From: Teresa L. Williamson

Patrick J. Lightfoot; Stephanie Nonluecha; Sandra S. Mabry To:

LEGTEAM; Emory A. Rounds III; Lorna A. Syme; Elizabeth D. Horton; Monica M. G. Ashar; Wendy G. Pond; Cc:

Heather A. Jones; Megan V. Khaner; Brandon L. Bunderson; Kimberly L. Sikora Panza; Rachel K. Dowell; Vincent Salamone; Steven Corbally; Leigh J. Francis; Grace A. Clark; Jim Robertson; Keith Labedz; Cheryl L. Kane-Piasecki; Deborah J. Bortot; Jack MacDonald; Dale A. Christopher; Nicole Stein; Daniel L. Skalla; Diana Veilleux; Seth Jaffe; David A. Meyers; Ciara M. Guzman; Patrick Shepherd; Rodrick T. Johnson; Kimberley H. Kaplan;

Elaine Newton; Christopher J. Swartz; Jaideep Mathai

Subject: NEW NOMINATIONS - April 6, 2017 Date: Friday, April 07, 2017 7:58:59 AM

Importance:

The following nominations have been posted on THOMAS. Please contact the agency if you do not have the final package.

Please remember to add the applicable Senate Transmittal Letter Template to FDTS before forwarding. Thanks!!

NOMINATION - OGE Reviewer: Patrick (INTEGRITY) - (5)

PN249 — 115th Congress (2017-2018) — Makan Delrahim — Department of Justice

Makan Delrahim, of California, to be an Assistant Attorney General, vice William Joseph Baer, resigned.

Date Received from President: 04/06/2017

Committee: Judiciary

Latest Action: 04/06/2017 - Received in the Senate and referred to the Committee on

the Judiciary. (All Actions)

NOMINATION - OGE Reviewer: Sandy (INTEGRITY)

PN248 — 115th Congress (2017-2018) — Eric D. Hargan — Department of Health

and Human Services

Eric D. Hargan, of Illinois, to be Deputy Secretary of Health and Human Services, vice William V. Corr, resigned.

Date Received from President: 04/06/2017

Committee: Finance

Latest Action: 04/06/2017 - Received in the Senate and referred to the Committee on

Finance. (All Actions)

NOMINATION - OGE Reviewer: Stephanie (INTEGRITY)

PN247 — 115th Congress (2017-2018) — David L. Norquist — Department of

Defense

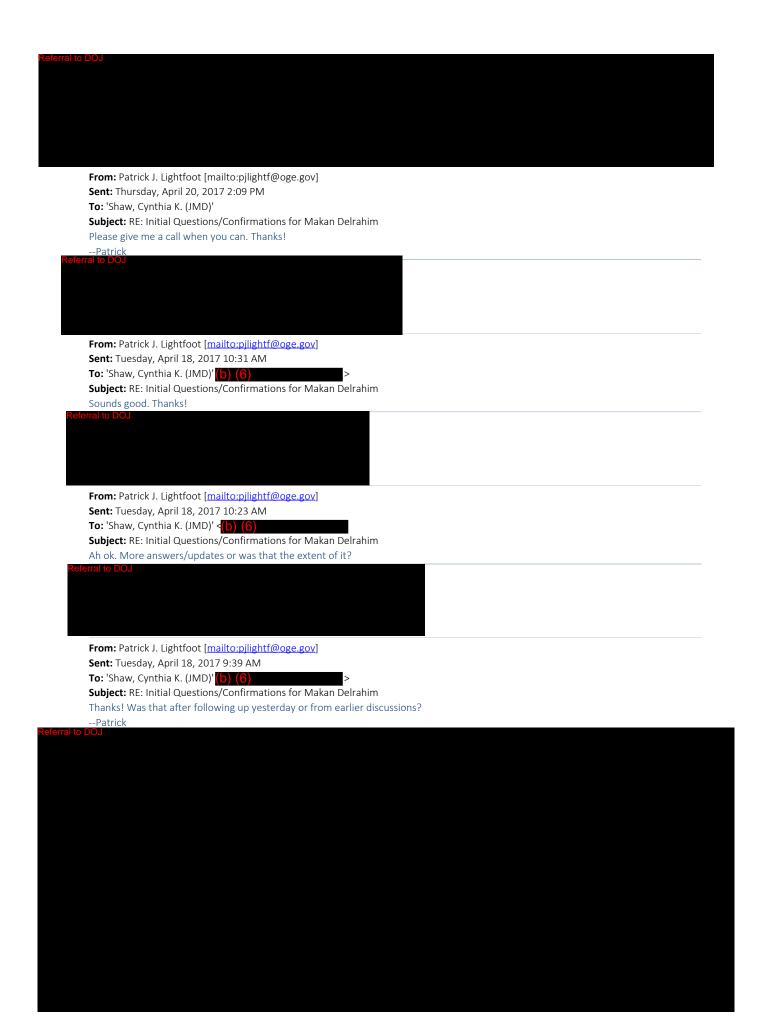
David L. Norquist, of Virginia, to be Under Secretary of Defense (Comptroller), vice Michael J. McCord.

