



October 16, 2025

Joseph V. Cuffari
Inspector General, U.S. Department of Homeland Security
Attn: Office of Investigations — Hotline
245 Murray Lane SW,
Washington, D.C. 20528-0305

submitted via hotline

Dear Inspector General Cuffari:

Campaign Legal Center (“CLC”) writes to request that the U.S. Department of Homeland Security (“DHS”) Office of Inspector General (“IG”) investigate whether DHS Border Czar, Thomas D. Homan, knowingly and willfully failed to report income on his financial disclosure statement. Specifically, Homan reportedly accepted \$50,000 in cash from individuals posing as businessmen seeking future government contracts in September 2024.¹ At the time, he claimed he would keep the “money in a trust until he had completed his service in the Trump administration” according to media reports of the recorded transaction.² Homan was legally required to publicly disclose any payments he received in 2024 and any trust he owns.³ An investigation is needed to determine if Homan intentionally excluded information from his financial disclosure statement in violation of federal criminal law.⁴

¹ Devlin Barrett, Glenn Thrush, Alana Feuer, Maggie Haberman, & Hamed Aleaziz, *Trump Justice Dept. Closed Investigation Into Tom Homan for Accepting Bag of Cash*, N.Y. Times (Sept. 20, 2025), <https://www.nytimes.com/2025/09/20/us/politics/tom-homan-fbi-trump.html>.

² Sarah N. Lynch, *Trump aide Homan accepted \$50,000 in bribery sting operation, sources say*, Reuters (Sept. 22, 2025), <https://www.reuters.com/world/us/trump-aide-homan-accepted-50000-bribery-sting-operation-sources-say-2025-09-21/>.

³ Any assets and income, from employment or otherwise, must be reported for the entire preceding calendar year to filing date. Sources of compensation must be reported for the two prior calendar years to the filing date. U.S. Office of Government Ethics, Public Financial Disclosure Guide, “Reporting Period: New Entrant Report,” [https://www.oge.gov/web/278eGuide.nsf/Definitions#Reporting Periods:New Entrant Report](https://www.oge.gov/web/278eGuide.nsf/Definitions#Reporting%20Periods%3ANew%20Entrant%20Report).

⁴ 5 U.S.C. § 13106(2)(A).

Members of the federal executive branch are required by law to completely and accurately file financial disclosure statements to preserve the public's trust in government. In enacting the financial disclosure requirements, Congress determined that the public has a right to transparency surrounding officials' financial interests, especially those that may impact an official's decision making. When a senior official intentionally fails to report certain financial interests, it keeps everyone in the dark and jeopardizes the public's confidence that government employees are acting in the public's interest. The IG should investigate this matter and enforce federal ethics laws.

Employees Must File Complete and Accurate Financial Disclosure Statements Representing All Income in the Relevant Reporting Period

Federal law makes it illegal for any person to “knowingly and willfully . . . falsify any information [or] fail to file or report any information that such person is required to report” in a public financial disclosure statement.⁵ A person “who knowingly and willfully falsifies or who knowingly and willfully fails to file or report any information that such individual is required to report” on a financial disclosure is subject to civil penalties and possible imprisonment.⁶

Each public financial disclosure statement must include the “source, type, and amount or value of income . . . from any source.”⁷ Income includes “[e]arned income such as compensation for services, fees, commissions, salaries, wages, and similar items” and “gross income derived from business.”⁸ Generally, income means “gross income” as determined by the Internal Revenue Service, which defines “gross income” as “all income from whatever source derived, unless excluded by law. Gross income includes income realized in any form, whether in money, property, or services. Income may be realized, therefore, in the form of services, meals, accommodations, stock, or other property, as well as in cash.”⁹ Money received as a bribe or in an attempted bribery scheme must be included in income.¹⁰

“The head of each agency, each Secretary concerned, or the Director of the Office of Government Ethics, as appropriate, **must** refer to the Attorney General the name of any individual when there is reasonable cause to believe that such

⁵ 5 U.S.C. § 13106(2)(A).

⁶ *Id.* at § 13106(2)(B).

⁷ 5 U.S.C. § 13104(a)(1)(A).

⁸ 5 C.F.R. § 2634.105(j).

⁹ 26 C.F.R. § 1.61-1(a).

