

November 16, 2017

Bradley Brooker
Designated Agency Ethics Official
Office of the Director of National Intelligence
Washington, DC 20511

Dear Mr. Brooker,

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of General Counsel, Office of the Director of National Intelligence.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my non-equity position with the law firm of Holland & Knight LLP. I will receive a performance based discretionary bonus payment for services rendered in 2017 up to the date of my departure before I assume the duties of the position of General Counsel. For a period of two years after my receipt of this payment, I will not participate personally and substantially in any particular matter in which I know Holland & Knight is a party or represents a party, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse and dependent children are limited partners in Howell-McDowell Management Co. LLP (HMMC), a family investment partnership. Within 90 days of confirmation, my spouse and dependent children will withdraw from HMMC, and there will be distributed to them their proportionate share of the assets of HMMC, which will include shares of the entities listed in Attachment A.

Within 90 days of confirmation, I will divest interests in the entities listed in Attachment A. Additionally, my spouse and dependent children will divest their individually held interests in the entities listed in Attachment A, including the interests distributed to them in accordance with the preceding paragraph. With regard to each of these entities, I will not participate

personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until it has been divested, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that myself, my spouse, and my dependent children may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I, my spouse, and my dependent children receive Certificates of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon time frames and that all proceeds are invested in non-conflicting assets.

My spouse is a beneficiary of a discretionary trust, the Family Partnership Bypass Trust. I am not a beneficiary of that trust. The trust is managed independently by a trustee with full discretion as to investments and distributions. My spouse does not have an enforceable right to distributions from this trust, the assets of which are not part of our investment portfolio. I have been advised, based on a legal opinion issued by the U.S. Office of Government Ethics on August 6, 2008 (DO-08-024), that the assets of the discretionary trust are not subject to the conflicts of interest provisions of 18 U.S.C. § 208. Pursuant to 5 C.F.R. § 2635.502(d), I will seek written authorization to participate personally and substantially in particular matters involving specific parties in which any one of the companies held through the trust is a party or represents a party.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I will meet in person with you or the ADAEO after confirmation but not later than 15 days after appointment as General Counsel of the Office of the Director of National Intelligence in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document compliance with this ethics agreement by notifying the ethics official in writing when I have completed the steps described in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Jason Klitenic

ATTACHMENT A

AABA – ALTABA INC COM
A - AGILENT TECHNOLOGIES INC COM
AAL - AMERICAN AIRLINES INC COM USDI
AAPL - APPLE INC COM STK
ABBV - ABBVIE INC COM USD0.01
ABC - AMERISOURCEBERGEN CORP COM
ABT - ABBOTT LAB COM
ACN - ACCENTURE PLC SHS CL A NEW
ADBE - ADOBE SYS INC COM
ADI - ANALOG DEVICES INC COM
ADM - ARCHER-DANIELS-MIDLAND CO COM
ADP - AUTOMATIC DATA PROCESSING INC COM
ADSK - AUTODESK INC COM
AEE - AMEREN CORP COM
AEP - AMER ELEC PWR CO INC COM
AES - AES CORP COM
AET - AETNA INC
AGN - ALLERGAN PLC. COM STK.
AIG - AMERICAN INTERNATIONAL GROUP INC COM
AIV - APARTMENT INVT & MGMT CO CL A
AIZ - ASSURANT INC COM
AKAM - AKAMA I TECHNOLOGIES INC COM STK
ALK - ALASKA AIR GROUP INC COM
ALL - ALLSTATE CORP COM
ALLE - ALLEGION PLC COMMON STOCK
AMAT - APPLIED MATERIALS INC COM
AME - AMETEK INC NEW COM
AMGN - AMGEN INC COM
AMP - AMERIPRISE FINL INC COM
AMT - AMERICAN TOWER CORP
AMZN – AMAZON INC COM
ANDV - ANDEAVOR
ANTM - ANTHEM INC COM
AON - AON PLC COM
APA - APACHE CORP COM
APC - ANADARKO PETRO CORP COM
APH - AMPHENOL CORP NEW CL A
APL - AFLAC INC COM
APO - AIR PROD & CHEM INC COM
AVB - AVALONBAY CMNTYS REIT
AVGO - BROADCOM LIMITED COM NPV
AVY - AVERY DENNISON CORP COM
AXP - AMERICAN EXPRESS CO
AZO - AUTOZONE INC COM
BA - BOEING