Date Received from President: 04/06/2017

Committee: Armed Services

Latest Action: 04/06/2017 - Received in the Senate and referred to the Committee on

Armed Services. (All Actions)





Subject: RE: Initial Questions/Confirmations for Makan Delrahim Hi Cindy,

Wanted to follow-up and see if you've gotten additional initial responses from the filer. Thanks!

--Patrick

Referral to DOJ

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

Sent: Friday, April 07, 2017 8:53 AM

To: 'Shaw, Cynthia K. (JMD)' (b) (6) > Subject: RE: Initial Questions/Confirmations for Makan Delrahim

Thanks for the update! I see that he was nominated yesterday as well. Hopefully this one should be able to move rather quickly. (6)

--Patrick

Referral to DOJ

From: Patrick J. Lightfoot [mailto:pilightf@oge.gov]

Sent: Monday, April 03, 2017 11:05 AM

To: 'Shaw, Cynthia K. (JMD)' (6)

Subject: RE: Initial Questions/Confirmations for Makan Delrahim

Awesome; thanks for the update!

Referral to DOJ

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

Sent: Monday, April 03, 2017 10:56 AM

To: 'Shaw, Cynthia K. (JMD)' (6)

Subject: RE: Initial Questions/Confirmations for Makan Delrahim

Hi Cindy,

Just wanted to follow up and confirm receipt. I assume you're the reviewer based on the assignments in Integrity, but let me know if I should forward my comments to another reviewer over there.

Thanks! --Patrick

From: Patrick J. Lightfoot

Sent: Wednesday, March 29, 2017 3:53 PM

To: 'Shaw, Cynthia K. (JMD)'

Subject: Initial Questions/Confirmations for Makan Delrahim

Hi Cindy,

Looks like we've got another report to team up on! I assume your after-hours info and back-up reviewer are still the same? In addition to the questions below, could you also send me the filer's personal mailing address so that we can mail him a copy of our Nominee Guide? My other comments are below.

Thanks!

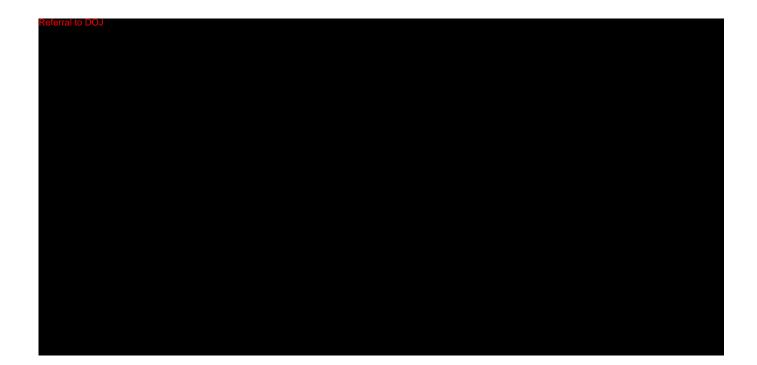
(b)(3), (5), (6)	



