



**CERTIFICATE OF DIVESTITURE**

**CERTIFICATE NO:**

**DATE OF ISSUANCE:**

**ELIGIBLE PERSON:**

**[The divestiture property is identified in the attachment to this Certificate.]**

**[Please note: Upon the sale of this property, only the capital gain realized under Federal tax law is eligible for deferral under section 1043. This Certificate of Divestiture does not apply to ordinary compensation income.]**

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code and 5 C.F.R. § 2634.1002 with respect to the specific property described in the attachment. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Section 1043 of the Internal Revenue Code and the rules of 5 C.F.R. part 2634, subpart J provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service. Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should also be consulted as to these matters. Eligible persons must follow Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824).

A Certificate of Divestiture may only be used if the person identified above is an “eligible person” at the time of divestiture. The rules of 5 C.F.R. part 2634, subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003.

David J. Apol  
General Counsel

Attachment



**ATTACHMENT**

ELIGIBLE PERSON: Julie L. Ellison and Matthew B. Ellison [co-trustees of the Matthew B. Ellison Irrevocable Trust], Department of the Treasury

<b>Description</b>	<b>Quantity</b>
Adobe	71.367 shares
Advanced Micro Devices, Inc.	426 shares
Alphabet, Inc.	891 shares
Amazon.com, Inc.	905 shares
American Electric Power Company, Inc.	607 shares
Amgen, Inc.	90.042 shares
Apple, Inc.	890 shares
Berkshire Hathaway, Inc.	235 shares
BlackRock, Inc.	122 shares
Cigna Group	137 shares
Eli Lilly & Co.	64.442 shares
ExxonMobil Corp.	644 shares
Johnson & Johnson	134 shares
JPMorgan Chase & Co.	550 shares
Mastercard, Inc.	63 shares
Meta Platforms, Inc.	138 shares
Microsoft Corp.	546 shares
NextEra Energy, Inc.	586 shares
Northrop Grumman Corp.	98 shares
Pfizer, Inc.	868 shares
Proctor & Gamble Co.	161 shares
Prologis, Inc.	342 shares
Qualcomm, Inc.	494 shares
Salesforce, Inc.	211 shares
ServiceNow, Inc.	83.302 shares
T-Mobile US, Inc.	364 shares
Tesla, Inc.	229 shares
UnitedHealth Group, Inc.	132 shares
Verizon Communications, Inc.	654 shares
Visa, Inc.	229 shares