trades, despite having undergone contemporaneous training that explained the requirements, he *should have known* about the disclosure requirements. In March 2020, high profile insider trading allegations engulfed several members of Congress and became widely publicized.<sup>19</sup> Among the Senators who faced scrutiny for stock trades was Senator Kelly Loeffler,<sup>20</sup> for whom Sen. Tuberville later campaigned in her runoff election.<sup>21</sup> These allegations of STOCK Act violations were all based on information disclosed in PTRs. Then, another scandal involving STOCK Act violations came to light: Rep. Donna Shalala failed to file PTRs for numerous

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<sup>14</sup> U.S. SENATE SELECT COMM. ON ETHICS, *Training*, [https://www.ethics.senate.gov/public/index.cfm/training?ContentRecord\\_id=8FDB39D9-EC8D-4B69-BDBB-9000EB45092F](https://www.ethics.senate.gov/public/index.cfm/training?ContentRecord_id=8FDB39D9-EC8D-4B69-BDBB-9000EB45092F).

<sup>15</sup> See U.S. SENATE SELECT COMM. ON ETHICS, Code of Conduct Training Handout (March 2021), [https://www.ethics.senate.gov/public/\\_cache/files/2e0cdb90-66df-4ed1-9a3b-9f1bc7144448/coc---march-2021.pdf](https://www.ethics.senate.gov/public/_cache/files/2e0cdb90-66df-4ed1-9a3b-9f1bc7144448/coc---march-2021.pdf).

<sup>16</sup> U.S. SENATE SELECT COMM. ON ETHICS, *Training*, *supra* note 14.

<sup>17</sup> Sen. Tuberville assumed office on Jan. 3, 2021.

<sup>18</sup> U.S. SENATE SELECT COMM. ON ETHICS, *Training*, *supra* note 14.

<sup>19</sup> 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](https://www.wsj.com/articles/justice-department-investigating-lawmakers-for-possible-insider-trading-11585586365?mod=article_inline).

<sup>20</sup> Tia Mitchell, *A Timeline of investigations into Perdue, Loeffler stock trading*, ATLANTA J. & CONST. (Dec. 16, 2020), <https://www.ajc.com/politics/a-timeline-of-investigations-into-perdue-loeffler-stock-trading/L6TU65WK5JBFXKDC4YWBKGGNPU/>.

<sup>21</sup> Taylor Cooper, *Big Name Republicans campaign for Loeffler and Perdue in Brunswick*, BRUNSWICK NEWS (Dec. 17, 2020) [https://thebrunswicknews.com/news/local\\_news/big-name-republicans-campaign-for-loeffler-and-perdue-in-brunswick/article\\_5b74d138-fd44-53e5-9d29-083e4472fdd6.html](https://thebrunswicknews.com/news/local_news/big-name-republicans-campaign-for-loeffler-and-perdue-in-brunswick/article_5b74d138-fd44-53e5-9d29-083e4472fdd6.html).

transactions.<sup>22</sup> Considering that the requirement for PTRs in Congress was headline news throughout 2020, it seems unlikely that he was unaware of the disclosure requirements requiring him to be notified of and disclose his stock transactions.

For these reasons, Sen. Tuberville cannot excuse his failure to report with a claim that he was unfamiliar with the financial disclosure requirements. An Ethics Committee investigation can gather information to determine whether Sen. Tuberville knowingly violated the STOCK Act.

## Conclusion

The STOCK Act requires Senators to timely file PTRs for any individual stock trades.<sup>23</sup> Based on the available facts, there is reason to believe that Sen. Tuberville was aware of this requirement, and his failure to timely file the transaction reports violates the STOCK Act.

CLC respectfully requests that the Ethics Committee investigate whether Sen. Tuberville's nondisclosure was an intentional violation of the STOCK Act.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Kedric L. Payne  
General Counsel and Senior Director,  
Ethics

\_\_\_\_\_/s/\_\_\_\_\_  
Delaney N. Marsco  
Senior Legal Counsel, Ethics

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<sup>22</sup> 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 Sen. Tuberville'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.

<sup>23</sup> P.L. 112-105, *supra* note 3; see U.S. SENATE SELECT COMMITTEE ON ETHICS, Financial Disclosure Instructions for Calendar Year 2020, <https://www.ethics.senate.gov/public/cache/files/1d1f7bc9-14f1-404d-ae6d-ba83395e651b/cy-2020-financial-disclosure-instructions-with-cover--final.pdf>.

