Annual Report 2019 for Calendar Year 2018 | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (Updated Jan. 2019)

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

Filer's Information

Oberman, Martin J

Board Member, Surface Transportation Board

Report Year: 2019

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/ Oberman, Martin J [electronically signed on 05/15/2019 by Oberman, Martin J 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/ Oehrle, Christopher, Certifying Official [electronically signed on 07/18/2019 by Oehrle, Christopher in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Granahan, Megan, Certifying Official [electronically signed on 08/06/2019 by Granahan, Megan in Integrity.gov]

Data Revised 07/18/2019

Data Revised 07/17/2019

Data Revised 06/20/2019

Data Revised 06/18/2019

Data Revised 06/04/2019

Data Revised 06/03/2019

### 1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	то
1	Chicago Metropolitan Agency for Planning	Chicago, Illinois	government agency	board member	9/2017	11/2018
2	Law practice of "Martin J. Oberman"	Chicago, Illinois	Solo Legal Practice	attorney	6/1989	12/2018
3	Estate TrustMartin J. Oberman	Chicago, Illinois	revocable trust	trustee	1/1998	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Law Practice of "Martin J. Oberman" (solo See End legal practice)	note N/A		Legal fees	\$385,000
2	Profit sharing plan for Law Practice of "Martin J. Oberman"	No			
2.1	ABBOTT LABS COM	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.2	ALPHABET INC	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.3	AT&T INC COM	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.4	BLACKROCK CORPORATE HIGH YIELD FUND	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
2.5	BLACKROCK CREDIT ALLOCATION INCOME TR FUND	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.6	BLACKSTONE GROUP L.P. (BX)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.7	CISCO SYSTEMS INC	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.8	HARTFORD FINL SVCS GROUP INC	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.9	ILLINOIS TOOL WORKS INC	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.10	ISHARES TR IBOXX USD INVT GRADE CORP BD ETF	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.11	JOHNSON & JOHNSON	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.12	JP MORGAN CHASE & CO	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2.13	U.S. Brokerage Account (Cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
2.14	MCKESSON CORP NEW NT 2.700% 12/15/22	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
2.15	MICROSOFT CORP	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.16	NUVEEN FLOATING RATE INCOME FUND	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.17	POTASH CORP SASK INC NT 4.875% 03/30/20	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
2.18	PROCTER & GAMBLE CO	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.19	PSEG PWR LLC GTD FXD RT SR NT 3.000% 06/15/21	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.20	QUALCOMM INC FXD RT NT 2.600% 01/30/23	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
2.21	ROYAL DUTCH SHELL PLC	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
2.22	STARBUCKS CORP	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2.23	TRAVELERS COS INC	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2.24	NXP Semiconductors N.V Common Stock	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.25	CVS Health Corp	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
2.26	Kimberly-Clark	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
2.27	O'Reilly Automotive Inc.	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.28	Raytheon Co	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2.29	Ross Stores, Inc Common Stock	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
2.30	Enterprise Product EPD	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
2.31	Investco Exchange-Traded Fd TR II SR LN ETF (BKLN) (previously Powershares)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.32	Abbvie Inc. Fixed RT SR Note 2.500% 2020	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500
2.33	EBAY Inc. Fixed RT Note 3.450% 2024	N/A	\$15,001 - \$50,000	Interest	\$1,001 - \$2,500

## 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Law Practice of "Martin J. Oberman"	Chicago, Illinois	My solo legal practice will be inactive during my appointment, and all outstanding client fees will be fixed before I enter government service.	12/2018

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

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

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Facing History and Ourselves (Non-profit organization) 403(b) plan	No			
1.1	Vanguard Target Retirement Income (Sole asset in plan)	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
2	ReliaStar Life Insurance (Cash Annuity)	N/A	\$50,001 - \$100,000	Interest	\$2,501 - \$5,000
6. Ot	her Assets and Income				
#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Bank Account (cash)	N/A	\$1,001 - \$15,00	0	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	U.S. Brokerage Investment Account				
2.1	DFA International Core Equity Fund (DFIEX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
2.2	DFA Emerging Markets Core Equity Port (DFCEX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.3	DFA International Small Company Port (DFISX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	DFA US Small Cap Port (DFSTX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.5	IShares Core S&P 500 ETF (IVV)	Yes	\$100,001 - \$250,000		\$201 - \$1,000
2.6	IShares Core S&P Mid Cap 400 ETF (IJH)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.7	FIMM Tax Exempt Portfolio Class I (FTCXX)	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
3	Reach Provider, Inc. (Reach Provider, Inc. is See Endnote a Delaware C Corp that uses mobile communications to enhance supply chain management. It is an early-stage startup still in the concept phase and has no revenue.)	N/A	None (or less than \$1,001)		None (or less than \$201)

