

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

Filer's Information

Mandelker, Sigal Pearl

Under Secretary for Terrorism and Financial Intelligence, Department of the Treasury

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- **Committee on Banking, Housing, and Urban Affairs**
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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/ Mandelker, Sigal Pearl [electronically signed on 02/15/2017 by Mandelker, Sigal Pearl 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/ Horton, Elizabeth A, Certifying Official [electronically signed on 04/06/2017 by Horton, Elizabeth A in Integrity.gov]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 04/07/2017 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	Proskauer Rose LLP	See Endnote	New York City, New York	Law Firm	Partner	5/2009	Present

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Proskauer Rose LLP (law firm)	N/A		Partnership Share	\$1,260,000
2	Proskauer Rose LLP capital account	N/A	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000
3	Keogh	No			
3.1	T. Rowe Price Retirement 2035	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.2	Dodge & Cox Stock	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.3	RiverPark/Wedgewood Institutional	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.4	Vanguard Institutional Index I	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.5	Vanguard Small Cap Index Adm	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.6	Dodge & Cox International Stock	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.7	JPMorgan Emerging Markets Equity L	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.8	Vanguard Developed Markets Idx Admiral	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.9	Vanguard Emerging Markets Stock Idx Adm	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	T. Rowe Price Retirement 2035	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
5	Dodge & Cox Stock	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6	Vanguard Institutional Index I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7	Vanguard Small Cap Index Adm	Yes	\$15,001 - \$50,000		\$201 - \$1,000
8	Dodge & Cox International Stock	Yes	\$15,001 - \$50,000		\$201 - \$1,000
9	Proskauer Rose LLP, profit sharing plan	No			
9.1	T. Rowe Price Retirement 2035	Yes	\$1,001 - \$15,000		\$201 - \$1,000
9.2	Dodge & Cox Stock	Yes	\$1,001 - \$15,000		\$201 - \$1,000
9.3	Vanguard Institutional Index I	Yes	\$1,001 - \$15,000		\$201 - \$1,000
9.4	Vanguard Small Cap Index Adm	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.5	Dodge & Cox International Stock	Yes	\$1,001 - \$15,000		\$201 - \$1,000
9.6	JPMorgan Emerging Markets Equity L	Yes	\$1,001 - \$15,000		None (or less than \$201)
9.7	Vanguard Emerging Mkts Stock Idx Adm	Yes	\$1,001 - \$15,000		\$201 - \$1,000
10	Employees' Retirement Plan of Proskauer Rose LLP, a defined benefit plan, (value not readily ascertainable) \$87/month at age 65	N/A			None (or less than \$201)
11	Proskauer Rose LLP (law firm) anticipated partnership share	N/A	\$250,001 - \$500,000		None (or less than \$201)
12	JPMorgan Emerging Markets Equity L	Yes	\$15,001 - \$50,000		None (or less than \$201)
13	Vanguard Emerging Mkts Stock Idx Adm	Yes	\$15,001 - \$50,000		None (or less than \$201)
14	PIMCO Total Return Instl	Yes	None (or less than \$1,001)		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
15	Proskauer Rose LLP - Partners' Cash Balance Retirement Plan, a defined benefit plan, lump sum upon separation	N/A	\$50,001 - \$100,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Proskauer Rose LLP	New York City, New York	The capital account will be returned in a lump sum within 60 days of my withdrawal from the firm and will be calculated as of the date of withdrawal.	2/2017
2	Proskauer Rose LLP	New York City, New York	I will continue to participate in these defined contribution plans. The plan sponsor will not make further contributions after my separation. (Items 3, 4-8, and 12-14 in Part 2)	10/2013
3	Proskauer Rose LLP	New York City, New York	I will receive a lump sum payment from the firm of the Partners' Cash Balance Retirement Plan (defined benefit plan) following withdrawal from the firm.	10/2014
4	Proskauer Rose LLP	New York City, New York	I will continue to participate in the Employees' Retirement Plan (defined benefit plan). The plan is frozen and there have been no additional accruals since 2010.	5/2009
5	Proskauer Rose LLP	New York City, New York	I will receive a final payment of my 2016 distributions and a pro rated payment for 2017 distributions. The pro rata share will be calculated as of the date of my withdrawal. The payment will be made within 60 days of my departure subject to a withholding for estimated state tax liabilities for FY16 and FY17, which will be finalized in August 2017 and August 2018, respectively. Any excess amount that has been withheld will be refunded when the taxes are finalized. The amount will be minimal.	2/2017
6	Proskauer Rose LLP	New York City, New York	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation. (Item 9 in Part 2)	5/2010

