

FINANCIAL DISCLOSURE REPORT FOR CALENDAR YEAR 2020

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) FREUDENTHAL, NANCY D.	2. Court or Organization UNITED STATES DISTRICT COURT - DISTRICT OF WYOMING	3. Date of Report 03/19/2021
4. Title (Article III judges indicate active or senior status; magistrate judges indicate full- or part-time) U.S. DISTRICT JUDGE - ACTIVE	5a. Report Type (check appropriate type) ☐ Nomination ☐ Date ☐ Initial ☒ Annual ☐ Final 5b. ☐ Amended Report	6. Reporting Period 01/01/2020 to 12/31/2020
7. Chambers or Office Address OFFICE OF JUDGE FREUDENTHAL 2120 CAPITOL AVE. CHEYENNE, WY 82001		
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. BOARD MEMBER	WYOMING PROFESSIONAL ASSISTANCE PROGRAM
2. TRUSTEE	TRUST #1 (REPORTABLE ASSETS ARE INCLUDED IN PART VII)
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. 2003	STATE OF WYOMING RETIREMENT PLAN WITH FORMER EMPLOYER, NO CONTROL, AGREEMENT SIGNED IN 2003
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.)

<u>DATE</u>	<u>SOURCE AND TYPE</u>	<u>INCOME</u> (yours, not spouse's)
1. 2020	STATE OF WYOMING RETIREMENT DISTRIBUTION	\$42,107.00
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. 2020	STATE OF WYOMING - RETIREMENT DISTRIBUTION
2. 2020	SELF-EMPLOYED ATTORNEY
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.				

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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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Name of Person Reporting

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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)	(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. INDIVIDUAL ASSETS (H)									
2. MERIDIAN TRUST FCU (cash)	A	Interest	M	T					
3. MASS MUTUAL FIXED WHOLE LIFE PAID-UP AT AGE 65 INSURANCE	C	Dividend	N	T					
4. VOYA/SECURITY LIFE OF DENVER WHOLE LIFE INSURANCE POLICY	B	Interest	L	T					
5. AMERIPRISE NON-QUALIFIED CASH RESERVE CERTIFICATE (cash)	A	Interest	K	T					
6. ACCOUNT #1 (H)									
7. AMERIPRISE BANK INSURED SWEEP (ABISA) (cash)	A	Interest	J	T					
8. INVESCO BALANCED RISK COMM STRAT Y (BRCYX)		None	K	T	Buy (add'l)	02/24/20	J		
9.					Sold (part)	12/14/20	J		
10. BLACKROCK SHORT OBLIGS INSTL CL (BISOX)	A	Dividend			Sold (part)	02/24/20	J		
11.					Sold (part)	03/23/20	K		
12.					Sold	04/20/20	J		
13. BLACKROCK EMERGING MARKETS INSTL CL (MADCX)	A	Dividend	K	T	Buy	02/24/20	K		
14.					Buy (add'l)	04/21/20	J		
15.					Sold (part)	12/14/20	J		
16. COLUMBIA CORPORATE INCOME CL Z (SRINX)	A	Dividend			Sold (part)	02/24/20	K		
17.					Sold (part)	03/23/20	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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18.					Sold	04/20/20	K		
19. COLUMBIA SELECT LARGE CAP GROWTH CL Z (UMLGX)	C	Dividend	K	T	Sold (part)	02/24/20	J		
20.					Buy (add'l)	03/23/20	J		
21.					Sold (part)	04/20/20	J		
22.					Buy (add'l)	05/26/20	J		
23.					Sold (part)	10/26/20	J		
24.					Buy (add'l)	11/20/20	J		
25.					Buy (add'l)	12/14/20	J		
26. FIRST EAGLE OVERSEAS CL 1 (SGOIX)	A	Dividend	K	T	Buy	02/24/20	K		
27.					Buy (add'l)	03/23/20	J		
28.					Sold (part)	04/20/20	J		
29. GOLDMAN SACHS INTL EQUITY INSIGHTS INVESTOR CL (GCITX)		None			Sold (part)	02/24/20	J		
30.					Buy (add'l)	03/23/20	J		
31.					Sold (part)	04/20/20	J		
32.					Sold (part)	10/26/20	J		
33.					Sold	11/20/20	K		