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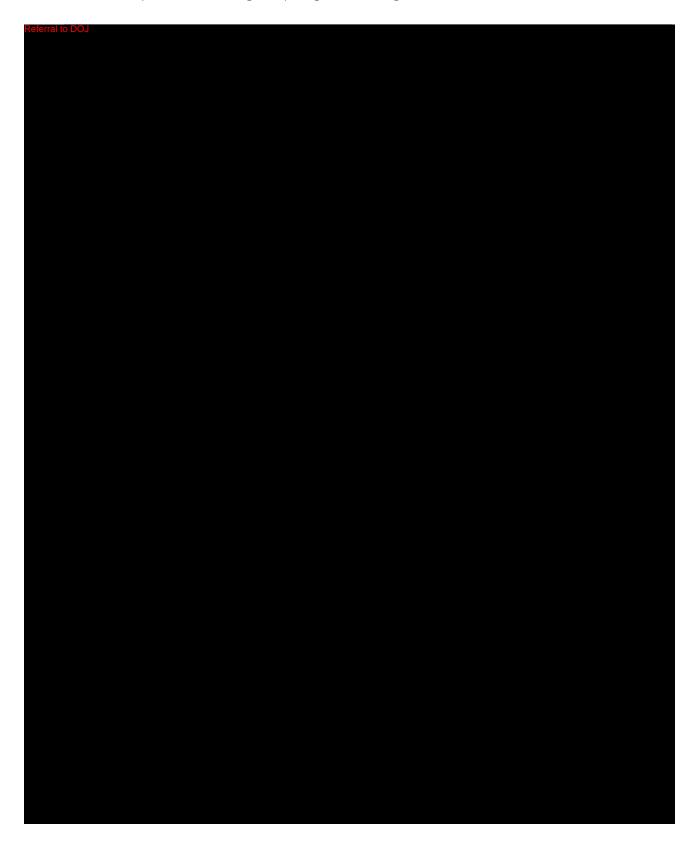


Referral to DOJ		

From: Patrick J. Lightfoot
To: "Shaw, Cynthia K. (JMD)"
Subject: RE: Makan Delrahim

Date: Friday, April 21, 2017 9:09:45 AM

Thanks, Cindy! I'll be reviewing everything this morning and will circle back.



Referral to DOJ		

 From:
 Patrick J. Lightfoot

 To:
 "Shaw, Cynthia K. (JMD)"

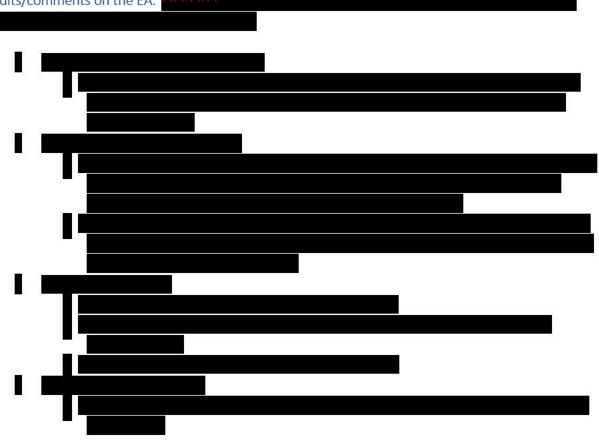
 Subject:
 RE: Delrahim 278

Date: Friday, April 21, 2017 11:51:30 AM

Attachments: EA for preclearance-Delrahim (PJL edits 4.21.17).docx

page attachment wi hheld in full

I've got a few follow-ups on the report, which are noted below. I've also attached my edits/comments on the EA. (6)(6).(6)



