

U.S. Department of Justice
Washington, DC 20530

Supplemental Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

For 6 Month Period Ending 01/31/2025
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number
 Daniel J. Edelman, Inc. 3634
- (c) Primary Business Address
 111 North Canal Street, Suite 1100, Chicago, IL 60606

2. Has there been a change in the information previously furnished in connection with the following?
- (a) If an individual:
- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
- (c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes No
- If yes, has the registrant filed an updated Exhibit C? Yes No
- If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes No

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, did any employee or individual working in any capacity (including a partner, officer, director or similar official), other than in a clerical or secretarial capacity or in a related or similar capacity, begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s)? Yes No

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response					

(c) Have any employees or individuals (including partners, officers, directors or similar officials), who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
Jere J. Sullivan Jr.	Chairman, EGA International Affairs	12/20/2024
Gurpreet Brar	Special Projects and Client Advisor	01/10/2025

(d) Have any employees or individuals (including partners, officers, directors or similar officials), who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
See Appendix for Response			

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of this supplemental statement or submitted with this filing? Yes No

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Foreign Principal	Date of Termination
Ministry of Culture - KSA	11/09/2024
Hassana Investment Company	09/24/2024

8. Has the registrant registered for any new foreign principal(s)² during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Foreign Principal	Date Registered
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9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during this 6 month reporting period.

Neom Company
Invest Hong Kong
Outlook Energy Investments LLC
Alterra Management Limited

10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A³ and/or B⁴ previously filed for any foreign principal(s)? Yes No

If no, and there is a change to any Exhibit A and/or B, please file an amendment if it is required.

If yes, furnish the following information:

Foreign Principal	Date Amended
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² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes No

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
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13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes No

If yes, describe fully.

Foreign Principal	Activities/Services
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⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal, or from any other source, for or in the interests of any foreign principal, any contributions, income or money either as compensation or otherwise?

Yes No

If no, please explain why no monies were received.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Foreign Principal See Appendix for Response	Date Received	From Whom	Purpose	Amount	Subtotal
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\$ 1,326,218.89

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date _____

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes No

If yes, furnish the following information:

Foreign Principal See Appendix for Response	Date Received	From Whom	Purpose	Thing of Value
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^{6, 7} A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes No

If no, explain why no disbursements were made.

Neom Company: No disbursements

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					

\$	1,615.52
	<u>Total</u>

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
Neom Company				None
Ministry of Culture - KSA				None
Invest Hong Kong				None
Hassana Investment Company				None
Outlook Energy Investments LLC				None
Alterra Management Limited				None

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
08/29/2024	Richard Edelman	Ro Khanna's Campaign	Online Contribution	\$ 1,000.00
09/23/2024	Richard Edleman	Ritchie Torres' Campaign	Online Contribution	\$ 500.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes No

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

Neom Company
Ministry of Culture - KSA
Invest Hong Kong
Alterra Management Limited

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input checked="" type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input checked="" type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

See Appendix for Response

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|---|---|---|
| <input type="checkbox"/> Public officials | <input checked="" type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input checked="" type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input checked="" type="checkbox"/> Other (specify) _____ | | |

See Appendix for Response

20. Indicate the language used in the informational materials:

- English Other (specify) _____

See Appendix for Response

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes No

If no, please file the required informational materials.

See Appendix for Response

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes No

See Appendix for Response

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature ¹³
03/07/2025	Raquel daFonseca	<input data-bbox="854 501 922 531" type="text" value="Sign"/> /s/Raquel daFonseca
_____	_____	<input data-bbox="854 585 922 615" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 674 922 703" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 762 922 791" type="text" value="Sign"/> _____

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

3-6-2025

Raquel deFonseca



Appendix Response to Item 5(b)

Item 5(b): During this 6-month reporting period, did any employee or individual working in any capacity, other than in a clerical or secretarial capacity or in a related or similar capacity, begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s)?

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
Maia-Lin Audrey Scott	Neom Company	Washington, DC 20008	UNITED STATES	Research Associate	10/01/2024
Makena Dingwell	Outlook Energy Investments LLC	Miami, FL 33131	UNITED STATES	Senior Program Manager, International Public Affairs	08/20/2024
Carole Cassidy	Outlook Energy Investments LLC	Al Reef Abu Duabi UNITED ARAB EMIRATES	UNITED KINGDOM	Associate Director	11/11/2024
Eleanor Best	Outlook Energy Investments LLC	London London UNITED KINGDOM	UNITED KINGDOM	Director	11/18/2024
Alex Eeles	Alterra Management Limited	Farham GU98HP UNITED KINGDOM	UNITED KINGDOM	Editorial Director	08/28/2024

Appendix Response to Item 5(d)