# Exhibit A



US MARKETS OPEN

In the news

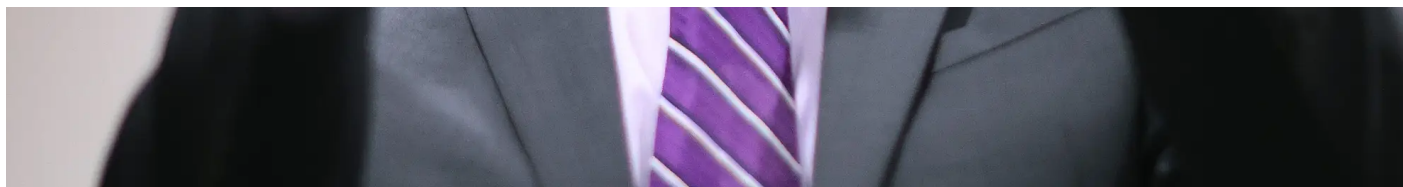
▼ Dow Jones	▼ Nasdaq	▼ S&P 500	▼ TSLA	▲ FB	▼ BABA
+0.61%	+0.33%	+0.62%	+4.91%	-0.41%	+1.31%

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## Republican Sen. Tommy Tuberville violated federal transparency law by failing to properly disclose stock transactions worth up to \$3.56 million

Dave Levinthal Jul 27, 2021, 4:00 AM

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**Sen. Tommy Tuberville, a Republican from Alabama, failed to properly disclose dozens of stock trades.** Chip Somodevilla/Getty Images

**The Alabama lawmaker filed nearly 130 of his stock disclosures weeks or months late.**

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**He's a member of the Senate Health Committee and trades pandemic-sensitive stocks.**

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**Tuberville, a critic of China's government, traded stock options of Chinese e-commerce giant Alibaba.**

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Sen. Tommy Tuberville, the junior Republican from Alabama, failed to properly disclose stock and stock-option trades together worth at least \$894,000 and as much as \$3.56 million, according to an [Insider analysis of newly filed Senate records](#).

Tuberville was weeks or months late in disclosing nearly 130 separate trades made between early January and early May. Federal lawmakers violate the [STOCK Act's](#) transparency provision if they don't formally disclose a trade in a certified report within 45 days of a stock trade.

Among Tuberville's trades: a January 25 stock option sale involving [Alibaba Group Holding Limited](#). The Chinese e-commerce company has ties to the Chinese Communist Party, for which it reportedly helped produce a [propaganda app](#).

Tuberville's office [previously told Insider](#) the senator had fully divested of a separate Alibaba stock investment in 2020 before becoming a senator early this year. Tuberville is one of Congress' preeminent critics of China's government.

**[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.](#)**

The senator earlier this year also bought and sold stock and stock options in a variety of companies particularly sensitive to the COVID-19 pandemic. They include [Regeneron Pharmaceuticals Inc.](#), which made a COVID treatment [used last year](#) to treat former President Donald Trump; [Johnson & Johnson](#), which manufactures one of the leading COVID vaccines; and [3M](#), which makes a [variety](#) of medical and personal protective products.

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Tuberville is a [member](#) of the Senate Committee on Health, Education, Labor and Pensions, which has this year routinely conducted hearings on COVID-19 matters.

Tuberville also reported making five separate stock and stock-option transactions involving aluminum company Alcoa on January 6, the day pro-Donald Trump rioters attacked the US Capitol.

Other trades involved the stocks of Google parent company Alphabet, PayPal Holdings Inc., eBay Inc., confectioner The Hershey Company, Warren Buffett holding company Berkshire Hathaway Inc., and Occidental Petroleum Corporation, according to a certified disclosure statement dated July 23.

His largest single trades involved a May 6 purchase of United States Steel Corporation stock and a March 16 purchase of Alcoa stock, each valued at between \$100,001 and \$250,000. Members of Congress are required to report stock trade values only in broad ranges.

**Sen. Tommy Tuberville financial disclosure**



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Tuberville does not personally make his own stock trades and has "long had financial advisors who actively manage his portfolio without his day-to-day involvement," Tuberville spokeswoman Ryann DuRant said in a statement to Insider. "Senator Tuberville was unaware that the specific transactions reported in this particular periodic transaction report occurred."

