

**FINANCIAL DISCLOSURE REPORT
FOR CALENDAR YEAR 2019**

*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) Heffley, Marilyn	2. Court or Organization United States District Court Room 4001	3. Date of Report 08/13/2020
4. Title (Article III judges indicate active or senior status; magistrate judges indicate full- or part-time) MAGISTRATE - FULL TIME	5a. Report Type (check appropriate type) ☐ Nomination ☐ Date ☐ Initial ☒ Annual ☐ Final	6. Reporting Period 01/01/2019 to 12/31/2019
	5b. ☐ Amended Report	
7. Chambers or Office Address UNITED STATES COURTHOUSE 601 MARKET STREET - ROOM 4001 PHILADELPHIA, PA 19106-1768		
IMPORTANT NOTES: <i>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>		

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

☒ NONE *(No reportable positions.)*

POSITION

NAME OF ORGANIZATION/ENTITY

1.		
2.		
3.		
4.		
5.		

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

☒ NONE *(No reportable agreements.)*

DATE

PARTIES AND TERMS

1.		
2.		
3.		

FINANCIAL DISCLOSURE REPORT

Page 2 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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.)

<u>DATE</u>	<u>SOURCE AND TYPE</u>	<u>INCOME</u> (yours, not spouse's)
1.		
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.)

<u>DATE</u>	<u>SOURCE AND TYPE</u>
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.)

<u>SOURCE</u>	<u>DATES</u>	<u>LOCATION</u>	<u>PURPOSE</u>	<u>ITEMS PAID OR PROVIDED</u>
1.				
2.				
3.				
4.				
5.				

Name of Person Reporting	Date of Report
Heffley, Marilyn	08/13/2020

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.		

FINANCIAL DISCLOSURE REPORT

Page 4 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
1. PORTIN HOFFMAN FINANCIAL GROUP ADVISORY RETIREMENT SWEEP PROGRAM	A	Interest	K	T					
2. AMERICAN AMCAP FUND F2	A	Dividend	K	T					
3. AMERICAN AMCAP FUND F2	C	Distribution	K	T					
4. GOLDMAN SACHS ABSOLU RETURN TACKER	A	Dividend	K	T	Buy	07/24/19	K		
5. GOLDMAN SACHS ABSOLU RETURN TACKER	A	Distribution	J	T	Buy	07/24/19	K		
6. AQR MANAGED FUTURES FUND CL I	A	Dividend	K	T	Sold (part)	07/24/19	K	A	
7. JOHN HANCOCK DISCIPL INED VALUE MID CAP I	A	Dividend	L	T					
8. OPPENHEIMER DEV MARKETS CLASS Y	A	Dividend	K	T					
9. OPPENHEIMER DEV MARKETS CLASS Y	A	Distribution	J	T					
10. PIMCO ALL ASSET ALL AUTHORITY- INSTIT CL	B	Dividend	L	T					
11. T ROWE PRICE BLUE CHIP GROWTH INC	A	Distribution	J	T					
12. T ROWE PRICE BLUE CHIP GROWTH INC	A	Dividend	L	T					
13. THE HARTFORD INTL OPPT FD CLASS I	A	Dividend	L	T					
14. UNDISCOVERED MGRS BEHAVIOR VALUE CL L	A	Dividend	L	T					
15. UNDISCOVERED MGRS BEHAVIOR VALUE CL L	B	Distribution	J	T					
16. VANGUARD EQUITY INCOME INVESTOR CL	C	Dividend	M	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	

FINANCIAL DISCLOSURE REPORT

Page 5 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)

