

# Executive Branch Personnel

## Public Financial Disclosure Report:

### Periodic Transaction Report (OGE Form 278-T)

#### Filer's Information

---

Richman, Peter

Assistant Director, Federal Trade Commission

---

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/ Richman, Peter [electronically signed on 07/19/2018 by Richman, Peter 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/ White, Christian S., Certifying Official [electronically signed on 08/27/2018 by White, Christian S. in Integrity.gov]

---

Other review conducted by

/s/ Bannon, Craig, Ethics Official [electronically signed on 08/24/2018 by Bannon, Craig in Integrity.gov]

---

U.S. Office of Government Ethics Certification

---

#### Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	AAPL Apple Inc.	Sale	07/18/2018	No	\$1,001 - \$15,000
2	AAPL Apple Inc.	Sale	07/18/2018	No	\$1,001 - \$15,000
3	ADBE Adobe Systems Inc	Sale	07/18/2018	No	\$1,001 - \$15,000
4	ADBE Adobe Systems Inc	Sale	07/18/2018	No	\$1,001 - \$15,000
5	BSV Vanguard Short Term Bond	Sale	07/17/2018	No	\$15,001 - \$50,000
6	BSV Vanguard Short Term Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
7	BSV Vanguard Short Term Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
8	BSV Vanguard Short Term Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
9	COST Costco Wholesale Corp	Sale	07/18/2018	No	\$1,001 - \$15,000
10	COST Costco Wholesale Corp	Sale	07/18/2018	No	\$1,001 - \$15,000
11	DBLTX Doubleline Total Return Bond Fund	Sale	07/17/2018	No	\$15,001 - \$50,000
12	DBLTX Doubleline Total Return Bond Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
13	DBLTX Doubleline Total Return Bond Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
14	DBLTX Doubleline Total Return Bond Fund	Sale	07/18/018	No	\$1,001 - \$15,000
15	FB Facebook, Inc. - Class A Common Stock	Sale	07/18/2018	No	\$1,001 - \$15,000
16	FB Facebook, Inc. - Class A Common Stock	Sale	07/18/2018	No	\$1,001 - \$15,000
17	FDN First TR Exchange Traded Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
18	FDN First TR Exchange Traded Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
19	FDN First TR Exchange Traded Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
20	HYG iShares iBoxx \$ High Yield Corporate Bd	Sale	07/17/2018	No	\$1,001 - \$15,000
21	HYG iShares iBoxx \$ High Yield Corporate Bd	Sale	07/18/2018	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
22	HYG iShares iBoxx \$ High Yield Corporate Bd	Sale	07/18/2018	No	\$1,001 - \$15,000
23	IBB iShares Nasdaq Biotechnology Index Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
24	IBB iShares Nasdaq Biotechnology Index Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
25	IBB iShares Nasdaq Biotechnology Index Fund	Sale	07/18/2018	No	\$1,001 - \$15,000
26	IEFA iShares Core MSCI EAFE ETF	Sale	07/18/2018	No	\$15,001 - \$50,000
27	IEFA iShares Core MSCI EAFE ETF	Sale	07/18/2018	No	\$15,001 - \$50,000
28	IEFA iShares Core MSCI EAFE ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
29	IEI iShares Barclays 3-7 Year Treasury Bond	Sale	07/17/2018	No	\$15,001 - \$50,000
30	IEI iShares Barclays 3-7 Year Treasury Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
31	IEI iShares Barclays 3-7 Year Treasury Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
32	IEI iShares Barclays 3-7 Year Treasury Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
33	IEMG iShares Core MSCI Emerging Markets ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
34	IEMG iShares Core MSCI Emerging Markets ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
35	IEMG iShares Core MSCI Emerging Markets ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
36	IJR iShares S&P SmallCap 600 Index	Purchase	07/18/2018	No	\$1,001 - \$15,000
37	IJR iShares S&P SmallCap 600 Index	Purchase	07/18/2018	No	\$1,001 - \$15,000
38	IJR iShares S&P SmallCap 600 Index	Purchase	07/18/2018	No	\$1,001 - \$15,000
39	IJR iShares S&P SmallCap 600 Index	Purchase	07/18/2018	No	\$1,001 - \$15,000
40	IJR iShares S&P SmallCap 600 Index	Purchase	07/18/2018	No	\$15,001 - \$50,000
41	IUSG ISHARES CORE S&P U.S. GROWTH ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
42	IUSG ISHARES CORE S&P U.S. GROWTH ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
43	IUSG ISHARES CORE S&P U.S. GROWTH ETF	Purchase	07/18/2018	No	\$15,001 - \$50,000
44	IUSG ISHARES CORE S&P U.S. GROWTH ETF	Purchase	07/18/2018	No	\$15,001 - \$50,000
45	IUSG ISHARES CORE S&P U.S. GROWTH ETF	Purchase	07/18/2018	No	\$15,001 - \$50,000
46	IUSV ISHARES CORE S&P US VALUE ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
47	IUSV ISHARES CORE S&P US VALUE ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
48	IUSV ISHARES CORE S&P US VALUE ETF	Purchase	07/18/2018	No	\$15,001 - \$50,000
49	IUSV ISHARES CORE S&P US VALUE ETF	Purchase	07/18/2018	No	\$50,001 - \$100,000
50	IUSV ISHARES CORE S&P US VALUE ETF	Purchase	07/18/2018	No	\$50,001 - \$100,000
51	KIE SPDR S&P Insurance ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
52	LQD iShares iBoxx \$ Invest Grade Corp Bond	Sale	07/17/2018	No	\$15,001 - \$50,000
53	LQD iShares iBoxx \$ Invest Grade Corp Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