¹⁰ Internal Revenue Service, “Publication 17 (2024), Your Federal Income Tax,” <https://www.irs.gov/publications/p17>.

individual has willfully failed to file a public report or information required on [a financial disclosure] report.”¹¹

Appropriate personnel or other action can be taken by “[t]he President, the Vice President, the Director of the Office of Government Ethics, the Secretary concerned, the head of each agency, and the Office of Personnel Management” for willful violations of the law.¹²

Homan Apparently Received \$50,000 in Cash in September 2024

In September 2024, Homan was working at Homeland Strategic Consulting, LLC, a now-defunct consulting firm he founded.¹³ The website for the firm stated: “We have a proven track record of opening doors and bringing successful relationships to our clients, resulting in tens of millions of dollars of federal contracts to private companies.”¹⁴ The website uses Homan’s past work as the ICE acting director to market the firm.¹⁵

During this time, he accepted a \$50,000 cash payment from undercover FBI agents who were posing as businessmen attempting to secure future government contracts “related to border security.”¹⁶ This exchange of money occurred as part of a larger investigation into Homan, who was alleged to be soliciting payments in exchange for contracts if then-candidate Donald Trump won the election.¹⁷ The exchange was said to be recorded.¹⁸

At the time of the payment and for many months later, it appears that Homan was unaware that the businessmen were imposters. Public information suggests that Homan was allowed to keep the money without knowing that FBI agents were the source because “[t]he FBI and the Justice Department planned to wait to see whether Homan would deliver on his alleged promise once he became the nation’s top immigration official.”¹⁹

¹¹ 5 C.F.R. § 2634.701(a) (emphasis added).

¹² *Id.* at (d).

¹³ Archived page of Homeland Strategic Consulting, <https://web.archive.org/web/20240905161515/https://homelandstrategic.com/>.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ Barrett, et.al, *supra* note 1.

¹⁷ Carol Leonnig & Ken Dilanian, *Tom Homan was investigated for accepting \$50,000 from undercover FBI agents. Trump’s DOJ shut it down.*, MSNBC (Sept. 20, 2025), <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>.

¹⁸ Zach Montague, *Tom Homan Was Said to Have Received \$50,000 From Agents. He May Not Have to Return It.*, N.Y. Times (Oct. 8, 2025), <https://www.nytimes.com/2025/10/08/us/politics/tom-homan-sting-money.html>.

¹⁹ Leonnig & Dilanian, *supra* note 17.

On January 20, 2025, Homan was appointed Border Czar, and was required to file his financial disclosure statement, which includes his assets and income for 2024. On February 10, 2025, Homan signed and certified that his financial disclosure was “true, complete and correct to the best of my knowledge.” His knowledge at the time of the certification, according to media reporting, was that he had received \$50,000 for services from a potential government contractor. As described below, his financial disclosure statement did not include any income from a potential government contractor that meets this description.

Homan has not denied accepting the \$50,000. He has only denied that he did anything “criminal” or “illegal.”²⁰ A DHS spokesperson did not respond to questions about the money.²¹ Attorney General Pam Bondi evaded questions during a congressional hearing about whether the money was received, only commenting on the investigation that resulted in “no credible evidence of any wrongdoing.”²² A White House spokesperson also refused to answer questions about whether Homan accepted the money.²³ There has been no reported denial by anyone with knowledge of the relevant facts that Homan accepted the \$50,000. The recorded FBI exchange has not been made public.

Homan’s Financial Disclosure Statement Does Not Seem to Include the \$50,000 Payment

Homan was appointed to the Border Czar position on January 20, 2025.²⁴ The reporting period for Homan’s financial disclosure statement as a new entrant encompasses any income received in September 2024, regardless of the source and purpose of the income. Yet Homan’s financial disclosure statement does not appear to include the \$50,000 cash payment he received.

Any assets and income, from employment or otherwise, must be reported for the entire preceding calendar year to filing date. He lists \$360,000 as his annual salary for Homeland Strategic Consulting as income.

Disclosure rules also require Homan to disclose any clients of his consulting company that provided him with compensation exceeding \$5,000 per year.²⁵ Sources of compensation must be reported for the two prior calendar years to the

²⁰ Montague, *supra* note 18.

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ Public Financial Disclosure Report (OGE Form 278e) for Thomas D. Homan, attached as Exhibit A.

