

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Kohm, James A

Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission

Report Year: 2019

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Kohm, James A [electronically signed on 06/07/2019 by Kohm, James A in Integrity.gov] - Filer received a 30 day filing extension.

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Pankey, Lorielle L, Certifying Official [electronically signed on 11/18/2019 by Pankey, Lorielle L in Integrity.gov]

Other review conducted by

/s/ Bannon, Craig, Ethics Official [electronically signed on 11/18/2019 by Bannon, Craig in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 11/18/2019

Data Revised 11/15/2019

Data Revised 10/11/2019

1. Filer's Positions Held Outside United States Government

None

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Allstate Corp	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
2	Astrazeneca Plc	N/A	\$50,001 - \$100,000	Dividends	\$2,501 - \$5,000
3	BWX Technologies, Inc. (BWXT)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	Citigroup Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Comcast Corp	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
6	Devon Energy Corp	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
7	Discovery Communications Series A	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	Discovery Communications Series C	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	Duke Energy	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
10	Dynex Capital	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
11	Entergy Corp	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12	Exelon Corp	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
13	Hartford Financial Services	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
14	Encompass	See Endnote	\$1,001 - \$15,000		None (or less than \$201)
15	Host Hotels & Resorts inc.	N/A	\$1,001 - \$15,000		None (or less than \$201)
16	ITT Inc.	N/A	\$1,001 - \$15,000		None (or less than \$201)
17	Liberty Broadband Ser. C	N/A	\$1,001 - \$15,000		None (or less than \$201)
18	Manpower Group	N/A	\$100,001 - \$250,000	Dividends	\$1,001 - \$2,500
19	McDermott Intl Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
20	Newell Brands, Inc. (formerly Newell Rubbermaid, Inc.)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
21	Newmont Mining Corp.	N/A	\$1,001 - \$15,000		None (or less than \$201)
22	Occidental Petroleum Corp.	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
23	Pepsico Inc.	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
24	Piper Jaffary Companies	N/A	\$1,001 - \$15,000		None (or less than \$201)
25	Regions Financial Corp.	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
26	Syngenta Ag	See Endnote	N/A	\$1,001 - \$15,000	None (or less than \$201)
27	Travelers Companies Inc		N/A	\$1,001 - \$15,000	None (or less than \$201)
28	US Bancorp		N/A	\$250,001 - \$500,000	Dividends \$5,001 - \$15,000
29	Xylem Inc		N/A	\$15,001 - \$50,000	Dividends \$201 - \$1,000
30	John Hancock Funds Strategic Growth Fund Class A		Yes	\$50,001 - \$100,000	None (or less than \$201)
31	Investco QQQ ETF	See Endnote	Yes	\$50,001 - \$100,000	\$201 - \$1,000
32	Spdr S&P 500 ETF		Yes	\$100,001 - \$250,000	\$1,001 - \$2,500
33	Dreyfus General Money Market Fund (Prestige)		Yes	\$500,001 - \$1,000,000	None (or less than \$201)
34	U.S. Bank account #1 (cash)		N/A	\$15,001 - \$50,000	Interest \$201 - \$1,000
35	Metlife Preference Plus Variable Annuity (SEP IRA)		No		
35.1	Baillie Gifford International Stock Portfolio		Yes	\$1,001 - \$15,000	None (or less than \$201)
35.2	Morgan Stanley Mid Cap Growth		Yes	\$15,001 - \$50,000	None (or less than \$201)
35.3	T. Rowe Price Small Cap Growth		Yes	\$50,001 - \$100,000	None (or less than \$201)
35.4	MetLife Stock Index Portfolio Fund		Yes	\$50,001 - \$100,000	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
36	Weyerhaeuser Co.	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
37	Schwab International Equity ETF	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
38	Schwab US Dividend Equity ETF	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
39	Schwab US Large Cap ETF	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
40	Harris Corp	See Endnote	N/A	\$1,001 - \$15,000	None (or less than \$201)
41	Lions Gate	N/A	None (or less than \$1,001)		None (or less than \$201)
42	Marriott International, Inc. (MAR)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
43	Freeport McMoran Inc.	N/A	None (or less than \$1,001)		None (or less than \$201)
44	Weyerhaeuser Co.	N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
45	Liberty Global PLC Series A	N/A	\$1,001 - \$15,000		None (or less than \$201)
46	Liberty Global PLC Series C	See Endnote	N/A	\$1,001 - \$15,000	None (or less than \$201)
47	Liberty Sirius XM Group Series C (LSXMK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
48	Liberty Expedia Holdings Inc Series A (LEXEA)	See Endnote	N/A	\$1,001 - \$15,000	None (or less than \$201)
49	Liberty Sirius XM Group Series A (LSXMA)	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
50	Enbridge		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
51	Simmons First National Corp		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
52	Rayonier, Inc.		N/A	\$1,001 - \$15,000		None (or less than \$201)
53	AT&T		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
54	Liberty Broadband Corp. Ser A		N/A	\$1,001 - \$15,000		None (or less than \$201)
55	Qurate Retail, Inc.	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
56	GCI Liberty	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)
57	Marriott Vacations Worldwide Corp. (VAC)	See Endnote	N/A	\$1,001 - \$15,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

None

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

(N/A) - Not required for this type of report

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Metlife Management Assistance Group 401(k)	No			
1.1	Fidelity (R) VIP Equity-Income	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	Consultant, sole proprietor	See Endnote	\$15,001 - \$50,000	consulting fees	

6. Other Assets and Income

None

7. Transactions

#	DESCRIPTION	TYPE	DATE	AMOUNT	
1	Marriott Vacations Worldwide Corp. (VAC)	See Endnote	Exchange	09/04/2018	\$1,001 - \$15,000
2	GCI Liberty	See Endnote	Exchange	03/09/2018	\$1,001 - \$15,000

8. Liabilities

None

9. Gifts and Travel Reimbursements

None

Endnotes

PART	#	ENDNOTE
2.	14	Previously Health South Corp. changed its name to Encompass Health Corp. (EHC) on or about Jan. 2, 2018.
2.	26	Syngenta Ag delisted its American Depositary Shares from the New York Stock Exchange effective Jan. 18, 2018.
2.	31	Name change, used to be Power Shares QQQ ETF
2.	40	Harris Corporation and L3 Technologies completed an all-stock merger on June 29, 2019. The combined company is now L3Harris Technologies (NYSE: LHX).
2.	46	Filed for bankruptcy
2.	48	Expedia Group, Inc. acquired Liberty Expedia in an all-stock transaction on July 26, 2019.
2.	55	Liberty Interactive Corp.'s tracking stock, QVC Group, which was listed on the 2018 report, was renamed to Qurate Retail, Inc. in March 2018.
2.	56	Liberty Interactive Corp.'s Ventures Group stock (listed on prior report) was exchanged for GCI Liberty stock in March 2018.
2.	57	ILG, Inc. (listed on prior report) was exchanged for Marriott Vacations Worldwide Corp. on or about Sept. 4, 2018.
5.	2	Management consulting to non-profits
7.	1	Marriott Vacations Worldwide Corp. acquired ILG, Inc.
7.	2	Liberty Interactive Corp.'s Ventures Group stock was exchanged for GCI Liberty stock in connection with a split-off on Mar. 9, 2018.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).