--Patrick





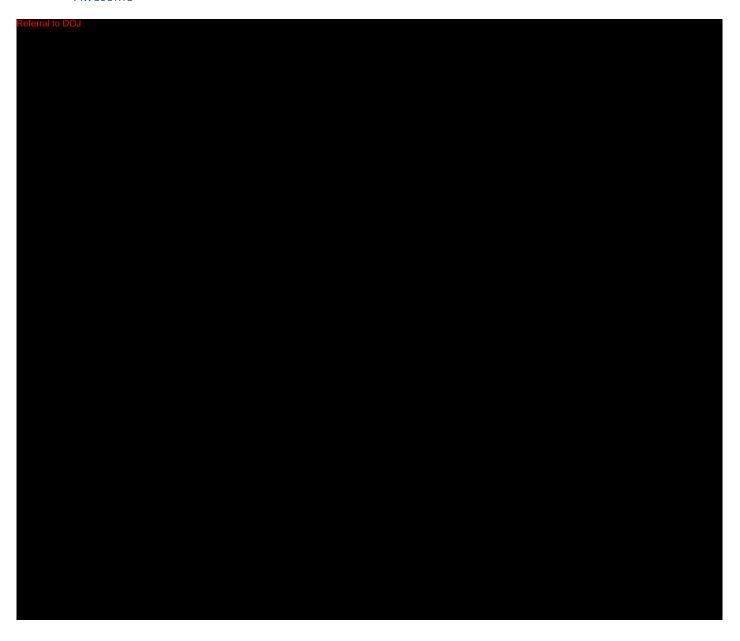
From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

Sent: Friday, April 21, 2017 4:31 PM

To: 'Shaw, Cynthia K. (JMD)' (b) (6)

Subject: RE: (b)(3), (6) again

Awesome



From: Patrick J. Lightfoot

To: "Shaw, Cynthia K. (JMD)"

Subject: Patrick J. Lightfoot

Subject: RE: Delrahim EA

Date:Monday, April 24, 2017 9:10:42 AMAttachments:EA for preclearance-Delrahim 4.24.17.docx



Revised EA is attached and a few minor edits on the report are below.



We can try, but odds are this won't make it through all of OGE by noon.



From: Heather A. Jones
To: Patrick J. Lightfoot
Subject: RE: Delrahim

Date: Monday, April 24, 2017 9:22:58 AM

Thanks. (b) (5)

From: Patrick J. Lightfoot

Sent: Monday, April 24, 2017 9:22 AM To: Heather A. Jones; Deborah J. Bortot

Subject: FW: Delrahim

Deb & Heather:



Will keep you posted once I've seen the edits and the report is ready for pre-preclearance.

--Patrick





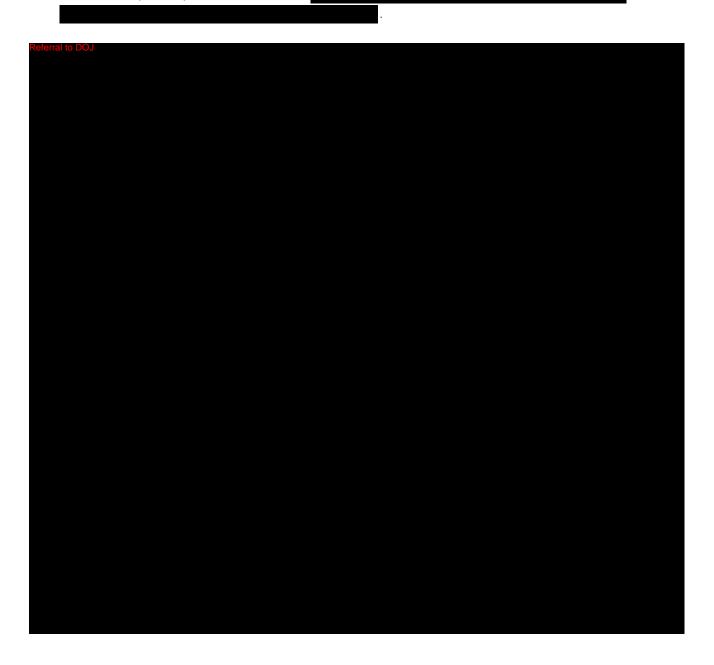
From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

Sent: Monday, April 24, 2017 4:03 PM

To: 'Shaw, Cynthia K. (JMD)' (b) (6)

Subject: RE: Delrahim

Thanks, Cindy! Can you double-check the (b)(3), (6)







From: Patrick J. Lightfoot

To: "Shaw, Cynthia K. (JMD)"

Subject: RE: Any news on delrahim?

