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January 5, 2017

U.S. Securities and Exchange Commission
100 F Street NE
Washington D.C. 20549

Office of Congressional Ethics
U.S. House of Representatives
425 3rd Street SW
Washington D.C. 20024

RE: Request for investigation of Reps. Tom Price (R-Ga.) and Chris Collins (R-NY)

Dear Commissioners:

On behalf of Public Citizen, we request an investigation into the stock market trading activities of Reps. Tom Price (R-Ga.) and Chris Collins (R-NY) for possible violations of insider trading and conflicts of interest laws and regulations. A letter of inquiry is below.

Sincerely,

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January 4, 2017

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U.S. House of Representatives
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Dear Commissioners:

Since passage of the STOCK Act in 2012 – which (i) explicitly applied the laws against insider trading to members of Congress and (ii) mandated real-time disclosure of stock trading activity by members of Congress (as well as the President and cabinet officials) – most members of Congress have become more cautious about trading activity that may pose questions of conflicts of interest. There is a greater reluctance by members of Congress to trade in the stock market generally, and in stocks that are directly related to the members' official duties specifically.

The STOCK Act, however, has not deterred trading activity that raise the appearance of conflicts of interest by Reps. Tom Price (R-Ga.) and Chris Collins (R- NY). Both members of Congress sit on congressional committees with direct oversight of the pharmaceutical and health industries, are key sponsors of legislation affecting the health care industry, and are very actively trading on pharmaceutical and health care stocks that have reaped substantial profits on the stock market.

Rep. Price chairs the House Budget Committee, which plays a critical role in shaping health care legislation. He sits on the House Ways and Means Subcommittee on Health, which oversees Medicare. Rep. Collins serves on the House Energy and Commerce Committee, including its Subcommittee on Health, and on President-elect Trump's transition team. These are assignments privy to public as well as non-public information on trends and opportunities affecting health care as well as information on potential legislation and regulations impacting the industry.

Since 2012, Rep. Price has bought and sold stocks in about 40 pharmaceutical and health care companies, including at least a dozen in the most recent congressional session, selling shares in Gilead Sciences Inc. and buying shares in Aetna, Pfizer Inc. and Eli Lilly & Co and others (*see* Attachment). Rep. Collins is also very active in the pharmaceutical and health care stock market,

comprising the largest shareholder of Australia's Innate Immunotherapeutics Limited, with a 17 percent stake and sits on the company's board of directors.¹

On March 17, 2016, Rep. Price bought shares of Aetna, Pfizer and Eli Lilly, all of which promptly increased in value. The sale of Gilead shares was also well timed, which dropped \$15 in value per share shortly after Price's reported sale.

On August 29, 2016, Rep. Collins, who sits on the board of Innate Immuno, purchased 4 million shares of the company. Two days later, Rep. Price purchased between \$50,000 and \$100,000 in stocks of the same company. Innate Immuno is currently experimenting with a new drug to treat multiple sclerosis, a drug the company's chief executive believes could make or break the company's future. The stock value of Innate Immuno doubled in the short period since Price and Collins invested in the company.

At the same time, Reps. Price and Collins have sponsored several legislative measures, including the the 21st Century Cures Act, which was enacted into law in December, and which the *Wall Street Journal* reports could benefit Innate Immuno because it "authorizes spending \$6.3 billion for medical research, including \$500 million for the FDA to speed up drug approvals."²

These patterns of extensive trading activity in businesses and industries that Reps. Price and Collins oversee in their official capacity, and the beneficial timing of these trades, raise legitimate questions concerning both potential insider trading and conflicts of interest. Some of these questions include:

- Did Price and Collins have access to nonpublic material information accounting for a doubling in value of their investments in Innate Immuno? Collins sits on the board of the company, a company which is placing its bets on an experimental drug currently in clinical trials, and both members of Congress made substantial purchases in the company's stock at almost the same time.
- Does pharmaceutical and health care legislation sponsored by Price and Collins run afoul of conflicts of interest concerns in that the legislation could directly and substantially benefit the lawmakers' own investments beyond the benefit to the public generally? These legislative vehicles could well produce windfall profits for Price and Collins.

While the information available so far on the stock trading activities of Reps. Price and Collins falls short of evidence that any illegal insider trading or violations of congressional ethics rules have occurred, the patterns, opportunities and remarkable financial benefits gained, and to be gained, warrant investigation.

¹ James Grimaldi and Michelle Hackman, "Donald Trump's pick for Health Secretary traded medical stocks while in House," *Wall Street Journal* (Dec. 22, 2016) available at: <http://www.wsj.com/articles/donald-trumps-pick-for-health-secretary-traded-medical-stocks-while-in-house-1482451061>; see also <http://www.innateimmuno.com/irm/content/board-of-directors.aspx?RID=251>.

² Grimaldi and Hackman, op.cit., available at: <http://www.wsj.com/articles/donald-trumps-pick-for-health-secretary-traded-medical-stocks-while-in-house-1482451061>