## 7. Transactions

#	DESCRIPTION	ТҮРЕ	DATE	AMOUNT
1	Apple Inc Common Stock	Sale	12/20/2018	\$1,001 - \$15,000
2	Abbott Laboratories	Sale	12/20/2018	\$1,001 - \$15,000
3	Ameren Corp	Sale	12/21/2018	\$1,001 - \$15,000
4	AEP	Sale	12/21/2018	\$1,001 - \$15,000

#	DESCRIPTION	ТҮРЕ	DATE	AMOUNT
5	AFG	Sale	12/21/2018	\$1,001 - \$15,000
6	Anthem Inc ANTM	Sale	12/21/2018	\$1,001 - \$15,000
7	Aon plc	Sale	12/21/2018	\$1,001 - \$15,000
8	Avery Dennison Corp	Sale	12/21/2018	\$1,001 - \$15,000
9	Boeing Co	Sale	12/21/2018	\$1,001 - \$15,000
10	Booze Allen Hamilton BAH	Sale	12/21/2018	\$1,001 - \$15,000
11	Bemis Co Inc	Sale	12/21/2018	\$1,001 - \$15,000
12	Bristol-Myers Squibb	Sale	12/21/2018	\$1,001 - \$15,000
13	Brown & Brown BRO	Sale	12/21/2018	\$1,001 - \$15,000
14	British American Tobacco BTI	Sale	12/21/2018	\$1,001 - \$15,000
15	Blackstone Group BX	Sale	12/21/2018	\$1,001 - \$15,000
16	Cadence Design Systems, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
17	CDW Corporation - Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
18	Comcast Corporation - Class A Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
19	CME Group Inc	Sale	12/21/2018	\$1,001 - \$15,000
20	Compass Group CMPGY	Sale	12/21/2018	\$1,001 - \$15,000
21	Copart, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
22	Cisco Systems, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
23	CVS Caremark Corp.	Sale	12/21/2018	\$1,001 - \$15,000
24	Chevron Corp	Sale	12/21/2018	\$1,001 - \$15,000
25	DFA Emerging Markets Core Equity DFCEX	Purchase	12/20/2018	\$15,001 - \$50,000

#	DESCRIPTION	ТҮРЕ	DATE	AMOUNT
26	DFA International Core Equity DFIEX	Purchase	12/20/2018	\$100,001 - \$250,000
27	DFA International Small Company DFISX	Purchase	12/20/2018	\$15,001 - \$50,000
28	DFA US Small Cap Portfolio Instl. Class DFSTX	Purchase	12/20/2018	\$15,001 - \$50,000
29	Amdocs LTD DOX	Sale	12/21/2018	\$1,001 - \$15,000
30	Enterprise Product Partners LTD EPD	Sale	12/21/2018	\$1,001 - \$15,000
31	Facebook, Inc Class A Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
32	Fidelity National Information	Sale	12/21/2018	\$1,001 - \$15,000
33	Fiserv, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
34	Fidelity National Financial FNF	Sale	12/21/2018	\$1,001 - \$15,000
35	Genpact Limited Common G	Sale	12/21/2018	\$1,001 - \$15,000
36	Gilead Sciences, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
37	HD Supply Holdings, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
38	Helen of Troy Limited - Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
39	Hilton Grand Vacations Inc. HGV	Sale	12/21/2018	\$1,001 - \$15,000
40	Harris Corp	Sale	12/21/2018	\$1,001 - \$15,000
41	IntercontinentalExchange	Sale	12/21/2018	\$1,001 - \$15,000
42	ICON plc - Ordinary Shares	Sale	12/21/2018	\$1,001 - \$15,000
43	iShares S&P MidCap 400 Index	Purchase	12/21/2018	\$15,001 - \$50,000
44	Intuitive Surgical, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
45	Illinois Tool Works Inc	Sale	12/21/2018	\$1,001 - \$15,000