Date: Tuesday, April 25, 2017 3:21:34 PM

Yes indeed, I left you a voicemail just before 3. Give me a ring when you've got a chance. Thanks!



From: Patrick J. Lightfoot
To: "Shaw, Cynthia K. (JMD)"

Subject: anguage for review

Date: Tuesday, April 25, 2017 3:39:43 PM

Attachments: (b)(5) language.docx



Cindy,

The paragraph for review is attached.

--Patrick





From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

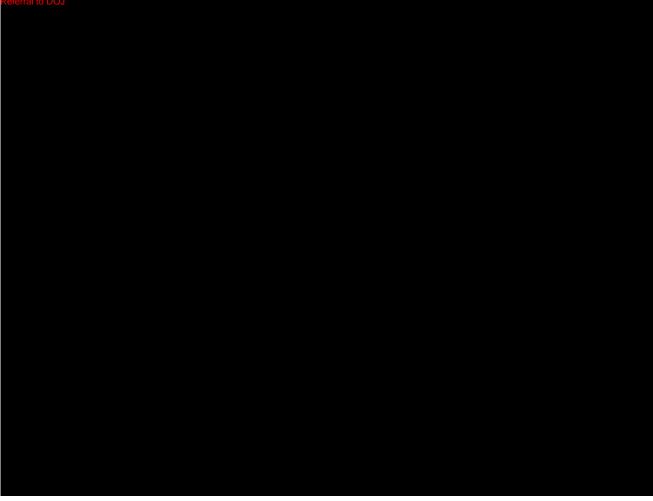
Sent: Wednesday, April 26, 2017 7:54 AM

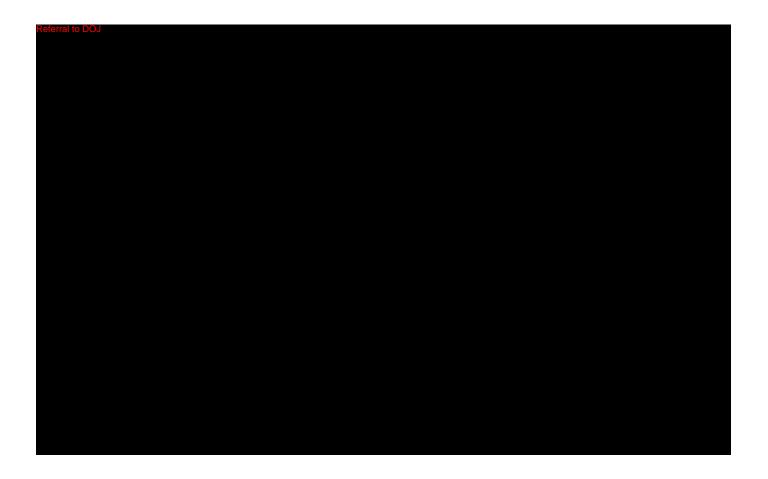
To: 'Shaw, Cynthia K. (JMD)' (b) (6)

Subject: RE: substitute

I've forwarded this on to Deb and Heather for their awareness and we'll figure out next steps.







