

FINANCIAL DISCLOSURE REPORT FOR CALENDAR YEAR 2018

Report Required by the Ethics
in Government Act of 1978
(5 U.S.C. app. §§ 101-111)

1. Person Reporting (last name, first, middle initial) Benton, William D.	2. Court or Organization U.S. Court of Appeals, 8th Cir	3. Date of Report 04/30/2019
4. Title (Article III judges indicate active or senior status; magistrate judges indicate full- or part-time) Circuit Judge (active)	5a. Report Type (check appropriate type) ☐ Nomination ☐ Date ☐ Initial ☒ Annual ☐ Final 5b. ☐ Amended Report	6. Reporting Period 01/01/2018 to 12/31/2018
7. Chambers or Office Address U.S. Courthouse 400 E. 9th St. Kansas City MO 64106		
IMPORTANT NOTES: The instructions accompanying this form must be followed. Complete all parts, checking the NONE box for each part where you have no reportable information.		

I. POSITIONS. (Reporting individual only; see pp. 9-13 of filing instructions.)

☐ NONE (No reportable positions.)

	<u>POSITION</u>	<u>NAME OF ORGANIZATION/ENTITY</u>
1.	Director	Freedom's Frontier National Heritage Area, Inc.
2.	Trustee	Trust #1
3.		
4.		
5.		

II. AGREEMENTS. (Reporting individual only; see pp. 14-16 of filing instructions.)

☒ NONE (No reportable agreements.)

	<u>DATE</u>	<u>PARTIES AND TERMS</u>
1.		
2.		
3.		

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III. NON-INVESTMENT INCOME. *(Reporting individual and spouse; see pp. 17-24 of filing instructions.)***A. Filer's Non-Investment Income**☐ NONE *(No reportable non-investment income.)*

DATE	SOURCE AND TYPE	INCOME (yours, not spouse's)
1. 2018	State of Missouri - judicial retirement	\$83,675.64
2.		
3.		
4.		

B. Spouse's Non-Investment Income - *If you were married during any portion of the reporting year, complete this section.**(Dollar amount not required except for honoraria.)*☒ NONE *(No reportable non-investment income.)*

DATE	SOURCE AND TYPE
1.	
2.	
3.	
4.	

IV. REIMBURSEMENTS *-- transportation, lodging, food, entertainment.**(Includes those to spouse and dependent children; see pp. 25-27 of filing instructions.)*☐ NONE *(No reportable reimbursements.)*

SOURCE	DATES	LOCATION	PURPOSE	ITEMS PAID OR PROVIDED
1. Rotary International	Mar. 12-15, 2018	Evanston IL	civic organization meeting	transportation, meals and hotel
2. Rotary International	May 3-4, 2018	Estes Park CO	civic organization meeting	transportation, meals and hotel
3. Rotary International	Sep. 12-14, 2018	Evanston IL	civic organization meeting	transportation, meals and hotel
4. Rotary International	Sep. 19-20, 2018	Montreal Canada	civic organization meeting	transportation, meals and hotel
5. American Legion	Sep. 29-30, 2018	Indianapolis IN	veterans organization meeting	transportation, meals and hotel
6. Rotary International	Oct. 24, 2018	Evanston IL	civic organization meeting	transportation, meals and hotel

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V. GIFTS. *(Includes those to spouse and dependent children; see pp. 28-31 of filing instructions.)*

☒ NONE *(No reportable gifts.)*

SOURCE	DESCRIPTION	VALUE
1.		
2.		
3.		
4.		
5.		

VI. LIABILITIES. *(Includes those of spouse and dependent children; see pp. 32-33 of filing instructions.)*

☒ NONE *(No reportable liabilities.)*

CREDITOR	DESCRIPTION	VALUE CODE
1.		
2.		
3.		
4.		
5.		

