

Instructions for nominees: The Senate Committee on Commerce, Science, and Transportation asks you to provide typed answers to each of the following questions. It is requested that the nominee type the question in full before each response. Do not leave any questions blank. Type "None" or "Not Applicable" if a question does not apply to the nominee. Return printed answers to Committee. Begin each section (i.e., "A", "B", etc.) on a new sheet of paper.

A. BIOGRAPHICAL INFORMATION AND QUALIFICATIONS

1. Name (Include any former names or nicknames used):

Geoffrey Adam Starks

2. Position to which nominated:

Commissioner, Federal Communications Commission

3. Date of Nomination:

Not yet announced.

4. Address (List current place of residence and office addresses):

Residence:



Office:

**Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554**

5. Date and Place of Birth:

March 13, 1980 in Kansas City, Missouri

6. Provide the name, position, and place of employment for your spouse (if married) and the names and ages of your children (including stepchildren and children by a previous marriage).

Spouse: Lauren Thompson Starks, Associate General Counsel and Director of Government Affairs, Southern New Hampshire University



7. List all college and graduate degrees. Provide year and school attended.

**Harvard College, A.B. 2002
Yale Law School, J.D. 2008**

8. List all post-undergraduate employment, and highlight all management-level jobs held and any non-managerial jobs that relate to the position for which you are nominated.

Assistant Bureau Chief, Enforcement Bureau, Federal Communications Commission^{(1) (2)}

Senior Counsel, Office of the Deputy Attorney General, United States Department of Justice⁽²⁾

Attorney, Williams & Connolly LLP

Law Clerk, Honorable Duane Benton – 8th Circuit Court of Appeals

Summer Associate, Jenner & Block LLP

Summer Associate, Williams & Connolly LLP

Research Assistant to Law Professor Steven Duke, Yale Law School

Summer Associate, Wachtell Lipton Rosen & Katz

Legislative Staff, Illinois State Senate

Analyst, Goldman Sachs Investment Banking Division

(1) Position held included responsibilities and content areas related to the position

(2) Position held included significant enterprise-level or segment-level management responsibilities

9. Attach a copy of your resume.

Please find my resume attached.

10. List any advisory, consultative, honorary, or other part-time service or positions with Federal, State, or local governments, other than those listed above, within the last ten years.

None.

11. List all positions held as an officer, director, trustee, partner, proprietor, agent, representative, or consultant of any corporation, company, firm, partnership, or other business, enterprise, educational, or other institution within the last ten years.

None.

12. Please list each membership you have had during the past ten years or currently hold with any civic, social, charitable, educational, political, professional, fraternal, benevolent or religious organization, private club, or other membership organization. Include dates of membership and any positions you have held with any organization. Please note whether any such club or organization restricts membership on the basis of sex, race, color, religion, national origin, age, or handicap.

American Bar Association. Member. 2017-present.

Federal Communications Bar Association. Member. 2017-present.

Eighth Circuit Bar Association. Member. 2008-present.

Harvard Club of Washington D.C. Member of the Schools Committee. 2008-present.

Yale Law Journal, Board Member. 2007-2008.

None of these groups restrict membership on the basis of sex, race, color, religion, national origin, age or handicap.

13. Have you ever been a candidate for and/or held a public office (elected, non-elected, or appointed)? If so, indicate whether any campaign has any outstanding debt, the amount, and whether you are personally liable for that debt.

No.

14. Itemize all political contributions to any individual, campaign organization, political party, political action committee, or similar entity of \$500 or more for the past ten years. Also list all offices you have held with, and services rendered to, a state or national political party or election committee during the same period.

I contributed a total of \$500 to the presidential campaign of Barack Obama in 2012. I have not contributed \$500 or more to any other individual, campaign organization, political party, political action committee or any similar entity for the past ten years. I have not held any offices with any state or national political party, political action committee, or campaign committee during the same period. Between January 2008 and February 2008, I was Deputy Field Director for Obama for America in Connecticut.

15. List all scholarships, fellowships, honorary degrees, honorary society memberships, military medals, and any other special recognition for outstanding service or achievements.