17. VANGUARD EQUITY INCOME INVESTOR CL	B	Distribution	M	T					
18. AB GLOBAL BOND ADVISOR CLASS	B	Dividend	K	T					
19. BLACKROCK FLOATING RATE INC PORT INSTL	B	Dividend	K	T					
20. EATON VANCE INCOME FUND OF BOSTON CL I	B	Dividend	K	T					
21. JOHN HANCOCK BOND FUND CLASS I	C	Dividend	L	T					
22. JOHN HANCOCK BOND FUND CLASS I	A	Distribution	L	T					
23. LORD ABBETT SHORT DURATION INCOME CL F	A	Dividend	K	T					
24. GUARDIAN LIFE INS & ANNUITY CO (VARIABLE ANNUITY IRA PLAN)		None	M	T					
25. LIFE INS SUB ACCOUNT: AB VPS GROWTH & INCOME PORTFOLIO CLASS B	A	Dividend	J	T					
26. LIFE INS SUB ACCOUNT: BLACK ROCK CAPITAL APPRECIATION SERIES I	A	Dividend	J	T					
27. LIFE INS SUB ACCOUNT: BLACK ROCK ADVANTAGE LARGE CAP CORE CL LL	A	Dividend	J	T					
28. LIFE INS SUB ACCOUNT: COLUMBIA VARIABLE PORTFOLIO SMALL CAP VA	A	Dividend	J	T					
29. LIFE INS SUB ACCOUNT: FIDELITY VIP MIDCAP PORT SRCL2	A	Dividend	J	T					
30. LIFE INS SUB ACCOUNT: FIDELITY VIP MIDCAP PORT SRCL2	A	Dividend	J	T					
31. LIFE INS SUB ACCOUNT: FRANKLIN SMALL CAP VALUE VIP FUND CLASS	A	Dividend	J	T					
32. LIFE INS SUB ACCOUNT:GUARDIAN GLOBAL UTILITIES VIP FUND	A	Dividend	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	

FINANCIAL DISCLOSURE REPORT

Page 6 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
33. LIFE INS SUB ACCOUNT: GUARDIAN INTERNATIONAL GROWTH VIP FUND	A	Dividend	J	T					
34. LIFE INS SUB ACCOUNT: GUARDIAN INTERNATIONAL VALUE VIP FUND	A	Dividend	J	T					
35. LIFE INS SUB ACCOUNT: JANUS HENDERSON GLOBAL TECHNOLOGY PORTFO	A	Dividend	J	T					
36. LIFE INS SUB ACCOUNT: MFS VIT UTILITIES SERIES SC	A	Dividend	J	T					
37. LIFE INS SUB ACCOUNT: OPPENHEIMER GLOBAL STRATEGIC INCOME/VA S	A	Dividend	K	T					
38. LIFE INS SUB ACCOUNT: OPPENHEIMER MAIN STREET SMALL CAP FUND/V	A	Dividend	J	T					
39. LIFE INS SUB ACCOUNT: PIMCO TOTAL RETURN ADVISOT CL	A	Dividend	J	T					
40. LIFE INS SUB ACCOUNT: PIONEER MID CAP VALUE VCT CL II	A	Dividend	J	T					
41. LIFE INS SUB ACCOUNT: VICTORY INCORE INVESTMENT QUALITY BOND V	A	Dividend	K	T					
42. LIFE INS SUB ACCOUNT: VICTORY INCORE LOW DURATION BOND VIP SER	A	Dividend	J	T					
43. LIFE INS SUB ACCOUNT: VICTORY RS LARGE CAP ALPHA VIP SERIES	A	Dividend	J	T					
44. JOHN HANCOCK FUNDS STRATEGIC INCOME OPPORTUNITIES FUND CL I	A	Dividend	J	T					
45. PORTIN HOFFMAN FINANCIAL GROUP ADVISORY RETIREMENT SWEEP PROGRAM	A	Interest	J	T					
46. AMERICAN AMCAP FUND F2	A	Dividend	K	T	Sold (part)	12/04/19	J	A	
47. AMERICAN AMCAP FUND F2	A	Distribution	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	

FINANCIAL DISCLOSURE REPORT

Page 7 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
48. AMERICAN EUROPACIFIC GROWTH FUND CL F2	A	Dividend	J	T	Sold (part)	07/25/19	J	A	
49. AMERICAN EUROPACIFIC GROWTH FUND CL F2	A	Distribution	J	T					
50. COLUMBIA OVERSEAS VALUE CLASS ADV	A	Dividend	J	T	Buy	07/25/19	J		
51. COLUMBIA OVERSEAS VALUE CLASS ADV	A	Distribution	J	T					
52. GOLDMAN SACHS ABSOLU RETURN TRACKER	A	Dividend	K	T					
53. GOLDMAN SACHS ABSOLU RETURN TRACKER	A	Distribution	K	T					
54. HARDING LOEVNER INST EMERGING MRKTS CL I	A	Dividend	K	T	Sold (part)	12/04/19	J	A	
55. PARNASSUS MID CAP	A	Dividend	K	T					
56. PARNASSUS MID CAP	A	Distribution	K	T					
57. VANGUARD EQUITY INCOME ADMIRAL FD	B	Dividend	K	T					
58. VANGUARD EQUITY INCOME ADMIRAL FD	A	Distribution	K	T					
59. ZACKS SMALL-CAP CORE FUND	A	Dividend	K	T	Sold (part)	12/04/19	J	A	
60. AB GLOBAL BOND ADVISOR CLASS	A	Dividend	J	T					
61. BLACKROCK STRATEGIC INCOME OPPTS I INSTL	B	Dividend	K	T					
62. BLACKROCK STRATEGIC INCOME OPPTS I INSTL	A	Distribution	J	T					
63. COLUMBIA STRATEGIC INCOME FUND ADV	B	Dividend	K	T					
64. EATON VANCE FLOATING RATE ADVANTAGE CL I	A	Dividend	J	T	Sold (part)	12/04/19	J	A	

