Office of the General Counsel
U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

March 22, 2023

Mr. Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear Mr. Rounds:

The purpose of this letter is to forward the attached amendment to Mr. Ken Wainstein's ethics agreement dated October 26, 2021. As Mr. Wainstein explains in his letter dated March 16, 2023, he is unable to legally sell the assets, Lukoil PJSC Spon ADR (LUKOY) and Yandex N V CI A (YNDX), as agreed to in his Ethics Agreement, as they remain under U.S. Government sanctions against Russia. These assets are included on Undersecretary Wainstein's screening and recusal document, so his staff will screen all particular matters that could affect the financial interest of these companies from him. For as long as he owns these interests, he will not participate personally and substantially in any particular matter that to his knowledge has a direct and predictable effect on the financial interests of either of these entities, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

As the Alternate Designed Agency Ethics official for the Department of Homeland Security, I have reviewed the updated information contained in the amendment and, based upon my review of it and the prior and continuing commitments made by Mr. Wainstein in his previously transmitted Ethics Agreement, I continue to believe that Mr. Wainstein is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

MICHAEL J O'CONNOR

Digitally signed by MICHAEL J O'CONNOR
Date: 2023.03.22 11:23:03 -04'00'

Michael J. O'Connor
Alternate Designed Agency Ethics Official

Office of Intelligence and Analysis
U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

March 16, 2023

Michael O'Connor
Alternate Designated Agency Ethics Official
Department of Homeland Security
Office of the General Counsel, Ethics Compliance and Law Division
Washington, DC 20528

Re: Amendment to Ethics Agreement of Mr. Ken Wainstein

Dear Mr. O'Connor:

The purpose of this document is to amend my ethics agreement signed on October 26, 2021. As explained below, I will not be divesting two assets, Lukoil PJSC Spon ADR (LUKOY) and Yandex N V CI A (YNDX), as agreed to in my Ethics Agreement.

I have been unable to legally sell these assets as the companies are under U.S. Government sanctions against Russia. I have also determined it is not feasible to divest these assets via transfer to an adult child, as the lengthy process, time, and administrative expense required to accomplish that task would be excessive in comparison to the very small value of the assets and their minimal risk of conflict. I have confirmed with my staff that there is an exceptionally small likelihood any particular matters pertaining to these two companies will arise in connection with my official duties. These assets have been included on my screening and recusal document. For as long as I own these interests, 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 either of these entities, 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 have been advised that this amendment to my ethics agreement will be posted publicly, consistent with the public information law at 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,

Ken Wainstein

October 26, 2021

Mr. Joseph B. Maher
Designated Agency Ethics Official
Department of Homeland Security
2707 Martin Luther King Jr Ave, SE
Washington, DC 20528

Dear Mr. Maher:

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 Under Secretary for Intelligence and Analysis, for the U.S. Department of Homeland Security. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 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 particular 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 an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds $50,000, 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 any holdings of the funds that are in the specific sector in which the funds concentrate, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

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 regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but not later than 15 days after my appointment pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – DAVIS POLK & WARDWELL, LLP

Upon confirmation, I will withdraw from the partnership of Davis Polk & Wardwell LLP. Pursuant to the Davis Polk & Wardwell LLP partnership agreement dated March 1, 1993, I will receive a partnership withdrawal payment, which will be calculated based on the firm's performance through a date no later than the end of the month immediately preceding the month in which my withdrawal occurs. I will receive this partnership withdrawal payment before I assume the duties of the position of Under Secretary. Pursuant to the same partnership agreement, I will receive a pro rata partnership share based on the outstanding value of my partnership interests as soon as it is available for distribution, which will be calculated based on firm collections received through my departure date. The firm will withhold certain amounts from my partnership share distribution for account reconciliation and tax purposes, and any remaining balance of withheld amounts will be reimbursed to me in approximately three years. I also will receive a lump-sum distribution of my interest in the firm's defined benefit plan. Until I receive all amounts owed to me by the firm, including any balance of withheld amounts, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Davis Polk & Wardwell LLP to pay amounts owed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, until I receive all amounts owed to me by the firm, I also will not participate personally and substantially in any particular matter involving specific parties in which I know this firm is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). 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).