Item 5(d): Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Jere J. Sullivan Jr.	Chairman, EGA International Affairs	Neom Company	12/20/2024
Joseph P. Ames	Executive VP	Ministry of Culture - KSA	11/09/2024
Jarrood Moses	UEG President & CEO	Ministry of Culture - KSA	11/09/2024
Tyler Joseph Lehner	Vice President, EGA	Ministry of Culture - KSA	11/09/2024
Lorenz Esguerra	GM, Chicago Brand	Ministry of Culture - KSA	11/09/2024
Audra Silverman	SVP Communications	Ministry of Culture - KSA	11/09/2024
Maria Pereyra Vera	Program Manager	Ministry of Culture - KSA	11/09/2024
Richard Edelman	Chief Executive Officer	Ministry of Culture - KSA	11/09/2024
Jordan Rittenberry	General Manager, Bay Area	Ministry of Culture - KSA	11/09/2024
Daniela Albin	Senior Director UEG	Ministry of Culture - KSA	11/09/2024
Alexandra Wales	Senior Manager, Talent/Influencer	Ministry of Culture - KSA	11/09/2024
Mary Gannon Pittman	Executive VP - Training/Coaching Services	Ministry of Culture - KSA	11/09/2024
Kevin Goldman	Exec Vice President	Ministry of Culture - KSA	11/09/2024
Paul Dunn	Senior VP - TV and Streaming Partnerships	Ministry of Culture - KSA	11/09/2024
Matthew Ostrower	VP Partnerships	Ministry of Culture - KSA	11/09/2024
Sophia Tailor	Senior Analyst	Ministry of Culture - KSA	11/09/2024
Elyssa Robyn Feldman	Coordinator, Talent & Influencers, UEG	Ministry of Culture - KSA	11/09/2024
Kacey Laine Johnson	Senior Director, Talent + Influencers, UEG	Ministry of Culture - KSA	11/09/2024
Briyana Damali Dyer	Coordinator, Entertainment Rights & Partnerships, UEG	Ministry of Culture - KSA	11/09/2024
Sarah Varney	Public Relations	Ministry of Culture - KSA	11/09/2024
Simon Hailes	Managing Director, Head of Edelman Smithfield, Middle East	Hassana Investment Company	09/24/2024
Sarah Algethami	Director	Hassana Investment Company	09/24/2024
Yasa Ahmad	Senior Account Manager	Hassana Investment Company	09/24/2024
Sarah Mohammed Alzahrani	Account Executive	Hassana Investment Company	09/24/2024
Abdullah Mohammed	Account Executive	Hassana Investment Company	09/24/2024
Suhaib Alwazir	Sr. Director	Hassana Investment Company	09/24/2024
Gurpreet Brar	Special Projects and Client Advisor	Alterra Management Limited	01/10/2025

Appendix Response to Item 11

Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal(s)	Activities/Services
Neom Company	<p>PUBLIC RELATIONS: Provided communications and PR strategy development and support for global and regional events.</p> <p>MEDIA RELATIONS: Provided media identification and media outreach. Conducted media monitoring and coverage reports. Provide media training for client.</p> <p>CRISIS WORK: Issues management planning.</p> <p>ACCOUNT MANAGEMENT: Ongoing account management and client calls.</p> <p>PLANNING: Conducted strategic planning.</p>
Ministry of Culture - KSA	<p>PUBLIC RELATIONS: Disseminated press release and outreach to select media.</p> <p>ACCOUNT MANAGEMENT: Conducted regular account management activities.</p>
Invest Hong Kong	<p>Content creation and dissemination of press releases and newsletters on FINTech development and initiatives in Hong Kong.</p> <p>Conducted press office activities.</p> <p>Provide account management and counsel around InvestHK's on-going content and media activities.</p>
Hassana Investment Company	<p>PUBLIC RELATIONS: Provided review and editing of press releases: disseminated by client.</p> <p>ACCOUNT MANAGEMENT: Conducted weekly calls with the client.</p> <p>PLANNING: Updated the communication strategy for the year 2024-2025.</p> <p>OTHER: Conducted a messaging workshop to develop key messages for communication materials.</p>
Outlook Energy Investments LLC	<p>PUBLIC RELATIONS: Creation of PR plans and content development for client conference attendance at international events.</p> <p>ACCOUNT MANAGEMENT: Conducted weekly client meetings.</p> <p>PLANNING: Creation of stakeholder engagement plans.</p> <p>OTHER Website content creation.</p>
Alterra Management Limited	<p>PUBLIC RELATIONS Provided content development for client use at US event.</p>