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	

FINANCIAL DISCLOSURE REPORT

Page 8 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
65. LORD ABBETT SHORT DURATION INCOME CL F	A	Dividend	K	T					
66. PORTIN HOFFMAN FINANCIAL GROUP BANK DEPOSIT SWEEP PROGRAM	A	Interest	L	T					
67. AMERICAN EUROPACIFIC GROWTH FUND CL F2	A	Dividend	K	T	Sold (part)	07/25/19	J	A	
68. AMERICAN EUROPACIFIC GROWTH FUND CL F2	A	Distribution	K	T					
69. AMERICAN FUNDAMENTAL INVESTORS CL F2	A	Dividend	K	T					
70. AMERICAN FUNDAMENTAL INVESTORS CL F2	B	Distribution	K	T					
71. AMERICAN GROWTH FUND OF AMERICA CL F2	A	Dividend	K	T					
72. AMERICAN GROWTH FUND OF AMERICA CL F2	B	Distribution	K	T					
73. DREYFUS GLOBAL REAL RETURN CL I	B	Dividend	K	T					
74. COLUMBIA OVERSEAS VALUE CLASS ADV	A	Dividend	K	T	Buy	07/25/19	K		
75. COLUMBIA OVERSEAS VALUE CLASS ADV	A	Distribution	K	T					
76. GOLDMAN SACHS ABSOLU RETURN TRACKER	A	Dividend	K	T					
77. GOLDMAN SACHS ABSOLU RETURN TRACKER	A	Distribution	K	T					
78. HARDING LOEVNER INST EMERGING MRKTS CL I	A	Dividend	K	T					
79. JPMORGAN EQUITY INCOME CLASS I	B	Dividend	L	T					
80. JPMORGAN EQUITY INCOME CLASS I	B	Distribution	L	T					
81. JP MORGAN UNDISCOVERED MNG BEHAVIOR CL I	A	Dividend	K	T	Buy	08/05/19	K		

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	

FINANCIAL DISCLOSURE REPORT

Page 9 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)
82. JP MORGAN UNDISCOVERED MNG BEHAVIOR CL I	B	Distribution	K	T					
83. PARNASSUS MID CAP	A	Dividend	K	T					
84. PARNASSUS MID CAP	B	Distribution	K	T					
85. T ROWE PRICE BLUE CHIP GROWTH INC	A	Dividend	L	T					
86. T ROWE PRICE BLUE CHIP GROWTH INC	A	Distribution	L	T					
87. TWEEDY BROWNE GLOBAL VALUE FUND	A	Dividend	K	T					
88. TWEEDY BROWNE GLOBAL VALUE FUND	A	Distribution	K	T					
89. AB GLOBAL BOND ADVISOR CLASS	A	Dividend	K	T					
90. BLACKROCK PA MUNI BOND FD INSTL	B	Dividend	J	T					
91. EATON VANCE FLOATING RATE ADVANTAGE CL I	B	Dividend	K	T					
92. FIDELITY TOTAL BOND	B	Dividend	K	T					
93. FIDELITY TOTAL BOND	A	Distribution	K	T					
94. NUVEEN PA MUNICIPAL BOND CL I	B	Dividend	L	T					
95. NUVEEN PA MUNICIPAL BOND CL I	A	Distribution	L	T					
96. PGIM ABSOLUTE RETURN BOND CL Z	B	Dividend	K	T					
97. PGIM ABSOLUTE RETURN BOND CL Z	A	Distribution	K	T					
98. ISHARES CORE S&P SMALL-CAP E	A	Dividend	J	T	Sold (part)	08/05/19	J	A	