²⁵ U.S. Off. Gov’t. Ethics, Financial Disclosure Guide, “OGE Form 278e: Part 4 Your Sources of Compensation Exceeding \$5,000 in a Year (Nominee and New Entrant Reports Only)”, https://www.oge.gov/web/278eGuide.nsf/Part_4.

filing date.²⁶ In that section of Homan's report, he lists nine entities that paid him for "consulting services."²⁷ These entities are established entities. Specifically, one of the clients is America First Policy Institute and another is a known public affairs firm, DCI Group. Of the remaining seven, four are known government contractors.²⁸ Public information provides no reason to believe that any of his disclosed clients were connected to the \$50,000 FBI payment.

Based on publicly available information, Homan may have assumed that the source of the income were businessmen at the time he signed his financial disclosure statement because the FBI had not revealed their investigation. "Shortly after Trump's inauguration, however, in either late January or February 2025, former acting Deputy Attorney General Emil Bove was briefed on the case and told Justice Department officials he did not support the investigation, according to two people familiar with the case."²⁹ This appears to be the earliest that Homan could have learned about the true source of the payment. Therefore, Homan should have at least disclosed receiving \$50,000 from the "businessmen." But even if he knew that the FBI was the true source of the payment at the time he filed his financial disclosures (and even if he returned the money in 2025), the payment was reportable as 2024 income.

The payment was required to be reported: it constitutes income for purposes of financial disclosure reporting as cash given to Homan; it was in excess of the reporting threshold;³⁰ and it was received during the reporting period. The payment's seeming omission from Homan's financial disclosure statement constitutes a failure to report information required to be reported.

There is Reasonable Cause to Believe Homan's Failure to Report Was Knowing and Willful

Homan may have intentionally omitted the payment from his financial disclosure statement, constituting a knowing and willful violation of the law. Homan's otherwise thorough financial disclosure statement and his past experience

²⁶ OGE Public Financial Disclosure Guide, *supra* note 3.

²⁷ See Exhibit A.

²⁸ U.S. Government Contract Summary for Guidepost Solutions, LLC, https://www.usaspending.gov/award/CONT_AWD_15JA1123P000000010_1501_-NONE_-NONE- (last accessed Oct. 15, 2025); U.S. Government Contract Summary for Geo Care, https://www.usaspending.gov/award/CONT_AWD_DJBP0700RRCRT1E01403YK_1540_DJB200140_1540; U.S. Government Contract Summary for Mammoth Energy Services, https://www.usaspending.gov/award/CONT_AWD_140D0423F0388_1406_140D0423D0068_1406 (last accessed Oct. 15, 2025); U.S. Government Contract Summary for SE&M Solutions, https://www.usaspending.gov/award/CONT_AWD_75ACF123P00018_7590_-NONE_-NONE- (last accessed Oct. 15, 2025).

²⁹ Leonnig & Dilanian, *supra* note 17.

³⁰ Depending on how the payment is reported, the reporting threshold varies. But all the thresholds are far below \$50,000.

in government requiring regular disclosures suggest an understanding of the legal requirements. Homan's refusal to deny accepting the payment suggests that he did in fact accept the payment.

In light of his declaration that he did not engage in wrongdoing, it seems possible that he withheld the payment from his financial disclosure statement to avoid an inference that he did engage in criminal conduct surrounding contracting processes. The circumstances surrounding Homan's acceptance of the payment, including the later dropped DOJ investigation into a potentially longstanding practice of promising future contracts in exchange for cash, provide reasonable cause to believe Homan knowingly and willfully omitted the payment from his financial disclosure statements.

Conclusion

Homan was legally required to publicly disclose any income he received in 2024. It seems very likely that Homan received a \$50,000 payment in September 2024 and failed to include that income in his financial disclosure statement. The IG should investigate to determine if Homan intentionally excluded information from his financial disclosure statement in violation of federal criminal law.