	<p>MEDIA RELATIONS: Created content for press release disseminated by client partner. Arranged introductory meetings with US-based Journalist.</p> <p>SOCIAL MEDIA: Created social media content for client posting.</p> <p>ACCOUNT MANAGEMENT: Participation in weekly client calls.</p> <p>PLANNING: On-going planning for client participation in NYC Climate Week and attendance at events.</p>
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Appendix Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Neom Company	08/23/2024	NEOM COMPANY	Professional Services & OOPs	\$37,583.60	
Neom Company	10/03/2024	NEOM COMPANY	Professional Services & OOPs	\$58,142.85	
Neom Company	10/09/2024	NEOM COMPANY	Professional Services & OOPs	\$37,583.60	
Neom Company	10/30/2024	NEOM COMPANY	Professional Services & OOPs	\$55,905.02	
Neom Company	10/30/2024	NEOM COMPANY	Professional Services & OOPs	\$29,071.42	
Neom Company	-----	-----	-----	----->	\$218,286.49
Ministry of Culture - KSA	08/01/2024	Ministry of Culture	Professional Services	\$38,340.10	
Ministry of Culture - KSA	10/22/2024	Ministry of Culture	Professional Services	\$34,316.60	
Ministry of Culture - KSA	11/12/2024	Ministry of Culture	Professional Services	\$ 7,355.00	
Ministry of Culture - KSA	-----	-----	-----	----->	\$80,011.70
Invest Hong Kong	08/01/2024	InvestHK	PR retainer services	\$14,338.91	
Invest Hong Kong	09/01/2024	InvestHK	PR retainer services	\$14,390.04	
Invest Hong Kong	10/01/2024	InvestHK	PR retainer services	\$14,381.67	
Invest Hong Kong	11/01/2024	InvestHK	PR retainer services	\$14,367.61	
Invest Hong Kong	12/01/2024	InvestHK	PR retainer services	\$14,393.16	
Invest Hong Kong	-----	-----	-----	----->	\$71,871.39
Hassana Investment Company	09/30/2024	Hassana Investment Company	PR Services	\$137,763.00	
Hassana Investment Company	12/18/2024	Hassana Investment Company	PR Services	\$137,763.00	
Hassana Investment Company	12/18/2024	Hassana Investment Company	PR Services	\$137,763.00	
Hassana Investment Company	12/18/2024	Hassana Investment Company	PR Services	\$137,763.00	
Hassana Investment Company	-----	-----	-----	----->	\$551,052.00
Outlook Energy Investments LLC	01/31/2025	OUTLOOK ENERGY INVESTMENTS LLC	Professional Services	\$26,997.31	
Outlook Energy Investments LLC	-----	-----	-----	----->	\$26,997.31
Alterra Management Limited	08/16/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	08/16/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	08/16/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	08/16/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	09/23/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	10/31/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	11/15/2024	Alterra Management Limited	PR Services	\$47,250.00	
Alterra Management Limited	11/27/2024	Alterra Management Limited	PR Services	\$47,250.00	

Alterra Management Limited	-----	-----	-----	----->	\$378,000.00
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Appendix Response to Item 14(c)

Item 14(c): RECEIPTS-THINGS OF VALUE: During this 6 month reporting period, has the registrant received any thing of value other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
Neom Company				None
Ministry of Culture - KSA				None
Invest Hong Kong				None
Hassana Investment Company				None
Outlook Energy Investments LLC				None
Alterra Management Limited				None