SECTION 3 – OTHER RESIGNATIONS

Upon confirmation, I will resign from my positions with the following entities:

- Georgetown University Law Center
- Bipartisan Commission on Biodefense
- National Association of Former United States Attorneys
- Burke & Herbert Bank
- St. Stephen's & St. Agnes School
- Alclear, LLC

I also previously resigned from my position with the Café Studios. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will also step down from my positions on the following Federal Advisory Committees:

- Office of the Director of National Intelligence, National Counterterrorism Center Director's Advisory Board
- Central Intelligence Agency, General Counsel's External Advisory Board

SECTION 4 – OTHER POSITIONS

I will retain my position as a trustee of my Family Trust, the Suzanne G. Kominski Living Trust, and the John Kominski Living Trust. I will not receive any fees for the services that I provide as a trustee to any of these trusts during my appointment to the position of Under Secretary. 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 my Family Trust, the Suzanne G. Kominski Living Trust, or the John Kominski Living Trust, 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 also will retain my position as executor of the Estate of Mr. Kominski. I will not receive any fees for the services that I provide as an executor during my appointment to the position of Under Secretary. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my interest in the Estate of Mr. Kominski, 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).

SECTION 5 – DIVESTITURES

As soon as practicable, but not later than 90 days after my confirmation, I will divest my interests in the entities listed on the Enclosure. 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 I have divested it, 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

I understand that I 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 receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets. I understand that I must timely submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture, and in order to divest assets within the agreed upon timeframe.

I (including my spouse and dependent children if applicable) will not repurchase any asset I was required to divest without my consultation with my agency ethics official and the U.S. Office of Government Ethics.

SECTION 6 – SPOUSE EMPLOYMENT

My spouse is the owner of the Potomack Company. For as long as my spouse continues to own this company, 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 company, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 7 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 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,

Kenneth L. Wainstein

Encl:
Asset List for Divestiture

Abbott Labs (ABT)
Abbott Labs, bonds
Aberdeen Standard Physical Precious Metals Basket
Abbvie, bonds
Accenture (CAN)
Adobe Inc. (ADBE)
Adyen (ADYEY)
Aecom (ACM)
Aercap Holdings (AER)
AIA Group (AAGIY)
Air Liquide (AIQUY)
Air Products & Chemicals (APD)
Alcon Inc. (ALC)
Alexandria Real Estate, bonds
Alfa Laval (ALFVY)
Alibaba Group (BABA)
Alleghany Corp.(Y)
Allegion PLC (ALLE)
Allianz (ALIZY)
Allstate (ALL)
Ally Financial (ALLY)
Alphabet Inc (GOOG/GOOGL)
Altria Group (MO)
Akzo Nobel NV (AZOY)
Amazon.com (AMZN)
Ambev SA (ABEV)
American Electric Power (AEP)
American Electric Power, bonds
American Honda Finance Corp., bonds
American International Group (AIG)
American Tower Corp. (AMT)
American Tower Corp., bonds
Ameriprise Financial (AMP)
Amerisourse Bergen Corp. (ABC)
Amgen Inc. (AMGN)
Amgen Inc., bonds
AMN Healthcare (AMN)
Analog Devices, Inc (ADI)
Anheuser-Busch Inbev, bonds
Annaly Capital Management (NLY)
Ansys Inc. (ANSS)

Anthem Inc., bonds
Apple Inc. (APPL)
Applied Materials Inc., (AMAT)
AssA ABLOY Group (ASAZY)
Arch Capital Group (ACGL)
Arlington County, VA, bonds
Ashtead Group (ASHTY)
Aspen Technology Inc. Del. (AZPN)
AT&T, bonds
Atlas Copco (ATLKY)
Autodesk Inc. (ADSK)
Automatic Data Processing Inc. (ADP)
Axalta Coating Systems (AXTA)
Baker Hughes Co. (BKR)
Banco Bilbao Vizcaya (BBVA)
BancorpSouth Bank (BXS)
Bank of America, bonds
Bank of Montreal, bonds
Bank of Nova Scotia, bonds
Baush Health Cos. (BHC)
Bentley Systems Inc. Cl B (BSY)
Berkley W R Corp (WRB)
Berkshire Hathaway (BRK.B)
Berry Global (BERY)
Bexar County, TX, bonds
BHP Group (BHP)
Boxscore Brands Inc. (below reporting threshold)
Blackrock (BLK)
Boeing Company (BA)
Boston Scientific Corp (BSX)
BP PLC (BP)
Bright Horizons Family Solutions (BFAM)
Bristol Myers Squibb Co (BMY)
Brookfield Asset Management (BAM)
Burke & Herbert BK& Trust Company (BHRB)
California State, bonds
Cameco Corp. (CCJ)
Carmax Inc. (KMX)
Carnival (CCL)
Carrier Global Corp., bonds