Date	Stock	Purchase or Sell	Threshold	Amount
10/13/2008	Verizon Communications	P		\$8,695.41
7/28/2009	Anadarko Pete	P		\$473.00
7/28/2009	Apple Inc	P		\$1,914.60
7/28/2009	AT&T Inc	P		\$485.26
7/28/2009	Bristol Myers Squibb Co	P		\$1,481.90
7/28/2009	Caterpillar Inc.	P		\$1,498.35
7/28/2009	Cliffs Natural Resources	P		\$2,491.00
7/28/2009	CSX Corp	P		\$1,990.00
7/28/2009	Hewlett Packard	P		\$1,962.25
7/28/2009	JP Morgan Chase & Co	P		\$1,482.39
7/28/2009	Kellogg Co	P		\$954.40
7/28/2009	Merk & Co Inc New Com	P		\$1,463.63
7/28/2009	Nucor Corporation	P		\$1,445.76
7/28/2009	Peabody Energy	P		\$1,990.07
7/28/2009	Potash CP of Saskatchewan Inc	P		\$2,990.40
7/28/2009	Southwestern Energy Company	P		\$1,480.68
7/28/2009	SPDR Gold TR Gold SHS	P		\$1,473.92
9/17/2009	Monsanto Co/New	S		\$2,406.64
9/17/2009	Starbucks Corp	S		\$1,743.31
9/18/2009	Crown Castle Intl	P		\$3,123.89
9/18/2009	Skyworks Solutions	P		\$3,117.51
9/18/2009	Weyerhaeuser Co	P		\$3,094.83
9/30/2009	AK Steel Holding Corp	P		\$299.10
9/30/2009	Anadarko Pete	P		\$187.92
9/30/2009	Apple Inc	P		\$920.90
9/30/2009	AT&T Inc	P		\$297.11
9/30/2009	Bristol Myers Squibb Co	P		\$878.28
9/30/2009	Caterpillar Inc.	P		\$667.55
9/30/2009	Cliffs Natural Resources	P		\$1,013.70
9/30/2009	Conocophillips	P		\$630.14
9/30/2009	CSX Corp	P		\$1,176.84
9/30/2009	CVS Caremark Corp	P		\$1,467.39
9/30/2009	Devon Energy Corp	P		\$673.20
9/30/2009	Freeport McMoran CP&Gold	P		\$694.00
9/30/2009	Goldman Sachs Grp Inc	P		\$735.44
9/30/2009	Hewlett Packard	P		\$1,080.31
9/30/2009	JP Morgan Chase & Co	P		\$707.18
9/30/2009	Kellogg Co	P		\$638.56
9/30/2009	Merk & Co Inc New Com	P		\$906.83
9/30/2009	Nucor Corporation	P		\$941.98
9/30/2009	Peabody Energy	P		\$1,083.44
9/30/2009	Potash CP of Saskatchewan Inc	P		\$1,554.99
9/30/2009	Research in Motion	P		\$1,504.80
9/30/2009	Sandisk Corp	P		\$903.42
9/30/2009	Shaw Group Incorporated	P		\$1,086.64

9/30/2009	SPDR Gold TR Gold SHS	P	\$883.98
9/30/2009	Target Corporation	P	\$838.26
9/30/2009	Wynn Resorts Ltd	P	\$354.10
10/30/2009	AK Steel Holding Corp	P	\$362.71
10/30/2009	Anadarko Pete	P	\$182.10
10/30/2009	Apple Inc	P	\$759.20
10/30/2009	AT&T Inc	P	\$232.20
10/30/2009	Bristol Myers Squibb Co	P	\$677.35
10/30/2009	Caterpillar Inc.	P	\$385.63
10/30/2009	Cliffs Natural Resources	P	\$640.80
10/30/2009	Conocophillips	P	\$199.56
10/30/2009	CSX Corp	P	\$762.66
10/30/2009	CVS Caremark Corp	P	\$1,002.96
10/30/2009	Devon Energy Corp	P	\$707.41
10/30/2009	Freeport McMoran CP&Gold	P	\$441.54
10/30/2009	Goldman Sachs Grp Inc	P	\$687.56
10/30/2009	Hewlett Packard	P	\$715.50
10/30/2009	JP Morgan Chase & Co	P	\$715.00
10/30/2009	Kellogg Co	P	\$309.18
10/30/2009	Merk & Co Inc New Com	P	\$620.40
10/30/2009	Nucor Corporation	P	\$992.25
10/30/2009	Peabody Energy	P	\$592.20
10/30/2009	Potash CP of Saskatchewan Inc	P	\$1,570.80
10/30/2009	Research in Motion	P	\$1,184.60
10/30/2009	Sandisk Corp	P	\$931.50
10/30/2009	Shaw Group Incorporated	P	\$1,438.08
10/30/2009	Skyworks Solutions	P	\$657.09
10/30/2009	Southwestern Energy Company	P	\$1,484.78
10/30/2009	SPDR Gold TR Gold SHS	P	\$408.36
10/30/2009	Target Corporation	P	\$488.70
10/30/2009	Weyerhaeuser Co	P	\$181.35
10/30/2009	Wynn Resorts Ltd	P	\$1,936.44
1/11/2010	AK Steel Holding Corp	S	\$374.84
1/11/2010	Anadarko Pete	P	\$132.90
1/11/2010	Apple Inc	P	\$418.53
1/11/2010	AT&T Inc	P	\$134.49
1/11/2010	Bristol Myers Squibb Co	P	\$100.06
1/11/2010	Caterpillar Inc.	P	\$64.02
1/11/2010	Cliffs Natural Resources	S	\$1,477.46
1/11/2010	Conocophillips	P	\$266.89
1/11/2010	Crown Castle Intl	P	\$818.39
1/11/2010	CSX Corp	S	\$103.27
1/11/2010	CVS Caremark Corp	S	\$4,818.17
1/11/2010	Devon Energy Corp	P	\$74.88
1/11/2010	Flextronics	P	\$3,612.12
1/11/2010	Goldman Sachs Grp Inc	P	\$683.19
1/11/2010	Hewlett Packard	S	\$3,175.62

1/11/2010	JP Morgan Chase & Co	P	\$400.03
1/11/2010	Kellogg Co	P	\$320.63
1/11/2010	Merk & Co Inc New Com	S	\$3,705.83
1/11/2010	Nucor Corporation	S	\$148.31
1/11/2010	On Semiconductor Cop	P	\$3,607.66
1/11/2010	Peabody Energy	S	\$195.20
1/11/2010	Potash CP of Saskatchewan Inc	S	\$6,861.36
1/11/2010	Qualcomm Inc.	P	\$3,583.56
1/11/2010	Research in Motion	S	\$4,394.58
1/11/2010	Sandisk Corp	S	\$1,159.08
1/11/2010	Shaw Group Incorporated	S	\$327.19
1/11/2010	Skyworks Solutions	S	\$763.02
1/11/2010	Southwestern Energy Company	P	\$99.68
1/11/2010	SPDR Gold TR Gold SHS	P	\$226.04
1/11/2010	Target Corporation	P	\$452.14
1/11/2010	Weatherford International Ltd	P	\$4,819.39
1/11/2010	Weyerhaeuser Co	S	\$88.29
1/11/2010	Wynn Resorts Ltd	S	\$341.06
1/14/2010	Hewlett Packard	P	\$1,105.99
1/14/2010	Potash CP of Saskatchewan Inc	P	\$3,597.67
5/4/2010	Advanced Micro Devices	P	\$3,740.88
5/4/2010	AK Steel Holding Corp	P	\$448.56
5/4/2010	Anadarko Pete	P	\$63.85
5/4/2010	Apple Inc	S	\$777.54
5/4/2010	AT&T Inc	S	\$1,137.42
5/4/2010	Bristol Myers Squibb Co	S	\$3,680.76
5/4/2010	Cliffs Natural Resources	P	\$1,059.03
5/4/2010	Conocophillips	S	\$115.85
5/4/2010	Cree Research Inc	P	\$3,675.03
5/4/2010	Crown Castle Intl	P	\$339.68
5/4/2010	CSX Corp	S	\$222.57
5/4/2010	Devon Energy Corp	S	\$3,181.14
5/4/2010	FedEx	P	\$3,651.64
5/4/2010	Flextronics Ltd	S	\$59.99
5/4/2010	Freeport McMoran CP&Gold	S	\$2,890.29
5/4/2010	Goldman Sachs Grp Inc	S	\$3,136.52
5/4/2010	Hewlett Packard	P	\$1,425.16
5/4/2010	Intel Corp	P	\$3,716.06
5/4/2010	JP Morgan Chase & Co	P	\$257.39
5/4/2010	Kellogg Co	S	\$2,451.77
5/4/2010	Nucor Corporation	P	\$360.38
5/4/2010	On Semiconductor Cop	P	\$527.29
5/4/2010	Peabody Energy	P	\$612.61
5/4/2010	Potash CP of Saskatchewan Inc	P	\$419.80
5/4/2010	Qualcomm Inc.	P	\$972.92
5/4/2010	Sandisk Corp	S	\$1,628.34
5/4/2010	Shaw Group Incorporated	S	\$401.51