- **Attorney General Award for Exceptional Service (highest award for a Department of Justice employee)**
- **Thomas T. Hoopes Prize (highest award for a senior thesis from Harvard College)**
- **Kathryn Ann Huggins Prize (prize for best senior thesis from the W.E.B. Du Bois Institute)**
- **Judge Charles Wyzanski Prize (Lowell House Senior Award for a student pursuing "theoretical and practical issues of justice")**
- **Goldman Sachs Scholarship for Excellence**

16. Please list each book, article, column, or publication you have authored, individually or with others. Also list any speeches that you have given on topics relevant to the position for which you have been nominated. Do not attach copies of these publications unless otherwise instructed.

Verizon Rural Call Completion Industry Workshop, March 29, 2017, National Press Club. Comments issued on behalf of the FCC.

Tinker's Tenure in the School Setting: The Case for Applying O'Brien to Content-Neutral Regulations. Yale Law Journal Online, August 30, 2010.

Defining Corporate Scierter. *Securities Litigation Report*, September 2006, (co-authored with Warren R. Stern while a summer associate at Wachtell).

Forty Acres and a Lexus. *The Harvard Crimson*, April 15, 2002.

17. Please identify each instance in which you have testified orally or in writing before Congress in a governmental or non-governmental capacity and specify the date and subject matter of each testimony.

None.

18. Given the current mission, major programs, and major operational objectives of the department/agency to which you have been nominated, what in your background or employment experience do you believe affirmatively qualifies you for appointment to the position for which you have been nominated, and why do you wish to serve in that position?

Since 2015, I have had the honor to serve the public as a member of the FCC staff. As a leader in the Enforcement Bureau, I have had the privilege of working with a team of talented lawyers to protect consumers, secure networks and fight waste, fraud and abuse. I have worked extensively with FCC staff and leadership on various cases, initiatives, and proposals, and I look forward to building on those relationships and those achievements should I be fortunate enough to be confirmed as an FCC Commissioner.

The analytical skills and methods I have honed as a lawyer and practitioner in both private practice and government (as a law clerk on

a U.S. Court of Appeals, at the Department of Justice, and at the FCC), have provided me with the intellectual framework and the broad body of experience essential to serve effectively as an FCC Commissioner. I would approach each issue first by looking at the law as written by Congress – and, if Congress has spoken to the matter in question, I will act according to the statute’s direction. Where the statute is silent or specifically grants the FCC discretion, I will review the applicable rules and record, and apply my best judgment to reach a reasoned determination on the matter at issue.

Being a public servant is a calling to serve a mission bigger than one’s self. My service in all three branches of government has granted me a very broad but, at the same time, very integrated perspective that informs my approach to solving complex issues. While I have certainly been shaped and guided by my work and life experiences, I nevertheless have certain core values that remain central to that approach: the desire to protect consumers; the need to hold wrongdoers accountable for practices that harm Americans and taxpayer resources; and the commitment to ensuring the benefits of fair yet robust competition that promotes innovation in the marketplace.

19. What do you believe are your responsibilities, if confirmed, to ensure that the department/agency has proper management and accounting controls, and what experience do you have in managing a large organization?

If confirmed, my responsibility, indeed my duty, would be to ensure the Commission’s fulfillment of its statutorily delegated fiscal responsibilities in a transparent, effective, and efficient manner. The Commission’s categorical obligation, and mine if confirmed, is to be a vigilant steward over taxpayer resources, and to take immediate appropriate corrective actions should the Commission’s operations ever deviate from the most efficient use of those resources.

My roles in various leadership offices in the government, as well as my private sector experience, have taught me the vital role strong internal controls play in good management. In particular, as Assistant Bureau Chief at the FCC, I have supervised the work of several divisions of the Enforcement Bureau. For example, I have supervised and supported the Investigations & Hearings Division (IHD) and the Universal Service Fund Strike Force by setting Division priorities, being proactive in

managing team work product, and meeting formally and informally with all professionals in the group and all relevant stakeholders to ensure we accomplish our statutory mission.