Once Tuberville became aware of the transactions, "the senator expeditiously prepared and submitted this report to the Senate Ethics Committee," DuRant said. "The Senator has put processes in place for timely reporting moving forward."

DuRant did not respond to Insider questions about who Tuberville's financial advisers are or whether the senator has given his financial advisers direction regarding buying or selling stock in Chinese companies. She also did not respond to a

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Fines for a first-time STOCK Act violator begin at \$200. It's unclear whether

Tuberville has paid a fine for filing his stock disclosures late

Tuberville has paid a fine for filing his stock disclosures late.

"Our office is working with the [Senate Ethics] Committee to ensure full compliance with their rules," DuRant said. Representatives from the Senate Ethics Committee did not respond to messages.

Tuberville first came to national prominence not on Capitol Hill but on the football field, serving 10 years as the coach of the Auburn University Tigers. There, he led Auburn to a perfect season and No. 2 national ranking in 2004. He [resigned](#) from Auburn in 2008 and subsequently coached at [Texas Tech University](#) and the [University of Cincinnati](#).

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Tuberville entered the political arena last year and easily [defeated](#) Jeff Sessions, a former US senator and attorney general under President Donald Trump, in a Republican primary before [beating](#) incumbent Democratic Sen. Doug Jones in the November general election.

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**Rep. Tom Malinowski, a Democrat from New Jersey, faces scrutiny for violating the federal STOCK Act by not disclosing dozens of personal stock trades.** Tom Williams/CQ-Roll Call via Getty Images

## Trouble ahead, trouble behind

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; Rep. [Dan Crenshaw](#), a Republican of Texas; Rep. [Blake Moore](#), a Republican of Utah; 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.

[< HOMEPAGE](#)

Sen. [Kelly Loeffler](#), a Republican of Georgia; former Sen. [David Perdue](#) of Georgia;

former Rep. [Donna Shalala](#), a Democrat of Florida; and former Rep. [Chris Collins](#), a Republican of New York.

Many exasperated government watchdog organizations have this year called on Congress to tighten their own stock trading rules.

"This activity undermines faith in the institution and raises the real possibility of actual conflicts of interest," said Noah Bookbinder, president of nonpartisan watchdog organization Citizens for Responsibility and Ethics in Washington.

A small group of bipartisan members of Congress in March [introduced](#) a bill that would ban themselves and their colleagues from trading individual stocks. Separately, Sen. [Elizabeth Warren](#), a Massachusetts Democrat, and Rep. [Pramila Jayapal](#), a Washington Democrat, told Insider they'd soon introduce companion legislation barring members of Congress from trading individual stocks.

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But other similar efforts have failed in recent years, most notably in 2012, when the

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Since lawmakers on both sides of the aisle are regularly violating the STOCK Act

SINCE LAWMAKERS ON BOTH SIDES OF THE AISLE ARE REGULARLY VIOLATING THE STOCK ACT,

Bookbinder noted. Because "members of each party can point to bad behavior on the other side," Bookbinder said he hopes members of Congress will support a stock trading ban because it's not "just a partisan, gotcha" issue.

"All of this goes away if you have a rule that members of Congress can't trade individual stocks when they're in office," he said, "even if they're notoriously reluctant to regulate themselves and restrict themselves."

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# Exhibit B

United States Senate

## Financial Disclosures

## Periodic Transaction Report for 07/23/2021


Mr. Thomas H Tuberville (Tuberville, Tommy)

 **Filed 07/23/2021 @ 2:02 PM**

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The following statements were checked before filing:

- ☒ I certify that the statements I have made on this form are true, complete and correct to the best of my knowledge and belief.
- ☒ I understand that reports cannot be edited once filed. To make corrections, I will submit an *electronic* amendment to this report.