BAC - BANK OF AMERICA CORP
BAX - BAXTER INTL INC COM
BBT - BB&T CORP COM
BBY - BEST BUY INC COM STK
BCR - CR BARD
BEN - FRKLN RES INC COM
BF/B - BROWN-FORMAN INC CL B NON-VTG COM
BHF - BRIGHTHOUSE FINANCIAL INC
BHI - BAKER HUGHES INC COM
BIIB - BIOGEN INC COMMON STOCK
BIVV - BIOVERATIV INC COM
BK - BANK NEW YORK MELLON CORP COM STK
BLD - TOPBUILD CORP COM
BLK - BLACKROCK INC COM STK
BLL - BALL CORP COM
BMY - BRISTOL MYERS SQUIBB CO COM
BOX - BECTON DICKINSON & CO COM
BRK/B - BERKSHIRE HATHAWAY INC-CL B
BSX - BOSTON SCIENTIFIC CORP COM
BTI - BRITISH AMERICAN TOBACCO
BWA - BORG WARNER INC COM
BXP - BSTN PPTYS INC
C - CITIGROUP INC COM NEW COM NEW
CA - CA INC COM
CABO - CABLE ONE INC COM
CAG - CONAGRA BRANDS INC COM USD5
CAH - CARDINAL HLTH INC
CARS - CARS COM INC
CAT - CATERPILLAR INC COM
CB - CHUBB LTD ORD
CBG - CBRE GROUP INC CL A CL A
CBS - CBS CORP NEW CL B
CCI - CROWN CASTLE INTL CORP NEW COM
CCL - CARNIVAL CORP COM PAIRED
CDK - CDK GLOBAL INC COM
CELG - CELGENE CORP COM
CERN - CERNER CORP COM
CF - CF INDS HLDGS INC COM
CFG - CITIZENS FINL GROUP INC COM
CHTR - CHARTER COMMUNICATIONS INC NEW CL A
CINF - CIN FNCL CORP COM
CI - CIGNA CORPORATION
CL - COLGATE-PALMOLIVE CO COM
CLX - CLOROX CO COM
CMA - COMERICA INC COM
CMCSA - COMCAST CORP NEW-CL A
CME - CME GROUP INC COM STK
CMG - CHIPOTLE MEXICAN GRILL INC COM STK

CMI - CUMMINS INC
CMS - CMS ENERGY CORP COM
CNC - CENTENE CORP DEL COM
CNP - CENTERPOINT ENERGY INC COM
CNX - CONSOL ENERGY INC COM
COF - CAPITAL ONE FINL CORP COM
COG - CABOT OIL & GAS CORP COM
COH - COACH INC COM
COL - ROCKWELL COLLINS INC COM
CONSOLIDATED VENTURES INC. (Not Publicly Traded)
COP - CONOCOPHILLIPS COM
COST - COSTCO WHOLESALE CORP NEW COM
COTY - COTY INC COM CL A COM CL A
CPB - CAMPBELL SOUP CO COM
CRM - SALESFORCE COM INC COM STK
CSCO - CISCO SYSTEMS INC
CSRA - CSRA INC COM
CSX - CSX CORP COM
CTAS - CINTAS CORP COM
CTL - CENTURYLINK INC COM
CTSH - COGNIZANT TECH SOLUTIONS CORP CL A
CTXS - CITRIX SYS INC COM
CVS - CVS HEALTH CORP COM
CVX - CHEVRON CORP COM
CXO - CONCHO RES INC COM STK
D - DOMINION ENERGY INC COM STK NPV
DAL - DELTA AIR LINES INC DEL COM NEW
DE - DEERE & CO COM
DFS - DISCOVER FINL SVCS COM STK
DGX - QUEST DIAGNOSTICS INC COM
DHI - DR HORTON INC COM
DHR - DANAHER CORP COM
DIS - WALT DISNEY CO
DISCA - DISCOVERY COMMUNICATIONS INC
DNB - DUN & BRADSTREET CORP
DNOW - NOW INC COM
DOV - DOVER CORP COM
DPS - DR PEPPER SNAPPLE GROUP INC COM STK
DRI - DARDEN RESTAURANTS INC COM
DTE - DTE ENERGY CO COM
DUK - DUKE ENERGY CORP NEW COM
DWDP – DOWDUPONT INC.
DXC - DXC TECHNOLOGY CO COM
EA - ELECTR ARTS COM
EBAY - EBAY INC COM
ECL - ECOLAB INC COM STK
ED - CONS EDISON INC COM
EFX - EQUIFAX INC COM