Respectfully submitted,

_____/s/____

Kedric L. Payne
General Counsel, Vice President, and Sr.
Director, Ethics

_____/s/____

Delaney Marsco
Director, Ethics

Exhibit A

Report Type: New Entrant Report

Year (Annual Report only):

Date of Appointment: 01/2025

Date of Termination:

Appointment Type: Non-Career

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Homan, Thomas D

Border Czar, Department of Homeland Security

Date of Appointment: 01/20/2025

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Homan, Thomas D [electronically signed on 02/10/2025 by Homan, Thomas D in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ O'Connor, Michael, Certifying Official [electronically signed on 05/08/2025 by O'Connor, Michael in Integrity.gov]

Other review conducted by
/s/ Lam, Ashley, Ethics Official [electronically signed on 04/10/2025 by Lam, Ashley in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 05/07/2025

Data Revised 05/05/2025

Data Revised 04/10/2025

Data Revised 03/18/2025

Data Revised 03/10/2025

Data Revised 03/08/2025

Data Revised 02/25/2025

Data Revised 02/24/2025

Data Revised 02/21/2025

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Homeland Strategic Consulting, LLC	Fredericksburg, Virginia	LLC	President	7/2018	12/2024

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Homeland Strategic Consulting, LLC	N/A		Salary	\$360,000
1.1	JL Wilkinson Consulting	See Endnote		Speaker fees	\$96,469
1.2	New Hampshire GOP - 10/27/23	N/A		Honorarium	\$1,174
1.3	Brotherhood of the Fallen - 11/1/23	N/A		Honorarium	\$3,130
1.4	Patriots for Family Values - 12/5/23	N/A		Honorarium	\$1,020
1.5	Patriots for Florida - 12/5/23	N/A		Honorarium	\$2,302
1.6	Perdue University - 2/8/24	N/A		Honorarium	\$1,000
1.7	American Conservative Agenda - 2/21/24	N/A		Honorarium	\$3,000
1.8	Sangamon County GOP - 3/29/24	N/A		Honorarium	\$5,000
1.9	Ohio Republicans - 4/22/24	N/A		Honorarium	\$3,000
1.10	National Automobile Foundation - 7/9/24	N/A		Honorarium	\$5,000
2	IRA #1	No			
2.1	iShares Core S&P 500 ETF (IVV)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.2	iShares Russell Mid-Cap ETF (IWR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	Vanguard Growth Index Fund ETF Class Shares (VUG)	Yes	None (or less than \$1,001)		None (or less than \$201)
2.4	American Funds Fundamental Investors Class F3 Shares (FUNFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.5	International Growth & Income Fund Class F3 Shares (IGAIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.6	Bridge Builder Core Bond Fund (BBTBX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.7	Bridge Builder Core Plus Bond Fund (BBCPX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.8	Bridge Builder International Equity Fund (BBIEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.9	Bridge Builder Large Cap Growth Fund (BBGLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.10	Bridge Builder Large Cap Value Fund (BBVLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.11	Bridge Builder Small/Mid Cap Value Fund (BBVSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.12	Bridge Builder Small/Mid Cap Growth Fund (BBGSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.13	International Small Company Portfolio Institutional Class Shares (DFISX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.14	Dodge & Cox Stock Fund (DODGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.15	Hartford World Bond Fund Class F Shares (HWDFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.16	JPMorgan High Yield Fund Class R6 Shares (JHYUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.17	JPMorgan US Government Money Market Fund Capital Shares (OGVXX)	Yes	None (or less than \$1,001)		None (or less than \$201)
2.18	MFS Value Fund Class R6 Shares (MEIKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.19	JPMorgan Mid Cap Value Fund Class R6 Shares (JMVYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Homeland Strategic Consulting LLC 401(K)	No			
3.1	iShares Core S&P 500 ETF (IVV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.2	iShares Russell Mid-Cap ETF (IWR)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	Vanguard Growth Index Fund ETF Class Shares (VUG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.4	American Funds Fundamental Investors Class F3 Shares (FUNFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.5	International Growth & Income Fund Class F3 Shares (IGAIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.6	Bridge Builder Core Bond Fund (BBTBX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.7	Bridge Builder Core Plus Bond Fund (BBCPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.8	Bridge Builder International Equity Fund (BBIEX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.9	Bridge Builder Large Cap Growth Fund (BBGLX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.10	Bridge Builder Large Cap Value Fund (BBVLX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.11	Bridge Builder Small/Mid Cap Value Fund (BBVSX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.12	Bridge Builder Small/Mid Cap Growth Fund (BBGSX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.13	International Small Company Portfolio Institutional Class Shares (DFISX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.14	Dodge & Cox Stock Fund (DODGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.15	Hartford World Bond Fund Class F Shares (HWDFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.16	JPMorgan High Yield Fund Class R6 Shares (JHYUX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.17	JPMorgan Mid Cap Value Fund Class R6 Shares (JMVYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.18	JPMorgan US Government Money Market Fund Capital Shares (OGVXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.19	MFS Value Fund Class R6 Shares (MEIKX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	Homeland Security Consulting LLC, defined benefit plan				
4.1	iShares Core S&P 500 ETF (IVV)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.2	iShares Russell Mid-Cap ETF (IWR)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.3	Vanguard Growth Index Fund ETF Class Shares (VUG)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.4	American Funds Fundamental Investors Class F3 Shares (FUNFX)	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.5	International Growth & Income Fund Class F3 Shares (IGAIX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.6	Bridge Builder Core Bond Fund (BBTBX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.7	Bridge Builder Core Plus Bond Fund (BBCPX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.8	Bridge Builder International Equity Fund (BBIEIX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.9	Bridge Builder Large Cap Growth Fund (BBGLX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