 **Transactions** (132 transactions total) 0 Self 132 Joint 0 Spouse 0 Dependent Child

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
132	03/29/2021	Joint	<u>ALGN</u>	Align Technology, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
131	04/05/2021	Joint	<u>INTC</u>	Intel Corporation Option Type: Put <i>Strike price: \$60.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
130	01/25/2021	Joint	<u>BABA</u>	Alibaba Group Holding Limited Option Type: Put <i>Strike price: \$230.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
129	01/21/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc. Option Type: Put <i>Strike price: \$15.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
128	01/21/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc.	Stock	Purchase	\$15,001 - \$50,000	--
127	01/15/2021	Joint	<u>SDOG</u>	ALPS Sector Dividend Dogs ETF	Stock	Purchase	\$15,001 - \$50,000	--
126	01/13/2021	Joint	<u>QQQ</u>	Invesco QQQ Trust Option Type: Put <i>Strike price: \$262.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
125	01/13/2021	Joint	<u>TDY</u>	Teledyne Technologies Incorporated	Stock	Sale (Full)	\$50,001 - \$100,000	--
124	01/06/2021	Joint	<u>AA</u>	Alcoa Corporation Option Type: Put <i>Strike price: \$22.00</i> <i>Expires: 01/21/2022</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
123	01/06/2021	Joint	<u>AA</u>	Alcoa Corporation Option Type: Put <i>Strike price: \$22.00</i> <i>Expires: 01/21/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
122	01/06/2021	Joint	<u>AA</u>	Alcoa Corporation Option Type: Call <i>Strike price: \$26.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
121	01/06/2021	Joint	<u>AA</u>	Alcoa Corporation	Stock	Purchase	\$15,001 - \$50,000	--
120	01/06/2021	Joint	<u>AA</u>	Alcoa Corporation	Stock	Purchase	\$15,001 - \$50,000	--
119	01/05/2021	Joint	<u>FB</u>	Facebook, Inc. Option Type: Put <i>Strike price: \$225.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
118	01/04/2021	Joint	<u>INTC</u>	Intel Corporation Option Type: Put <i>Strike price: \$50.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
117	01/04/2021	Joint	<u>INTC</u>	Intel Corporation Option Type: Put <i>Strike price: \$50.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
116	01/04/2021	Joint	<u>INTC</u>	Intel Corporation Option Type: Put <i>Strike price: \$50.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
115	01/04/2021	Joint	<u>INTC</u>	Intel Corporation Option Type: Put <i>Strike price: \$50.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
114	01/04/2021	Joint	<u>WY</u>	Weyerhaeuser Company	Stock	Sale (Full)	\$50,001 - \$100,000	--
113	01/04/2021	Joint	<u>ONEQ</u>	Fidelity Nasdaq Composite Index ETF	Stock	Sale (Full)	\$100,001 - -\$250,000	--
112	01/04/2021	Joint	<u>DG</u>	Dollar General Corporation	Stock	Sale (Full)	\$50,001 - \$100,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
111	02/19/2021	Joint	<u>ADBE</u>	Adobe Inc. Option Type: Put <i>Strike price:</i> \$405.00 <i>Expires:</i> 06/18/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
110	02/16/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Put <i>Strike price:</i> \$25.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
109	02/16/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Call <i>Strike price:</i> \$30.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
108	02/16/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Call <i>Strike price:</i> \$30.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
107	02/16/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Call <i>Strike price:</i> \$30.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
106	02/16/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Call <i>Strike price:</i> \$30.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
105	02/16/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation	Stock	Purchase	\$15,001 - \$50,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
104	02/11/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Call <i>Strike price: \$30.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
103	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Put <i>Strike price: \$25.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
102	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Put <i>Strike price: \$25.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