EIX - EDISON INTL COM
EL - ESTEE LAUDER COMPANIES INC CL A
EMN - EASTMAN CHEM CO COM
EMR - EMERSON ELECTRIC CO COM
ENB - ENBRIDGE INC COM
EOG - EOG RESOURCES INC COM
EQIX - EQUINIX INC COM PAR \$0 .001
EQR - EQTY RESDNTL EFF 5/15/02
EQT - EQT CORP COM
ES - EVERSOURCE ENERGY COM
ESC MIRANT CORP
ESRX - EXPRESS SCRIPTS HLDG CO COM
ESS - ESSEX PPTY TR REIT
ETFC - ETRADE FINL CORP
ETN - EATON CORP PLC COM
ETR - ENTERGY CORP NEW COM
EVHC - ENVISION HEALTHCARE CORP COM
EW - EDWARDS LIFESCIENCES CORP COM
EXC - EXELON CORP COM
EXPE - EXPEDIA INC DEL COM NEW
EXPO - EXPEDITORS INTL WASH INC COM
EXR - EXTRA SPACE STORAGE INC COM
F - FORD MTR CO DEL COM PAR \$0.01 COM PAR \$0.01
FAST - FASTENAL CO COM
FB - FACEBOOK INC CL A CL A
FCX - FREEPORT-MCMORAN INC
FDX - FEDEX CORP COM
FFIV - F5 NETWORKS INC COM STK
FHN - 1ST HORIZON NATL CORP COM
FIS - FIDELITY NATL INFORMATION SVCS INC COM STK
FISV - FISERV INC COM
FITB - 5TH 3RD BANCORP COM
FLS - FLOWSERVE CORP COM
FMC - FMC CORP COM (NEW)
FOXA - TWENTY-FIRST CENTURY FOX INC CL A
FTR - FRONTIER COMMUNICATIONS COMMON STOCK
FTV - FORTIVE CORP COM MON STOCK
FUR - FLIR SYS INC COM
GCI - GANNETT CO INC COM
GD - GENERAL DYNAMICS CORP COM
GE - GENERAL ELECTRIC CO
GHC - GRAHAM HLDGS CO COM
GILD - GILEAD SCIENCES INC
GIS - GENERAL MILLS INC COM
GLW - CORNING INC COM
GM - GEN MTRS CO COM
GOOG - ALPHABET INC CAP STK CL C
GOOGL - ALPHABET INC CAPITAL STOCK CL A