5/4/2010	Skyworks Solutions	S	\$355.33
5/4/2010	SPDR Gold TR Gold SHS	S	\$1,035.36
5/4/2010	Target Corporation	S	\$167.16
5/4/2010	Visa Inc CL A	P	\$3,662.81
5/4/2010	Weatherford International Ltd	P	\$734.08
5/4/2010	Weyerhaeuser Co	S	\$243.12
5/4/2010	Wynn Resorts Ltd	S	\$352.62
6/16/2010	Anadarko Pete	S	\$811.96
6/16/2010	Wynn Resorts Ltd	S	\$170.90
6/23/2010	Sandisk Corp	S	\$3,357.01
8/17/2010	Cliffs Natural Resources	S	\$4,310.65
8/17/2010	Potash CP of Saskatchewan Inc	S	\$6,312.18
9/1/2010	Weyerhaeuser Co	(in lieu of fractional share)	\$1.92
11/2/2010	Sandisk Corp	S	\$1,838.99
11/2/2010	VMWare	P	\$5,445.16
6/21/2011	Advanced Micro Devices	S	\$3,093.03
6/21/2011	AK Steel Holding Corp	P	\$2,872.98
6/21/2011	Alcoa	P	\$3,978.24
6/21/2011	American Tower Reit Com (total of othe	P	\$3,986.04
6/21/2011	Apache Corp	P	\$2,621.43
6/21/2011	Baker Hughes Inc	P	\$2,621.42
6/21/2011	Caterpillar Inc.	S	\$304.25
6/21/2011	Cliffs Natural Resources	S	\$339.15
6/21/2011	Concophillips	S	\$3,176.46
6/21/2011	Cree Research Inc	S	\$1,741.65
6/21/2011	Crown Castle Intl	S	\$1,448.98
6/21/2011	CSX Corp	S	\$6,965.86
6/21/2011	Delta Airlines	P	\$3,988.60
6/21/2011	Dow Chemical	P	\$3,971.85
6/21/2011	F5 Networks Inc	P	\$2,574.00
6/21/2011	FedEx	P	\$267.70
6/21/2011	Flextronics Intl LTD	S	\$3,201.96
6/21/2011	Goodyear Tire & Rubber	P	\$5,324.89
6/21/2011	Hess Corporation	P	\$2,646.57
6/21/2011	Hewlett Packard	S	\$2,590.16
6/21/2011	Intel Corp	S	\$3,545.63
6/21/2011	Iron Mountain Inc	P	\$2,636.59
6/21/2011	JP Morgan Chase	S	\$3,563.58
6/21/2011	Monster Beverage Corp Com	P	\$6,645.91
6/21/2011	Nabors Industries Ltd New	P	\$2,645.98
6/21/2011	Nucor Corporation	P	\$645.53
6/21/2011	On Semiconductor Cop	P	\$656.91
6/21/2011	Oracle Corp	P	\$5,285.88
6/21/2011	Peabody Energy	S	\$2,392.92
6/21/2011	Prudential Financial	P	\$3,960.74
6/21/2011	Qualcomm Inc.	S	\$2,726.95
6/21/2011	Shaw Group Incorporated	S	\$4,529.86

6/21/2011	Skyworks Solutions	S	\$965.00
6/21/2011	Southwestern Energy company	S	\$3,034.94
6/21/2011	SPDR Gold TR Gold SHS	S	\$3,314.27
6/21/2011	Stanley Black & Decker Inc.	P	\$2,651.84
6/21/2011	Target Corporation	S	\$3,240.42
6/21/2011	The Mosaic Co	P	\$3,976.95
6/21/2011	Visa INC CL A	S	\$374.96
6/21/2011	VMWare Inc Class A	S	\$2,552.58
6/21/2011	Weatherford International Ltd	S	\$2,335.70
6/21/2011	Weyerhaeuser co	S	\$4,390.79
6/21/2011	Wynn Resorts	S	\$7,182.54
1/25/2012	AK Steel Holding Corp	P	\$1,090.95
1/25/2012	Alcoa Inc	S	\$2,678.83
1/25/2012	American Tower Reit	S	\$1,007.26
1/25/2012	Arache Corp	P	\$292.17
1/25/2012	Avnet Inc	P	\$3,794.36
1/25/2012	Baker Hughes Inc	P	\$764.10
1/25/2012	Caterpillar Inc.	S	\$649.89
1/25/2012	Cliffs Natural Resources	P	\$227.78
1/25/2012	Corn Products International Inc	P	\$3,750.79
1/25/2012	Covidien PLC New	P	\$3,792.50
1/25/2012	Crown Castle Intl	S	\$698.71
1/25/2012	Delta Airlines Inc New	S	\$259.79
1/25/2012	Dow Chemical	P	\$100.34
1/25/2012	F5 Networks Inc	S	\$488.00
1/25/2012	FedEx Corp	S	\$184.15
1/25/2012	Goodyear Tire & Rubber	P	\$447.03
1/25/2012	Hess Corporation	P	\$401.84
1/25/2012	Iron Mountain Inc (DE)	S	\$2,500.43
1/25/2012	Monster Worldwide Inc	S	\$4,023.21
1/25/2012	Nabors Industries Ltd New	P	\$577.38
1/25/2012	Nucor Corporation	S	\$481.40
1/25/2012	On Semiconductor Corp	S	\$4,842.67
1/25/2012	Oracle Corp	P	\$481.38
1/25/2012	Peabody Energy	P	\$1,200.09
1/25/2012	Prudential Financial	P	\$57.46
1/25/2012	Qualcomm Inc.	S	\$354.43
1/25/2012	SAIA Inc	S	\$58.22
1/25/2012	Skyworks Solutions	S	\$21.50
1/25/2012	Stanley Black & Decker Inc.	S	\$143.41
1/25/2012	The Mosaic Co	P	\$334.28
1/25/2012	Visa Inc CL A	S	\$1,003.91
1/25/2012	VMWare Inc Class A	S	\$91.81
1/25/2012	Weatherford International Ltd	P	\$16.52
1/25/2012	Wynn Resorts	P	\$120.28
4/30/2012	AK Steel Holding Corp	S	\$303.96
4/30/2012	American Tower Reit Com	S	\$327.39