54	LQD iShares iBoxx \$ Invest Grade Corp Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
55	LQD iShares iBoxx \$ Invest Grade Corp Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
56	MBB iShares Barclays MBS Bond	Sale	07/17/2018	No	\$1,001 - \$15,000
57	MBB iShares Barclays MBS Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
58	MBB iShares Barclays MBS Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
59	MBB iShares Barclays MBS Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
60	NFLX NetFlix Inc	Sale	07/18/2018	No	\$1,001 - \$15,000
61	NFLX NetFlix Inc	Sale	07/18/2018	No	\$1,001 - \$15,000
62	PCY INVESCO EMERGING MARKETS SOVEREIGN ...	Sale	07/17/2018	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
63	PCY INVESCO EMERGING MARKETS SOVEREIGN ...	Sale	07/18/2018	No	\$1,001 - \$15,000
64	PCY INVESCO EMERGING MARKETS SOVEREIGN ...	Sale	07/18/2018	No	\$1,001 - \$15,000
65	PCY INVESCO EMERGING MARKETS SOVEREIGN ...	Sale	07/18/2018	No	\$1,001 - \$15,000
66	PGX INVESCO PREFERRED ETF	Sale	07/17/2018	No	\$1,001 - \$15,000
67	PGX INVESCO PREFERRED ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
68	PGX INVESCO PREFERRED ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
69	SHY iShares Barclays 1-3 Year Treasury Bond	Sale	07/17/2018	No	\$15,001 - \$50,000
70	SHY iShares Barclays 1-3 Year Treasury Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
71	SHY iShares Barclays 1-3 Year Treasury Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
72	SHY iShares Barclays 1-3 Year Treasury Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
73	TIP iShares Barclays TIPS Bond	Sale	07/17/2018	No	\$15,001 - \$50,000
74	TIP iShares Barclays TIPS Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
75	TIP iShares Barclays TIPS Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
76	TIP iShares Barclays TIPS Bond	Sale	07/18/2018	No	\$1,001 - \$15,000
77	VEA VANGUARD FTSE DEVELOPED MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
78	VEA VANGUARD FTSE DEVELOPED MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
79	VEA VANGUARD FTSE DEVELOPED MARKETS ETF	Purchase	07/18/2018	No	\$15,001 - \$50,000
80	VEA VANGUARD FTSE DEVELOPED MARKETS ETF	Purchase	07/18/2018	No	\$15,001 - \$50,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
81	VEA VANGUARD FTSE DEVELOPED MARKETS ETF	Purchase	07/18/2018	No	\$50,001 - \$100,000
82	VFH Vanguard Financials ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
83	VFH Vanguard Financials ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
84	VFH Vanguard Financials ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
85	VGT Vanguard Information Tech ETF	Sale	07/18 2018	No	\$1,001 - \$15,000
86	VGT Vanguard Information Tech ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
87	VGT Vanguard Information Tech ETF	Sale	07/18/2018	No	\$1,001 - \$15,000
88	VWO VANGUARD FTSE EMERGING MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
89	VWO VANGUARD FTSE EMERGING MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
90	VWO VANGUARD FTSE EMERGING MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
91	VWO VANGUARD FTSE EMERGING MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
92	VWO VANGUARD FTSE EMERGING MARKETS ETF	Purchase	07/18/2018	No	\$1,001 - \$15,000
93	XLB MATERIALS SELECT SECTOR SPDR FUND	Sale	07/18/2018	No	\$1,001 - \$15,000
94	XLB MATERIALS SELECT SECTOR SPDR FUND	Sale	07/18/2018	No	\$1,001 - \$15,000
95	XLB MATERIALS SELECT SECTOR SPDR FUND	Sale	07/18/2018	No	\$1,001 - \$15,000
96	XLE SECTOR SPDR ENERGY	Sale	07/18/2018	No	\$1,001 - \$15,000
97	XLE SECTOR SPDR ENERGY	Sale	07/18/2018	No	\$1,001 - \$15,000
98	XLI Industrial Select Sector SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
99	XLI Industrial Select Sector SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
100	XLI Industrial Select Sector SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
101	XLP Sector SPDR Consmrs STPL	Sale	07/18/2018	No	\$1,001 - \$15,000
102	XLP Sector SPDR Consmrs STPL	Sale	07/18/2018	No	\$1,001 - \$15,000
103	XLP Sector SPDR Consmrs STPL	Sale	07/18/2018	No	\$1,001 - \$15,000
104	XLRE Real Estate Select Sector SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
105	XLRE Real Estate Select Sector SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
106	XLRE Real Estate Select Sector SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
107	XLU Sector SPDR Utilities	Sale	07/18/2018	No	\$1,001 - \$15,000
108	XLU Sector SPDR Utilities	Sale	07/18/2018	No	\$1,001 - \$15,000
109	XLV Health Care Select SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
110	XLV Health Care Select SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
111	XLV Health Care Select SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
112	XLY Consumer Discretionary SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
113	XLY Consumer Discretionary SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000
114	XLY Consumer Discretionary SPDR	Sale	07/18/2018	No	\$1,001 - \$15,000

## Endnotes

## Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and

other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

## 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.

---