4.10	Bridge Builder Large Cap Value Fund (BBVLX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.11	Bridge Builder Small/Mid Cap Value Fund (BBVSX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.12	Bridge Builder Small/Mid Cap Growth Fund (BBGSX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.13	International Small Company Portfolio Institutional Class Shares (DFISX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.14	Dodge & Cox Stock Fund (DODGX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
4.15	Hartford World Bond Fund Class F Shares (HWDFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.16	JPMorgan High Yield Fund Class R6 Shares (JHYUX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
4.17	JPMorgan Mid Cap Value Fund Class R6 Shares (JMVYX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4.18	JPMorgan US Government Money Market Fund Capital Shares (OGVXX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4.19	MFS Value Fund Class R6 Shares (MEIKX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	IRA #2	No			
5.1	3I Group PLC American Depository Receipts (TGOPY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.2	ABB LTD Sponsored ADR (ABBNY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.3	Abbott Laboratories (ABT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.4	Accenture Plc (ACN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.5	Adidas-Salomon AG (ADDYY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.6	Adobe, Inc. (ADBE)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.7	Advanced Micro Devices, Inc. (AMD)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.8	AerCap Holdings N.V. Ordinary Shares (AER)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.9	AIA Group Limited American Depository Receipt (AAGIY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.10	Air Liquide (AIQUY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.11	Allison Transmission Holdings, Inc. (ALSN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.12	Alphabet Inc Class A (GOOGL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.13	Amazon.com, Inc. (AMZN)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.14	American Express Co. (AXP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.15	AMETEK, Inc. (AME)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.16	Amphenol Corporation (APH)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.17	Analog Devices, Inc. (ADI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.18	Aon Plc (AON)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.19	Apple, Inc. (AAPL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.20	Applied Materials, Inc. (AMAT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.21	AptarGroup, Inc. (ATR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.22	Arista Networks, Inc. (ANET)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.23	Armstrong World Industries, Inc. (AWI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.24	ASM International NV (ASMIY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.25	ASML Holding N.V. New York Registry Shares (ASML)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.26	Avery Dennison Corp. (AVY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.27	Baker Hughes Co (BKR)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.28	Ball Corporation Common Stock (BALL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.29	Bank of America Corp. (BAC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.30	BellRing Brands Inc. Common Stock (BRBR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.31	Blackstone Inc. Common Stock (BX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.32	Boeing Co (BA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.33	Boston Scientific Corp. (BSX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.34	Broadcom, Inc. (AVGO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.35	Brown-Forman Corp B (BF.B)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.36	Bruker Corp. (BRKR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.37	Bureau Veritas SA ADR (BVVBY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.38	CAPGEMINI S E American Depository Receipts (CGEMY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.39	CBRE Group, Inc. (CBRE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.40	The Charles Schwab Corp. (SCHW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.41	Chipotle Mexican Grill, Inc. (CMG)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.42	Chubb Ltd. (CB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.43	Churchill Downs, Inc. (CHDN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.44	Cigna Corp. (CI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.45	Cincinnati Financial Corp. (CINF)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.46	Cintas Corp. (CTAS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.47	Citigroup, Inc. (C)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.48	The Coca-Cola Co. (KO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.49	Compagnie Financiere Richemontag Switz (CFRUY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.50	Compass Group PLC American Depository Receipt (CMPGY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.51	ConocoPhillips (COP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.52	Continental AG ADR (CTTAY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.53	Costco Wholesale Corp. (COST)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.54	CRH PLC American Depository Shares (CRH)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.55	CRODA International PLC ADR (COIHY)	N/A	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.56	Crown Castle International Corp. (CCI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.57	Danaher Corp. (DHR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.58	DBS Group Holdings LTD ADR (DBSDY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.59	Dell Technologies, Inc. (DELL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.60	Diageo plc Common Stock (DEO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.61	Diploma PLC (DPMAY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.62	Disco Corp ADR (DSCSY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.63	Dollar Tree, Inc. (DLTR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.64	Dominion Energy, Inc. (D)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.65	Duke Energy Corp. (DUK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.66	Eaton Corporation PLC (ETN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.67	