4/30/2012	Apache Corp	S		\$191.83
4/30/2012	Avnet Inc	S		\$252.20
4/30/2012	Baker Hughes Inc	S		\$219.99
4/30/2012	Caterpillar Inc.	S		\$205.29
4/30/2012	Cliffs Natural Resources	S		\$311.44
4/30/2012	Corn Products International Inc	S		\$171.44
4/30/2012	Covidien PLC New	P		\$552.16
4/30/2012	Crown Castle Intl	S		\$339.85
4/30/2012	Delta Airlines Inc New	S		\$219.88
4/30/2012	Dow Chemical	S		\$3,822.00
4/30/2012	EMC Corp Mass	P		\$2,255.66
4/30/2012	EOG Resources Inc	P		\$2,193.45
4/30/2012	Express Scripts Hldg Co Com	P		\$3,397.70
4/30/2012	FedEx Corp	S		\$3,707.28
4/30/2012	Goodyear Tire & Rubber	S		\$4,102.87
4/30/2012	Hess Corporation	S		\$208.31
4/30/2012	Kansas CY Southn Ind New	P		\$3,391.68
4/30/2012	Las Vegas Sands Corporation	P		\$3,385.88
4/30/2012	Monster Beverage Corp Com	P		\$2,215.31
4/30/2012	Nabors Industries Ltd New	S		\$232.44
4/30/2012	Nucor Corporation	S		\$235.63
4/30/2012	Oracle Corp	S		\$5,252.31
4/30/2012	Peabody Energy	S		\$3,243.01
4/30/2012	Prudential Financial	S		\$3,991.83
4/30/2012	Qualcomm Inc.	S		\$127.37
4/30/2012	Rackspace Hosting Inc com	P		\$3,364.41
4/30/2012	SAIA Inc	S		\$603.24
4/30/2012	Seagate Technology PLC	P		\$3,384.28
4/30/2012	Skyworks Solutions	S		\$270.21
4/30/2012	Stanley Black & Decker Inc.	S		\$146.31
4/30/2012	The Mosaic Co	S		\$3,589.19
4/30/2012	Union Pacific Corp	P		\$3,368.29
4/30/2012	United Rentals Inc	P		\$3,403.85
4/30/2012	Visa Inc CL A	S		\$3,193.10
4/30/2012	VMWare Inc Class A	S		\$335.12
4/30/2012	Weatherford International Ltd	S		\$171.88
4/30/2012	Wynn Resorts	S		\$1,599.44
7/11/2012	Caterpillar Inc.	S		\$3,608.59
7/11/2012	Ingredion Inc Com	S		\$3,029.66
7/11/2012	Qualcomm Inc.	S		\$2,216.93
7/11/2012	Stanley Black & Decker Inc.	S		\$2,041.14
7/11/2012	VMWare Inc Class A	S		\$3,169.22
7/13/2012	Guggenheim S&P Equal Weighted Index	S	\$1-15K	
7/13/2012	Ishares High Dividend Equity Fd	P	\$1-15K	
7/13/2012	Powershares DB Base Us Dollar Index F	P	\$1-15K	
7/13/2012	Select Sector SPDR T Utilities Select Se	P	\$1-15K	
7/13/2012	SPDR S&D Dividend	S	\$1-15K	