101	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Put <i>Strike price: \$25.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
100	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Put <i>Strike price: \$25.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
99	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Call <i>Strike price: \$30.00</i> <i>Expires: 09/17/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
98	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation	Stock	Purchase	\$1,001 - \$15,000	--
97	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation	Stock	Purchase	\$15,001 - \$50,000	--
96	02/10/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation	Stock	Purchase	\$15,001 - \$50,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
95	02/09/2021	Joint	<u>VEEV</u>	Veeva Systems Inc. Option Type: Put <i>Strike price:</i> \$240.00 <i>Expires:</i> 03/19/2021	Stock Option	Purchase	\$1,001 - \$15,000	--
94	02/08/2021	Joint	<u>E</u>	Ford Motor Company Option Type: Put <i>Strike price:</i> \$11.00 <i>Expires:</i> 09/17/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
93	02/04/2021	Joint	<u>SSYS</u>	Stratasys Ltd. Option Type: Put <i>Strike price:</i> \$45.00 <i>Expires:</i> 09/17/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
92	02/04/2021	Joint	<u>SSYS</u>	Stratasys Ltd. Option Type: Put <i>Strike price:</i> \$45.00 <i>Expires:</i> 09/17/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
91	02/03/2021	Joint	<u>MSFT</u>	Microsoft Corporation Option Type: Put <i>Strike price:</i> \$185.00 <i>Expires:</i> 04/16/2021	Stock Option	Purchase	\$1,001 - \$15,000	--
90	02/03/2021	Joint	<u>BRK-B</u>	Berkshire Hathaway Inc.	Stock	Purchase	\$50,001 - \$100,000	--
89	02/02/2021	Joint	<u>CSX</u>	CSX Corporation Option Type: Put <i>Strike price:</i> \$80.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
88	03/29/2021	Joint	<u>WST</u>	West Pharmaceutical Services, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
87	03/29/2021	Joint	<u>WAL</u>	Western Alliance Bancorporation	Stock	Purchase	\$1,001 - \$15,000	--
86	03/29/2021	Joint	<u>WAT</u>	Waters Corporation	Stock	Purchase	\$1,001 - \$15,000	--
85	03/29/2021	Joint	<u>VMW</u>	VMware, Inc.	Stock	Purchase	\$1,001 - \$15,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
84	03/29/2021	Joint	<u>MMM</u>	3M Company	Stock	Purchase	\$1,001 - \$15,000	--
83	03/29/2021	Joint	<u>TER</u>	Teradyne, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
82	03/29/2021	Joint	<u>SNA</u>	Snap-on Incorporated	Stock	Purchase	\$1,001 - \$15,000	--
81	03/29/2021	Joint	<u>SIVB</u>	SVB Financial Group	Stock	Purchase	\$1,001 - \$15,000	--
80	03/29/2021	Joint	<u>SWKS</u>	Skyworks Solutions, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
79	03/29/2021	Joint	<u>SEIC</u>	SEI Investments Company	Stock	Purchase	\$1,001 - \$15,000	--
78	03/29/2021	Joint	<u>ROK</u>	Rockwell Automation, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
77	03/29/2021	Joint	<u>REGN</u>	Regeneron Pharmaceuticals, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
76	03/29/2021	Joint	<u>DGX</u>	Quest Diagnostics Incorporated	Stock	Purchase	\$1,001 - \$15,000	--
75	03/29/2021	Joint	<u>QCOM</u>	QUALCOMM Incorporated	Stock	Purchase	\$1,001 - \$15,000	--
74	03/29/2021	Joint	<u>PYPL</u>	PayPal Holdings, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
73	03/29/2021	Joint	<u>ODFL</u>	Old Dominion Freight Line, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
72	03/29/2021	Joint	<u>NDSN</u>	Nordson Corporation	Stock	Sale (Full)	\$1,001 - \$15,000	--
71	03/29/2021	Joint	<u>NTES</u>	NetEase, Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
70	03/29/2021	Joint	<u>MRK</u>	Merck & Co., Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
69	03/29/2021	Joint	<u>JNJ</u>	Johnson & Johnson	Stock	Sale (Full)	\$1,001 - \$15,000	--
68	03/29/2021	Joint	<u>INTU</u>	Intuit Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
67	03/29/2021	Joint	<u>IDXX</u>	IDEXX Laboratories, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
66	03/29/2021	Joint	<u>IEX</u>	IDEX Corporation	Stock	Purchase	\$1,001 - \$15,000	--
65	03/29/2021	Joint	<u>IEX</u>	IDEX Corporation	Stock	Purchase	\$1,001 - \$15,000	--
64	03/29/2021	Joint	<u>HON</u>	Honeywell International Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