#	DESCRIPTION	ТҮРЕ	DATE	AMOUNT
46	iShares S&P 500 Index	Purchase	12/21/2018	\$100,001 - \$250,000
47	Johnson & Johnson	Sale	12/21/2018	\$1,001 - \$15,000
48	JP Morgan Chase & Co	Sale	12/21/2018	\$1,001 - \$15,000
49	Kimberly-Clark	Sale	12/21/2018	\$1,001 - \$15,000
50	Lamar Advertising Company - Class A Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
51	L-3 Communications Holdings	Sale	12/21/2018	\$1,001 - \$15,000
52	Lilly Eli & Co	Sale	12/21/2018	\$1,001 - \$15,000
53	Mastercard Inc A	Sale	12/21/2018	\$1,001 - \$15,000
54	McDonald's Corp	Sale	12/21/2018	\$1,001 - \$15,000
55	The Michaels Companies, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
56	Marsh & McLennan Companies	Sale	12/21/2018	\$1,001 - \$15,000
57	Merck & Co Inc	Sale	12/21/2018	\$1,001 - \$15,000
58	Microsoft Corporation - Common Stock	Sale	12/21/2018	\$15,001 - \$50,000
59	Motorola Solutions Inc	Sale	12/21/2018	\$1,001 - \$15,000
60	NICE-Systems Limited - American Depositary Shares each representing one Ordinary Share	Sale	12/21/2018	\$1,001 - \$15,000
61	NXP Semiconductors N.V Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
62	Omnicom Group	Sale	12/21/2018	\$1,001 - \$15,000
63	Oracle Corp	Sale	12/21/2018	\$1,001 - \$15,000
64	O'Reilly Automotive, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000