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From: Patrick J. Lightfoot
To: Shaw, Cynthia K. (JMD)"

Subject: Confirmatory Email for Makan Delrahim

Date: Wednesday, April 26, 2017 11:25:41 AM

Cindy,

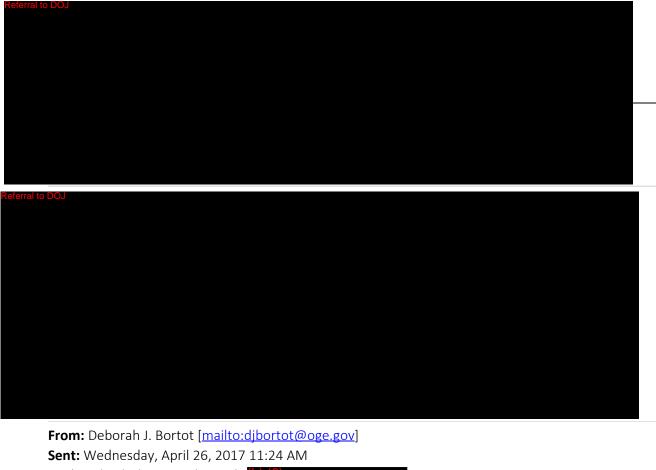
OGE will be reviewing the nominee's report for preclearance. **Please be sure to instruct the nominee to** <u>personally</u> **review the report carefully once more**, given that the nominee will be personally responsible for all entries in the report as they currently appear.

Before OGE reviews this report for "preclearance," I'm sending you a list of some of the nominee's material representations on which we are relying. Please forward this message to the nominee and instruct him to notify us immediately if any item in this list is incorrect.

Among other material representations, we are relying on the following:

- The nominee has personally reviewed all entries in the current version of the report and has affirmed that they are correct.
- (b)(3), (6)
- For Part 1 and Part 4, the nominee has provided information covering the entire reporting period of January 1, <u>2015</u>, to present.
- For Part 2, Part 5, and Part 6 the nominee has provided information covering the entire reporting period of January 1, <u>2016</u>, to present.
- The ethics agreement correctly describes all items addressed in the agreement.

--Patrick



To: 'cynthia.k.shaw@usdoj.gov' < (b) (6)

Cc: Patrick J. Lightfoot pjlightf@oge.gov>

Subject: Delrahim

4 page attachment withheld in full - (b)(3), (4), (5), (6)

Cindy,

If you are good with the language in the attached EA, we are ready to preclear.

Thanks, Deb

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From: Patrick J. Lightfoot
To: "Shaw, Cynthia K. (JMD)"
Subject: RE: Precleared: Makan Delrahim
Date: Wednesday, April 26, 2017 1:32:04 PM

Attachments: EA precleared -Delrahim.docx

page attachment withheld in full - (b)(3)

Cindy,

Please have the filer sign the ethics agreement (I see that some spacing may need to be corrected in light of the signature block at the end) and sign/submit the final version of the report in Integrity.

Thanks!

--Patrick

From: Patrick J. Lightfoot

Sent: Wednesday, April 26, 2017 1:30 PM

To: Stefan Passantino (b) (6)

Cc: Cindy Shaw (b) (6)); Ann Donaldson (b) (6)); James

D. Schultz (b) (6)
Subject: PE: Procleared: Makan Delrahim

Subject: RE: Precleared: Makan Delrahim

Stefan,

Mr. Delrahim's ethics agreement is attached.

Sincerely,

~ ~

Patrick J. Lightfoot Assistant Counsel, Ethics Law & Policy Branch General Counsel & Legal Policy Division

U.S. Office of Government Ethics 1201 New York Ave NW, Suite 500 Washington, DC 20005 Telephone: (202) 482-9271

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

From: Heather A. Jones

Sent: Wednesday, April 26, 2017 1:26 PM

To: Stefan Passantino (b) (6)
Cc: Patrick J. Lightfoot; Cindy Shaw (b) (6)
); Ann Donaldson

(b) (6)); David J. Apol; Deborah J. Bortot; Heather A. Jones; James D. Schultz

(b) (6)); Rodrick T. Johnson; Sandra S. Mabry; Teresa L. Williamson

Subject: Precleared: Makan Delrahim

Stefan-

Makan Delrahim is precleared. Patrick, please send the ethics agreement to the White House.