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2 Value Codes (See Columns C1 and D3)	Q =Appraisal U =Book Value	R =Cost (Real Estate Only) V =Other	S =Assessment W =Estimated	T =Cash Market	

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34. GOLDMAN SACHS SMALL CAP VALUE INSIGHTS INVESTOR CL (GTTTX)	A	Dividend	K	T	Buy	05/26/20	J		
35.					Sold (part)	12/14/20	J		
36. GOLDMAN SACHS GQG PARTNERS INTL OPPTYS INVESTOR CL (GSINX)	A	Dividend	K	T	Buy (add'l)	01/24/20	J		
37.					Buy (add'l)	03/23/20	J		
38.					Sold (part)	04/20/20	J		
39. JOHN HANCOCK CLASSIC VALUE CL I (JCVIX)	A	Dividend	K	T	Buy (add'l)	02/24/20	J		
40.					Buy (add'l)	03/23/20	J		
41.					Sold (part)	04/20/20	J		
42.					Sold (part)	12/14/20	J		
43. HARTFORD INTL VALUE CL I (HILIX)	A	Dividend	K	T	Buy	11/20/20	K		
44. HARTFORD INTL GROWTH CL I (HNCIX)	A	Dividend	K	T	Buy	10/26/20	K		
45. IVY VALUE CL I (IYAIX)	B	Dividend	K	T	Buy	02/24/20	K		
46.					Buy (add'l)	03/23/20	J		
47.					Buy (add'l)	04/20/20	J		
48.					Buy (add'l)	05/26/20	J		
49.					Sold (part)	12/14/20	J		

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50. JANUS HENDERSON US MANAGED VOLATILITY CL I (JRSIX)	B	Dividend	K	T	Sold (part)	02/24/20	J		
51.					Buy (add'l)	03/23/20	J		
52.					Sold (part)	04/20/20	J		
53.					Sold (part)	05/26/20	K		
54. JOHN HANCOCK STRATEGIC INCOME OPPTY CL I (JIPIX)	A	Dividend	K	T	Buy (add'l)	03/23/20	K		
55.					Buy (add'l)	04/20/20	J		
56. BRANDYWINE GLOBAL BOND I (LROIX)	A	Dividend	K	T	Sold (part)	03/23/20	J		
57. LORD ABBETT SHORT DURATION INCOME CL F (LDLFX)	A	Dividend	K	T	Buy	10/26/20	K		
58.					Buy (add'l)	12/14/20	J		
59. NATIXIS OAKMARK INTL CL Y (NOIYX)		None	K	T	Buy	02/24/20	K		
60.					Buy (add'l)	03/23/20	J		
61.					Sold (part)	12/14/20	J		
62. PUTNAM INCOME CL Y (PNCYX)	C	Dividend	L	T	Buy	02/24/20	L		
63.					Buy (add'l)	04/21/20	K		
64.					Buy (add'l)	05/26/20	J		
65.					Buy (add'l)	07/20/20	J		
66.					Sold (part)	11/20/20	J		

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67.					Buy (add'l)	12/14/20	J		
68. WELLS FARGO INTL VALUE INSTL CL (WVIX)		None			Sold	02/24/20	K		
69. WESTERN ASSET CORE PLUS BOND I (WACPX)	A	Dividend	K	T	Sold (part)	03/23/20	J		
70.					Buy (add'l)	04/20/20	J		
71.					Sold (part)	10/26/20	J		
72. ISHARES 20+ YR TREAS BOND ETF (TLT)	A	Dividend	L	T	Sold (part)	03/23/20	J		
73.					Buy (add'l)	04/20/20	J		
74.					Buy (add'l)	07/20/20	J		
75.					Buy (add'l)	10/26/20	J		
76.					Buy (add'l)	11/20/20	J		
77.					Buy (add'l)	12/14/20	J		
78. ISHARES 7-10 YR TREASURY BOND ETF (IEF)	A	Dividend			Sold (part)	03/11/20	K		
79.					Sold (part)	03/23/20	J		
80.					Sold	04/20/20	K		
81. ISHARES 1-3 YR TREASURY BOND ETF (SHY)	A	Dividend			Buy (add'l)	03/23/20	J		
82.					Buy (add'l)	04/20/20	K		
83.					Sold (part)	05/26/20	K		