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	

FINANCIAL DISCLOSURE REPORT

Page 10 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
99. BLACKROCK STRATEGIC INCOME OPPRSI INSTL	B	Dividend	J	T					
100. ZACKS SMALL-CAP CORE FUND	C	Distribution	J	T					
101. ENTRUSTPERMAL ALTER CORE FUND CL I	A	Dividend	J	T					
102. PNC SAVINGS ACCOUNT	A	Interest	J	T					
103. MERILL EDGE CASH MANAGEMENT	A	Interest	N	T					
104. SUN COKE ENERGY	A	Dividend	J	T					
105. BLACKROCK LARGE CAP CORE CL III - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
106. COLUMBIA VP SMALL CAP VALUE - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
107. FIDELITY VIP CONTRAFUND SRCL2 - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
108. FIDELITY VIP MID CAP PORT SRCL2 - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
109. FRANKLIN SMALL CAP VALUE VIP FUND CL - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
110. PIONEER MID-CAP VALUE VCT CL II - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
111. RS LOW DURATION BOND VIP SERIES - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
112. OPPENHEIMER MAIN STREET SMALL- CAP FUND/VA - GUARD INV B SERIES	A	Dividend	J	T	Buy	02/02/19	J		
113. ALLIANCEBERNSTEIN VPS GROWTH & INCOME PORTFOLIO CL B - GUARD INV	A	Dividend	J	T	Buy	02/02/19	J		
114. GUARDIAN INTERNATIONAL GROWTH VIP FUND	A	Dividend	J	T	Buy	02/02/19	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	

FINANCIAL DISCLOSURE REPORT

Page 11 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)
115. GUARDIAN INTERNATIONAL VALUE VIP FUND	A	Dividend	J	T	Buy	02/02/19	J		
116. COLUMBIA VP - SMALL CAP VALUE - GUARD INV B SERIES	A	Dividend	J	T	Buy	05/03/19	J		
117. FRANKLIN U.S. GOVERNMENT SECURITIES VIP FUND - GUARD INV B SERIES	A	Dividend	J	T	Buy	05/03/19	J		
118. PIMCO TOTAL RETURN ADVISOR CL - GUARD INV B SERIES	A	Dividend	J	T	Buy	05/03/19	J		
119. RS INVESTMENT QUALITY BOND VIP SERIES - GUARD INV B SERIES	A	Dividend	J	T	Buy	05/03/19	J		
120. RS LOW DURATION BOND VIP SERIES - GUARD INV B SERIES	A	Dividend	J	T	Buy	05/03/19	J		
121. OPPENHEIMER GLOBAL STRATEGIC INCOMEVA S - GUARD INV B SERIES	A	Dividend	J	T	Buy	05/03/19	J		
122. ALLIANCEBERNSTEIN VPS GROWTH & INCOME PORTFOLIO CL B - GUARD INV	A	Dividend	J	T	Buy	05/03/19	J		
123. BLACKROCK LARGE CAP CORE CL III - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
124. COLUMBIA VP SMALL CAP VALUE - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
125. FIDELITY VIP MID CAP PORT SRCL2 - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
126. FRANKLIN SMALL CAP VALUE VIP FUND CL - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
127. PIONEER MID-CAP VALUE VCT CL II - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
128. OPPENHEIMER MAIN STREET SMALL-CAP FUND/VA - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
129. ALLIANCEBERNSTEIN VPS GROWTH & INCOME PORTFOLIO CL B - GUARD INV	A	Dividend	J	T	Buy	08/02/19	J		
130. JANUS ASPEN GLOBAL TECHNOLOGY SS - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	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	