Caterpillar Fin Svs Corp, bonds
CBOE Global Markets (CBOE)
CDK Global Inc. (CDK)
CDN Natl Railway Co. (CNI)
CDW Corp (CDW)
Centene Corp. (CNC)
Centerpoint Energy (CNP)
Cerner Corp (CERN)
Champaign, IL, bonds
Charles River Laboratories (CRL)
Charles Schwab Corp (SCHW)
Check Point Software Tech Ltd (CHKP)
Chemed Corp New (CHE)
Chubb (CB)
Chugai Pharmaceutical Ltd (CHGCY)
Church & Dwight (CHD)
Cisco Systems Inc. (CSCO)
CITI group, bonds
CIT group
Citrix Systems (CTXS)
Clackamas County, Oregon, bonds
Cleveland Biolabs (below reporting threshold)
Close Bros Group (CBGPY)
Coca Cola Company (KO)
Coca Cola Europacific Partners (CCEP)
Colgate Palmolive Co. (CL)
Colorado State, bonds
Columbus, OH, bonds
Comcast Corp. (CMCSA)
Comcast Corp., bonds
Conocophillips (COP)
Cooper Companies Inc New (COO)
Copart Inc (CPRT)
Costco (COST)
Creditcorp (BAP)
CSPC Pharmaceutical Group Ltd. (CSPCY)
CVS Health Corp, bonds
Danaher Corp (DHR)
Dassault Systemes (DASTY)
DBS Group Holdings (DBSDY)
Deere and Co. (DE)

Dell Technologies Inc (DELL)
Diageo Plc New GB (DEO)
Discover Financial Services (DFS)
Dish Network Corp (DISH)
Document SEC Sys Inc (DSS) (below reporting threshold)
Dollar Gen Corp (DG)
Dollar Tree (DLTR)
DTE Energy Corp, bonds
Duck Creek Technologies Inc. (DCT)
EBAY Inc (EBAY)
Elanco Animal Health Inc. (ELAN)
Enbridge Inc., bonds
ENN Energy Holdings Ltd. (XNGSY)
Enterprise Products Operating, bonds
EOG Resources Inc (EOG)
Epiroc Aktiebolag (EPOKY)
EQT Corp (EQT)
Equifax Inc. (EFX)
Equinix Inc., bonds
Equitable Holdings (EQH)
Ereste Group Bank (EBKDY)
Estee Lauder Cos. (EL)
Euronet Worldwide (EEFT)
Evergy Inc. (EVRG)
Expeditors Intl Wash Inc (EXPD)
Experian (EXPGY)
Exponent Inc (EXPO)
Facebook (FB)
Factset Resh Systems Inc (FDS)
Fair Isaac Corp (FICO)
Fannie Mae, bonds
Fanuc Corp (FANUY)
FEDEX Corp (FDX)
Fidelity National Financial (FNF)
Fidelity National Information Service (FIS)
First Trust North American Energy Infrastructure Fund (EMLP)
FL State Turnpike, bonds
Fleetcor Technologies (FLT)
Flex Limited (FLEX)
Fomento Economico Mexicano (FMX)
Fox Corp (FOXA)