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84.					Sold	08/24/20	J		
85. ISHARES CORE MSCI EMERGING MARKETS ETF (IEMG)		None			Sold	02/24/20	J		
86. ISHARES CURRENCY HEDGED MISC EUROZONE ETF (HEZU) (X)	A	Dividend			Sold	02/24/20	J		
87.					Buy	04/20/20	J		
88.					Sold	12/14/20	K		
89. ISHARES MSCI UTD KINGDOM NEW ETF (EWU)		None			Sold	02/24/20	J		
90.					Buy	03/11/20	J		
91.					Sold	03/23/20	J		
92. SPDR PORTFOLIO S&P 500 ETF (SPLG)	A	Dividend	J	T	Buy (add'l)	03/11/20	J		
93.					Sold	04/20/20	K		
94.					Buy	12/14/20	K		
95. VANECK VECTORS FALLEN ANGEL HIGH YIELD ETF (ANGL)	A	Dividend	K	T	Buy	08/24/20	K		
96.					Buy (add'l)	12/14/20	J		
97. VANGUARD CONSUMER STAPLES ETF (VDC)	A	Dividend	J	T					
98. VANGUARD ENERGY ETF (VDE)	A	Dividend			Sold (part)	02/24/20	J		
99.					Buy (add'l)	03/23/20	J		
100.					Sold (part)	04/20/20	J		

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101.					Sold (part)	05/26/20	J		
102.					Sold	08/24/20	J		
103. VANGUARD MORTGAGE BACKED SECURITIES ETF (VMBS)	A	Dividend			Sold	02/24/20	K		
104. VANGUARD VALUE ETF (VTV)		None			Sold	02/24/20	K		
105. VANGUARD FINANCIALS ETF (VFH)	A	Dividend	J	T	Buy	07/20/20	J		
106. VANGUARD SHORT TERM CORP BOND ETF (VCSH)	A	Dividend			Buy	05/26/20	K		
107.					Sold (part)	10/26/20	J		
108.					Sold (part)	11/20/20	J		
109.					Sold	12/14/20	J		
110. ACCOUNT #2 (H)									
111. COLUMBIA ADAPTIVE RISK ALLOC CL Z (CRAZX)	B	Dividend	L	T					
112. COLUMBIA ALTERNATIVE BETA CL Z (CLAZX)		None	J	T					
113. ISHARES MSCI PACIFIC EX JAPAN ETF (EPP) X		None			Sold	03/02/20	J		
114. ISHARES TIPS BOND ETF (TIP)	A	Dividend	J	T	Buy	02/03/20	J		
115.					Buy (add'l)	10/01/20	J		
116. ISHARES IBOXX \$INVESTMENT GRADE CORP BOND ETF (LQD)	A	Dividend	J	T	Sold (part)	02/03/20	J		
117.					Buy (add'l)	04/01/20	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	

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)
118.					Buy (add'l)	05/01/20	J		
119.					Sold (part)	10/01/20	J		
120. ISHARES 20+ YR TREAS BD ETF (TLT)	A	Dividend	J	T	Buy (add'l)	02/03/20	J		
121.					Sold (part)	06/01/20	J		
122.					Buy (add'l)	10/01/20	J		
123. ISHARES 7-10 YR TREASURY BOND ETF (IEF)	A	Dividend	J	T	Buy (add'l)	02/03/20	J		
124.					Buy (add'l)	03/02/20	J		
125.					Buy (add'l)	05/01/20	J		
126.					Sold (part)	06/01/20	J		
127.					Buy (add'l)	10/01/20	J		
128.					Buy (add'l)	12/01/20	J		
129. ISHARES 1-3 YR TREASURY BOND ETF (SHY)	A	Dividend			Sold (part)	02/03/20	J		
130.					Buy (add'l)	03/02/20	J		
131.					Sold (part)	05/01/20	J		
132.					Sold (part)	06/01/20	J		
133.					Sold (part)	07/01/20	J		
134.					Buy (add'l)	10/01/20	J		

1 Income Gain Codes:

(See Columns B1 and D4)

2 Value Codes

(See Columns C1 and D3)