63	03/29/2021	Joint	<u>HSY</u>	The Hershey Company	Stock	Purchase	\$1,001 - \$15,000	--
62	03/29/2021	Joint	<u>GGG</u>	Graco Inc.	Stock	Purchase	\$1,001 - \$15,000	--
61	03/29/2021	Joint	<u>GNTX</u>	Gentex Corporation	Stock	Purchase	\$1,001 - \$15,000	--
60	03/29/2021	Joint	<u>FTNT</u>	Fortinet, Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
59	03/29/2021	Joint	<u>EA</u>	Electronic Arts Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
58	03/29/2021	Joint	<u>EBAY</u>	eBay Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
57	03/29/2021	Joint	<u>EW</u>	Edwards Lifesciences Corporation	Stock	Purchase	\$1,001 - \$15,000	--
56	03/29/2021	Joint	<u>DECK</u>	Deckers Outdoor Corporation	Stock	Purchase	\$1,001 - \$15,000	--
55	03/29/2021	Joint	<u>CNR</u>	Cornerstone Building Brands, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
54	03/29/2021	Joint	<u>CL</u>	Colgate-Palmolive Company	Stock	Sale (Full)	\$1,001 - \$15,000	--
53	03/29/2021	Joint	<u>CLX</u>	The Clorox Company	Stock	Purchase	\$1,001 - \$15,000	--
52	03/29/2021	Joint	<u>CHE</u>	Chemed Corporation	Stock	Purchase	\$1,001 - \$15,000	--
51	03/29/2021	Joint	<u>CE</u>	Celanese Corporation	Stock	Purchase	\$1,001 - \$15,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
50	03/29/2021	Joint	<u>BIO</u>	Bio-Rad Laboratories, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
49	03/29/2021	Joint	<u>BHP</u>	BHP Group	Stock	Purchase	\$1,001 - \$15,000	--
48	03/29/2021	Joint	<u>ATHM</u>	Autohome Inc.	Stock	Purchase	\$1,001 - \$15,000	--
47	03/29/2021	Joint	<u>AME</u>	AMETEK, Inc.	Stock	Purchase	\$1,001 - \$15,000	--
46	03/29/2021	Joint	<u>GOOGL</u>	Alphabet Inc.	Stock	Purchase	\$1,001 - \$15,000	--
45	03/16/2021	Joint	<u>AA</u>	Alcoa Corporation Option Type: Put <i>Strike price: \$25.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
44	03/16/2021	Joint	<u>AA</u>	Alcoa Corporation Option Type: Call <i>Strike price: \$26.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
43	03/16/2021	Joint	<u>AA</u>	Alcoa Corporation	Stock	Purchase	\$1,001 - \$15,000	--
42	03/16/2021	Joint	<u>AA</u>	Alcoa Corporation	Stock	Purchase	\$100,001 - \$250,000	--
41	03/12/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc. Option Type: Put <i>Strike price: \$16.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
40	03/12/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc. Option Type: Call <i>Strike price: \$20.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
39	03/12/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc.	Stock	Purchase	\$15,001 - \$50,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
38	03/11/2021	Joint	<u>ADP</u>	Automatic Data Processing, Inc. Option Type: Put <i>Strike price:</i> \$175.00 <i>Expires:</i> 08/20/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
37	04/27/2021	Joint	<u>CALX</u>	Calix, Inc. Option Type: Put <i>Strike price:</i> \$40.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
36	04/27/2021	Joint	<u>CALX</u>	Calix, Inc. Option Type: Put <i>Strike price:</i> \$40.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
35	04/27/2021	Joint	<u>CALX</u>	Calix, Inc. Option Type: Put <i>Strike price:</i> \$40.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
34	04/26/2021	Joint	<u>QQQ</u>	Invesco QQQ Trust Option Type: Put <i>Strike price:</i> \$285.00 <i>Expires:</i> 03/18/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
33	04/21/2021	Joint	<u>CSX</u>	CSX Corporation Option Type: Put <i>Strike price:</i> \$80.00 <i>Expires:</i> 08/20/2021	Stock Option	Purchase	\$1,001 - \$15,000	--
32	04/21/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Call <i>Strike price:</i> \$30.00 <i>Expires:</i> 12/17/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
31	04/20/2021	Joint	<u>MSFT</u>	Microsoft Corporation Option Type: Put <i>Strike price:</i> \$205.00 <i>Expires:</i> 07/16/2021	Stock Option	Purchase	\$1,001 - \$15,000	--
30	04/20/2021	Joint	<u>FB</u>	Facebook, Inc. Option Type: Put <i>Strike price:</i> \$225.00 <i>Expires:</i> 07/16/2021	Stock Option	Purchase	\$1,001 - \$15,000	--
29	04/19/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Put <i>Strike price:</i> \$25.00 <i>Expires:</i> 09/17/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
28	04/19/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc. Option Type: Put <i>Strike price:</i> \$17.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