Frederick County, MD, bonds
Fuchs Petrolub AG (FUPBY)
Gaming & Leisure REIT (GLPI)
General Electric (GE)
General Electric Cap Corp, bonds
General Mills, bonds
Glaxo Smith Kline (GSK)
Goldman Sachs, bonds
Graphic Packaging Holding (GPK)
Hartford Financial Services Group Inc (HIG)
HDFC Bank (HDB)
Heineken (HEINY)
Henry Jack & Assoc Inc(JKHY)
Hess Corp (HES)
Holly Frontier Corp (HFC)
Home Depot Inc (HD)
Honeywell International (HON)
Honolulu, HI, bonds
HSBC Hldgs PLC (HSBC)
Huntington Ingalls Industries (HII)
IAC/Interative Corp. (IAC)
Icici Bank Ltd. (IBN)
Illumina Inc. (ILMN)
Infineon Technologies (IFNNY)
ING Group (ING)
Ingersoll Rand Inc (IR) (below reporting threshold)
Ingredion (INGR) (below reporting threshold)
Intel Corp (INTC)
Interactive Brokers Group Inc. (IBKR)
Intercontinental Exchange Group (ICE)
Intuitive Surgical Inc (ISRG)
iShares Gold TR (IAU)
Itau Unibanco Hldg SA (ITUB)
ITT Inc (ITT)
JBG Smith Properties (JBGS)
John Deere Capital Corp, bonds
Johnson & Johnson (JNJ)
Johnson Ctls Intl PLC (JCI)
Jones Lang Lasalle (JLL)
JP Morgan Chase
JP Morgan Chase, bonds

KBR Inc (KBR)
KDDI Corp (KDDIY)
Kinross Gold Corp (KGC)
Komatsu Ltd Spon (KMTUY)
Kraft Heinz Co (KHC)
Kubota Corp (KUBTY)
L3 Harris Technologies Inc (LHX)
Laboratory Corporation of America Holdings (LH)
Lennox (LII)
Lewisville, TX, bonds
Liberty Broadband (LBRDK)
Liberty Sirius (LSXMK)
Linde PLC EUR (LIN)
LKQ Corp (LKQ)
Lockheed Martin (LMT)
Lockheed Martin, bonds
Loews (L)
Lonza Group (LZAGY)
Loreal Co (LRLCY)
Los Angeles City, bonds
Lowes Companies (LOW)
Lpl Financial (LPLA)
Lukoil PJSC (LUKOY)
LVMH Moet Hennessey (LVMUY)
Lumentum Hldgs Inc (LITE) (below reporting threshold)
Magna International Inc(MGA)
Mallinckrodt Pub Ltd (MNKKQ) (below reporting threshold)
Markel Corp (MKL)
Marsh & McKlennan (MMC)
Martin Marrieta (MLM)
Marui Group Ltd (MAURY)
Massachusetts Bay Transportation Authority, bonds
Massachusetts State, bonds
McDonalds Corp. (MCD)
Medtronic (MDT)
Michelin Co (MGDDY)
Micro Focus International (MFGP) (below reporting threshold)
Microsoft Corp (MSFT)

Molson Coors Bev (TAP)
Mondelez International Inc (MDLZ)
Monster Beverage Corp (MNST)
Morgan Stanley, bonds
MSCI Inc (MCSI)
Nashville and Davidson Cnty, TN, bonds
NC Housing Authority, bonds
NCR Corp (NCR)
Nestle (NSRGY)
Newmarket Corp (NEU)
New York State Dormitory Authority, bonds
New York State Metropolitan Transportation Authority, bonds
Nextera Energy (NEE)
Nextera Energy Capital, bonds
Nidec Corp (NJDCY)
Nike, bonds
Nisource Inc (NI)
Nitori Hldgs Co (NCLTY)
Nordson Corp (NDSN)
Norfolk Southern Corp (NSC)
Novartis (NVS)
Novo Nordisk (NVO)
Novozymes (NVZMY)
Nvidia Corp (NVDA)
Northwest Texas Independent School Board, bonds
Nuveen Virginia Municipal Bond Fund
O Reilly Automotive Inc (ORLY)
Occidental Pete Corp (OXY)
Occidental Pete Corp Warrants (OXY WS)
OGE Energy Corp (OGE)
Old Dominion Freight (ODFL)
Old Republic International Corp (ORI)
Olin Corp (OLN)
Oracle (ORCL)
Oregon St Dept Trans, bonds
Organon & Co (OGN)
Orlando Florida Utilities Commission, bonds
Otsuka Holdings (OTSKY)
P.T. Telekomunikasi Indonesia (TLK)
Penn State University, bonds

