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House of Representatives

Mashington, **DC** 20515—0102

May 4, 2015

2015 MAY -4 PM 3: 29

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The Honorable Charles W. Dent Committee on Ethics U.S. House of Representatives 1015 Longworth House Office Building Washington, D.C. 20515

RE: Response of Martha Roby to CY2013 Financial Disclosure Statement Checklist

Chairman Dent:

This letter responds to the Checklist that I received from you related to the Calendar Year 2013 Financial Disclosure Statement that I previously filed with the Office of the Clerk of the House. This letter reconciles the items noted in the Checklist as follows:

- A trust was previously established for the benefit of my dependent daughter and a separate trust was also previously established for the benefit of my dependent son. My spouse and I serve as co-trustees of each trust. The CY2013 Financial Disclosure Statement reflects that my dependent children had assets held for their benefit in Ford Motor Company, Intel Corporation and Microsoft Corporation. The explanation for each dependent child's holdings in such assets is as follows:
 - a. The trust for the benefit of my dependent daughter sold (i) 280 shares of Waddell & Reed Financial, Inc. stock on July 27, 2012 at a per share sales price equal to \$29.7201, which yielded gross proceeds equal to \$8,137.66, and (ii) 341 shares of Torchmark Corporation on August 2, 2012 at a per share sales price equal to \$50.3606, which yielded gross proceeds equal to \$17,049.17. The gross proceeds from the sales were used in CY2013 by my dependent daughter's trust to purchase (iii) 250 shares of Microsoft Corporation stock on February 26, 2013 at a per share purchase price equal to \$28.0522 for a total purchase price equal to \$7,013.05, (iv) 450 shares of Ford Motor Company stock on March 12, 2013 at a per share purchase price equal to \$13.6088 for a total purchase price equal to \$6,123.98, and (v) 250 shares of Intel Corporation stock on July 3, 2013 at a per share purchase price equal to \$24.2406 for a total purchase price equal to \$6,060.16.
 - b. The trust for the benefit of my dependent son sold 210 shares of Torchmark Corporation on August 2, 2012 at a per share sales price equal to \$50.3712, which yielded gross proceeds equal to \$10,403.03. The gross proceeds from the sales were used in CY2013 by my dependent son's trust to purchase (iii) 100 shares of Microsoft Corporation stock on February 26, 2013 at a per share purchase price equal to \$27.4499 for a total purchase price equal to \$2,819.05, (iv) 225 shares of Ford Motor Company stock on March 12, 2013 at a per share purchase price equal to \$13.6996 for a total purchase price equal to \$3,082.41, and (v) 100 shares of Intel Corporation stock on July 3, 2013 at a per share purchase price equal to \$24.4147 for a total purchase price equal to \$3,255.00.

- 2. The CY2013 Financial Disclosure Statement disclosed that I owned interests in the Columbia Balanced Fund Class A and Eaton Vance Atlanta Capital SMID-Cap Fund Class A. These assets are owned by my rollover individual retirement account that was previously held entirely in cash. On January 31, 2012, my rollover IRA purchased (i) 151.8630 shares of Columbia Balanced Fund Class A at a per share purchase price equal to \$28.5025 for a total purchase price equal to \$4,328.49, and (ii) 189.6690 shares of Easton Vance Atlanta Capital SMID-Cap Fund Class A at a per share purchase price equal to \$16.7494 for a total purchase price equal to \$4,644.99. These assets are the only assets owned by my rollover IRA.
- 3. Mainstay Cornerstone Growth Class A was reported as jointly owned by my spouse and me on the CY2013 Financial Disclosure Statement. On January 23, 2013, the 183.066 shares of Mainstay Growth Equity Class A fund valued at \$11.661 per share that were jointly owned by my spouse and me were exchanged for 73.117 shares of Mainstay Cornerstone Growth Class A fund valued at \$19.196 per share that were thereafter also jointly owned by my spouse and me.
- 4. My spouse owns assets through the Balch & Bingham LLP 401(k) Profit Sharing Plan. The CY2013 Financial Disclosure Statement reported a transaction (exchange) involving Mainstay Funds Large Cap Growth Fund, which was owned by my spouse through the Balch & Bingham LLP 401(k) Profit Sharing Plan. There were not any transactions, including any exchanges, involving Mainstay Funds Large Cap Growth Fund owned by my spouse through his 401(k) profit sharing plan that require any reporting on Schedule B.
- 5. The CY2013 Financial Disclosure Statement reported mortgage indebtedness jointly owed by my spouse and me to both Arthur M. Britton and Regions Bank. The mortgage indebtedness related to a primary residence located at 3260 Bankhead Avenue, Montgomery, Alabama, which we sold in May 2013. Upon sale of such residence, the mortgage indebtedness owed to Arthur M. Britton and Regions Bank was paid in full.
- 6. The CY2013 Financial Disclosure Statement did not report any trips because I did not participate in any trips during CY2013 that required disclosure on my CY2013 Financial Disclosure Statement.

Thank you for your time and attention to this matter. If you have any questions, please do not hesitate to contact Stephen E. Boyd, my Chief of Staff, at 202-225-2901.

very truly yours

Martha Roby

Mamber of Congress