Ecolab, Inc. (ECL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.68	Eli Lilly & Co. (LLY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.69	ENGIE ADR (ENGIY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.70	ENN Energy Holdings Limited American Depository Receipt (XNGSY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.71	Entegris, Inc. (ENTG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.72	EPIROC AKTIEBOLAG (EPOKY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.73	Equifax, Inc. (EFX)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.74	Experian Group LTD ADR (EXPGY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.75	Exxon Mobil Corp. (XOM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.76	FANUC Corp American Depository Receipt (FANUY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.77	Fidelity National Information Services, Inc. (FIS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.78	Galaxy ENTMT Group LTD American Depository Receipts (GXYYY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.79	Arthur J. Gallagher & Co. (AJG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.80	General Dynamics Corp. (GD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.81	Gildan Activewear Inc. Class A Sub. Vot. Common Stock (GIL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.82	Goldman Sachs Group Inc (GS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.83	Grupo Financiero Banorte ADR (GBOOY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.84	HEICO Corp. (HEI)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.85	Henkel KGAA ADR PFD (HENGY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.86	Hexagon AB ADR (HXGBY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.87	The Home Depot, Inc. (HD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.88	Honeywell International, Inc. (HON)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.89	Howmet Aerospace Inc. Common Stock (HWM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.90	Hoya Corp (HOCY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.91	ICICI Bank Limited Common Stock (IBN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.92	ICON plc Ordinary Shares (ICLR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.93	Illinois Tool Works, Inc. (ITW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.94	IMCD Group N V (IMCDY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.95	ING Group N.V. Common Stock (ING)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.96	Intel Corp. (INTC)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.97	Intercontinental Exchange, Inc. (ICE)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.98	Intuit, Inc. (INTU)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.99	Intuitive Surgical, Inc. (ISRG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.100	IQVIA Holdings, Inc. (IQV)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.101	Itau Unibanco Banco Holding SA American Depositary Shares (Each repstg 500 Preferred shares) (ITUB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.102	Jacobs Solutions Inc (J)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.103	James Hardie Industries plc American Depositary Shares (Ireland) (JHX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.104	Johnson & Johnson (JNJ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.105	JPMorgan Chase & Co. (JPM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.106	KBC Group NV ADR (KBCSY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.107	KENVUE Inc (KVUE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.108	Keysight Technologies, Inc. (KEYS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.109	KKR & Co., Inc. (KKR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.110	KLA Corp. (KLAC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.111	Lamb Weston Holdings, Inc. (LW)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.112	Lennox International, Inc. (LII)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.113	Li Ning Co Limited American Depository Receipt (LNNGY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.114	London Stock Exchange Group American Depository Receipts (LNSTY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.115	Lowes Companies Inc (LOW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.116	M&T Bank Corp. (MTB)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.117	Marriott International, Inc. (MAR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.118	Marsh & McLennan Cos., Inc. (MMC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.119	Martin Marietta Materials, Inc. (MLM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.120	Marvell Technology Group Ltd. (MRVL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.121	McDonald's Corp. (MCD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.122	McKesson Corp. (MCK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.123	Medtronic Plc (MDT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.124	Merck & Co., Inc. (MRK)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.125	MERCK KGAA American Depository Receipt (MKKGY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.126	Meta Platforms Inc. Class A Common Stock (META)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.127	Microsoft Corp. (MSFT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.128	Mitsui Fudosan Co LTD American Depository Receipts (MTSFY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.129	Mizuho Financial Group Inc. Sponosred ADR (Japan) (MFG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.130	Moelis & Co. (MC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.131	Mondelez International, Inc. (MDLZ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.132	Moody's Corp. (MCO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.133	Morgan Stanley (MS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.134	MTU Aero Engines Hldgs AG ADR (MTUAY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.135	Nasdaq, Inc. (NDAQ)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.136	Nestle S A ADR (NSRGY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.137	Netflix, Inc. (NFLX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.138	NewMarket Corp. (NEU)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.139	Nitori Hldgs Co LTD (NCLTY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.140	Nomura Resh Inst LTD (NRILY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.141	Nordson Corp. (NDSN)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.142	Norfolk Southern Corp. (NSC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.143	Novo Nordisk A/S Common Stock (NVO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.144	NVIDIA