GPC - GENUINE PARTS CO COM
GPS - GAP INC COM
GS - GOLDMAN SACHS GROUP INC COM
GT - GOODYEAR TIRE & RUBBER CO COM
GWW - GRAINGER WW INC COM
HAL - HALLIBURTON CO COM
HBAN - HUNTINGTON BANCSHARES INC COM
HCN - WELLTOWER INC COM REIT
HCP - HCP INC COM REIT
HD - HOME DEPOT INC COM
HES - HESS CORP COM STK
HIG - HARTFORD FINL SVCS GROUP INC COM
HOG - HARLEY DAVIDSON COM USD0.01
HON - HONEYWELL INTL INC COM STK
HP - HELMERICH & PAYNE INC COM
HPE - HEWLETT PACKARD ENTERPRISE CO COM
HPQ - HP INC COM
HRB - H & R BLOCK INC COM
HRS - HARRIS CORP COM
HSIC - HENRY SCHEIN INC COMMON STOCK
HST - HOST HOTELS & RESORTS INC REIT
HSY - HERSHEY COMPANY COM STK USD1
HUM - HUMANA INC COM
HYH - HALYARD HEALTH INC COM
IBM - INTERNATIONAL BUSINESS MACHS CORP COM
ICE - INTERCONTINENTAL EXCHANGE INC COM
IFF - INTL FLAVORS & FRAGRANCES INC COM
ILG - ILG INC COM
ILMN - ILLUMINA INC COM
INCY - INCYTE CORP COM
INTC - INTEL CORP COM
INTU - INTUIT COM
IP - INTL PAPER CO COM
IPG - INTERPUBLIC GROUP COMPANIES INC COM
IR - INGERSOLL-RAND PLC COM STK
IRM - IRON MTN INC NEW COM
ISRG - INTUITIVE SURGICAL INC COM NEW STK
ITW - ILL TOOL WKS INC COM
IVZ - INVESCO LTD COM STK USD0.20
JBGS – JBG SMITH PROPERTIES COM
JBHT – JB HUNT TRANS SVCS INC COM
JBL - JABIL INC
JCI - JOHNSON INTL PLC COM
JNJ - JOHNSON & JOHNSON COM
JNPR - JUNIPER NETWORKS INC COM
JPM - JPMORGAN CHASE & CO COM
K - KELLOGG CO COM USD0.25
KEY - KEYCORP NEW COM

KEYS - KEYSIGHT TECHNOLOGIES INC COM
KHC - KRAFT HEINZ CO COM
KIM - KIMCO RLTY CORP COM
KLAC - KLA-TENCOR CORP
KMB - KIMBERLY-CLARK CORP COM
KMI - KINDER MORGAN INC DEL COM
KMX - CARMAX INC COM
KO - COCA COLA CO COM
KORS - MICHAEL KORS HOLDINGS LTD COM NPV
KSU - KS CY SOUTHN
LB - L BRANDS INC COM
LEG - LEGGETT & PLATT INC COM
LEN - LENNAR CORP CL A CL A
LH - LAB CORP AMER HLDGS COM NEW
LKQ - LKQ CORP COM LKQ CORP
LLL - L3 TECHNOLOGIES INC COM
LLY - ELI LILLY & CO COM
LMT - LOCKHEED MARTIN CORP COM
LNC - LINCOLN NATL CORP COM
LOGM - LOGMEIN INC COM
LOW - LOWES COS INC COM
LRCX - LAM RESH CORP COM
LUK - LEUCADIA NATL CORP COM
LUV - S.W. AIRL CO COM
LVLT - LEVEL 3 COMMUNICATIONS INC COM NEW
LW - LAMB WESTON HLDGS INC COM USDS
M - MACYS INC COM STK
MA - MASTERCARD INC CL A
MAA - MID-AMER APT CMNTYS INC COM
MAR - MARRIOTT INTL INC NEW COM STK CL A
MAS - MASCO CORP COM
MAT - MATTEL INC COM
MCO - MOODYS CORP COM
MCD - MCDONALDS CORP COM
MCHP - MICROCHIP TECHNOLOGY INC COM
MCK - MCKESSON CORP
MDLZ - MONDELEZ INTL INC COM
MDT - MEDTRONIC PLC COMMON STOCK STOCK
MET - METLIFE INC COM STK USD0.01
MFGP - ADR MICRO FOCUS INTL PLC
MJN - MEAD JOHNSON NUTRITION COM USD0.01
MLM - MARTIN MARIETTA MATLS INC COM
MMC - MARSH & MCLENNAN CO'S INC COM
MMM - 3M CO COM
MNK - MALLINCKRODT PLC COMMON STOCK
MNST - MONSTER BEVERAGE CORP NEW COM
MO - ALTRIA GROUP INC COM
MON - MONSANTO CO NEW COM