65         PepsiCo Inc         Sale         12/21/2018         \$1,001 - \$15,000           66         Pfizer Inc         Sale         12/21/2018         \$1,001 - \$15,000           67         Procter & Gamble         Sale         12/21/2018         \$1,001 - \$15,000           68         Progressive Corp         Sale         12/21/2018         \$1,001 - \$15,000           69         Philip Morris International         Sale         12/21/2018         \$1,001 - \$15,000           70         PNC Finl Services Group         Sale         12/21/2018         \$1,001 - \$15,000           71         Royal Dutch Shell PLC ADR RDSB         Sale         12/21/2018         \$1,001 - \$15,000           72         Ross Stores, Inc Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           73         Republic Services Inc         Sale         12/21/2018         \$1,001 - \$15,000           74         Raytheon Co         Sale         12/21/2018         \$1,001 - \$15,000           75         Starbucks Corporation - Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           75         Sherwin-Williams Co         Sale         12/21/2018         \$1,001 - \$15,000           76         Sealed Air Corp         Sale         12/2	#	DESCRIPTION	ТҮРЕ	DATE	AMOUNT
67         Procter & Gamble         Sale         12/21/2018         \$1,001 - \$15,000           68         Progressive Corp         Sale         12/21/2018         \$1,001 - \$15,000           69         Philip Morris International         Sale         12/21/2018         \$1,001 - \$15,000           70         PNC Finl Services Group         Sale         12/21/2018         \$1,001 - \$15,000           71         Royal Dutch Shell PLC ADR RDSB         Sale         12/21/2018         \$1,001 - \$15,000           72         Ross Stores, Inc Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           73         Republic Services Inc         Sale         12/21/2018         \$1,001 - \$15,000           74         Raytheon Co         Sale         12/21/2018         \$1,001 - \$15,000           75         Starbucks Corporation - Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           76         Sealed Air Corp         Sale         12/21/2018         \$1,001 - \$15,000           78         Sun Communities SUI         Sale         12/21/2018         \$1,001 - \$15,000           78         Sun Communities SUI         Sale         12/21/2018         \$1,001 - \$15,000           79         AT&T Inc         Sale <t< td=""><td>65</td><td>PepsiCo Inc</td><td>Sale</td><td>12/21/2018</td><td>\$1,001 - \$15,000</td></t<>	65	PepsiCo Inc	Sale	12/21/2018	\$1,001 - \$15,000
68         Progressive Corp         Sale         12/21/2018         \$1,001 - \$15,000           69         Philip Morris International         Sale         12/21/2018         \$11,001 - \$15,000           70         PNC Finl Services Group         Sale         12/21/2018         \$11,001 - \$15,000           71         Royal Dutch Shell PLC ADR RDSB         Sale         12/21/2018         \$1,001 - \$15,000           72         Ross Stores, Inc Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           73         Republic Services Inc         Sale         12/21/2018         \$1,001 - \$15,000           74         Raytheon Co         Sale         12/21/2018         \$1,001 - \$15,000           74         Raytheon Co         Sale         12/21/2018         \$1,001 - \$15,000           75         Starbucks Corporation - Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           76         Sealed Air Corp         Sale         12/21/2018         \$1,001 - \$15,000           78         Sun Communities SUI         Sale         12/21/2018         \$1,001 - \$15,000           79         AT&T Inc         Sale         12/21/2018         \$1,001 - \$15,000           81         TJX Cos Inc         Sale         12/21/201	66	Pfizer Inc	Sale	12/21/2018	\$1,001 - \$15,000
69         Philip Morris International         Sale         12/21/2018         \$1,001 - \$15,000           70         PNC Finl Services Group         Sale         12/21/2018         \$1,001 - \$15,000           71         Royal Dutch Shell PLC ADR RDSB         Sale         12/21/2018         \$1,001 - \$15,000           72         Ross Stores, Inc Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           73         Republic Services Inc         Sale         12/21/2018         \$1,001 - \$15,000           74         Raytheon Co         Sale         12/21/2018         \$1,001 - \$15,000           75         Starbucks Corporation - Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           76         Sealed Air Corp         Sale         12/21/2018         \$1,001 - \$15,000           77         Sherwin-Williams Co         Sale         12/21/2018         \$1,001 - \$15,000           78         Sun Communities SUI         Sale         12/21/2018         \$1,001 - \$15,000           79         AT&T Inc         Sale         12/21/2018         \$1,001 - \$15,000           81         TJX Cos Inc         Sale         12/21/2018         \$1,001 - \$15,000           82         Travelers Cos Inc         Sale         12	67	Procter & Gamble	Sale	12/21/2018	\$1,001 - \$15,000