3 Value Method Codes

(See Column C2)

A =\$1,000 or less

F =\$50,001 - \$100,000

J =\$15,000 or less

N =\$250,001 - \$500,000

P3 =\$25,000,001 - \$50,000,000

Q =Appraisal

U =Book Value

B =\$1,001 - \$2,500

G =\$100,001 - \$1,000,000

K =\$15,001 - \$50,000

O =\$500,001 - \$1,000,000

R =Cost (Real Estate Only)

V =Other

C =\$2,501 - \$5,000

H1 =\$1,000,001 - \$5,000,000

L =\$50,001 - \$100,000

P1 =\$1,000,001 - \$5,000,000

P4 =More than \$50,000,000

S =Assessment

W =Estimated

D =\$5,001 - \$15,000

H2 =More than \$5,000,000

M =\$100,001 - \$250,000

P2 =\$5,000,001 - \$25,000,000

T =Cash Market

E =\$15,001 - \$50,000

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)
135.					Sold	12/01/20	J		
136. ISHARES MSCI EAFE ETF (EFA)	A	Dividend	J	T	Sold (part)	01/10/20	J		
137.					Sold (part)	02/03/20	J		
138.					Sold (part)	03/02/20	J		
139.					Buy (add'l)	06/01/20	J		
140.					Sold (part)	10/01/20	J		
141. ISHARES RUSSELL 2000 ETF (IWM)		None			Buy	07/17/20	J		
142.					Sold	08/03/20	J		
143. ISHARES JPMORGAN USD EMERGING MARKETS BOND ETF (EMB)	A	Dividend	J	T	Buy (add'l)	02/03/20	J		
144.					Sold	03/02/20	J		
145.					Buy	06/01/20	J		
146. ISHARES IBOXX \$ HIGH YIELD CORP BOND ETF (HYG)	A	Dividend	J	T	Sold (part)	02/03/20	J		
147.					Sold	03/02/20	J		
148.					Buy	06/01/20	J		
149.					Sold (part)	10/01/20	J		
150. ISHARES 3-7 YR TREAS BOND ETF (IEI)	A	Dividend	J	T	Buy (add'l)	02/03/20	J		
151.					Buy (add'l)	03/02/20	J		

1 Income Gain Codes:

(See Columns B1 and D4)

2 Value Codes

(See Columns C1 and D3)

3 Value Method Codes

(See Column C2)

A =\$1,000 or less

F =\$50,001 - \$100,000

J =\$15,000 or less

N =\$250,001 - \$500,000

P3 =\$25,000,001 - \$50,000,000

Q =Appraisal

U =Book Value

B =\$1,001 - \$2,500

G =\$100,001 - \$1,000,000

K =\$15,001 - \$50,000

O =\$500,001 - \$1,000,000

R =Cost (Real Estate Only)