7/16/2012	Caterpillar Inc.	S	\$1-15K	
7/16/2012	Guggenheim S&P Equal Weighted Index	P	\$1-15K	
7/16/2012	Guggenheim S&P Equal Weighted Index	S	\$1-15K	
7/16/2012	Ingredient Inc.	S	\$1-15K	
7/16/2012	Qualcomm Inc.	S	\$1-15K	
7/16/2012	Stanley Black & Decker Inc.	S	\$1-15K	
7/16/2012	Vmware Inc. Class A	S	\$1-15K	
9/28/2012	Marsh & McLennan Cos Inc.	P		\$2,492.32
9/28/2012	Starbucks Corp Washington	P		\$2,505.00
10/1/2012	Kraft Foods Corp W/I			\$15.18
10/10/2012	Industrial Select ETF Sector SPDR	P	\$1-15K	
10/10/2012	Ishares TR - Dow Jones US Fincl Sector	P	\$1-15K	
10/10/2012	Powershares DB Base Us Dollar Index E	S	\$1-15K	
10/10/2012	Select Sector SPDR T Utilities	S	\$1-15K	
10/10/2012	Vanguard Materials ETF	P	\$1-15K	
10/11/2012	Ishares TR S&P 500 index Fd	P	\$1-15K	
10/19/2012	First Trust Tech ETF Alphasdex Fund	S	\$1-15K	
10/19/2012	Industrial Select ETF Sector SPDR	P	\$1-15K	
10/19/2012	Ishares TR - Dow Jones US Fincl Sector	P	\$1-15K	
10/19/2012	Ishares TR S&P 500 index Fd	P	\$1-15K	
10/19/2012	Powershares DB Base Us Dollar Index E	S	\$1-15K	
10/19/2012	Select Sector SPDR T Utilities	S	\$1-15K	
10/19/2012	Vanguard Materials ETF	P	\$1-15K	
11/12/2012	Abbott Laboratories	S	\$1-15K	\$6,404.46
11/12/2012	Allstate Corp	S	\$15-50K	\$15,116.62
11/12/2012	Altria Group Inc.	S	\$1-15K	\$11,792.98
11/12/2012	American International Group Inc	S		\$311.24
11/12/2012	Amgen Inc.	S	\$100-250K	\$111,260.86
11/12/2012	Aqua America Inc.	S	\$15-50K	\$23,002.26
11/12/2012	Automatic Data Processing	S	\$1-15K	\$12,065.96
11/12/2012	Bank of America Corp	S*	\$1-15K	\$1,434.30
11/12/2012	Berkshire Hathaway I Series B New	S	\$1-15K	\$8,409.31
11/12/2012	Boeing Co	S	\$15-50K	\$22,022.27
11/12/2012	Boeing Co	S	\$1-15K	\$14,690.15
11/12/2012	Broadridge Financial Solutions	S	\$1-15K	\$1,187.37
11/12/2012	CBL & Assoc Properties Reit Inc.	S	\$15-50K	\$23,363.89
11/12/2012	Cisco Systems Inc.	S	\$15-50K	
11/12/2012	Colgate-Palmolive Co.	S	\$15-50K	\$20,677.33
11/12/2012	Conagra Foods Inc.	S	\$1-15K	\$13,726.74
11/12/2012	Elan Plc Adr	S	\$1-15K	\$5,143.36
11/12/2012	Emerson Electric Co.	S	\$15-50K	\$19,916.88
11/12/2012	Exelon Corporation	S	\$1-15K	\$10,656.00
11/12/2012	Exxon Mobil Corp	S	\$15-50K	\$35,525.39
11/12/2012	Fannie Mae			\$28.36
11/12/2012	Federal Home Loan Mtg			\$18.63
11/12/2012	Frontier Communications Corp			\$256.07
11/12/2012	General Electric Com	S	\$1-15K	\$6,814.26

11/12/2012	Home Depot Inc.	S	\$15-50K	\$32,163.70
11/12/2012	Intel Corp	S	\$15-50K	\$19,096.61
11/12/2012	Johnson & Johnson	S	\$15-50K	\$14,786.80
11/12/2012	Kraft Foods Corp	S	\$1-15K	\$3,773.84
11/12/2012	Masco Corp	S	\$1-15K	\$5,975.61
11/12/2012	Masco Corp	S	\$1-15K	\$1,489.02
11/12/2012	McDonalds Corp.	S	\$50-100K	\$58,788.11
11/12/2012	Merck & Co Inc. New	S	\$15-50K	\$35,016.26
11/12/2012	Mondelez Intl Inc.	S	\$15-50K	\$6,795.39
11/12/2012	Monsanto Co. New	S	\$15-50K	\$18,650.33
11/12/2012	Pepsico Incorporated	S	\$1-15K	\$9,635.21
11/12/2012	Pfizer Incorporated	S	\$15-50K	\$25,262.20
11/12/2012	Philip Morris International Inc.	S	\$15-50K	\$25,305.45
11/12/2012	Philip Morris International Inc.	S	\$1-15K	\$7,079.94
11/12/2012	Procter & Gamble Co	S	\$1-15K	\$13,271.80
11/12/2012	Procter & Gamble Co	S	\$1-15K	\$10,355.30
11/12/2012	Royal Dutch Schell Pl Adr CL A	S	\$15-50K	\$25,655.31
11/12/2012	Sony Corp Adr New	S	\$1-15K	\$6,893.69
11/12/2012	Suntrust Banks Inc.	S	\$1-15K	\$2,596.94
11/12/2012	Suntrust Banks Inc.	S	\$1-15K	\$2,602.14
11/12/2012	Verizon Communication Com	S	\$1-15K	\$12,657.69
11/12/2012	Wal-Mart Stores Inc.	S	\$15-50K	\$37,231.21
11/12/2012	Western Union Co.	S	\$1-15K	\$6,699.50
11/15/2012	Legg Mason	S	\$1-15K	
12/17/2012	AK Steel Holding Corp	S		\$1,536.76
12/17/2012	Amazon	P		\$4,552.56
12/17/2012	American Tower Reit Com	P		\$536.69
12/17/2012	Apache Corp	S		\$1,774.64
12/17/2012	Avenet Inc	S		\$3,200.54
12/17/2012	Baker Hughes Inc	S		\$1,949.23
12/17/2012	Cliffs Natural Resources	S		\$2,055.04
12/17/2012	Covidien PLC New	S		\$5,002.38
12/17/2012	Crown Castle Intl	S		\$498.59
12/17/2012	Danaher Corporation	P		\$3,535.36
12/17/2012	Delta Airlines	S		\$4,050.36
12/17/2012	EMC Corp Mass	P		\$1,586.34
12/17/2012	EOG Resources Inc	S		\$2,408.84
12/17/2012	Express Scripts Hldg Co Com	P		\$1,435.46
12/17/2012	F5 Networks Inc	S		\$1,993.21
12/17/2012	Hess Corporation	S		\$2,077.55
12/17/2012	Ishares S&P Midcap 400 Index	P		\$7,074.20
12/17/2012	Ishares S&P500 Growth Index	P		\$7,157.16
12/17/2012	Ishares SP Smallcap 600 Index	P		\$4,698.21
12/17/2012	Kansas CY Southn Ind New	S		\$3,605.27
12/17/2012	Las Vegas Sands Corporation	S		\$2,836.43
12/17/2012	Limited Brands Inc	P		\$2,356.12
12/17/2012	Marsh & McLennan Cos Inc.	S		\$2,541.10

