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June 27 2017

MEMORANDUM FOR THE CHIEF OF STAFF

SUBJECT: SCREENING ARRANGEMENT

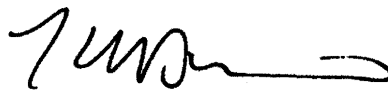
This memorandum is to inform you of the screening arrangement I have implemented to help ensure that I do not participate in "particular matters" with which I have a personal or business relationship which consists of Palantir.

All particular matters involving Palantir will be forwarded to you, or, in your absence, another senior Defense official for appropriate disposition. If you believe my participation in a particular matter involving Palantir is important, you may contact, the Designated Agency Ethics Official, via the DoD Standards of Conduct Office (SOCO). If you determine that the interest of the Government in my participation outweigh any appearance of impropriety, you will, depending on the circumstances, make a written determination specifically authorizing my participation in the particular matter pursuant to 5 C.F.R. § 2635.502 or request a waiver pursuant to 18 U.S.C. § 208(b)(1).

In order to ensure that I do not participate in matters relating to Palantir without appropriate approval/waiver, I have taken, or will take, the following steps:

- I request that you screen all matters directed to my attention that involve Palantir.
- If you determine that Palantir is or represents a party in the matter, you will refer the matter to a senior official for action or assignment without my knowledge or involvement.
- In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am requesting that you seek the assistance of SOCO if you are uncertain whether or not I may participate in a matter involving Palantir.

In consultation with SOCO, I will revise and update this memorandum if warranted by changed circumstances, including changes in my financial interests, my personal or business relationships, or the nature of my official duties. I will provide a copy of the revised screening arrangement memorandum to you.



Justin Mikolay

cc:
DoD Standards of Conduct Office