



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,

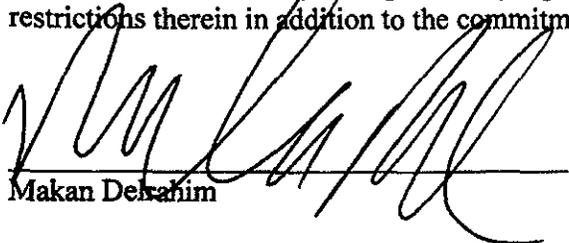


Lee J. Lofthus
Assistant Attorney General
For Administration and
Alternate Designated Agency Ethics Official

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.


Makan Debrahim

April 26, 2017
Date