Appendix Response to Item 15(a)-Detail

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Ministry of Culture - KSA	09/04/2024	Pay.gov	FARA Filing Fee	\$ 305.00	
Ministry of Culture - KSA	-----	-----	-----	----->	\$ 305.00
Invest Hong Kong	09/04/2024-09/04/2024	Pay.gov	FARA Filing Fee	\$ 305.00	
Invest Hong Kong	09/09/2024-09/09/2024	Taxi	Client meetings/ media/ interview support	\$ 8.48	
Invest Hong Kong	09/09/2024-09/09/2024	Taxi	Client meetings/ media/ interview support	\$ 7.58	
Invest Hong Kong	10/08/2024-10/08/2024	City Office Supplies Co.	Stationery	\$ 9.63	
Invest Hong Kong	10/08/2024-10/08/2024	Taxi	Client meetings/ media/ interview support	\$ 39.15	
Invest Hong Kong	10/08/2024-10/08/2024	Taxi	Client meetings/ media/ interview support	\$ 33.11	
Invest Hong Kong	10/08/2024-10/08/2024	Taxi	Client meetings/ media/ interview support	\$ 3.72	
Invest Hong Kong	10/31/2024-10/31/2024	Taxi	Client meetings/ media/ interview support	\$ 20.07	
Invest Hong Kong	10/31/2024-10/31/2024	Taxi	Client meetings/ media/ interview support	\$ 16.52	
Invest Hong Kong	11/01/2024-11/01/2024	Taxi	Client meetings/ media/ interview support	\$ 32.61	
Invest Hong Kong	11/01/2024-11/01/2024	Taxi	Client meetings/ media/ interview support	\$ 17.30	
Invest Hong Kong	11/25/2024-11/25/2024	Taxi	Client meetings/ media/ interview support	\$ 37.37	
Invest Hong Kong	12/04/2024-12/04/2024	Taxi	Client meetings/ media/ interview support	\$ 30.45	
Invest Hong Kong	12/04/2024-12/04/2024	Taxi	Client meetings/ media/ interview support	\$ 18.25	
Invest Hong Kong	12/13/2024-12/13/2024	Taxi	Client meetings/ media/ interview support	\$ 27.59	
Invest Hong Kong	12/13/2024-12/13/2024	Taxi	Client meetings/ media/ interview support	\$ 20.32	
Invest Hong Kong	12/13/2024-12/13/2024	Taxi	Client meetings/ media/ interview support	\$ 9.46	
Invest Hong Kong	-----	-----	-----	----->	\$ 636.61
Hassana Investment Company	10/21/2024	Taxi	Transportation cancelation fee from client office	\$ 2.45	
Hassana Investment Company	10/21/2024	Taxi	Meeting at client offices	\$ 16.16	
Hassana Investment Company	11/03/2024	Taxi	Meeting at client offices	\$ 20.88	
Hassana Investment Company	11/03/2024	Taxi	Meeting at client offices	\$ 7.35	
Hassana Investment Company	11/04/2024	Taxi	Meeting at client offices	\$ 5.72	
Hassana Investment Company	11/04/2024	Taxi	Meeting at client offices	\$ 19.44	
Hassana Investment Company	11/06/2024	Taxi	Meeting at client offices	\$ 19.07	
Hassana Investment Company	11/06/2024	Taxi	Meeting at client offices	\$ 16.55	
Hassana Investment	11/07/2024	Taxi	Meeting at client offices	\$ 10.06	

Company					
Hassana Investment Company	11/07/2024	Taxi	Meeting at client offices	\$ 12.23	
Hassana Investment Company	-----	-----	-----	----->	\$ 129.91
Outlook Energy Investments LLC	09/04/2024	Pay.gov	FARA Filing Fee	\$ 305.00	
Outlook Energy Investments LLC	-----	-----	-----	----->	\$ 305.00
Alterra Management Limited	08/12/2024	Uber	Taxi to client meeting	\$ 10.00	
Alterra Management Limited	08/12/2024	Uber	Taxi to client meeting	\$ 30.00	
Alterra Management Limited	08/12/2024	Uber	Taxi to client meeting	\$ 23.00	
Alterra Management Limited	09/10/2024	Uber	Taxi to client meeting	\$ 29.00	
Alterra Management Limited	09/11/2024	Uber	Taxi to client meeting	\$ 7.00	
Alterra Management Limited	09/11/2024	Uber	Taxi to client meeting	\$ 28.00	
Alterra Management Limited	09/12/2024	Uber	Taxi to client meeting	\$ 33.00	
Alterra Management Limited	09/12/2024	Uber	Taxi to client meeting	\$ 23.00	
Alterra Management Limited	10/14/2024	Uber	Taxi to client meeting	\$ 28.00	
Alterra Management Limited	10/14/2024	Taxi Cab	Taxi to client meeting	\$ 28.00	
Alterra Management Limited	-----	-----	-----	----->	\$ 239.00

Appendix Response to Item 18-List

Item 18-List: During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

Foreign Principal	Informational Materials
Neom Company	Email
Ministry of Culture - KSA	Press releases
Invest Hong Kong	Press releases
Invest Hong Kong	Email
Alterra Management Limited	Email

Appendix Response to Item 19-List

Item 19-List: During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

Foreign Principal	Recipients
Neom Company	Editors
Ministry of Culture - KSA	Newspapers
Invest Hong Kong	Editors
Invest Hong Kong	Newspapers
Alterra Management Limited	Other (specify): Email to Journalists

Appendix Response to Item 20-List

Item 20-List: Indicate the language used in the informational materials:

Foreign Principal	Language Used
Neom Company	English
Ministry of Culture - KSA	English
Invest Hong Kong	English
Alterra Management Limited	English

Appendix Response to Item 21-List

Item 21-List: Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? If no, please file the required informational materials.

Foreign Principal	Filed
Neom Company	Yes
Ministry of Culture - KSA	Yes
Invest Hong Kong	Yes
Alterra Management Limited	Yes

Appendix Response to Item 22-List

Item 22-List: Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Foreign Principal	Label
Neom Company	Yes
Ministry of Culture - KSA	Yes
Invest Hong Kong	Yes
Alterra Management Limited	Yes