

ALAN GRAYSON
9TH DISTRICT, FLORIDA

COMMITTEE ON FOREIGN AFFAIRS
SUBCOMMITTEE ON
WESTERN HEMISPHERE
SUBCOMMITTEE ON
MIDDLE EAST AND NORTH AFRICA

COMMITTEE ON SCIENCE, SPACE,
AND TECHNOLOGY
SUBCOMMITTEE ON ENERGY
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January 13, 2014

K. Michael Conaway, Chairman
Linda T. Sanchez, Ranking Member
Committee on Ethics
U.S. House of Representatives
1015 Longworth H.O.B.
Washington, DC 20515

**HAND
DELIVERED**
LEGISLATIVE RESOURCE CENTER
2014 JAN 14 PM 2:39
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES
MC

Dear Chairman and Ranking Member:

This is in response to your letter to me dated September 17, 2013, regarding my 2012 Financial Disclosure Statement. Your letter requested a response within 30 days. Before that time was up, I requested a 90-day extension. Therefore, this response is timely.

Your letter contained nine comments on my Disclosure. These comments are repeated below, interleaved with my responses.

III-3a: Please identify the holder of the asset shown on Schedule III separately. Cash and balances - \$5 million to \$25 million (pg. 3) Yamaha Stock and Vista Stock – income appears to exceed the sale amount in Schedule IV.

If by “holder,” the committee means the institutions that were holding the cash balances, they were Suntrust, PNC Bank, Capital One, GE Capital, American Express Bank, Venture Bank, RF Lafferty, Texas Capital Bank, EuroPacific, Fidelity, TD Ameritrade and Merrill Lynch.

Regarding the Yamana stock, the income reported on Page 3 exceeded the sale amount on Schedule IV because, as stated, the income included both capital gains and dividends.

Regarding the Vista stock, the reported income does not exceed the sale amount in Schedule IV.

III-3a: Please provide the strike price and dates for each of the assets listed on Schedule III.

- *Amer Elec options*
- *Morgan Options*
- *Lilly Options*
- *Merch Options*
- *3M options*
- *US Bank options*

- *Amer Elec options – strike price 35, date 1/19/13.*
- *Morgan Options – strike price 50, date 1/19/13.*
- *Lilly Options – strike price 40, date 1/19/13.*
- *Merck Options – strike price 35, date 1/19/13.*
- *3M options – strike price 95, date 1/19/13.*
- *US Bank options – strike price 30, date 1/19/13.*

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III-4: If the following asset has been fully sold (see sale reported on Schedule IV), its value should be reported as "None" on Schedule III (if its total income exceeded \$200).

- *Yamaha Stock*

This asset was not fully sold.

III-5: The type or amount of income is not properly shown for the following assets:

- *Dacha Stock*
- *VMS*
- *WSW Exchange Fund Units*

The type and amount of income for Dacha stock are reported on Page 3. The type and amount of income for VMS Ventures stock and WSW Exchange Fund Units are reported on Page 4.

IV-3: Several assets shown on Schedule IV are not annotated in Block E, Schedule III (see pages 2 & 3).

There were no reportable assets exchanged during the reporting period. All reportable purchases and sales are reported on Schedule IV.

IV-6 An asset reported on Schedule III was not reported as owned in the preceding FD and is not reported as purchased on Schedule IV.

- *CVS Stock*
- *Atlanta Stock*
- *Grocom Stock*
- *Restaurant Brands Stock*
- *Newson Stock*
- *Chancellor Stock*
- *Yamaha Stock*
- *Fast Food Stock*
- *Silver Standard Stock*
- *Thompson Creek Stock*
- *Taseleo Stock*

- *CYS Stock – previous disclosure as “Cypress stock”.*
- *Atlatsa Stock – previous disclosure on Page 18.*
- *Geocom Stock – previous disclosure on page 18.*
- *Restaurant Brands Stock– previous disclosure on Page 17.*
- *Nevsun Stock – previous disclosure on Page 17.*
- *Chancellor Stock – not reportable previously; worth less than \$1000 and generated no income.*
- *Yamana Stock – previous disclosure on Page 5.*
- *Fast Food Stock – previous disclosure as “Fast Food Indonesia stock”.*
- *Silver Standard Stock – previous disclosure as part of “Grayson Fund interest.”*
- *Thompson Creek Stock– previous disclosure as part of “Grayson Fund interest.”*
- *Taseko Stock– previous disclosure as part of “Grayson Fund interest.”*

IV-6 An asset reported as owned in the preceding FD is not reported as owned on Schedule III and is not reported as sold on Schedule IV.

- *Several assets listed for the “DC” on pages 17-18 of prior FD.*

As the disclosure instructions indicate, the "SP, DC, JT" disclosure is voluntary. In the preceding disclosure, I elected to make such disclosure. In the 2012 Financial Disclosure Statement, I elected not to make such disclosure. Nevertheless, all assets for dependent children that are required to be disclosed have been listed; they simply aren't designated as "DC" any longer.

IV-7: An asset reported as purchased on Schedule IV is not reported as owned on Schedule III and not reported as sold on Schedule IV.

- *DC-Dacha Stock*

The sale of this asset is reported on Schedule IV on Page 7. The year-end value of the asset was zero.


IV-7: An asset reported as sold on Schedule IV is not reported as having been owned on Schedule III and not reported as previously purchased on Schedule IV.

- *DC-Vista Stock*

This asset is reported on Schedule III on Page 3.

Thank you for your note. If you need any further information, please let me know.

Sincerely,


Rep. Alan Grayson (FL-9)