MPC - MARATHON PETE CORP COM
MRK - MERCK & CO INC NEW COM
MRO - MARATHON OIL CORP COM
MS - MORGAN STANLEY COM STK USD0.01
MSFT - MICROSOFT CORP COM
MSI - MOTOROLA SOLUTIONS INC
MTB - M & T BK CORP COM
MU - MICRON TECH INC COM
MUR - MURPHY OIL CORP COM
MUSA - MURPHY USA INC COM
MYL - MYLAN NV
NAVI - NAVIENT CORP COM
NBL - NOBLE ENERGY INC COM
NEE - NEXTERA ENERGY INC COM
NEM - NEWMONT MINING CORP NEW COM
NFLX - NETFLIX INC COM STK
NFX - NEWFIELD EXPLORATION
NGVT - INGEVITY CORP COM
NI - NISOURCE INC COM
NKE - NIKE INC CL B
NLSN - NIELSEN HOLDINGS PLC COMSTK
NOC - NORTHROP GRUMMAN CORP COM
NOV - NATIONAL OILWELL VARCO COM STK
NRG - NRG ENERGY INC COM NEW
NSC - NORFOLK SOUTHN CORP COM
NTRS - NORTHERN TR CORP COM
NUE - NUCOR CORP COM
NVDA - NVIDIA CORP COM
NWL - NEWELL BRANDS INC COM
NWS - NEWS CORP COM CL B
NWSA - NEWS CORP COM CL A
O - REALTY INCOME CORP COM
OMC - OMNICOM GROUP INC COM
ORCL - ORACLE CORP COM
ORLY - OREILLY AUTOMOTIVE INC NEW COM USD0.01
OVA - DAVITA INC COM
OXY - OCCIDENTAL PETROLEUM CORP
PAYX - PAYCHEX INC COM
PBCT - PEOPLES UTD FINL INC COM
PCAR - PACCAR INC COM
PCG - PG& E CORP COM
PCLN - THE PRICELINE GROUP INC
PDCO - PATTERSON COS INC COM
PEG - PUB SERVICE ENTERPRISE GROUP INC COM
PEP - PEPSICO INC COM
PFE - PFIZER INC COM
PFG - PRINCIPAL FINL GROUP INC COM STK
PG - PROCTER & GAMBLE COM NPV

PGR - PROGRESSIVE CORP OH COM
PH - PARKER-HANNIFIN CORP COM
PHM - PULTE GROUP INC
PK - PERKINELMER INC COM
PLD - PROLOGIS INC COM
PM - PHILIP MORRIS INTL COM STK NPV
PNC - PNC FINANCIAL SERVICES GROUP COM STK
PNR - PENTAIR PLC COM STK
PNW - PINNACLE W. CAP CORP COM
PPG - PPG IND INC COM
PPL - PPL CORP COM
PRGO - PERRIGO COMPANY LIMITED COM
PRU - PRUDENTIAL FINL INC COM
PSA - PUB STORAGE COM
PSX - PHILLIPS 66 COM
PX - PRAXAIR INC COM
PXD - PIONEER NAT RES CO COM
PYPL - PAYPAL HLDGS INC COM
QCOM - QUALCOMM INC COM
QRVO - QORVO INC COM
REGN - REGEN ERON PHARMACEUTICALS INC COM
RF - REGIONS FINL CORP NEW COM
RHT - RED HAT INC COM
ROK - ROCKWELL AUTOMATION
ROP - ROPER TECHNOLOGIES, INC
ROST - ROSS STORES INC COM
RRC - RANGE RES CORP COM
RSG - REPUBLIC SVCS INC COM
RTN - RAYTHEON CO USD0.01
786CVR - SAFEWAY CASA LEY NPV 01-30-2018 RIGHT
SAIC - SCIENCE APPLICATIONS INTL CORP NEW COM
SBUX - STARBUCKS CORP COM
SCG - SCANA CORP NEW COM
SCHW - CHARLES SCHWAB CORP COM NEW
SEE - SEALED AIR CORP NEW COM STK
SHW - SHERWIN-WILLIAMS CO COM
SJM - SMUCKER J M CO COM NEW
SLB - SCHLUMBERGER LTD COM COM
SLM - SLM CORP COM
SO - SOUTHERN CO COM STK
SPG - SIMON PROPERTY GROUP INC COM
SPGI - S&P GLOBAL INC COM
SPLS - STAPLES INC COM
SRE - SEMPRA ENERGY
SRCL - STERICYCLE INC COM
STI - SUN TR BANKS INC COM
STT - STATE STR CORP COM
STZ - CONSTELLATION BRANDS INC CL A CL A