70         PNC Finl Services Group         Sale         12/21/2018         \$1,001 - \$15,000           71         Royal Dutch Shell PLC ADR RDSB         Sale         12/21/2018         \$1,001 - \$15,000           72         Ross Stores, Inc Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           73         Republic Services Inc         Sale         12/21/2018         \$1,001 - \$15,000           74         Raytheon Co         Sale         12/21/2018         \$1,001 - \$15,000           75         Starbucks Corporation - Common Stock         Sale         12/21/2018         \$1,001 - \$15,000           76         Sealed Air Corp         Sale         12/21/2018         \$1,001 - \$15,000           77         Sherwin-Williams Co         Sale         12/21/2018         \$1,001 - \$15,000           78         Sun Communities SUI         Sale         12/21/2018         \$1,001 - \$15,000           79         AT&T Inc         Sale         12/21/2018         \$1,001 - \$15,000           80         TD Bank TD         Sale         12/21/2018         \$1,001 - \$15,000           81         TJX Cos Inc         Sale         12/21/2018         \$1,001 - \$15,000           82         Travelers Cos Inc         Sale         12/21/2018	68	Progressive Corp	Sale	12/21/2018	\$1,001 - \$15,000
71Royal Dutch Shell PLC ADR RDSBSale12/21/2018\$1,001 - \$15,00072Ross Stores, Inc Common StockSale12/21/2018\$1,001 - \$15,00073Republic Services IncSale12/21/2018\$1,001 - \$15,00074Raytheon CoSale12/21/2018\$1,001 - \$15,00075Starbucks Corporation - Common StockSale12/21/2018\$1,001 - \$15,00076Sealed Air CorpSale12/21/2018\$1,001 - \$15,00077Sherwin-Williams CoSale12/21/2018\$1,001 - \$15,00078Sun Communities SUISale12/21/2018\$1,001 - \$15,00079AT&T IncSale12/21/2018\$1,001 - \$15,00080TD Bank TDSale12/21/2018\$1,001 - \$15,00081TJX Cos IncSale12/21/2018\$1,001 - \$15,00082Travelers Cos IncSale12/21/2018\$1,001 - \$15,00083Tyson Foods Inc ASale12/21/2018\$1,001 - \$15,00084Total System Services IncSale12/21/2018\$1,001 - \$15,00085Unitedhealth Group IncSale12/21/2018\$1,001 - \$15,000	69	Philip Morris International	Sale	12/21/2018	\$1,001 - \$15,000
72       Ross Stores, Inc Common Stock       Sale       12/21/2018       \$1,001 - \$15,000         73       Republic Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         74       Raytheon Co       Sale       12/21/2018       \$1,001 - \$15,000         75       Starbucks Corporation - Common Stock       Sale       12/21/2018       \$1,001 - \$15,000         76       Sealed Air Corp       Sale       12/21/2018       \$1,001 - \$15,000         77       Sherwin-Williams Co       Sale       12/21/2018       \$1,001 - \$15,000         78       Sun Communities SUI       Sale       12/21/2018       \$1,001 - \$15,000         79       AT&T Inc       Sale       12/21/2018       \$1,001 - \$15,000         80       TD Bank TD       Sale       12/21/2018       \$1,001 - \$15,000         81       TJX Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         82       Travelers Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale	70	PNC Finl Services Group	Sale	12/21/2018	\$1,001 - \$15,000
73Republic Services IncSale12/21/2018\$1,001 - \$15,00074Raytheon CoSale12/21/2018\$1,001 - \$15,00075Starbucks Corporation - Common StockSale12/21/2018\$1,001 - \$15,00076Sealed Air CorpSale12/21/2018\$1,001 - \$15,00077Sherwin-Williams CoSale12/21/2018\$1,001 - \$15,00078Sun Communities SUISale12/21/2018\$1,001 - \$15,00079AT&T IncSale12/21/2018\$1,001 - \$15,00080TD Bank TDSale12/21/2018\$1,001 - \$15,00081TJX Cos IncSale12/21/2018\$1,001 - \$15,00082Travelers Cos IncSale12/21/2018\$1,001 - \$15,00083Tyson Foods Inc ASale12/21/2018\$1,001 - \$15,00084Total System Services IncSale12/21/2018\$1,001 - \$15,00085Unitedhealth Group IncSale12/21/2018\$1,001 - \$15,000	71	Royal Dutch Shell PLC ADR RDSB	Sale	12/21/2018	\$1,001 - \$15,000
74       Raytheon Co       Sale       12/21/2018       \$1,001 - \$15,000         75       Starbucks Corporation - Common Stock       Sale       12/21/2018       \$1,001 - \$15,000         76       Sealed Air Corp       Sale       12/21/2018       \$1,001 - \$15,000         77       Sherwin-Williams Co       Sale       12/21/2018       \$1,001 - \$15,000         78       Sun Communities SUI       Sale       12/21/2018       \$1,001 - \$15,000         79       AT&T Inc       Sale       12/21/2018       \$1,001 - \$15,000         80       TD Bank TD       Sale       12/21/2018       \$1,001 - \$15,000         81       TJX Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         82       Travelers Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale       12/21/2018       \$1,001 - \$15,000	72	Ross Stores, Inc Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
75       Starbucks Corporation - Common Stock       Sale       12/21/2018       \$1,001 - \$15,000         76       Sealed Air Corp       Sale       12/21/2018       \$1,001 - \$15,000         77       Sherwin-Williams Co       Sale       12/21/2018       \$1,001 - \$15,000         78       Sun Communities SUI       Sale       12/21/2018       \$1,001 - \$15,000         79       AT&T Inc       Sale       12/21/2018       \$1,001 - \$15,000         80       TD Bank TD       Sale       12/21/2018       \$1,001 - \$15,000         81       TJX Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         82       Travelers Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale       12/21/2018       \$1,001 - \$15,000	73	Republic Services Inc	Sale	12/21/2018	\$1,001 - \$15,000