V =Other

C =\$2,501 - \$5,000

H1 =\$1,000,001 - \$5,000,000

L =\$50,001 - \$100,000

P1 =\$1,000,001 - \$5,000,000

P4 =More than \$50,000,000

S =Assessment

W =Estimated

D =\$5,001 - \$15,000

H2 =More than \$5,000,000

M =\$100,001 - \$250,000

P2 =\$5,000,001 - \$25,000,000

T =Cash Market

E =\$15,001 - \$50,000

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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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)
152.					Sold (part)	06/01/20	J		
153.					Sold (part)	07/01/20	J		
154.					Buy (add'l)	10/01/20	J		
155. SPDR S&P 500 ETF (SPY)	A	Dividend	J	T	Sold (part)	02/03/20	J		
156.					Buy (add'l)	06/01/20	J		
157.					Sold (part)	07/07/20	J		
158.					Sold (part)	10/01/20	J		
159. VANGUARD FTSE EMERGING MARKETS ETF (VWO)	A	Dividend	J	T	Sold (part)	02/03/20	J		
160.					Sold (part)	03/02/20	J		
161.					Sold	05/01/20	J		
162.					Buy	06/01/20	J		
163.					Buy (add'l)	07/01/20	J		
164.					Sold (part)	10/01/20	J		
165.					Buy (add'l)	12/01/20	J		
166. VANGUARD MORTGAGE BACKED SECURITIES ETF (VMBS)	A	Dividend	J	T	Buy	02/03/20	J		
167.					Buy (add'l)	10/01/20	J		
168. VANGUARD REAL ESTATE INDEX ETF (VNQ)	A	Dividend	J	T	Buy	02/03/20	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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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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)
169.					Sold	03/02/20	J		
170.					Buy	06/01/20	J		
171.					Buy (add'l)	10/01/20	J		
172. BARCLAYS BANK IPATH BLOOMBERG COMMODITY INDEX TOT RETURN (DJP)		None			Sold	03/02/20	J		
173. ACCOUNT #3: (H)									
174. RIVERSOURCE VP-MODERATE PORTFOLIO CLASS 2		None	M	T					
175. ACCOUNT #4 (H)									
176. RIVERSOURCE COLUMBIA VP- MANAGED VOLATILITY MODERATE GROWTH FUND CL 2		None	M	T					
177. ACCOUNT #5 (H)									
178. RIVERSOURCE COLUMBIA VP- MANAGED VOLATILITY MODERATE GROWTH FUND CL 2		None	N	T					
179. RIVERSOURCE VP-MODERATE PORTFOLIO CLASS 2		None	N	T					
180. ACCOUNT #6 (H)									
181. RIVERSOURCE VP MODERATE C12		None	K	T					
182. ACCOUNT #7 (H)									
183. AMERIPRISE INSURED MONEY MARKET (AIMMA) (cash)	A	Interest	J	T					
184. AMERICAN CENTURY MID CAP VALUE CL I (AVUAX)	A	Dividend	K	T	Buy (add'l)	03/05/20	J		

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

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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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)
185.					Buy (add'l)	03/24/20	J		
186.					Sold (part)	05/14/20	J		
187.					Sold (part)	08/13/20	J	A	
188. BLACKROCK STRATEGIC INCOME OPPTY INSTL CL (BSIIX)	A	Dividend	K	T	Sold	03/25/20	K	B	
189.					Buy	05/14/20	K		
190.					Buy (add'l)	08/13/20	J		
191.					Buy (add'l)	11/12/20	K		
192. BLACKROCK HIGH YIELD BOND INSTL CL (BHYIX)	A	Dividend			Sold	02/13/20	K	A	
193. COLUMBIA INCOME OPPTY INSTL CL (CIOZX)	A	Dividend	K	T	Buy	03/24/20	K		
194. MULTI MANAGER VALUE STRATEGIES CL Z (CZMVX)	B	Dividend	L	T	Buy (add'l)	02/13/20	J		
195.					Buy (add'l)	03/05/20	J		
196.					Buy (add'l)	03/24/20	J		
197.					Buy (add'l)	05/14/20	J		
198.					Sold (part)	08/13/20	J	A	
199.					Sold (part)	11/12/20	J	A	
200. MULTI MANAGER TOTAL RETURN BOND STRATEGIES CL Z (CTRZX)	D	Dividend	N	T	Buy (add'l)	02/13/20	K		
201.					Sold (part)	03/05/20	K	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	

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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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)
202.					Sold (part)	03/24/20	K	B	
203.					Buy (add'l)	05/14/20	J		
204.					Buy (add'l)	08/13/20	K		
205.					Sold (part)	11/12/20	J	A	
206. MULTIMANAGER SMALL CAP EQUITY STRATEGIES CL Z (CZMSX)	A	Dividend	K	T	Sold (part)	02/13/20	J	A	
207.					Buy (add'l)	03/05/20	J		
208.					Buy (add'l)	03/24/20	J		
209.					Sold (part)	05/14/20	J		
210.					Sold (part)	08/13/20	J	A	
211.					Sold (part)	11/12/20	J	A	
212. MULTI MANAGER GROWTH STRATEGIES CL Z (CZMGX)	D	Dividend	L	T	Sold (part)	02/13/20	J	A	
213.					Buy (add'l)	03/05/20	J		
214.					Buy (add'l)	03/24/20	J		
215.					Buy (add'l)	05/14/20	J		
216.					Sold (part)	08/13/20	J	B	
217.					Sold (part)	11/12/20	J	A	
218. MULTI MANAGER INTL EQ STRAT INSTL (CMIEX)	A	Dividend	L	T	Buy (add'l)	03/05/20	J		