SWK - STANLEY BLACK & DECKER INC COM
SWKS - SKYWORKS SOLUTIONS INC COM
SWN - SOUTHWESTERN ENERGY CO COM
SYF - SYNCHRONY FINL COM
SYK - STRYKER CORP
SYMC - SYMANTEC CORP COM
SYY - SYSCO CORP COM
T - AT&T INC COM
TAP - MOLSON COORS BREWING COM CL B
TEL -TE CONNECTIVITY LTD
TER - TERADYNE INC COM
TGNA - TEGNA INC COM
TGT - TARGET CORP COM STK
TIF - TIFFANY & CO COM
TJX - TJX COS INC COM NEW
TIME - TIME INC NEW COM
TMK -TORCHMARK CORP COM
TMO - THERMO FISHER CORP
TPH -TRI POINTE GROUP INC COM
TRIP -TRIPADVISOR INC COM COM STK
TROW - T ROWE PRICE GROUP INC
TRV - TRAVELERS COS INC COM STK
TSS -TOTAL SYS SVCS INC COM
TWX -TJME WARNER INC USD0.01
TXN - TEXAS INSTRUMENTS INC COM
TXT - TEXTRON INC COM
UA - UNDER ARMOUR INC CL C COM
UAA - UNDER ARMOR INC CL A
UAL - UNITED CONTL HLDGS INC COM STK
UNH - UNITEDHEALTH GROUP INC COM
UNM - UNUM GROUP
UNP - UNION PAC CORP COM
UPS - UNITED PARCEL SVC INC CL B
USB - US BANCORP
UTX - UNITED TECHNOLOGIES CORP COM
V - VISA INC COM CL A STK
VAR - VARIAN MEDICAL SYSTEMS INC
VIAB - VIACOM INC NEW CL B
VLO - VALERO ENERGY CORP COM STK NEW
VMC - VULCAN MATERIALS CO COM
VNO - VORNADO RLTY TR COM
VREX - VAREX IMAGING CORP COM
VRSN - VERISIGN INC COM
VRTX - VERTEX PHARMACEUTICALS INC COM
VSM - VERSUM MATLS LLC COM
VTR - VENTAS INC REIT
VZ -VERIZON COMMUNICATIONS COM
WAT - WATERS CORP COM

WBA - WALGREENS BOOTS ALLIANCE INC COM
WDC - WESTN DIGITAL CORP COM
WEC - WEC ENERGY GROUP INC COM
WFC - WELLS FARGO & CO NEW COM STK
WFM - WHOLE FOODS MKT INC COM
WHR - WHIRLPOOL CORP COM
WLTW - WILLIS TOWERS WATSON PLC COM
WM - WASTE MGMT INC DEL COM STK
WMB - WILLIAMS CO INC COM
WMT - WAL-MART STORES INC COM
WPG - WASHINGTON PRIME GROUP NEW COM
WRK - WESTROCK CO COM
WU - WESTERN UNION CO
WY - WEYERHAEUSER CO COM
WYN - WYNDHAM WORLDWIDE CORP COM STK
WYNN - WYNN RESORTS LTD COM
XEC - CIMAREX ENERGY CO COM
XEL - XCEL ENERGY INC COM
XL - XL GROUP LTD XL GROUP LTD COM NPV
XLNX - XILINX INC COM
XOM - EXXON MOBJL CORP COM
XRAY - DENTSPLY SIRONA INC COM
XYL - XYLEM INC COM
YUM - YUM BRANDS INC COM
YUMC - YUM CHINA HLDGS INC COM
ZBH - ZIMMER BIOMET HLDGS INC COM
ZION - ZIONS BANCORP COM
ZTS - ZOETIS INC COM USD0.01 C1 'A'