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Proskauer Rose LLP	New York City, New York	Legal Services
2	Martin J. Whitman (indemnified by Third Avenue) (client of Proskauer Rose LLP)	New York, New York	Legal Services
3	Government Development Bank of PR (client of Proskauer Rose LLP)	San Juan, Puerto Rico	Legal Services
4	AFTRA Health and Retirement Funds (client of Proskauer Rose LLP)	New York, New York	Legal Services
5	United Wire, Metal & Machine Funds (client of Proskauer Rose LLP)	Long Island City, New York	Legal Services
6	Ophthotech Corporation (client of Proskauer Rose LLP)	New York, New York	Legal Services
7	American Eagle Outfitters (client of Proskauer Rose LLP)	New York, New York	Legal Services
8	Los Angeles 2024 Exploratory Committee (client of Proskauer Rose LLP)	Los Angeles, California	Legal Services
9	FDO Holdings (client of Proskauer Rose LLP)	Smyrna, Georgia	Legal Services
10	SL Green Realty Corporation (client of Proskauer Rose LLP)	New York, New York	Legal Services
11	JP Morgan Asset Management (client of Proskauer Rose LLP)	New York, New York	Legal Services
12	Rose Yuan (indemnified by JP Morgan) (client of Proskauer Rose LLP)	San Francisco, California	Legal Services
13	Hospital for Special Surgery (client of Proskauer Rose LLP)	New York, New York	Legal Services
14	Alan Ni (indemnified by JP Morgan) (client of Proskauer Rose LLP)	San Francisco, California	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
15	UFCW Local 342 Federal Credit Union (client of Proskauer Rose LLP)	Mineola, New York	Legal Services
16	S&P Global Inc. (client of Proskauer Rose LLP)	New York, New York	Legal Services
17	Henry Schein Inc. (client of Proskauer Rose LLP)	Melville, New York	Legal Services
18	Equity League Pension Trust Fund (client of Proskauer Rose LLP)	New York, New York	Legal Services
19	Drago Rajkovic (indemnified by JP Morgan) (client of Proskauer Rose LLP)	New York, New York	Legal Services
20	Pinebridge Investments (client of Proskauer Rose LLP)	New York, New York	Legal Services
21	Veronique Ferguson (indemnified by JP Morgan) (client of Proskauer Rose LLP)	New York, New York	Legal Services
22	Deerfield Management Company (client of Proskauer Rose LLP)	New York, New York	Legal Services
23	WestPoint Home LLC (client of Proskauer Rose LLP)	Clemson, South Carolina	Legal Services
24	National Hockey League (client of Proskauer Rose LLP)	New York, New York	Legal Services
25	Viskase Companies Inc (client of Proskauer Rose LLP)	Lombard, Illinois	Legal Services
26	Caledonian Bank Ltd., Caledonian Global, and Caledonian Securities Ltd. (client of Proskauer Rose LLP)	George Town, Cayman Islands, Outside U.S.	Legal Services
27	Prada (client of Proskauer Rose LLP)	New York, New York	Legal Services
28	J.P. Morgan Chase & Co. (client of Proskauer Rose LLP)	New York, New York	Legal Services
29	Glouston Capital Partners (client of Proskauer Rose LLP)	Boston, Massachusetts	Legal Services
30	WTA Tour, Inc. (client of Proskauer Rose LLP)	St. Petersburg, Florida	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
31	Kepos Capital, LP (client of Proskauer Rose LLP)	New York, New York	Legal Services
32	Great West Financial (client of Proskauer Rose LLP)	Greenwood Village, Colorado	Legal Services
33	Office of the Commissioner of Baseball (client of Proskauer Rose LLP)	New York, New York	Legal Services
34	Goldentree Asset Management (client of Proskauer Rose LLP)	New York, New York	Legal Services
35	United Realty Management Company Inc. (client of Proskauer Rose LLP)	New York, New York	Legal Services
36	Varde Management, L.P. (client of Proskauer Rose LLP)	Minneapolis, Minnesota	Legal Services
37	Lighthouse Guild International (client of Proskauer Rose LLP)	New York, New York	Legal Services
38	Liveperson (client of Proskauer Rose LLP)	New York, New York	Legal Services
39	Lagardere Unlimited, Inc. (client of Proskauer Rose LLP)	New York, New York	Legal Services
40	Becton, Dickinson and Company (client of Proskauer Rose LLP)	Franklin Lakes, New Jersey	Legal Services
41	The Edmond de Rothschild Foundation (client of Proskauer Rose LLP)	New York, New York	Legal Services
42	York Capital Management LP (client of Proskauer Rose LLP)	New York, New York	Legal Services
43	Icahn Enterprises L.P. (client of Proskauer Rose LLP)	New York, New York	Legal Services
44	AutoPlus Pep Boys (client of Proskauer Rose LLP)	Philadelphia, Pennsylvania	Legal Services
45	Ornit Niv (indemnified by FXCM) (client of Proskauer Rose LLP)	New York, New York	Legal Services
46	The Financial Oversight and Management Board for Puerto Rico (client of Proskauer Rose LLP)	San Juan, Puerto Rico	Legal Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
47	Nine confidential individual clients and six confidential corporate clients are not disclosed because the disclosure of the representations are prohibited by Rule 1.6 of the New York Rules of Professional Conduct, that does not permit disclosure without consent or waiver by the client. In addition, 14 of the foregoing confidential clients are not disclosed because they are represented in connection with an investigation and they have not been identified publicly.		