76Sealed Air CorpSale12/21/2018\$1,001 - \$15,00077Sherwin-Williams CoSale12/21/2018\$1,001 - \$15,00078Sun Communities SUISale12/21/2018\$1,001 - \$15,00079AT&T IncSale12/21/2018\$1,001 - \$15,00080TD Bank TDSale12/21/2018\$1,001 - \$15,00081TJX Cos IncSale12/21/2018\$1,001 - \$15,00082Travelers Cos IncSale12/21/2018\$1,001 - \$15,00083Tyson Foods Inc ASale12/21/2018\$1,001 - \$15,00084Total System Services IncSale12/21/2018\$1,001 - \$15,00085Unitedhealth Group IncSale12/21/2018\$1,001 - \$15,000	74	Raytheon Co	Sale	12/21/2018	\$1,001 - \$15,000
77Sherwin-Williams CoSale12/21/2018\$1,001 - \$15,00078Sun Communities SUISale12/21/2018\$1,001 - \$15,00079AT&T IncSale12/21/2018\$1,001 - \$15,00080TD Bank TDSale12/21/2018\$1,001 - \$15,00081TJX Cos IncSale12/21/2018\$1,001 - \$15,00082Travelers Cos IncSale12/21/2018\$1,001 - \$15,00083Tyson Foods Inc ASale12/21/2018\$1,001 - \$15,00084Total System Services IncSale12/21/2018\$1,001 - \$15,00085Unitedhealth Group IncSale12/21/2018\$1,001 - \$15,000	75	Starbucks Corporation - Common Stock	Sale	12/21/2018	\$1,001 - \$15,000
78       Sun Communities SUI       Sale       12/21/2018       \$1,001 - \$15,000         79       AT&T Inc       Sale       12/21/2018       \$1,001 - \$15,000         80       TD Bank TD       Sale       12/21/2018       \$1,001 - \$15,000         81       TJX Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         82       Travelers Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale       12/21/2018       \$1,001 - \$15,000	76	Sealed Air Corp	Sale	12/21/2018	\$1,001 - \$15,000
79AT&T IncSale12/21/2018\$1,001 - \$15,00080TD Bank TDSale12/21/2018\$1,001 - \$15,00081TJX Cos IncSale12/21/2018\$1,001 - \$15,00082Travelers Cos IncSale12/21/2018\$1,001 - \$15,00083Tyson Foods Inc ASale12/21/2018\$1,001 - \$15,00084Total System Services IncSale12/21/2018\$1,001 - \$15,00085Unitedhealth Group IncSale12/21/2018\$1,001 - \$15,000	77	Sherwin-Williams Co	Sale	12/21/2018	\$1,001 - \$15,000
80       TD Bank TD       Sale       12/21/2018       \$1,001 - \$15,000         81       TJX Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         82       Travelers Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale       12/21/2018       \$1,001 - \$15,000	78	Sun Communities SUI	Sale	12/21/2018	\$1,001 - \$15,000
81TJX Cos IncSale12/21/2018\$1,001 - \$15,00082Travelers Cos IncSale12/21/2018\$1,001 - \$15,00083Tyson Foods Inc ASale12/21/2018\$1,001 - \$15,00084Total System Services IncSale12/21/2018\$1,001 - \$15,00085Unitedhealth Group IncSale12/21/2018\$1,001 - \$15,000	79	AT&T Inc	Sale	12/21/2018	\$1,001 - \$15,000
82       Travelers Cos Inc       Sale       12/21/2018       \$1,001 - \$15,000         83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale       12/21/2018       \$1,001 - \$15,000	80	TD Bank TD	Sale	12/21/2018	\$1,001 - \$15,000
83       Tyson Foods Inc A       Sale       12/21/2018       \$1,001 - \$15,000         84       Total System Services Inc       Sale       12/21/2018       \$1,001 - \$15,000         85       Unitedhealth Group Inc       Sale       12/21/2018       \$1,001 - \$15,000	81	TJX Cos Inc	Sale	12/21/2018	\$1,001 - \$15,000
84         Total System Services Inc         Sale         12/21/2018         \$1,001 - \$15,000           85         Unitedhealth Group Inc         Sale         12/21/2018         \$1,001 - \$15,000	82	Travelers Cos Inc	Sale	12/21/2018	\$1,001 - \$15,000
85         Unitedhealth Group Inc         Sale         12/21/2018         \$1,001 - \$15,000	83	Tyson Foods Inc A	Sale	12/21/2018	\$1,001 - \$15,000
	84	Total System Services Inc	Sale	12/21/2018	\$1,001 - \$15,000
86         Visa Inc         Sale         12/21/2018         \$1,001 - \$15,000	85	Unitedhealth Group Inc	Sale	12/21/2018	\$1,001 - \$15,000
	86	Visa Inc	Sale	12/21/2018	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	<b>AMOUNT</b> \$1,001 - \$15,000	
87	Wal-Mart Stores	Sale	12/21/2018		
88	FIMM Tax Exempt Portfolio: Class I FTCXX	Purchase	12/14/2018	\$500,001 - \$1,000,000	
89	O'Rielly Automotive	Purchase	02/06/2018	\$15,001 - \$50,000	
90	Raytheon Co	Purchase	09/18/2018	\$15,001 - \$50,000	
91	NXP Semiconductors N.V Common Stock	Purchase	09/18/2018	\$15,001 - \$50,000	
92	CVS Caremark Corp.	Purchase	09/18/2018	\$15,001 - \$50,000	
93	Enterprise Products EPD	Purchase	09/18/2018 \$15,001 - \$50,000		
94	Kimberly-Clark	Purchase	09/18/2018	\$15,001 - \$50,000	
95	Ross Stores, Inc Common Stock	Purchase	09/18/2018 \$15,001 - \$50,000		
96	ALLIANCEBERNSTEIN ALL MARKET R CLASS 1(1)	Sale	11/27/2018	\$50,001 - \$100,000	
97	ALLIANCEBERNSTEIN INTL STRATEGIC CORE - ADV(1)	Sale	11/30/2018 \$50,001 - \$100,000		
98	ALLIANCEBERNSTEIN EMG MARKETS M/A- AD MULTI-ASSET PORT- ADVISOR(1)	Sale	12/03/2018 \$15,001 - \$50,000		
99	Investco Exchange-Traded Fd TR II SR LN ETF (BKLN)	Purchase	09/09/2016 \$15,001 - \$50,000		
100	Delta Air Lines (DAL)	Sale	09/28/2018	\$15,001 - \$50,000	
101	Norfolk Southern Corp (NSC)	Sale	09/28/2018	\$15,001 - \$50,000	