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VII. INVESTMENTS and TRUSTS – income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)
1. Equifax Inc. common stock	B	Dividend	L	T					
2. GE common stock	A	Dividend			Sold	08/24/18	J		
3. Oppenheimer Main Street Fund A MSIGX	B	Dividend	J	T					
4. Wells Fargo Emerging Growth Fund A (formerly "Small Cap") WEMAX	D	Distribution	K	T					
5. US Bancorp common stock	A	Dividend	J	T					
6. MOST 529 plan fund #1-Vanguard Aggressive Growth Portfolio		None	J	T					
7. MOST 529 plan fund #2-Vanguard Interest Accumulat'n Portfoli	A	Interest	K	T					
8. AIG American General universal life policy	B	Interest	K	T					
9. IRA # 1									
10. - Wells Fargo Bank deposit program	A	Interest	J	T					
11. -Ishares Russell 1000 Value IWD	A	Dividend			Sold	10/19/18	J	A	
12. -Ishares Core S&P 500 Index Fd IVV	A	Dividend	J	T					
13. -Invesco TR 11 (formerly Powershares) EM Mar Sov De PT PCY	A	Dividend	J	T					
14. -SPDR Bloomberg Barclays High Yield Bond ETF JNK	A	Interest	J	T					
15. -Vanguard FTSE Dev Markets ETF VEA	A	Dividend	J	T					
16. -Vanguard Intl Equity Index Fds FTSE Emerging Mkts ETF VWO	A	Dividend	J	T					
17. -Vanguard Mid Cap VO	A	Dividend	J	T					

1. Income Gain Codes:	A = \$1,000 or less (See Columns B1 and D4)	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes	F = \$50,001 - \$100,000 J = \$15,000 or less (See Columns C1 and D3)	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes	N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market

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18. -Vanguard REIT VNQ	A	Distribution	J	T					
19. -Vanguard Short Term Bond ETF BSV	A	Interest	J	T	Buy	10/19/18	J		
20. -Vanguard Small Cap Valu ETF VBR	A	Dividend	J	T					
21. -Vanguard Small Cap VB	A	Dividend	J	T					
22. -Vanguard Total Bond Market BND	A	Interest	J	T					
23. -Vanguard Intermediate Term Corp Bond ET VCIT	A	Interest	J	T					
24. -Vanguard Mid-Cap Value Index Fund VOE	A	Dividend	J	T	Buy	10/19/18	J		
25. -Vanguard Total Stock Market ETF VTI	A	Dividend	J	T					
26. -Vanguard Value ETF VTV	A	Dividend	J	T	Buy	10/09/18	J		
27. IRA # 2									
28. -Deutsche Secs Tr Enhanced Comm Strat Fd Instl Class SKIRX	A	Dividend			Sold	01/23/18	J	A	
29. -Bond Fund of Amer Class F2 ABNFX	A	Interest	J	T					
30. -Goldman Sachs Tr Finl Sq Treas Instrs Fd Instl Class FTIXX	A	Interest	J	T					
31. -American Funds Growth Fund of Am Class F2 GFFFX	A	Dividend	J	T					
32. -Hartford Mutl Fds Inc Midcap Fund Class 1 HFMIX	A	Dividend	J	T	Buy	01/23/18	J		
33. -American Funds New World Fund Class F2 NFFFX	A	Dividend			Sold	01/23/18	J	A	
34. -American Funds Washington Mutual Fd F2 WMFFX	A	Dividend	J	T					

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2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$50,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
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35. -Janus Invst Fd Flexible Bd Fd Class I JFLEX	A	Interest			Sold	01/23/18	J		
36. -John Hancock Funds III Disciplined Value Mid Cap Fd Class I JVMIX	A	Dividend	J	T					
37. -American EuroPacific Growth FU Class F2 AEPFX	A	Dividend	J	T					
38. -Nuveen Invst Fds Inc Real Estate Secs Fund Class I FARCX	A	Distribution	J	T					
39. - American Cap World Bd class F2 BJWFX	A	Dividend	J	T					
40. -Janus Funds Janus Perkins Small Cap Value Fd Cl I JSCOX	A	Dividend	J	T					
41. -Lazard Fds Inc Emerging Mkts Port Instl Shs LZEMX	A	Dividend	J	T					
42. - MFS Ser Tr X Emerging Mkts Debt FD class I MEDIX	A	Dividend	J	T					
43. -Metropolitan West Fds Total Return Bd Fd Cla MWTIX	A	Dividend	J	T					
44. -JP Morgan Fds JP Morgan Intrepid Value Fd Select Cl Shares JPIVX	A	Dividend	J	T					
45. -JP Morgan Tr II High Yield Fd Select Cl OHYFX	A	Dividend	J	T					
46. -Brookfield Invst Funds Global Listed Real Estate Fd Cl Y BLRYX	A	Dividend	J	T					
47. -Prudential Jennison Mid-Cap Growth Fnd Cl Z PEGZX	A	Dividend			Sold	01/23/18	J	A	
48. -PIMCO Fds Pac Invst Mgmt Ser-Commod Real Ret Strat Fd Instl Cl PCRIX	A	Dividend	J	T	Buy	01/23/18	J		
49. -PGIM Total Return Bond Cl Z PDBZX	A	Dividend	J	T	Buy	01/23/18	J		
50. -T Rowe Price Blue Chip Growth Fund TRBCX	A	Dividend	J	T					
51. - Voya Equity Tr Small Cap Opportunities FD cl I NSPIX		None	J	T					

