New Entrant Report | U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (March 2014)

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

#### Filer's Information

Paoletta, Mark R

Counsel, Office of the Vice President

Date of Appointment: 01/20/2017

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/ Paoletta, Mark R [electronically signed on 02/21/2017 by Paoletta, Mark R 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/ Morgan, Matthew E, Certifying Official [electronically signed on 03/31/2017 by Morgan, Matthew E in Integrity.gov]

Other review conducted by

/s/ Baykan, Deniz M, Ethics Official [electronically signed on 03/30/2017 by Baykan, Deniz M in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Apol, David, Certifying Official [electronically signed on 06/07/2017 by Apol, David in Integrity.gov]

Data Revised 06/01/2017

Data Revised 05/23/2017

Data Revised 03/31/2017

Data Revised 03/30/2017

Data Revised 03/29/2017

Data Revised 03/28/2017

Data Revised 03/27/2017

Data Revised 03/17/2017

### 1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	то
1	DLA Piper LLP	Washington, D. C., District of Columbia	Law Firm	Partner	7/2012	8/2016
2	DLA Piper LLP	Washington D.C., District of Columbia	Law Firm	Of Counsel	8/2016	12/2016
3	MP Strategies LLC	Tyson's Corner, Virginia	Corporation	President	9/2016	1/2017
4	Trump for America, Inc.	Washington, District of Columbia	Non-Profit	Volunteer	12/2016	1/2017
5	Judicial Education Project	Washington, District of Columbia	Non-Profit	Consultant	3/2016	8/2016

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

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	MP Strategies LLC (e.g., media projects - articles, websites, and documentary)	See Endnote	N/A	-	Fees for work billed	\$209,948
2	DLA Piper LLP (law firm)		N/A		Partnership distribution	\$275,410
3	DLA Piper LLP (law firm)		N/A		Bonus	\$100,000
4	DLA Piper LLP (law firm)		N/A		Fees for work billed as Of Counsel	\$11,650
5	Vanguard Target Retirement Income Inv Fund		Yes	\$100,001 - \$250,000		\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
6	Vanguard Target Retirement Fund 2025	Yes	\$50,001 - \$100,000		\$201 - \$1,000
7	Schwab Managed Retirement Trust Fund 2030	Yes	\$250,001 - \$500,000		\$1,001 - \$2,500
8	Judicial Education Project	N/A		Fees for work billed	\$84,000

# 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	DLA Piper 401k	Washington, District of Columbia	I will continue to participate in this defined contribution plan. The plan sponsor no longer makes contributions.	7/2012
2	Dickstein Shapiro 401k	Washington, District of Columbia	I will continue to participate in this defined contribution plan. The plan sponsor no longer makes contributions.	1/2007

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	MP Strategies LLC	Tyson's Corner, Virginia	media projects (e.g., articles, websites, documentary)
2	DLA Piper LLP	Washington, District of Columbia	Equity Partner
3	Samsung Electronics America, Inc	Ridgefield Park, New Jersey	legal services (client of DLA Piper)
4	ViaSat, Inc	Carlsbad, California	legal services (client of DLA Piper)
5	Gilead Sciences Inc	Foster City, California	legal services (client of DLA Piper)

#	SOURCE NAME		CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	Oracle		Redwood Shores, California	legal services (client of DLA Piper)
7	CGI Federal, Inc.		Fairfax, Virginia	legal services (client of DLA Piper)
8	Harbinger Capital Partners		New York, New York	legal services (client of DLA Piper)
9	Sorenson Communications, Inc.		Salt Lake City, Utah	legal services (client of DLA Piper)
10	Providence Equity Partners		New York, New York	legal services (client of DLA Piper)
11	Future Income Payments		Henderson, Nevada	legal services (client of DLA Piper)
12	PGA Tour		Ponte Verdra Beach, Florida	legal services (client of DLA Piper)
13	1 individual client name redacted per DC Bar Rule 1.6		Washington, District of Columbia	legal services (client of DLA Piper)
14	Governor Rick Snyder		Lansing, Michigan	legal services (client of DLA Piper, fees paid by The Governor's Club)
15	Judicial Education Project	See Endnote	Washington, District of Columbia	media projects (e.g., articles, websites)
16	DLA Piper LLP		Washington, District of Columbia	Of Counsel

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Harris, Wiltshire & Grannis	N/A		Partnership distribution	

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Harris, Wiltshire & Grannis capital account	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	American Funds EuroPacific Gr R6	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	American Funds Growth Fund of Amer R6	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	Franklin Small Cap Growth R6	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	American Funds Investment Co of America R6	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
7	Amerian Funds Bond Fund of Amer R6	Yes	\$50,001 - \$100,000		\$201 - \$1,000
8	KeyBank EB MaGIC Fund	Yes	\$1,001 - \$15,000	)	None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Level 3 Communications Inc.	N/A	\$15,001 - \$50,000		None (or less than \$201)
2	Oil Lease (Goose Creek Bay, Harris County, Texas) Sunoco Petroleum Partners	N/A	\$50,001 - \$100,000	Rent or Royalties	\$2,501 - \$5,000
3	U.S. Bank #1 (cash)	N/A	\$50,001 - \$100,000		None (or less than \$201)
4	U.S. Bank #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	U.S. Bank #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
6	US Bank #1 (cash)	N/A	\$100,001 - \$250,000	Interest	None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
7	U.S. Bank #1 Money Market Account	N/A	\$100,001 - \$250,000		None (or less than \$201)
8	(American Funds, VA College Savings Plan/College America) American Mutual Fund - 529A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
9	(American Funds, VA College Savings Plan/College America) The Growth Fund of America - 529A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
10	(American Funds, VA College Savings Plan/College America) Intermediate Bond Fund of America - 529A	Yes	\$50,001 - \$100,000		
11	(American Funds, VA College Savings Plan/CollegeAmerica) Short Term Bond Fund of America - 529A	Yes	\$1,001 - \$15,000		\$201 - \$1,000
12	(American Funds, VA College Savings Plan/College America) EuroPacific Growth Fund - 529A	Yes	\$1,001 - \$15,00	0	None (or less than \$201)
13	(American Funds, VA College Savings Plan/College America) Capital Income Builder - 529A	Yes	\$15,001 - \$50,000		\$201 - \$1,000
14	(American Funds, VA College Savings Plan/College America) The Investment Company of America - 529A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
15	(American Funds, VA College Savings Plan/College America) SMALLCAP World Fund - 529A	Yes	\$15,001 - \$50,000		None (or less than \$201)
16	Mass Mutual Whole Life Insurance	N/A			
16.1	Policy #1	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
16.2	Policy #2	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
16.3	Policy #3	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
17	Cisco Systems, Inc.	N/A	\$1,001 - \$15,00	0	None (or less than \$201)

## 7. Transactions

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

### 8. Liabilities

#	CREDITOR NAME		ТҮРЕ	AMOUNT	YEAR INCURRED	RATE	TERM
1	Citibank	See Endnote	capital account loan/ DLA Piper partnership	\$100,001 - \$250,000	2012	1 month Libor plus 1.75%	5 years interest only

### 9. Gifts and Travel Reimbursements

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

### **Endnotes**

PART	#	ENDNOTE
2.	1	This LLC has been dissolved and all outstanding client fees were paid before I entered government service.
4.	15	The Judicial Education Project paid me and MP Strategies LLC for my services
8.	1	This loan was paid off when I withdrew from my DLA partnership.

### 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).