Corp. (NVDA)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.145	NXP Semiconductors N.V. Common Stock (NXPI)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.146	O'Reilly Automotive, Inc. (ORLY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.147	Old Dominion Freight Line, Inc. (ODFL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.148	Otis Worldwide Corporation Common Stock (OTIS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.149	PACCAR, Inc. (PCAR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.150	Palo Alto Networks, Inc. (PANW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.151	Parker-Hannifin Corp. (PH)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.152	PepsiCo, Inc. (PEP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.153	Pernod Ricard S A (PRNDY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.154	Pfizer Inc. (PFE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.155	Piraeus Finl Hldgs S A (BPIRY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.156	The PNC Financial Services Group, Inc. (PNC)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.157	Pool Corp. (POOL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.158	Post Holdings, Inc. (POST)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.159	Procter & Gamble Co. (PG)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.160	Progressive Corp. (PGR)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.161	Prologis, Inc. (PLD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.162	PT Telekomunikasi Indonesia Tbk (TLK)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.163	Puma SE American Depositary Receipt (PUMSY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.164	Recruit Hldgs Co LTD (RCRUY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.165	RELX PLC PLC American Depositary Shares (Each representing One Ordinary Share) (RELX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.166	Renesas Electronics Corp American Depositary Receipt (RNECY)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.167	Roche Hldg LTD ADR (RHHBY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.168	Rockwell Automation, Inc. (ROK)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.169	Raytheon Technologies Corporation Common Stock (RTX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.170	Ryanair Holdings plc American Depositary Shares (RYAAY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.171	salesforce.com, inc. (CRM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.172	SAMPO OYJ ADR (SAXPY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.173	SAP SE ADS (SAP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.174	ServiceNow, Inc. (NOW)	N/A	\$1,001 - \$15,000		\$201 - \$1,000
5.175	The Sherwin-Williams Co. (SHW)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.176	Shin Etsu Chem Co LTD ADR (SHECY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.177	Shopify Inc. Class A Subordinate Voting Shares (SHOP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.178	Siemens A G Sponsored ADR (SIEGY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.179	Siemens Healthineers AG American Depositary Receipts (SMMNY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.180	Skyworks Solutions, Inc. (SWKS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.181	Southern Company (SO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.182	Starbucks Corp. (SBUX)	N/A	None (or less than \$1,001)		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.183	STERIS Plc (Ireland) (STE)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.184	Suncor Energy Inc. Common Stock (SU)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.185	Suzuki Motor Corp ADR (SZKMY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.186	Synopsys, Inc. (SNPS)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.187	Taiwan Semiconductor Manufacturing Company Ltd. (TSM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.188	Target Corp. (TGT)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.189	Techtronic Inds LTD (TTNDY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.190	Tempur Sealy International, Inc. (TPX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.191	Tencent Holdings LTD ADR (TCEHY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.192	Thales (THLLY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.193	The Trade Desk, Inc. (TTD)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.194	Thermo Fisher Scientific, Inc. (TMO)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.195	The TJX Cos., Inc. (TJX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.196	Tokyo Electron LTD ADR (TOELY)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.197	UniFirst Corp. (UNF)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.198	Unilever PLC Common Stock (UL)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.199	Union Pacific Corp. (UNP)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.200	UnitedHealth Group, Inc. (UNH)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.201	Universal Music Group NV (UNVGY)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.202	Vertex Pharmaceuticals, Inc. (VRTX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.203	Visa, Inc. (V)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.204	Vulcan Materials Co. (VMC)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.205	Waste Management, Inc. (WM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.206	Waters Corp. (WAT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.207	Zoetis, Inc. (ZTS)	N/A	None (or less than \$1,001)		None (or less than \$201)
5.208	iShares Core S&P Small-Cap ETF (IJR)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.209	iShares MSCI EAFE Small-Cap ETF (SCZ)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.210	Vanguard Growth Index Fund ETF Class Shares (VUG)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.211	Capital World Bond Fund Class F3 Shares (WFBFX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.212	Bridge Builder Core Bond Fund (BBTBX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.213	Bridge Builder Core Plus Bond Fund (BBCPX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
5.214	Eaton Vance Income Fund of Boston Class R6 Shares (EIBRX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
5.215	AbbVie, Inc. (ABBV)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.216	Copart, Inc. (CPRT)	N/A	\$1,001 - \$15,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Homeland Strategic Consulting LLC	Fredericksberg, Virginia	I no longer participate in this defined contribution plan.	7/2018
2	Homeland Security Consulting LLC	Fredericksburg, Virginia	The LLC will remain dormant during appointment.	7/2018