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52. Pfizer Inc. common stock	A	Dividend	K	T					
53. Lord Abbett High Yield Muni Bond Fund - HYMCX	B	Int./Div.	K	T					
54. Nuveen High Yield Municipal Bond Fund class C NHMCX	B	Int./Div.	K	T					
55. American International Group Inc. common stock	A	Dividend	K	T					
56. Federated Kaufmann Large Cap FD class C - KLCCX	C	Distribution	K	T					
57. Nuveen Municipal Trust High Yield Mun Bond Fd class C - NHCCX	B	Dividend	K	T					
58. American Balanced Fund Cl A	C	Distribution	L	T					
59. Capital Income Builder Fund Cl A	B	Dividend	L	T					
60. Income Fund of America Fund Cl A	D	Distribution	L	T					
61. American Funds Global Balanced Fund Cl A	A	Dividend	K	T					
62. Nutrien Ltd NTR (formerly Agrium Inc AGU)	A	Dividend	J	T					
63. Alphabet Inc Voting Cap Stk Cl A GOOGL	A	Dividend	J	T	Buy	10/26/18	J		
64. Amazon Com Inc AMZN	A	Dividend	J	T	Buy	11/27/18	J		
65. Amgen Inc. AMGN	A	Dividend	J	T					
66. Apple Inc AAPL	A	Dividend	J	T					
67. Big Lots Inc. BIG	A	Dividend			Sold	06/15/18	J		
68. Booz Allen Hamilton Holding Co BAH	A	Dividend	J	T					

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69. Brunswick Corp BC	A	Dividend			Sold	12/04/18	J	A	
70. Capital One Financial Corp. COF	A	Dividend	J	T					
71. CBS Corp C1 B CBS	A	Dividend	J	T					
72. Centene Corp. CNC	A	Dividend	J	T					
73. Check Point Software Tech Ltd CHKP	A	Dividend			Sold	11/29/18	J		
74. Cisco Systems Inc. CSCO	A	Dividend	J	T					
75. Citigroup Inc New C	A	Dividend	J	T					
76. Coresite Realty Corp COR	A	Dividend	J	T					
77. Costco Whsl Corp New Com COST	A	Dividend	J	T	Buy	04/12/18	J		
78. APTIV PLC (name change from Delphi Automotive PLC DLPH) APTV	A	Dividend	J	T					
79. Delta Air Lines Inc New DAL	A	Dividend	J	T					
80. Energy Select ETF Sector SPDR XLE	A	Dividend	J	T					
81. First Republic Bank San.Fran. CA FRC	A	Dividend	J	T					
82. First Trust Dow Jones Internet Index Fund FDN	A	Dividend	J	T					
83. Home Depot Inc HD	A	Dividend	J	T					
84. HP Inc HPQ	A	Dividend	J	T					
85. Huntington Ingalls Industries Inc HII	A	Dividend	J	T					

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86. Icon PLC ICLR	A	Dividend	J	T					
87. Ingredion Inc INGR	A	Dividend			Sold	08/02/18	J		
88. International Paper Co IP	A	Dividend			Sold	11/28/18	J	A	
89. iShares ETF Russell 2000 Growth IWO	A	Dividend	J	T	Buy	10/26/18	J		
90. iShares ETF Russell 2000 IWM	A	Dividend	J	T					
91. iShares ETF Russell Midcap Growth IWP		None	J	T	Buy	12/12/18	J		
92. iShares Core MSCI ETF Emerging Markets ETF IEMG	A	Dividend	J	T	Buy	09/21/18	J		
93. iShares Iboxx ET Investment Grade Corp Bd LQD	A	Dividend			Sold	01/11/18	J	A	
94. iShares Iboxx ET High Yield Corp Bond HYG	A	Dividend	J	T					
95. iShares JP Morgan USD Emerging Markets Bond EMB	B	Dividend	J	T					
96. iShares MBS ETF MBB	A	Dividend	J	T	Buy	09/20/18	J		
97. iShares Russell Midcap IWR	A	Dividend	J	T					
98. Johnson & Johnson JNJ	A	Dividend			Sold	07/05/18	J	A	
99. JP Morgan Chase & Co JPM	A	Dividend	J	T					
100. Maxim Integrated Prods Inc MXIM	A	Dividend	J	T					
101. Medtronic PLC MDT	A	Dividend	J	T					
102. Metlife Inc MET	A	Dividend	J	T					