12/17/2012	Monsanto	P	\$3,529.50
12/17/2012	Monster Beverage Corp Com	S	\$1,531.16
12/17/2012	Nabors Industries Ltd New	S	\$1,769.69
12/17/2012	Nucor Corporation	S	\$3,448.90
12/17/2012	Oneok	P	\$3,573.56
12/17/2012	Penn National Gaming	P	\$3,575.68
12/17/2012	Petsmart	P	\$3,533.00
12/17/2012	PNC Finl Svcs GP	P	\$4,735.50
12/17/2012	Qualcomm	P	\$3,523.17
12/17/2012	Rackspace Hosting Inc Com	S	\$1,504.32
12/17/2012	SAIA Inc	S	\$5,041.54
12/17/2012	Sandisk Corp	P	\$4,753.27
12/17/2012	Seagate Technology PLC	S	\$3,068.38
12/17/2012	Skyworks Solutions	S	\$3,440.67
12/17/2012	Starbucks Corp	P	\$870.56
12/17/2012	United Rentals Inc	P	\$2,874.36
12/17/2012	Visa Inc	P	\$4,736.64
12/17/2012	VMWare Inc Class A	P	\$3,566.68
12/17/2012	Weatherford International Ltd	S	\$1,494.88
12/17/2012	Whole Foods Markets	P	\$3,490.89
12/17/2012	Wynn Resorts	S	\$2,153.60
4/30/2013	Affiliated Managers Group	P	\$2,005.90
4/30/2013	Alliance Data Systems Corp	P	\$2,037.24
4/30/2013	Amazon	S	\$4,560.73
4/30/2013	American Tower Reit Com	S	\$2,921.38
4/30/2013	Calpine Corp New	P	\$2,093.76
4/30/2013	Cbre Group Inc	P	\$2,097.57
4/30/2013	CDN Pacific RV LTD New	P	\$1,987.04
4/30/2013	Chevron Corp	P	\$2,071.96
4/30/2013	Crown Castle Intl	S	\$3,005.66
4/30/2013	Danaher Corporation	S	\$1,580.76
4/30/2013	Eagle Matls	P	\$2,040.30
4/30/2013	EMC Corp Mass	S	\$3,198.83
4/30/2013	Energys	P	\$2,060.55
4/30/2013	Express Scripts Holding Co	S	\$5,167.69
4/30/2013	FEI Company	P	\$2,082.96
4/30/2013	Gartner Inc	P	\$2,072.16
4/30/2013	General Electric	P	\$2,095.26
4/30/2013	Heartland Payment Sys	P	\$2,079.63
4/30/2013	Helmerich & Payne	P	\$2,043.65
4/30/2013	Hertz Global Holding Inc	P (check)	\$2,085.39
4/30/2013	Honeywell Intl Inc	P	\$2,058.00
4/30/2013	Incyte Corp		\$2,092.85
4/30/2013	Interxion Holding NV	P	\$2,096.95
4/30/2013	Ishares S&P Midcap 400 Index	S	\$8,063.11
4/30/2013	Ishares S&P500 Growth Index	S	\$7,892.06
4/30/2013	Ishares SP Smallcap 600 Index	S	\$5,291.63

4/30/2013	Jarden Corp	P		\$2,057.58
4/30/2013	JP Morgan Chase & Co	P		\$2,055.48
4/30/2013	Kapstone Paper and Packaging	P		\$2,070.60
4/30/2013	L Brands Inc com	S		\$2,305.93
4/30/2013	Mobile Mini Inc	P		\$2,081.61
4/30/2013	Monsanto CO/NEW	S		\$1,813.26
4/30/2013	Nordson CP	P		\$2,074.50
4/30/2013	Oceaneering Intl Inc	P		\$2,034.64
4/30/2013	Oneok	S		\$1,889.17
4/30/2013	Onyx Pharmaceuticals	P		\$2,075.70
4/30/2013	Panera Bread	P		\$1,943.04
4/30/2013	Parexl Intl Corp	P		\$2,096.61
4/30/2013	Penn National Gaming	S		\$4,325.94
4/30/2013	Petsmart	S		\$3,388.42
4/30/2013	PNC Finl Svcs GP	S		\$3,255.76
4/30/2013	Polaris Industries Inc	P		\$2,062.80
4/30/2013	Qualcomm Inc.	S		\$1,227.57
4/30/2013	Rackspace Hosting Inc Com	S		\$1,727.96
4/30/2013	Robert Half Int	P		\$2,067.03
4/30/2013	Rock Tenn Co CLA	P		\$2,084.88
4/30/2013	Sandisk Corp	S		\$5,839.88
4/30/2013	Signet Jewelers Limited	P		\$2,053.20
4/30/2013	Starbucks Corp.	S		\$1,697.04
4/30/2013	Towers Watson	P		\$2,039.52
4/30/2013	Union Pacific Corp	S		\$2,064.53
4/30/2013	United Rentals Inc	S		\$5,112.54
4/30/2013	Valmont Industries	P		\$2,029.72
4/30/2013	Visa Inc	S		\$3,028.97
4/30/2013	VMWare Inc Class	S		\$2,676.28
4/30/2013	WABTEC	P		\$2,087.00
4/30/2013	Whole Foods Markets	S		\$3,432.31
4/30/2013	William Sonoma	P		\$1,925.28
4/30/2013	Wyndham Worldwide Corp	P		\$2,096.85
4/30/2013	XL Group PLC NEW	P		\$2,087.72
8/6/2013	ACE Ltd	P		\$2,431.28
8/6/2013	Be Aerospace	P		\$2,414.68
8/6/2013	Eagle Matls	S		\$2,017.46
8/6/2013	Jazz Pharmaceuticals	P		\$2,428.54
8/6/2013	Mobile Mini Inc	S	\$15-50K	\$2,546.29
10/8/2013	Onyx Pharmaceuticals (in exchange for	S? Redemption		\$2,750.00
10/24/2013	Hertz Global Holdings	S		\$2,080.56
10/24/2013	Jarden Corp	S		\$2,391.39
10/24/2013	Panera Bread	S		\$1,688.36
3/21/2014	Alliance Data Systems Corp	S	Not in PTR	\$3,518.17
3/21/2014	Incyte Corp	S	Not in PTR	\$5,729.73
10/21/2014	Affiliated Mgrs Group Inc	P	\$1-15K	\$568.37
10/21/2014	American Tower REIT Com	P	\$1-15K	\$380.04