FINANCIAL DISCLOSURE REPORT

Page 12 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
131. BLACKROCK CAPITAL APPRECIATION SERIES I - GUARD INV B SERIES	A	Dividend	J	T	Buy	08/02/19	J		
132. GUARDIAN INTERNATIONAL GROWTH VIP FUND	A	Dividend	J	T	Buy	08/02/19	J		
133. GUARDIAN INTERNATIONAL VALUE VIP FUND	A	Dividend	J	T	Buy	08/02/19	J		
134. GUARDIAN LARGE CAP FUNDAMENTAL GROWTH VI	A	Dividend	J	T	Buy	10/18/19	J		
135. GUARDIAN LARGE CAP DISCIPLINED GROWTH VI	A	Dividend	J	T	Buy	10/18/19	J		
136. GUARDIAN U.S. GOVERNMENT SECURITIES VIP	A	Dividend	J	T	Buy	10/18/19	J		
137. GUARDIAN SMALL-CAP CORE VIP FUND	A	Dividend	J	T	Buy	10/18/19	J		
138. GUARDIAN TOTAL RETURN BOND VIP FUND	A	Dividend	J	T	Buy	10/18/19	J		
139. GUARDIAN GLOBAL UTILITIES VIP FUND	A	Dividend	J	T	Buy	10/18/19	J		
140. GUARDIAN MULTI SECTOR BOND VIP FUND	A	Dividend	K	T	Buy	10/18/19	K		
141. FIDELITY VIP MID-CAP PORT SRCL2 - GUARD INV B SERIES	A	Dividend	J	T	Buy	11/02/19	J		
142. RS INVESTMENT QUALITY BOND VIP SERIES - GUARD INV B SERIES	A	Dividend	J	T	Buy	11/02/19	J		
143. RS LOW DURATION BOND VIP SERIES - GUARD INV B SERIES	A	Dividend	J	T	Buy	11/02/19	J		
144. GUARDIAN LARGE-CAP FUNDAMENTAL GROWTH VI	A	Dividend	J	T	Buy	11/02/19	J		
145. GUARDIAN LARGE-CAP DISCIPLINED GROWTH VI	A	Dividend	J	T	Buy	11/02/19	J		
146. GUARDIAN U.S. GOVERNMENT SECURITIES VIP	A	Dividend	J	T	Buy	11/02/19	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	

FINANCIAL DISCLOSURE REPORT

Page 13 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)
147. GUARDIAN TOTAL RETURN BOND VIP FUND	A	Dividend	J	T	Buy	11/02/19	J		
148. FRANKLIN U.S. GOVERNMENT SECURITIES VIP FUND - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
149. MFS VIT UTILITIES SERIES SC - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
150. PIMCO TOTAL RETURN ADVISOR CL - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
151. RS LARGE-CAP ALPHA VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
152. RS QUALITY INVESTMENT BOND VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
153. OPPENHEIMER GLOBAL STRATEGIC INCOMEVA S - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
154. JANUS ASPEN GLOBAL TECHNOLOGY SS - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
155. BLACKROCK CAPITAL APPRECIATION SERIES I - GUARD INV B SERIES	A	Dividend			Sold	02/02/19	J	A	
156. BLACKROCK LARGE CAP CORE CL III - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
157. FIDELITY VIP CONTRAFUND SRCL2 - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
158. FIDELITY VIP MID-CAP PORT SRCL2 - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
159. FRANKLIN SMALL CAP VALUE VIP FUND CL - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
160. MFS VIT UTILITIES SERIES SC - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
161. PIONEER MID-CAP VALUE VCT CL II - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
162. RS LARGE-CAP ALPHA VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	

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	

FINANCIAL DISCLOSURE REPORT

Page 14 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)
163. OPPENHEIMER MAIN STREET SMALL-CAP FUND/VA - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
164. JANUS ASPEN GLOBAL TECHNOLOGY SS - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
165. BLACKROCK CAPITAL APPRECIATION SERIES I - GUARD INV B SERIES	A	Dividend			Sold	05/03/19	J	A	
166. GUARDIAN INTERNATIONAL GROWTH VIP FUND	A	Dividend			Sold	05/03/19	J	A	
167. GUARDIAN INTERNATIONAL VALUE VIP FUND	A	Dividend			Sold	05/03/19	J	A	
168. FIDELITY VIP CONTRAFUND SRCL2 - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
169. FRANKLIN U.S. GOVERNMENT SECURITIES VIP FUND - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
170. MFS VIT UTILITIES SERIES SC - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
171. PIMCO TOTAL RETURN ADVISOR CL - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
172. RS LARGE-CAP ALPHA VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
173. RS INVESTMENT QUALITY BOND VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
174. RS LOW DURATION BOND VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
175. OPPENHEIMER GLOBAL STRATEGIC INCOMEVA S - GUARD INV B SERIES	A	Dividend			Sold	08/02/19	J	A	
176. BLACKROCK LARGE CAP CORE CL III - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
177. COLUMBIA VP SMALL CAP VALUE - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
178. FIDELITY VIP CONTRAFUND SRCL2 - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	

