

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Smith, Andrew M

Director, Bureau of Consumer Protection, Federal Trade Commission

Date of Appointment: 05/21/2018

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/ Smith, Andrew M [electronically signed on 04/17/2018 by Smith, Andrew M in Integrity.gov]

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/ White, Christian S., Certifying Official [electronically signed on 05/20/2018 by White, Christian S. in Integrity.gov]

Other review conducted by

/s/ Pankey, Lorielle L, Ethics Official [electronically signed on 05/18/2018 by Pankey, Lorielle L in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 05/18/2018

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Covington & Burling LLP	Washington, District of Columbia	Law Firm	Partner	11/2014	Present
2	Family Trust #1	Bethesda, Maryland	Trust	Co-Trustee	6/2017	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Covington & Burling LLP (law firm)	N/A		Partnership Share	\$1,612,500
2	Covington & Burling LLP (law firm) anticipated partnership share	N/A	\$250,001 - \$500,000	Interest	None (or less than \$201)
3	Covington & Burling LLP capital account	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	Morrison & Foerster LLP Retirement Plan	No	\$250,001 - \$500,000		
4.1	Vanguard Target Retirement Trust 2030 (VTR30)	Yes	\$250,001 - \$500,000		\$201 - \$1,000
5	Covington Pension Plan, defined benefit plan; eligible for lump sum payment or actuarially determined annuity after I leave the firm or after I reach age 62	No	\$250,001 - \$500,000		None (or less than \$201)
6	Covington & Burling Retirement Savings Plan	No	\$100,001 - \$250,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6.1	Schwab Manage Retirement Trust 2030 class V (SM530)	Yes	\$100,001 - \$250,000		None (or less than \$201)
7	Family Trust #1	No	\$500,001 - \$1,000,000	Interest	\$2,501 - \$5,000
7.1	US Bank deposit account (cash)	No	\$500,001 - \$1,000,000	Interest	\$2,501 - \$5,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Covington & Burling LLP	Washington, District of Columbia	I will receive deferred distributions for FY17 and FY18 at the same time and percentages as all partners, pursuant to law firm policy.	11/2014
2	Covington & Burling LLP	Washington, District of Columbia	My capital account will be paid to me in a lump sum 30 days following withdrawal from the partnership, with the value calculated as of the date of withdrawal.	11/2014
3	Morrison & Foerster LLP	San Francisco, California	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	10/2005
4	Covington & Burling LLP	Washington, District of Columbia	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	11/2014
5	Covington & Burling LLP	Washington, District of Columbia	I will continue to participate in the Covington Pension Plan, a defined benefit plan. I am eligible to receive my vested benefit under the Plan (a) after I leave the Firm or (b) after I reach age 62. I may receive my benefit in the form of a lump sum, which I may roll over to another eligible employer plan or an IRA, or in the form of an annuity.	11/2014