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

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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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)
219.					Buy (add'l)	03/24/20	J		
220.					Sold (part)	05/14/20	J		
221.					Sold (part)	08/13/20	J	A	
222.					Sold (part)	11/12/20	J		
223. DELAWARE US GROWTH INSTL CL (DEUIX)	B	Dividend	K	T	Sold (part)	02/13/20	J	A	
224.					Buy (add'l)	03/24/20	J		
225.					Sold (part)	05/14/20	J		
226.					Sold (part)	08/13/20	J	A	
227.					Sold (part)	11/12/20	J	A	
228. MFS INTL VALUE CL I (MINIX)	B	Dividend	K	T	Sold (part)	08/13/20	J	A	
229. MFS VALUE CL I (MEIIX)	B	Dividend	K	T	Buy (add'l)	03/05/20	J		
230.					Buy (add'l)	03/24/20	J		
231.					Buy (add'l)	05/14/20	J		
232.					Sold (part)	08/13/20	J	A	
233.					Sold (part)	11/12/20	J	A	
234. MFS MID CAP GROWTH CL I (OTCIX)	A	Dividend	K	T	Sold (part)	02/13/20	J	A	
235.					Buy (add'l)	03/24/20	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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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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)
236.					Sold (part)	05/14/20	J	A	
237.					Sold (part)	08/13/20	J	A	
238.					Sold (part)	11/12/20	J	A	
239. WELLS FARGO EMERGING MARKETS EQUITY INSTL CL (EMGNX)	A	Dividend	K	T	Buy (add'l)	03/24/20	J		
240.					Sold (part)	08/13/20	J	A	
241.					Buy (add'l)	11/12/20	J		
242. ISHARES CORE MSCI EMERG MKTS ETF (IEMG)		None			Buy (add'l)	03/24/20	J		
243.					Sold	05/14/20	J	A	
244. ACCOUNT #8 (H)									
245. AMERIPRISE INSURED MONEY MARKET (AIMMA) (cash)	A	Interest	J	T					
246. COLUMBIA DIVIDEND OPPTY CL A (INUTX)	A	Dividend	K	T					
247. COLUMBIA LARGE CAP VAL A (INDZX)	A	Dividend	K	T					
248. VIRTUS NEWFLEET MULTI SECTOR SHORT TERM BOND CL A (NARAX)	A	Dividend	J	T					
249. ANNALY CAPITAL MANAGEMENT INC (NLY)	A	Dividend	J	T					
250. STARWOOD PROPERTY TRUST INC (STWD)	A	Dividend	J	T					
251. ARES CAPITAL CORP (ARCC)	B	Dividend	K	T					
252. CHS INC CL B CUMUL REDEEMABLE PFD SER (CHSCL)	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	

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)
253. ACCOUNT #9 (H)									
254. STIFEL BANK PROGRAM MONEY MARKET (cash) (Y)									

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Name of Person Reporting	Date of Report
FREUDENTHAL, NANCY D.	03/19/2021

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

AMERICAN CENTURY MID CAP VALUE CL I (AVUAX) was AMERICAN CENTURY MID CAP VALUE INVESTOR CL (ACMVX).

SPDR PORTFOLIO S&P 500 ETF (SPLG) was SPDR PORTFOLIO LARGE CAP ETF (SPLG).

Accounts 3-5: Each account is a RIVERSOURCE LIFE RIVERSOURCE RAVA 5 ADVANTAGE VARIABLE ANNUITY. Underlying assets are listed in Part VII.

Account 6 is a RIVERSOURCE LIFE RETIREMENT ADVISOR ADV VARIABLE ANNUITY. The underlying asset is listed in Part VII.

Part VII, Column B: Lines reflecting no income are so reported because none was attributed to those particular holdings during the reporting period, whether taxable, tax exempt, or tax deferred, or because the investments do not allocate income to individual holdings, but instead are credited only in unit value, per page 42 of the filing instructions.

FINANCIAL DISCLOSURE REPORT

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Name of Person Reporting

FREUDENTHAL, NANCY D.

Date of Report

03/19/2021

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/ NANCY D. FREUDENTHAL**

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
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