

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Delrahim, Makan N

Assistant Attorney General, Antitrust Division, Department of Justice

Other Federal Government Positions Held During the Preceding 12 Months:

Deputy White House Counsel (1/2017 - Present)

Names of Congressional Committees Considering Nomination:

- **Committee on the Judiciary**
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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/ Delrahim, Makan N [electronically signed on 03/28/2017 by Delrahim, Makan N 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/ Lofthus, Lee, Certifying Official [electronically signed on 04/26/2017 by Lofthus, Lee in Integrity.gov]

Other review conducted by

/s/ Shaw, Cynthia K, Ethics Official [electronically signed on 04/26/2017 by Shaw, Cynthia K in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 04/27/2017 by Apol, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Brownstein Hyatt Farber Schreck, LLP	Los Angeles, California	Law Firm	Partner/Shareholder	8/2005	1/2017
2	Pepperdine University School of Law	Malibu, California	University/College	Adjunct Professor of Law	8/2011	12/2015
3	Trump for America, Inc.	Washington, District of Columbia	Non-Profit	Attorney	12/2016	1/2017
4	World Poker Tour Foundation, Inc.	Los Angeles, California	Non-Profit	Board Member	3/2012	12/2016
5	Preconcile, LLC	Baltimore, Maryland	Corporation	Member	6/2013	12/2016

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Brownstein Hyatt Farber Schreck, LLP	N/A		Equity Buyout	\$254,460
2	Brownstein Hyatt Farber Schreck, LLP	N/A		Salary & Bonus	\$728,096
3	Brownstein Hyatt Farber Schreck, LLP	N/A		S Distribution for 2016	\$70,616
4	Brownstein Hyatt Farber Schreck, LLP	No		Salary 2017 through 1/20	\$41,096
5	Brownstein Hyatt Farber Schreck, LLP 401K	No			
5.1	Vanguard Institutional Index Fund Institutional Shares	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
5.2	Vanguard Total International Stock Index Fund Admiral Shares	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5.3	Vanguard Mid-Cap Index Fund Institutional Shares	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
5.4	MainStay Large Cap Growth Fund	Yes	\$100,001 - \$250,000		\$15,001 - \$50,000
6	"Ultimate Justice" (Television Concept), Pilgrim Studios, Inc. (value not readily ascertainable)	N/A			None (or less than \$201)
7	Preconcile, Inc. (online dispute resolution service) (Baltimore, MD)	See Endnote	N/A	\$250,001 - \$500,000	None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Brownstein Hyatt Farber Schreck	Denver, Colorado	I will continue to participate in this defined contribution plan. As per plan policy, the plan sponsor will make the final 2016 contribution on or about April 2017. Neither I nor the sponsor will make any additional contribution.	8/2005

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Brownstein Hyatt Farber Schreck	Los Angeles, California	Partner in Law Firm
2	Qualcomm	San Diego, California	Legal Services
3	Ares Investment	Los Angeles, California	Legal Services
4	Baxter Healthcare	Chicago, Illinois	Legal Services
5	Anthem	Indianapolis, Indiana	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	Papersource Manufacturing & Converting	Los Angeles, California	Legal Services
7	Complete Control Management	Los Angeles, California	Legal Services
8	Ultimate Fighting Championship	Las Vegas, Nevada	Legal Services
9	Ardent Healthcare	Nashville, Tennessee	Legal Services
10	Medical Device Manufacturers Association	Washington, District of Columbia	Legal Services
11	Brentwood School	Los Angeles, California	Legal Services
12	Flexjet, LLC	Richmond Heights, Ohio	Legal Services
13	Mentor Network	Boston, Massachusetts	Legal Services
14	Jacob Khobian	Los Angeles, California	Legal Services
15	Caesar's Interactive	Las Vegas, Nevada	Legal Services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Jewish Federation Council of Los Angeles, Defined Benefit Plan	N/A	\$1,001 - \$15,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Bank Account no.1 (cash)		N/A	\$100,001 - \$250,000	Interest	\$201 - \$1,000
2	U.S. Bank Account no. 2 (cash)		N/A	\$250,001 - \$500,000	Interest	\$201 - \$1,000
3	U.S. Bank Account no. 3 (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)
4	U.S. Bank Account no. 4 (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Scottrade Brokerage		No			
5.1	Boston Scientific Corp.	See Endnote	N/A	None (or less than \$1,001)	Capital Gains	\$1,001 - \$2,500
5.2	Cash Account		N/A	\$1,001 - \$15,000		None (or less than \$201)
6	Residential Real Estate, Washington, DC		N/A	\$100,001 - \$250,000	Rent or Royalties	\$15,001 - \$50,000
7	Residential Real Estate, Washington, DC		N/A	\$500,001 - \$1,000,000	Rent or Royalties	\$15,001 - \$50,000
8	"Trash Fire" (Movie), Trash Fire, LLC, (value not readily ascertainable)	See Endnote	N/A			None (or less than \$201)
9	Chesapeake Beach, MD (commercial real estate)	See Endnote	N/A	\$500,001 - \$1,000,000		None (or less than \$201)

7. Transactions

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

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Lafayette Federal Credit Union	Mortgage (investment/rental property)	\$100,001 - \$250,000	2006	2.5	30 YR- ARM
2	Nationstar Mortgage	Mortgage (investment/rental property)	\$100,001 - \$250,000	2005	5.0	30 YR
3	Nationstar Mortgage	Mortgage (investment/rental property)	\$100,001 - \$250,000	2010	4.375	30YR
4	Senate Federal Credit Union	HELOC	\$250,001 - \$500,000	2013	5.0	10 YR
5	Charles Ruttkay	Mortgage (investment/rental property)	\$250,001 - \$500,000	2007	5.0	30 YR
6	Wells Fargo Bank	Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2013	2.625	30 YR ARM
7	Lafayette Federal Credit Union	Mortgage on Personal Residence	\$250,001 - \$500,000	2004	2.5	30 YR ARM

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
2.	7	Preconcile, LLC, became Preconcile, Inc., in February 2017. Filer owns 50 percent of this privately held corporation's common and preferred stock.
6.	5.1	This asset was divested March 28, 2017.

PART	#	ENDNOTE
6.	8	I am a passive investor in this movie. As an investor, I will receive a fixed amount that reflects a repayment of my investment on a "first-in-first-out basis." I am also eligible to receive a pre-determined pro-rata share of income once the movie hits its "break-even."
6.	9	Filer is joint owner of this property with family member. Pursuant to their agreement, the filer receives no income from the property.

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 \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 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.

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