10/21/2014	Arris Group	P	\$1-15K	\$3,569.02
10/21/2014	BE Aerospace Inc.	P	\$1-15K	\$400.55
10/21/2014	Calpine Corp	P	\$1-15K	\$1,083.23
10/21/2014	Carrizo Oil and Gas	P	\$1-15K	\$3,104.79
10/21/2014	CBRE Group Inc.	P	\$1-15K	\$507.74
10/21/2014	Chevron Corp	P	\$1-15K	\$1,138.07
10/21/2014	Crown Castle Intl	P	\$1-15K	\$588.00
10/21/2014	Dana Holding	P	\$1-15K	\$1,421.38
10/21/2014	Energys	P	\$1-15K	\$566.84
10/21/2014	FEI Company	P	\$1-15K	\$475.74
10/21/2014	Foot Locker Inc.	P	\$1-15K	\$3,122.43
10/21/2014	Gartner Inc	P	\$1-15K	\$379.37
10/21/2014	Guggenheim S&P Equ Weight	P	\$1-15K	\$3,963.34
10/21/2014	Heartland Payment Systems Inc.	S	\$1-15K	\$3,180.11
10/21/2014	Honeywell International Inc.	P	\$1-15K	\$461.15
10/21/2014	Interxion Holding	P	\$1-15K	\$906.20
10/21/2014	Jazz Pham PLC	S	\$1-15K	\$1,744.89
10/21/2014	JP Morgan Chase	P	\$1-15K	\$692.37
10/21/2014	Kapstone Paper and Packaging	S	\$1-15K	\$818.19
10/21/2014	Monsanto Co/New	P	\$1-15K	\$565.87
10/21/2014	One Gas Inc.	S	\$1-15K	\$399.35
10/21/2014	Oneok Inc. New	P	\$1-15K	\$363.15
10/21/2014	Polaris Industries Inc.	S	\$1-15K	\$293.17
10/21/2014	Powershares Dynamic Pharmaceutical	P	\$1-15K	\$8,880.81
10/21/2014	Qihoo 360 Tech Ltd Ads	P	\$1-15K	\$3,569.19
10/21/2014	Qualcomm Inc.	P	\$1-15K	\$299.43
10/21/2014	Rock Tenn CO CL A	P	\$1-15K	\$1,009.83
10/21/2014	Signet Jewelers Limited	S	\$1-15K	\$110.67
10/21/2014	Starbucks Corp	P	\$1-15K	\$297.83
10/21/2014	Union Pacific Corp	S	\$1-15K	\$325.25
10/21/2014	United Rentals	S	\$1-15K	\$1,500.49
10/21/2014	Visteon	P	\$1-15K	\$3,115.31
10/21/2014	Wyndham Worldwide Corp	P	\$1-15K	\$314.50
10/21/2014	XL Group PLC	P	\$1-15K	\$914.48
1/8/2015	Innate Immunotherapeutics, Ltd.	P		\$5,365.63
1/9/2015	Innate Immunotherapeutics, Ltd.	P		\$2,833.69
1/23/2015	Innate Immunotherapeutics, Ltd.	P		\$1,819.19
1/29/2015	Abbott Laboratories	P		\$3,103.43
1/29/2015	ACE Ltd	S		\$2,972.24
1/29/2015	Aetna Inc New CT	P		\$3,072.30
1/29/2015	Agilent Technologies	P		\$3,109.14
1/29/2015	Alcoa	P		*
1/29/2015	Amazon Com Inc	P		\$5,220.48
1/29/2015	American Express	P		*
1/29/2015	Amgen Inc	P	\$1-15K	*
1/29/2015	Amgen Inc	P		*
1/29/2015	Arris Group	P		\$4,081.06

1/29/2015	Be Aerospace	S		\$2,262.78
1/29/2015	Blackstone Group	P		*
1/29/2015	Boeing Co	P		3089.52*
1/29/2015	Calpine Corp	P		*
1/29/2015	Carrizo Oil and Gas	S		\$2,686.90
1/29/2015	CBRE Group Inc	S		*
1/29/2015	CDN Pacific RV LTD New	S		\$2,850.43
1/29/2015	Chevron Corp	S		\$2,770.53
1/29/2015	Crown Castle Intl	S		\$3,199.41
1/29/2015	Dana Holding	S		*
1/29/2015	Enersys	S		\$59.00
1/29/2015	Facebook Inc	P		*
1/29/2015	FEI Company	S	\$3,215.48	\$3,215.48
1/29/2015	Foot Locker Inc.	P		\$2,263.33
1/29/2015	Gartner Inc	S		*
1/29/2015	General Electric Co	S	\$2,260.18	\$2,260.18
1/29/2015	Genesee Wyoming Inc A	P		*
1/29/2015	Gilead Science	P	\$3,114.35	*
1/29/2015	Guggenheim S&P Equ Weight	P		*
1/29/2015	Helmerich & Payne	S		\$1,997.21
1/29/2015	Honeywell International Inc	S	\$99.09	\$99.09
1/29/2015	Hubbell Inc	P		\$3,109.77
1/29/2015	Interxion Holding NV	S		\$3,343.07
1/29/2015	Jazz Pharmaceuticals PLC	S	\$171.96	\$171.96
1/29/2015	JP Morgan Chase	S		\$3,011.77
1/29/2015	Kapstone Paper and Packaging	S		\$212.20
1/29/2015	Kinder Morgan	P		*
1/29/2015	KLX Inc Com	S		\$751.53
1/29/2015	Lear Corp	P		*
1/29/2015	Mastercard Corp	P		*
1/29/2015	Michael Kors Holdings	P		\$5,282.04
1/29/2015	Nordson CP	S		\$2,195.55
1/29/2015	Oceaneering Intl Inc	S		*
1/29/2015	Oneok Inc New	P		*
1/29/2015	Parexl Intl Corp	S	\$3,124.15	\$3,124.15
1/29/2015	Phillips 66 Com	P		*
1/29/2015	PNC Finl Svcs GP	S		\$2,895.54
1/29/2015	Polaris Industries	P		*
1/29/2015	Powershares Dynamic Pharmaceutical	S	\$9,828.69	\$9,828.69
1/29/2015	Qihoo 360 Tech Ltd Ads	P		*
1/29/2015	Qualcomm Inc.	S		\$2,593.30
1/29/2015	Quintiles Transnational Hldgs	P	\$3,070.58	\$3,070.58
1/29/2015	Robert Half Int	S		\$3,698.82
1/29/2015	Rock Tenn Co CLA	S		\$4,058.60
1/29/2015	Ryder Systems	P		\$3,095.55
1/29/2015	Signet Jewelers Ltd	P		\$1,728.44
1/29/2015	Starbucks Corp	W		*