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Homeland Strategic Consulting, LLC	Fredericksburg, Virginia	Services as President

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
2	Universal One	Research Triangle Park, North Carolina	Consulting Services
3	Guidepost Solutions	Washington, District of Columbia	Consulting Services
4	Fox News Corps	New York City, New York	News contributor
5	GEO Care	Boca Raton, Florida	Consulting Services
6	Mammoth Energy Services	Oklahoma City, Oklahoma	Consulting Services
7	USA Upstar	Greenwood, Indiana	Consulting Services
8	Heritage Foundation	Washington, District of Columbia	Senior Fellow
9	Immigration Reform Law Institute	Washington, District of Columbia	Visiting Fellow
10	DCI Group	Washington, District of Columbia	Consulting Services
11	SE&M Solutions	Harrisburg, Pennsylvania	Consulting Services
12	Miami FED	Miami, Florida	Consulting Services
13	America First Policy Institute	Washington, District of Columbia	Consulting Services
14	JL Wilkinson Consulting	West Point, Georgia	Public Speaking Services

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	IRA	No			
1.1	iShares Core S&P 500 ETF (IVV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	iShares Russell 2000 ETF (IWM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.3	Vanguard Index TR Vanguard Growth ETF (VUG)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	Vanguard Mid-Cap Index Fund ETF Shares (VO)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	Artisan International Small-Mid Fund Institutional Shares (APHJX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.6	Bridge Builder Core Bond Fund (BBTBX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.7	Bridge Builder Core Plus Bond Fund (BBCPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.8	Bridge Builder International Equity Fund (BBIEF)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.9	Bridge Builder Large Cap Growth Fund (BBGLX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.10	Bridge Builder Large Cap Value Fund (BBVLX)	Yes	\$50,001 - \$100,000		None (or less than \$201)
1.11	Bridge Builder Small/Mid Cap Value Fund (BBVSX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.12	Bridge Builder Small/Mid Cap Growth Fund (BBGSX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.13	JPMorgan US Government Money Market Fund Capital Shares (OGVXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.14	MFS Institutional International Equity Fund (MIEIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.15	PIMCO High Yield Fund Institutional Class Shares (PHIYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.16	PIMCO International Bond Fund (U.S. Dollar-Hedged) Institutional (PFORX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	██████ (cash)	N/A	\$100,001 - \$250,000		None (or less than \$201)
2	NY State Agency Tax Free Bond	N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
3	Brokerage Account	No			
3.1	First Trust Capital Strength ETF (FTCS)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
3.2	First Trust Dorsey Wright Focus 5 ETF (FV)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
3.3	iShares S&P 500 Value ETF (IVE)	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
3.4	New York St Mtg Agy Homeowner Mtg Rev	N/A	\$50,001 - \$100,000		None (or less than \$201)
4	Lincoln National Life Insurance Company, fixed annuity	N/A	\$500,001 - \$1,000,000		None (or less than \$201)

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

None

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

PART	#	ENDNOTE
2.	1.1	The amount paid was from multiple speaking/consulting engagements over the course of the reporting period.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (note: certain PAS nominees and appointees are required to report all mortgages); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$192 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.