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103. Microsoft Corp MSFT	A	Dividend	J	T					
104. Pentair PLC PNR	A	Dividend			Sold	12/06/18	J	A	
105. Invesco Optimum Yld ETF Diversified Commodity Strategy No K-1 PDBC	A	Dividend	J	T	Buy	09/21/18	J		
106. Invesco TR 11 Pfd (formerly Powershares ET Preferred Portfolio) PGX	A	Dividend	J	T					
107. Invesco TR 11 (formerly Powershares) Em Mar ET Sov De Pt PCY	A	Dividend	J	T					
108. Invesco TR 11 (fka Powershares) S&P ET Smallcap Financials Portf PSCF	A	Dividend	J	T					
109. Invesco TR 11 ETF S&P Small Cap Health Care PSCH	A	Dividend	J	T	Buy	10/26/18	J		
110. Qualcomm Inc. QCOM	A	Dividend	J	T					
111. Quest Diagnostics Inc DGX	A	Dividend	J	T					
112. Regency Centers Corp REIT REG	A	Distribution			Sold	06/08/18	J		
113. Reinsurance Group of American RGA	A	Dividend	J	T					
114. Ross Stores Inc (Calif) ROST	A	Dividend	J	T					
115. SPDR S&P 500 Trust ETF SPY	A	Dividend	J	T					
116. Thor Industries THO	A	Dividend			Sold	06/15/18	J	A	
117. Trustmark Corp TRMK	A	Dividend	J	T					
118. United Technologies Corp UTX	A	Dividend	J	T					
119. UnitedHealth Group Inc UNH	A	Dividend	J	T	Buy	11/29/18	J		

1. Income Gain Codes: (See Columns B1 and D4)	A ~\$1,000 or less F ~\$50,001 - \$100,000	B ~\$1,001 - \$2,500 G ~\$100,001 - \$1,000,000	C ~\$2,501 - \$5,000 H1 ~\$1,000,001 - \$5,000,000	D ~\$5,001 - \$15,000 H2 ~More than \$5,000,000	E ~\$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J ~\$15,000 or less N ~\$250,001 - \$500,000 P3 ~\$25,000,001 - \$50,000,000	K ~\$15,001 - \$50,000 O ~\$500,001 - \$1,000,000	L ~\$50,001 - \$100,000 P1 ~\$1,000,001 - \$5,000,000 P4 ~More than \$50,000,000	M ~\$100,001 - \$250,000 P2 ~\$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

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VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)
120. USG Corp New USG	A	Dividend			Sold	06/21/18	J	B	
121. Vanguard FTSE ET Pacific VPL	A	Dividend	J	T					
122. Vanguard FTSE ET Developed Markets ETF VEA	A	Dividend	J	T					
123. Vanguard Global ETF Ex-U.S. Real Estate VNQI	A	Dividend	J	T					
124. Vanguard Intl Equity ET Index Fds FTSE Emerging Mkts ETF VWO	A	Dividend	K	T					
125. Vanguard REIT ET VNQ	A	Dividend	K	T					
126. Vanguard Short Term ET Corp BD VCSH	A	Dividend	J	T					
127. Vanguard Total Bond ET Market BND	A	Dividend	J	T					
128. Walgreens Boots Alliance Inc WBA	A	Dividend			Sold	11/29/18	J	A	
129. Visa Inc Class A V	A	Dividend	J	T	Buy	12/06/18	J		
130. 3M Co MMM	A	Dividend	J	T					
131. Philip Morris Intl Inc Bonds	A	Interest			Sold	01/10/18	J		
132. Bank of America Corp Bonds	A	Interest	J	T					
133. Goldman Sachs Group Bonds	A	Interest	J	T					
134. AT&T senior unsecured Bonds	A	Interest	J	T					
135. Verizon Communications senior unsecured Bonds	A	Interest	J	T					
136. Gilead Sciences Inc senior unsecured Bonds	A	Interest	J	T					

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$50,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

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VII. INVESTMENTS and TRUSTS -- income, value, transactions (Includes those of spouse and dependent children; see pp. 34-60 of filing instructions.)