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Covington & Burling LLP	Washington, District of Columbia	legal services
2	Online Lenders Alliance	Washington, District of Columbia	legal services
3	Consumer Data Industry Association	Washington, District of Columbia	legal services
4	Equifax Inc.	Atlanta, Georgia	legal services
5	Uber Technologies, Inc.	San Francisco, California	legal services
6	Advanced Connectivity, LLC	torrance, California	legal services
7	Amazon.com	Seattle, Washington	legal services
8	Experian Holdings, Inc.	Costa Mesa, California	legal services
9	JPMorgan Chase & Co.	New York, New York	legal services
10	Early Warning Services, LLC	Scottsdale, Arizona	legal services
11	Capital One	McLean, Virginia	legal services
12	LexisNexis Risk Solutions	Alpharetta, Georgia	legal services
13	CSAA Insurance Exchange	Walnut Creek, California	legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
14	CoreLogic	Irvine, California	legal services
15	Cash America International, Inc.	Fort Worth, Texas	legal services
16	Wells Fargo Bank, NA	San Francisco, California	legal services
17	Everi Holdings Inc.	Las Vegas, Nevada	legal services
18	MoneyKey	Toronto, Outside U.S.	legal services
19	Elevate Credit Inc.	Fort Worth, Texas	legal services
20	Bank of America, NA	Charlotte, North Carolina	legal services
21	Gryphon Investors	San Francisco, California	legal services
22	American Financial Services Association	Washington, District of Columbia	legal services
23	Fidelity National Information Services, Inc.	Jacksonville, Florida	legal services
24	The Walt Disney Company	Burbank, California	legal services
25	American Express Company	New York, New York	legal services
26	Goldman, Sachs & Co.	New York, New York	legal services
27	Plaid Inc.	San Francisco, California	legal services
28	Credit Karma Inc.	San Francisco, California	legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
29	Celtic Bank	Salt Lake City, Utah	legal services
30	Exeter Finance LLC	Irving, Texas	legal services
31	Essent U.S. Holdings, Inc.	Radnor, Pennsylvania	legal services
32	CBC Companies	Columbus, Ohio	legal services
33	MoneyGram International, Inc.	Dallas, Texas	legal services
34	Leonard Green & Partners	Los Angeles, California	legal services
35	Banco Bilbao Vizcaya Argentaria, S.A.	Birmingham, Alabama	legal services
36	The Lead Group	Overland Park, Kansas	legal services
37	Plutopian Corporation	Washington, District of Columbia	legal services
38	Thomson Reuters	New York, New York	legal services
39	Microsoft Corporation	Redmond, Washington	legal services
40	Sotheby's, Inc.	New York, New York	legal services
41	Synchrony Financial Corp.	Stamford, Connecticut	legal services
42	LinkedIn Corporation	San Francisco, California	legal services
43	Cowboys Stadium, L.P.	Irving, Texas	legal services
44	eBureau, LLC	St. Clair, Minnesota	legal services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
45	PNC Financial Services Group, Inc.	Pittsburgh, Pennsylvania	legal services
46	PayPal, Inc.	San Jose, California	legal services
47	Pharmaceutical Research and Manufacturers of America	Washington, District of Columbia	legal services
48	Bluestem Brands Inc.	Eden Prairie, Minnesota	legal services
49	London Bay Capital, LLC	San Francisco, California	legal services
50	First Choice Loan Services Inc.	Pittsfield, Massachusetts	legal services
51	Altisource Solutions, Inc.	Luxemburg, Outside U.S.	legal services
52	Cardinal Health, Inc.	Dublin, Ohio	legal services
53	MB Financial Bank, N.A.	Ann Arbor, Michigan	legal services
54	First Data Corporation and its subsidiary TeleCheck	Houston, Texas	legal services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Spouse IRA (WF)	No	\$100,001 - \$250,000		
1.1	proshares russell 2k etf (SMDV)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.2	First Eagle overseas (SGOIX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.3	pimco all asset fd (PAAIX)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
1.4	franklin dynatech fd adv (FDYZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	gabelli equity income (GCIEX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.6	ev atl cap smll cap cl i (EISMX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	janus henderson triton i (JSMGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.8	a/f new world fund cl f2 (NFFFX)	No	\$1,001 - \$15,000		None (or less than \$201)
1.9	janus henderson euro i (HFEIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.10	blackrock ttl ret instl (MAHQX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.11	alger small cap focus z (AGOZX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.12	amg mgrs cdnce emr cl i (MECIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	college savings plan #1	No	\$50,001 - \$100,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.1	T Rowe Price Portfolio 2018	Yes	\$50,001 - \$100,000		None (or less than \$201)
2	U.S. Bank Deposit Accounts (cash)	No	\$250,001 - \$500,000	Interest	\$1,001 - \$2,500
3	Self IRA (WF)	No	\$50,001 - \$100,000		
3.1	Putnam International Equity Fund A (POVSX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
4	US bank deposit accounts - dependent child (cash)	No	\$1,001 - \$15,000		None (or less than \$201)
5	College savings plan #2	No	\$100,001 - \$250,000		
5.1	T Rowe Price Portfolio 2018	Yes	\$50,001 - \$100,000		None (or less than \$201)
5.2	T Rowe Price Portfolio for College	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	Morrison & Foerster LLP capital account	No	None (or less than \$1,001)	Interest	\$2,501 - \$5,000
7	FBB IRA (self)	No			
7.1	CHARLES SCHWAB US MC ETF (SCHM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.2	ISHARES 7-10 YEAR TREASURY BOND ETF (IEF)	No	\$1,001 - \$15,000		None (or less than \$201)
7.3	ISHARES IBOXX INVT GRADE BOND ETF (LQD)	No	\$1,001 - \$15,000		\$201 - \$1,000
7.4	ISHARES CORE US AGGREGATE BOND ETF (AGG)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.5	ISHARES NATIONAL MUNI BOND ETF (MUB)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7.6	ISHARES CORE S&P 500 ETF (IVV)	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
7.7	ISHARES JP MORGAN USD EMERGING MARKE (EMB)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.8	ISHARES U.S. PREFERRED STOCK ETF (PFF)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.9	SCHWAB INTERNATNAL SMALL CAP EQY ETF (SCHC)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.10	SCHWAB EMERGING MARKETS EQUITY ETF (SCHE)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7.11	SCHWAB US SMALL CAP ETF (SCHA)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.12	CHARLES SCHWAB US MC ETF (SCHM)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.13	VANGUARD FTSE ALL WORLD EX US ETF (VEU)	Yes	\$1,001 - \$15,000		\$201 - \$1,000

7. Transactions

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

8. Liabilities

None

9. Gifts and Travel Reimbursements

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

Endnotes

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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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 that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income 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, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income 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 of income was produced). 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 three 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).