#	DESCRIPTION	ТҮРЕ	DATE	AMOUNT	
102	Ryder System Medium Term Notes 2.65%	Sale	09/28/2018	\$15,001 - \$50,000	
103	Southwest Airlines Co (LUV)	Sale	09/28/2018	3/2018 \$15,001 - \$50,000	
104	Union Pacific Corp (UNP)	Sale	09/28/2018	9/28/2018 \$50,001 - \$100,000	
105	Dow Chem Sr. Notes 8/55%	Sale	12/31/2018	\$15,001 - \$50,000	
106	AutoZone Inc (AZO)	Sale	12/19/2018	\$1,001 - \$15,000	
107	Schlumberger Ltd (SLB)	Sale	12/19/2018	\$1,001 - \$15,000	
108	Walgreens Boots Alliance Inc.	Sale	12/19/2018	\$1,001 - \$15,000	
109	Validus Holdings LTD	Sale	12/19/2018	\$1,001 - \$15,000	
110	Wells Fargo & Co (WFC)	Sale	12/19/2018	\$1,001 - \$15,000	
111	Scripps Networks Interactive (SNI)	Sale	12/19/2018	\$1,001 - \$15,000	
112	Investco Exchange-Traded Fd TR II SR LN ETF (BKLN)	Purchase	09/09/2016	\$15,001 - \$50,000	
113	Abbvie Inc. Fixed RT SR Note 2.500% 2020	Purchase	10/17/2018	\$15,001 - \$50,000	

## 8. Liabilities

#	CREDITOR NAME	ТҮРЕ	AMOUNT	YEAR INCURRED	RATE	TERM
1	Citibank	Credit Card	\$10,001 - \$15,000	2016	variable	Revolving

### 9. Gifts and Travel Reimbursements

None

### Endnotes

PART	#	ENDNOTE
2.	1	In compliance with my ethics agreement, my law practice was dissolved, and income was earned, prior to entering federal service.
6.	3	Given the nature and stage of the company's business, I believe there is no market for our very small minority share of the company and my best estimate is that the value is well under \$1,000 at present

### 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 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 (limitations apply for PAS filers); (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 \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 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 \$156 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.

#### **Privacy Act Statement**

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U.S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person. subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

#### **Public Burden Information**

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).