☐ NONE (No reportable income, assets, or transactions.)

A. Description of Assets (including trust assets) Place "(X)" after each asset exempt from prior disclosure	B. Income during reporting period		C. Gross value at end of reporting period		D. Transactions during reporting period				
	(1) Amount Code 1 (A-H)	(2) Type (e.g., div., rent, or int.)	(1) Value Code 2 (J-P)	(2) Value Method Code 3 (Q-W)	(1) Type (e.g., buy, sell, redemption)	(2) Date mm/dd/yy	(3) Value Code 2 (J-P)	(4) Gain Code 1 (A-H)	(5) Identity of buyer/seller (if private transaction)
137. Apple Inc senior unsecured Bonds	A	Interest	J	T					
138. Home Depot Inc senior unsecured Bonds	A	Interest	J	T					
139. Cisco Systems Inc senior unsecured Bonds	A	Interest	J	T					
140. JP Morgan Chase senior unsecured Bonds	A	Interest	J	T					
141. Express Scripts Holding senior unsecured Bonds	A	Interest			Sold	09/21/18	J		
142. Oracle Corp senior unsecured Bonds	A	Interest	J	T					
143. U.S. Treasury Bonds	B	Interest	K	T					
144. Actavis Funding Scs senior unsecured Bonds	A	Interest			Sold	09/19/18	J		
145. Trust #1									
146. - Edward Jones money-market fund	A	Interest	J	T					
147. - American Balanced Fund Cl A	C	Distribution	L	T					
148. - Capital Income Builder Fund A	C	Dividend	L	T					
149. - Franklin Balanced Fund Cl A	B	Dividend	K	T					
150. - Income Fund of America Fund A	D	Dividend	M	T					
151. - American Funds Global Balanced Fund	B	Dividend	K	T					

1. Income Gain Codes: (See Columns B1 and D4)	A = \$1,000 or less F = \$50,001 - \$100,000	B = \$1,001 - \$2,500 G = \$100,001 - \$1,000,000	C = \$2,501 - \$5,000 H1 = \$1,000,001 - \$5,000,000	D = \$5,001 - \$15,000 H2 = More than \$5,000,000	E = \$15,001 - \$50,000
2. Value Codes (See Columns C1 and D3)	J = \$15,000 or less N = \$250,001 - \$500,000 P3 = \$25,000,001 - \$50,000,000	K = \$15,001 - \$50,000 O = \$500,001 - \$1,000,000	L = \$50,001 - \$100,000 P1 = \$1,000,001 - \$5,000,000 P4 = More than \$50,000,000	M = \$100,001 - \$250,000 P2 = \$5,000,001 - \$25,000,000	
3. Value Method Codes (See Column C2)	Q = Appraisal U = Book Value	R = Cost (Real Estate Only) V = Other	S = Assessment W = Estimated	T = Cash Market	

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VIII. ADDITIONAL INFORMATION OR EXPLANATIONS. *(Indicate part of report.)*

The Vanguard Aggressive Growth Portfolio, listed on line 6 of Part VII, invests in two stock funds: (1) Vanguard Institutional Total Stock Market Index Fund (60%), and Vanguard Total International Stock Index Fund (40%). This allocation is made by the MOST plan, not by me.

The Vanguard Interest Accumulation Portfolio, listed on line 7 of Part VII, directs all its assets into Vanguard Short Term Reserves Account, which, in turn, invests in (1) Vanguard Federal Money Market Fund, and (2) funding agreements issued by one or more insurance companies, banks, and other issuers. This allocation is made by the MOST plan, not by me, and I do not know any specifics of item (2).

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IX. CERTIFICATION.

I certify that all information given above (including information pertaining to my spouse and minor or dependent children, if any) is accurate, true, and complete to the best of my knowledge and belief, and that any information not reported was withheld because it met applicable statutory provisions permitting non-disclosure.

I further certify that earned income from outside employment and honoraria and the acceptance of gifts which have been reported are in compliance with the provisions of 5 U.S.C. app. § 501 et. seq., 5 U.S.C. § 7353, and Judicial Conference regulations.

Signature: **s/ William D. Benton**

NOTE: ANY INDIVIDUAL WHO KNOWINGLY AND WILLFULLY FALSIFIES OR FAILS TO FILE THIS REPORT MAY BE SUBJECT TO CIVIL AND CRIMINAL SANCTIONS (5 U.S.C. app. § 104)

Committee on Financial Disclosure
Administrative Office of the United States Courts
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