20. What do you believe to be the top three challenges facing the department/agency, and why?

- **Robust Access to the Internet. All Americans, regardless of where they live or what income they make, must have access to fast broadband to sustain and improve their lives. There should be no digital divides or broadband deserts in this country. Innovators, consumers, educators and families depend on broadband access to connect us, drive growth, and explore. If confirmed, I will work to ensure that the Commission advances policies that spur broadband deployment in all communities, large and small, affluent and economically challenged, because that deployment will be the most certain catalyst for both innovation and equality of opportunity.**

- **Protecting the Public Interest. Exciting technological advancements are on the horizon, including 5G, artificial intelligence, and the Internet-of-Things. In this dynamic and fast-paced landscape, I believe the agency must focus on its core mission – connecting all of the American people to safe and secure networks that serve the public interest, protecting consumers, and promoting competition and innovation. If confirmed, I would be guided by this mission.**

- **Consumer-Centric Use of Technology to Better Serve the Public. We are, today, more connected than ever. The FCC serves American consumers best by unlocking all the power and benefits inherent in that connectivity. While the Commission deserves praise for recent reforms to its rulemaking process, we can and should do more to expand the ways in which we engage with all Americans. The FCC should expand education and consumer awareness about the Commission’s mission, goals, and policies. Our electronic portals should be readily available and accessible to everyone – especially Americans whose only broadband connectivity is mobile. We should also explore technological solutions to vexing consumer problems like**

robocalls, to solving spectrum interference issues, and connecting Americans with disabilities. If confirmed, I will work with my colleagues at the Commission to continue the agency's efforts to make all of its work more transparent, easily accessible, and responsive to the public.

B. POTENTIAL CONFLICTS OF INTEREST

1. Describe all financial arrangements, deferred compensation agreements, and other continuing dealings with business associates, clients, or customers. Please include information related to retirement accounts.

While working at Williams & Connolly, I contributed to and participated in the firm's 401(k) plan, which is managed by Charles Schwab. Neither I nor my former employer has made any further contributions to that defined contribution since I left the practice in 2013.

While at Goldman Sachs, I contributed to and participated in the firm's 401(k) plan, which is managed by Goldman Sachs itself. Neither I nor my former employer have made any further contributions to the defined contribution plan since I left the firm in 2004.

2. Do you have any commitments or agreements, formal or informal, to maintain employment, affiliation, or practice with any business, association or other organization during your appointment? If so, please explain.

None.

3. Indicate any investments, obligations, liabilities, or other relationships which could involve potential conflicts of interest in the position to which you have been nominated.

None.

4. Describe any business relationship, dealing, or financial transaction which you have had during the last ten years, whether for yourself, on behalf of a client, or acting as an agent, that could in any way constitute or result in a possible conflict of interest in the position to which you have been nominated.

None.

5. Describe any activity during the past ten years in which you have been engaged for the purpose of directly or indirectly influencing the passage,

defeat, or modification of any legislation or affecting the administration and execution of law or public policy.

Since 2013, I have worked in the public sector – at the Department of Justice and the FCC. At those offices, I have been involved in various ways on a wide-range of legal and public policy issues. I have also been asked, on occasion, to review the implications of legislative proposals. All of those public sector efforts were descriptive and analytical in nature. None was directed at influencing or modifying legislation. Moreover, at no time in my career have I been a registered lobbyist, nor have I ever participated in an effort to influence the course of legislation on behalf of private clients.

6. Explain how you will resolve any potential conflict of interest, including any that may be disclosed by your responses to the above items.

Although I do not believe I have any conflicts of interest, should this question arise, I would work with the Designated Agency Ethics Official and take the appropriate steps to ensure compliance with applicable ethics laws and regulations, as set forth by Congress, the agency, and the bar, respectively.

C. LEGAL MATTERS

1. Have you ever been disciplined or cited for a breach of ethics, professional misconduct, or retaliation by, or been the subject of a complaint to, any court, administrative agency, the Office of Special Counsel, professional association, disciplinary committee, or other professional group? If yes:
 - a. Provide the name of agency, association, committee, or group;
 - b. Provide the date the citation, disciplinary action, complaint, or personnel action was issued or initiated;
 - c. Describe the citation, disciplinary action, complaint, or personnel action;
 - d. Provide the results of the citation, disciplinary action, complaint, or personnel action.