Parker Hannifin Corp. (PH)
Pepsico Inc (PEP)
Perrigo Co (PRGO)
Pfizer (PFE)
Philip Morris Intl (PM)
Phillips 66 (PSX)
Ping An Insurance (Group) (PNGAY)
PNC Financial Services, bonds
Pool Corp (POOL)
Post Holdings (POST)
Procter & Gamble Co (PG)
Progressive Corp Ohio (PGR)
Qualcomm Inc (QCOM)
Raleigh Durham NC, bonds
Rayonier Inc (RYN)
Raytheon (RTX)
Reckitt Benckiser (RBGLY)
Regeneron Pharmaceuticals Inc (REGN)
Renewable Water Resources, South Carolina, bonds
Rentokil Initial (RTOKY)
Republic Services (RSG)
Reynolds Consumer Prods (REYN) (below reporting threshold)
Rio Tinto Plc (RIO)
Roche Holdings Ltd (RHHBY)
Rockwell Automation (ROK)
Rollins Inc (ROL)
Ross Stores (ROST) (below reporting threshold)
Royal Bank of Canada, bonds
Royal Dutch Shell (RDS.B)
S&P Global Inc (SPGI)
Safran SA (SAFRY)
Salesforce.com Inc (CRM)
San Antonio, TX Water Sys, bonds
SAP SE (SAP)
Schlumberger Ltd (SLB)
Schlumberger Ltd, bonds (oilfield services)
Schneider Elec (SBGSY)
Scotts Miracle-Gro (SMG)
Sealed Air Corp (SEE)

Seattle, Washington Light & Power, bonds
SEI Investments Co (SEIC)
SGS SA (SGSOY)
Shell Int'l Fin, bonds
Sherwin Williams (SHW)
Shionogi & Co. LTD (SGIOY)
Simon Property Group, bonds
Site One Landscape Supply Inc (SITE)
Smyrna, TN, bonds
Sonova Hldg AG (SONVY)
Sony Group (SONY)
SS&C Technologies Holdings Inc (SSNC)
St. Joe Co
Starbucks Corp (SBUX)
Store Cap Corp REIT (STOR)
Symrise AG (SYIEY)
Sysmex Corp (SSMXY)
Taiwan Fund Inc. (TWN)
Taiwan Semiconductor Mfg Co (TSM)
Teledyne Technologies Inc (TDY)
Tencent Hldgs Ltd (TCEHY)
Teradyne Inc (TER)
Texas Instruments (TXN)
Thermo Fischer Scientific (TMO)
Thermo Fischer Scientific, bonds
Thor Industries Inc. (THO)
TJX Companies (TJX)
Toronto-Dominion Bank, bonds
Total Energies SE (TTE)
Truist Financial Corp (TFC)
UGI Corp (UGI)
Unicharm Corp Spon ADR (UNICY)
Unilever Plc (UL)
Union Pacific Corp (UNP)
United Health Group Inc (UNH)
United Health Group Inc, bonds
United Therapeutics Corp (UTHR)
University of Colorado, bonds
University of Pittsburgh, bonds
University of Washington, bonds
United Parcel Service (UPS)
Vectrus Inc (VEC)
Verizon (VZ)
Verizon, bonds
Vertex Pharmaceutical Inc (VRTX)
VF Corp (VFC)
Viatris Inc (VTRS)
Viavi Solutions Inc (VIAV) (below reporting threshold)
Virginia St Resources Authority, bonds
Virginia Commonwealth Transportation Board, bonds
Visa Inc (V)
Vistra Corp (VST)
Vontier Corp (VNT)
WABTEC (WAB) (below reporting threshold)
Walt Disney Co (DIS)
Walt Disney Company, bonds
Walton County, Florida School Board, bonds
Wells Fargo, bonds
West Virginia, bonds
Williams Cos. (WMB)
Workday Inc. (WDAY)
Xylem (XYL)
Yandex NV (YNDX)
Yum China Hldgs Inc (YUMC)
Yum! Brands Inc (YUM)
Zebra Technologies Corp (ZBRA)