1/29/2015	Starwood HTELS RSTS WW Inc	P		*
1/29/2015	Thermo Fisher Scientific	P	\$3,081.38	\$3,081.38
1/29/2015	Thermo Fisher Scientific	P		\$3,081.28
1/29/2015	Towers Watson	S		\$3,317.82
1/29/2015	Twenty First Century Fox CL A	P		\$6,286.34
1/29/2015	Union Pacific Corp	S		\$239.49
1/29/2015	United Rentals Inc	P		*
1/29/2015	Valmont Industries	S		\$1,873.40
1/29/2015	Visa Inc	P		\$4,190.06
1/29/2015	Visteon Corp	P		*
1/29/2015	WABTEC	S		\$3,415.10
1/29/2015	William Sonoma	S		\$2,889.76
1/29/2015	Williams Co Inc	P		\$1,513.03
1/29/2015	Wyndham Worldwide Corp	S		\$3,330.17
3/17/2016	Abbott Laboratories	S	\$1-15K	
3/17/2016	Aetna Inc New CT	P	\$1-15K	
3/17/2016	Agilent Technologies	S	\$1-15K	
3/17/2016	American Express	S	\$1-15K	
3/17/2016	Amgen Inc	P	\$1-15K	
3/17/2016	AthenaHealth Inc Com	P	\$1-15K	
3/17/2016	Bank of America Corp	P	\$1-15K	
3/17/2016	Biogen Inc com	P	\$1-15K	
3/17/2016	Boeing Co	P	\$1-15K	
3/17/2016	Bristol Myers Squibb Co	P	\$1-15K	
3/17/2016	CVS Health Corp Com	P	\$1-15K	
3/17/2016	Danaher Corporation	S	\$1-15K	
3/17/2016	Delta Air Lines Inc New	P	\$1-15K	
3/17/2016	Eli Lilly and Co	P	\$1-15K	
3/17/2016	Fifth Third Bancorp Ohio	P	\$1-15K	
3/17/2016	Gilead Science	S	\$1-15K	
3/17/2016	Honeywell International Inc	S	\$1-15K	
3/17/2016	Lowes Company Inc	P	\$1-15K	
3/17/2016	McKesson Corp	P	\$1-15K	
3/17/2016	Nike Inc B	P	\$1-15K	
3/17/2016	Northrop Grumman Corp (Hldg Co)	P	\$1-15K	
3/17/2016	Pfizer Inc	P	\$1-15K	
3/17/2016	PJT Partners Inc Com Cl A	S	\$1-15K	
3/17/2016	Quintiles Transnational Hldgs	S	\$1-15K	
3/17/2016	Ross Stores Inc	P	\$1-15K	
3/17/2016	Ryder Systems	S	\$1-15K	
3/17/2016	Synchrony Financial	P	\$1-15K	
3/17/2016	Thermo Fisher Scientific	S	\$1-15K	
3/17/2016	Union Pacific Corp	S	\$1-15K	
3/17/2016	United Technologies Corp	P	\$1-15K	
3/17/2016	Whitewave Foods Corp Cl A	P	\$1-15K	
3/17/2016	Williams Co Inc	S	\$1-15K	
3/17/2016	Xerox Corp	P	\$1-15K	

3/17/2016	Zimmer Biomet Hldgs Inc com	P	\$1-15K
3/31/2016	Verizon Communications	P	\$1-15K
7/11/2016	Harding Lowevner Emerg Mrkts Port Ac	P	\$15-50K
7/11/2016	Lord Abbett Develop Growth Class A	P	\$1-15K
7/11/2016	Pimco Commodity Real Ret Strat Admin	P	\$1-15K
8/31/2016	Innate Immunotherapeutics, Ltd.	P	\$50-100K
3/17/2016	Vantiv Inc Cl A	P	\$1-15K
3/17/2016	Alphabet Inc Cl A	P	\$1-15K
3/17/2016	Crown Castle Intl	P	\$1-15K
3/17/2016	Twenty First Century Fox CL A	S	\$1-15K
3/17/2016	Lear Corp	S	\$1-15K
3/17/2016	Facebook Inc Cl A	S	\$1-15K
3/17/2016	Kapstone Paper and Packaging	S	\$1-15K
3/17/2016	Mastercard Inc Cl A	S	\$1-15K
3/17/2016	Qihoo 360 Tech Ltd Ads	S	\$1-15K
3/17/2016	Kinder Morgan Inc Corp	S	\$1-15K
3/17/2016	Phillips 66 Com	S	\$1-15K
3/31/2016	L Brands Inc com	P	\$1-15K
3/17/2016	Lyondellbasell NV Cl A	P	\$1-15K
3/17/2016	Michael Kors Holdings	S	\$1-15K
3/17/2016	CBS Corp New Cl B Shrs	P	\$1-15K
3/17/2016	Foot Locker Inc.	S	\$1-15K
3/17/2016	Blackstone Group LP	S	\$1-15K
3/17/2016	JP Morgan Chase and Co	P	\$1-15K
3/17/2016	Monsanto CO/New	S	\$1-15K
3/17/2016	Nextera Energy Inc Com	P	\$1-15K
3/31/2016	Energys	S	\$1-15K
3/17/2016	Discover Fincl Svcs	P	\$1-15K
3/17/2016	Kansas CY Southn Ind New	P	\$1-15K
3/17/2016	Blackrock Inc	P	\$1-15K
3/17/2016	United Rentals Inc	S	\$1-15K
3/31/2016	PG&E Corporation	P	\$1-15K
3/17/2016	Oneok Inc New	S	\$1-15K
3/17/2016	XL Group PLC New	S	\$1-15K
3/17/2016	Amazon Com Inc	S	\$1-15K
3/17/2016	Sempra Energy	P	\$1-15K
3/17/2016	Genessee & Wyoming Inc A	S	\$1-15K
3/17/2016	Cognizant Tech Solutions Cl A	P	\$1-15K
3/17/2016	Alcoa Inc	S	\$1-15K
3/17/2016	Visteon	S	\$1-15K
3/17/2016	Polaris Industries Inc	S	\$1-15K
3/17/2016	Goldman Sachs Grp Inc	P	\$1-15K
3/17/2016	Visa Inc Cl A	S	\$1-15K
3/17/2016	Capital One Financial Corp	P	\$1-15K