Thanks, Heather

Heather Jones (202) 482-9316 Office of Government Ethics

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics





From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

Sent: Wednesday, April 26, 2017 3:32 PM

To: 'Shaw, Cynthia K. (JMD)' (b) (6)

Subject: RE: Delrahim EA

Is he available to sign and submit the report in Integrity?



From: Teresa L. Williamson

To: Patrick J. Lightfoot

Subject: RE: NEW NOMINATIONS - April 6, 2017 - Makan Delrahim

Date: Wednesday, April 26, 2017 3:52:11 PM

Awesome – have a good nite!

From: Patrick J. Lightfoot

Sent: Wednesday, April 26, 2017 3:44 PM

To: Teresa L. Williamson

Subject: RE: NEW NOMINATIONS - April 6, 2017 - Makan Delrahim

Yes indeed! Already working on it.

From: Teresa L. Williamson

Sent: Wednesday, April 26, 2017 3:43 PM

To: Patrick J. Lightfoot

Subject: FW: NEW NOMINATIONS - April 6, 2017 - Makan Delrahim

Importance: High

Hi Patrick – just wanted to send you a reminder that Makan Delrahim was nominated April 6. Please contact the agency for the final paperwork to send to the committee.

Thanks! Teresa

From: Teresa L. Williamson

Sent: Friday, April 07, 2017 7:59 AM

To: Patrick J. Lightfoot; Stephanie Nonluecha; Sandra S. Mabry

Subject: NEW NOMINATIONS - April 6, 2017

Importance: High

The following nominations have been posted on THOMAS. Please contact the agency if you do not have the final package.

Please remember to add the applicable Senate Transmittal Letter Template to FDTS before forwarding. Thanks!!

NOMINATION - OGE Reviewer: Patrick (INTEGRITY) - (b) (5)

PN249 — 115th Congress (2017-2018) — Makan Delrahim — Department of Justice

Makan Delrahim, of California, to be an Assistant Attorney General, vice William Joseph Baer, resigned.

Date Received from President: 04/06/2017

Committee: Judiciary

Latest Action: 04/06/2017 - Received in the Senate and referred to the Committee on

the Judiciary. (All Actions)

From: <u>Teresa L. Williamson</u>

To: Patrick J. Lightfoot; (b)(6) - Cynthia Shaw's email address ; (b)(6) - Janice Roo

Subject: Public Financial Disclosure Report of Makan N. Delrahim

Date: Monday, May 01, 2017 12:03:54 PM
Attachments: Delrahim, Makan N. final278.pdf

<u>Delrahim, Makan N. final278.pdf</u> <u>Delrahim, Makan N. finalsenateltr.pdf</u> <u>Delrahim, Makan N. finalEA.pdf</u> Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at https:// extapps2.oge.gov/201/Presiden.nsf/PAS%

Good Afternoon,

I've attached the financial disclosure package for Makan N. Delrahim, who has been nominated by President Trump for the position of Assistant Attorney General, Antitrust Division, Department of Justice.

Thanks!

Teresa Williamson Presidential Nominations Branch U.S. Office of Government Ethics 1201 New York Avenue, NW - Suite 500 Washington, DC 20005 202-482-9283

UNITED STATES OFFICE OF **GOVERNMENT ETHICS**

April 27, 2017

The Honorable Charles E. Grassley Chairman Committee on the Judiciary **United States Senate** Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Makan N. Delrahim, who has been nominated by President Trump for the position of Assistant Attorney General, Antitrust Division, Department of Justice.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

Digitally signed by DAVID APOL DAVID APOL ON CEUS, OEUS. Government, oue-Office of Government Ethics, cn=DAVID APOL, 0.9.2342.19200300.100.1.1=95491002981870 Date 2017.04.27 15 55 54 -04'00'

David J. Apol General Counsel

Enclosures



U.S. Department of Justice

APR 26 2017

Washington, D.C. 20530

Walter M. Shaub, Jr.
Director
Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3919

Dear Mr. Shaub:

In accordance with the provisions of Title I of the Ethics in Government Act of 1978, as amended, I am forwarding the financial disclosure report of Makan Delrahim. President Trump has nominated Mr. Delrahim to serve as Assistant Attorney General, Antitrust Division, "Department of Justice.