No.

2. Have you ever been investigated, arrested, charged, or held by any Federal, State, or other law enforcement authority of any Federal, State, county, or municipal entity, other than for a minor traffic offense? If so, please explain.

No.

3. Have you or any business or nonprofit of which you are or were an officer ever been involved as a party in an administrative agency proceeding, criminal proceeding, or civil litigation? If so, please explain.

No.

4. Have you ever been convicted (including pleas of guilty or *nolo contendere*) of any criminal violation other than a minor traffic offense? If so, please explain.

No.

5. Have you ever been accused, formally or informally, of sexual harassment or discrimination on the basis of sex, race, religion, or any other basis? If so, please explain.

No.

6. Please advise the Committee of any additional information, favorable or unfavorable, which you feel should be disclosed in connection with your nomination.

None.

D. RELATIONSHIP WITH COMMITTEE

1. Will you ensure that your department/agency complies with deadlines for information set by congressional committees?

Yes.

2. Will you ensure that your department/agency does whatever it can to protect congressional witnesses and whistle blowers from reprisal for their testimony and disclosures?

Yes.

3. Will you cooperate in providing the Committee with requested witnesses, including technical experts and career employees, with firsthand knowledge of matters of interest to the Committee?

Yes.

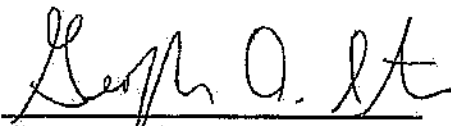
4. Are you willing to appear and testify before any duly constituted committee of the Congress on such occasions as you may be reasonably requested to do so?

Yes.

(Nominee is to include this signed affidavit along with answers to the above questions.)

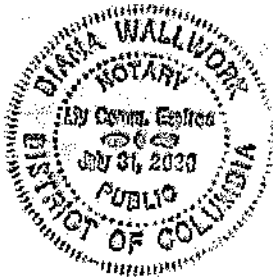
F. Affidavit

Geoffrey A. Starks being duly sworn, hereby states that he/she has read and signed the foregoing Statement on Biographical and Financial Information and that the information provided therein is, to the best of his/her knowledge, current, accurate, and complete.


Signature of Nominee

Subscribed and sworn before me this 27th day of April, 2018.


Notary Public



GEOFFREY ADAM STARKS

EDUCATION

Yale Law School, J.D. 2008, New Haven, CT

Activities: *The Yale Law Journal* (Board Member).

Harvard University, B.A. *Magna Cum Laude*, Social Studies, 2002,
Cambridge, MA

Honors: Thomas T. Hoopes Prize, Kathryn Ann Huggins Prize, Judge
Charles Wyzanski Prize, Goldman Sachs Scholarship for Excellence.

EMPLOYMENT

2015-Present: **Federal Communications Commission, Washington,
DC.**

Assistant Chief of the Enforcement Bureau. Conduct investigations under federal communications laws, and successfully announced over \$200 million in negotiated settlements and enforcement actions.

2013-2015: **United States Department of Justice, Office of the
Deputy Attorney General, Washington, DC.**
Senior Counsel. Provided advice to the Deputy Attorney General on domestic and international law enforcement, including civil, criminal, and national security matters.

2010-2013: **Williams & Connolly, Washington, D.C.**
Associate. Successfully conducted Major League Baseball salary-arbitration for player. Drafted dispositive motions in complex civil litigation.

2008-2009: **Law Clerk to Hon. Duane Benton, Kansas City, MO.**
Law clerk to U.S. Court of Appeals Judge for the 8th Circuit.

2004-2005: **Illinois State Senate, Springfield, IL.**
Staff Member. Reviewed and analyzed legislation for the Illinois Senate Local Government & Elections Committee.

2002-2004: **Goldman Sachs Investment Banking. New York, NY.**
Performed financial analysis in the investment banking division.

PROFESSIONAL HONORS

Attorney General Award for Exceptional Service.