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	

FINANCIAL DISCLOSURE REPORT

Page 15 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)
179. FIDELITY VIP MID-CAP PORT SRCL2 - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
180. FRANKLIN SMALL CAP VALUE VIP FUND CL - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
181. FRANKLIN U.S. GOVERNMENT SECURITIES VIP FUND - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
182. MFS VIT UTILITIES SERIES SC - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
183. PIMCO TOTAL RETURN ADVISOR CL - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
184. PIONEER MID-CAP VALUE VCT CL II - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
185. RS LARGE-CAP ALPHA VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
186. RS INVESTMENT QUALITY BOND VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
187. RS LOW DURATION BOND VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
188. OPPENHEIMER MAIN STREET SMALL-CAP FUND/VA - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
189. OPPENHEIMER GLOBAL STRATEGIC INCOMEVA S - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
190. ALLIANCEBERNSTEIN VPS GROWTH & INCOME PORTFOLIO CL B - GUARD INV	A	Dividend			Sold	09/13/19	J	A	
191. JANUS ASPEN GLOBAL TECHNOLOGY SS - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
192. BLACKROCK CAPITAL APPRECIATION SERIES I - GUARD INV B SERIES	A	Dividend			Sold	09/13/19	J	A	
193. GUARDIAN INTERNATIONAL GROWTH VIP FUND	A	Dividend			Sold	09/13/19	J	A	
194. GUARDIAN INTERNATIONAL VALUE VIP FUND	A	Dividend			Sold	09/13/19	J	A	

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

FINANCIAL DISCLOSURE REPORT

Page 16 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
195. FIDELITY VIP CONTRAFUND SRCL2 - GUARD INV B SERIES	A	Dividend			Sold	10/18/19	J	A	
196. FRANKLIN U.S. GOVERNMENT SECURITIES VIP FUND - GUARD INV B SERIES	A	Dividend			Sold	10/18/19	J	A	
197. MFS VIT UTILITIES SERIES SC - GUARD INV B SERIES	A	Dividend			Sold	10/18/19	J	A	
198. PIMCO TOTAL RETURN ADVISOR CL - GUARD INV B SERIES	A	Dividend			Sold	10/18/19	J	A	
199. OPPENHEIMER MAIN STREET SMALL- CAP FUND/VA - GUARD INV B SERIES	A	Dividend			Sold	10/18/19	J	A	
200. OPPENHEIMER GLOBAL STRATEGIC INCOMEVA S - GUARD INV B SERIES	A	Dividend			Sold	10/18/19	K	A	
201. BLACKROCK CAPITAL APPRECIATION SERIES I - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
202. BLACKROCK LARGE CAP CORE CL III - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
203. COLUMBIA VP SMALL CAP VALUE - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
204. FRANKLIN SMALL CAP VALUE VIP FUND CL - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
205. PIONEER MID-CAP VALUE VCT CL II - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
206. RS LARGE-CAP ALPHA VIP SERIES - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
207. ALLIANCEBERNSTEIN VPS GROWTH & INCOME PORTFOLIO CL B - GUARD INV	A	Dividend			Sold	11/02/19	J	A	
208. JANUS ASPEN GLOBAL TECHNOLOGY SS - GUARD INV B SERIES	A	Dividend			Sold	11/02/19	J	A	
209. GUARDIAN INTERNATIONAL GROWTH VIP FUND	A	Dividend			Sold	11/02/19	J	A	
210. GUARDIAN INTERNATIONAL VALUE VIP FUND	A	Dividend			Sold	11/02/19	J	A	

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

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)	(2)	(1)	(2)	(1)	(2)	(3)	(4)	(5)
	Amount Code 1 (A-H)	Type (e g , div , rent, or int)	Value Code 2 (J-P)	Value Method Code 3 (Q-W)	Type (e g , buy, sell, redemption)	Date mm/dd/yy	Value Code 2 (J-P)	Gain Code 1 (A-H)	Identity of buyer/seller (if private transaction)
211. GUARDIAN SMALL-CAP CORE VIP FUND	A	Dividend			Sold	11/02/19	J	A	
212. GUARDIAN GLOBAL UTILITIES VIP FUND	A	Dividend			Sold	11/02/19	J	A	
213.									
214.									
215.									

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	

FINANCIAL DISCLOSURE REPORT

Page 18 of 19

Name of Person Reporting	Date of Report
Heffley, Marilyn	08/13/2020

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

FINANCIAL DISCLOSURE REPORT

Page 19 of 19

Name of Person Reporting

Heffley, Marilyn

Date of Report

08/13/2020

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/ Marilyn Heffley**

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
Suite 2-301
One Columbus Circle, N.E.
Washington, D.C. 20544