We have conducted a thorough review of the enclosed report. The conflict of interest statute, 18 U.S.C. § 208, requires that Mr. Delrahim recuse himself from participating personally and substantially in any particular matter in which he knows that he has a financial interest directly and predictably affected by the matter, or in which he knows that a person whose interests are imputed to him has a financial interest directly and predictably affected by the matter, unless he first obtains a written waiver, pursuant to Section 208(b)(1), or qualifies for a regulatory exemption, pursuant to Section 208(b)(2). Mr. Delrahim understands that the interests of the following persons are imputed to him: his spouse; minor children; any general partner of a partnership in which he is a limited or general partner; any organization in which he serves as an officer, director, trustee, general partner or employee; and any person or organization with which he is negotiating or has an arrangement concerning prospective employment. In determining whether a particular matter has a direct and predictable effect on his financial interests or on those of any other person whose interests are imputed to him, Mr. Delrahim will consult with Department of Justice ethics officials.

Mr. Delrahim owns 50 percent of the stock in a privately held company, Preconcile, Inc., an online dispute resolution service from which he resigned in December 2016. Because he will continue to have a financial interest in Preconcile, he will not participate personally and

substantially in any particular matter that to his knowledge has a direct and predictable effect on the financial interest of Preconcile, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Mr. Delrahim resigned as a partner from the law firm of Brownstein Hyatt Farber Schreck, LLP in January 2017. For a period of one year after his resignation, he will not participate personally and substantially in any particular matter involving specific parties in which he knows the firm is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, he will not participate personally and substantially in any particular matter involving specific parties in which he knows that a former client of his is a party or represents a party, for a period of one year after he last provided service to that client, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Mr. Delrahim previously held a position with World Poker Tour Foundation, Inc. from which he resigned in December 2016. For a period of one year after his resignation from this entity, he will not participate personally and substantially in any particular matter involving specific parties in which he knows the entity is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If Mr. Delrahim has a managed account or otherwise uses the services of an investment professional during his appointment, he will ensure that the account manager or investment professional obtains his prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

He will meet in person with Department ethics officials during the first week of his service in the position of Assistant Attorney General, Antitrust Division in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of his confirmation, he will document his compliance with this ethics agreement by notifying Department ethics officials in writing when he has completed the steps described in this ethics agreement.

Mr. Delrahim understands that as an appointee he must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that he previously signed and that he will be bound by the requirements and restrictions therein in addition to the commitments he has made in this ethics agreement. Mr. Delrahim will seek a waiver of the provisions of paragraph 7 of the Ethics Pledge under Executive Order 13770 with respect to particular matters and specific issue areas on which he lobbied. He understands that any such waiver will not permit him to participate in particular matters involving specific parties on which he lobbied.

Mr. Delrahim has been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Based on the above agreements and counseling, I am satisfied that the report presents no conflicts of interest under applicable laws and regulations and that you can so certify to the Senate Judiciary Committee.

Sincerely,

Lee J. Lofthus

Assistant Attorney General For Administration and

Alternate Designated Agency Ethics Official

Enclosure

NOMINEE STATEMENT

I have read the attached Ethics Agreement signed by Lee J. Lofthus, Assistant Attorney General
and Designated Agency Ethics Official, on April 26, 2017 and I agree to
comply with the conflict of interest statute and regulations, and to follow the procedures set forth
in the agreement. I understand that as an appointee I must continue to abide by the Ethics Pledge
(Exec. Order No. 13770) that I previously signed and that I will be bound by the requirements and
restrictions therein in addition to the commitments I have made in this ethics agreement.
$\Lambda / \Lambda \Lambda / / / / / $
April 26, 2017
Makan Delrahim Date