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Cap Media LLC (Media Consulting)	N/A	\$1,001 - \$15,000	consulting fees	
2	401k - Alliance for American Manufacturing Plan	No			
2.1	Invesco Stable Asset Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2.2	Putnam U.S. Government Income Trust - Class R	Yes	None (or less than \$1,001)		\$201 - \$1,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	NY 529 College Savings Plan	No			
1.1	Vanguard Institutional Total Stock Market Index Fund (Income Not Readily Ascertainable)	Yes	\$50,001 - \$100,000		
1.2	Vanguard Total International Stock Index Fund (Income Not Readily Ascertainable)	Yes	\$15,001 - \$50,000		

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	US bank accounts (cash)	N/A	\$15,001 - \$50,000		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	Wells Fargo	See Endnote	Mortgage on Personal Residence	\$100,001 - \$250,000	2016	2.875	15 year
2	Wells Fargo	See Endnote	Mortgage on Personal Residence	\$250,001 - \$500,000	2010	4.625	30 year

9. Gifts and Travel Reimbursements

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

Endnotes

PART	#	ENDNOTE
1.	1	When I joined Proskauer in 2009 I had the title Senior Counsel. I became a Partner in November 2011.
8.	1	I originally took out a mortgage on this residence in 2010, which I refinanced in 2016. This mortgage is the refinanced mortgage. #2 is the original mortgage.

PART	#	ENDNOTE
8.	2	As noted above, we refinanced this mortgage in 2016. As such, this mortgage now has a zero balance.

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.

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).