27	04/19/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc. Option Type: Call <i>Strike price:</i> \$20.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
26	04/19/2021	Joint	<u>CLF</u>	Cleveland-Cliffs Inc.	Stock	Purchase	\$50,001 - \$100,000	--
25	04/19/2021	Joint	<u>AA</u>	Alcoa Corporation	Stock	Sale (Full)	\$50,001 - \$100,000	--
24	04/16/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation Option Type: Call <i>Strike price:</i> \$30.00 <i>Expires:</i> 12/17/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
23	04/16/2021	Joint	<u>ECOM</u>	ChannelAdvisor Corporation	Stock	Purchase	\$15,001 - \$50,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
22	04/14/2021	Joint	<u>ADBE</u>	Adobe Inc. Option Type: Put <i>Strike price:</i> \$400.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
21	04/14/2021	Joint	<u>FCX</u>	Freeport-McMoRan Inc.	Stock	Sale (Full)	\$15,001 - \$50,000	--
20	04/12/2021	Joint	<u>SSYS</u>	Stratasys Ltd. Option Type: Put <i>Strike price:</i> \$22.50 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
19	04/08/2021	Joint	<u>CALX</u>	Calix, Inc. Option Type: Put <i>Strike price:</i> \$40.00 <i>Expires:</i> 01/21/2022	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
18	04/07/2021	Joint	<u>CALX</u>	Calix, Inc. Option Type: Put <i>Strike price:</i> \$40.00 <i>Expires:</i> 10/15/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
17	04/07/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Put <i>Strike price:</i> \$25.00 <i>Expires:</i> 11/19/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
16	04/07/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Call <i>Strike price:</i> \$29.00 <i>Expires:</i> 11/19/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
15	04/07/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation Option Type: Call <i>Strike price:</i> \$29.00 <i>Expires:</i> 11/19/2021	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
14	04/07/2021	Joint	<u>OXY</u>	Occidental Petroleum Corporation	Stock	Purchase	\$50,001 - \$100,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
13	04/05/2021	Joint	<u>INTC</u>	Intel Corporation Option Type: Put <i>Strike price: \$50.00</i> <i>Expires: 07/16/2021</i>	Stock Option	Purchase	\$1,001 - \$15,000	--
12	04/05/2021	Joint	<u>EA</u>	Electronic Arts Inc. Option Type: Put <i>Strike price: \$115.00</i> <i>Expires: 06/18/2021</i>	Stock Option	Purchase	\$1,001 - \$15,000	--
11	04/01/2021	Joint	<u>PYPL</u>	PayPal Holdings, Inc. Option Type: Put <i>Strike price: \$220.00</i> <i>Expires: 06/17/2022</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
10	04/01/2021	Joint	<u>PYPL</u>	PayPal Holdings, Inc. Option Type: Put <i>Strike price: \$220.00</i> <i>Expires: 06/17/2022</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
9	05/24/2021	Joint	<u>FCX</u>	Freeport-McMoRan Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
8	05/18/2021	Joint	<u>FDSWX</u>	AIG Focused Dividend Strategy Fund Class W	Stock	Sale (Full)	\$1,001 - \$15,000	--
7	05/10/2021	Joint	<u>FCX</u>	Freeport-McMoRan Inc.	Stock	Sale (Full)	\$1,001 - \$15,000	--
6	05/06/2021	Joint	<u>X</u>	United States Steel Corporation Option Type: Put <i>Strike price: \$24.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$15,001 - \$50,000	--
5	05/06/2021	Joint	<u>X</u>	United States Steel Corporation Option Type: Call <i>Strike price: \$29.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--

#	Transaction Date	Owner	Ticker	Asset Name	Asset Type	Type	Amount	Comment
4	05/06/2021	Joint	<u>X</u>	United States Steel Corporation Option Type: Call <i>Strike price: \$29.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
3	05/06/2021	Joint	<u>X</u>	United States Steel Corporation Option Type: Call <i>Strike price: \$29.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
2	05/06/2021	Joint	<u>X</u>	United States Steel Corporation Option Type: Call <i>Strike price: \$29.00</i> <i>Expires: 10/15/2021</i>	Stock Option	Sale (Full)	\$1,001 - \$15,000	--
1	05/06/2021	Joint	<u>X</u>	United States Steel Corporation	Stock	Purchase	\$100,001 - \$250,000	The filer's financial advisors actively manage his accounts without the filer's day to day involvement. The filer was unaware that the specific transactions in this report occurred. Upon becoming aware of the transactions, the filer expeditiously prepared and submitted this report to the Committee.