

U.S. Department of Justice
Washington, DC 20530

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

For Six Month Period Ending October 31, 2019
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration No.
Marathon Strategies, LLC 6289

(c) Business Address(es) of Registrant

38 East 29th Street 4FL
New York, NY 10016

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 No
(2) Citizenship Yes No
(3) Occupation Yes No

(b) If an organization:

(1) Name Yes No
(2) Ownership or control Yes No
(3) Branch offices Yes No

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

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 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 Connection Ended
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(b) 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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5. (a) Has any person named in Item 4(b) 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.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

Name	Residence Address	Citizenship	Position	Date Assumed
Paul Blake Christy	217 Thompson Street #38 New York, NY 10012	USA Citizen	Communications Associate	June 12, 2019
Anthony Hoglebe	999 Willoughby Ave 1D Brooklyn, NY 11221	USA Citizen	Vice President of Communications	July 30, 2019

(c) Have any employees or individuals, 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
Aziz Yakub	Communications Associate	June 14, 2019

(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? Yes No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Aziz Yakub	Communications Associate	Consulate General of Japan (NY)	June 14, 2019

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes No

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No
If yes, furnish the following information:

Foreign Principal	Date of Termination
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8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No
If yes, furnish the following information:

Name and Address of Foreign Principal(s)	Date Acquired
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KGL Investment Company K.S.C.C.	May 1, 2019
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9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

Consulate General of Japan (NY)

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No

Exhibit B⁴ Yes No

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

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, have you 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 your activities and services:

Consulate General of Japan (NY)

- Daily monitoring & Analysis
- Media Outreach and strategic media counsel
- Proactive messaging recommendation and support
- U.S. media and cultural insight reports
- Key influencer/stakeholder mapping and outreach

KGL Investment Company K.S.C.C.:

Media monitoring, content creation, paid media placements, strategic messaging recommendation and support

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

If yes, identify each such 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 or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

KGL Investment Company K.S.C.C. - Assist principal in determining most effective approaches to engage U.S. media, which include certain political or policy positions.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

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, have you received 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, any contributions, income or money either as compensation or otherwise? Yes No

If no, explain why.

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

Date	From Whom	Purpose	Amount
05/19/2019	Cons Gen of Japa (NY)	Monthly Retainer Fee	\$10,300
06/17/2019	Cons Gen of Japa (NY)	Monthly Retainer Fee	\$10,300
07/08/2019	Cons Gen of Japa (NY)	Monthly Retainer Fee	\$10,300
08/14/2019	Cons Gen of Japa (NY)	Monthly Retainer Fee	\$10,300
09/16/2019	Cons Gen of Japa (NY)	Monthly Retainer Fee	\$10,300
10/15/2019	Cons Gen of Japa (NY)	Monthly Retainer Fee	\$10,300
See attachment	KGL Inv Co. K.S.C.C.:	See Attachment - Continued	Continued
			\$252,165.35
			Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you 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, have you filed an Exhibit D⁸ to your registration? Yes No

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

(c) **RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you 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	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he 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, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

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.

Date	To Whom KGL Inv Co. K.S.C.C.	Purpose	Amount
05/27/2019	JSM Consulting, LLC	Communications consulting	1,500.00
05/30/2019	Gulf State Analytics	Communications consulting	3,500.00
05/30/2019	PR Newswire	Press Release	2,115.00
05/31/2019		Pass through exp. (cabs & meals)	97.08
06/27/2019	PR Newswire	Press Release	1,345.00
06/30/2019		Pass through exp. (cabs & meals)	732.29
07/31/2019		Pass through exp. (cabs & meals)	410.50
08/07/2019	PR Newswire	Press Release	1,605.00
05/31/2019	Youssef Haddad	Arabic Translations	248.20
05/31/2019	FlexPoint Media	Media Placement	30,149.00
06/19/2019	Youssef Haddad	Arabic Translations	165.60
06/27/2019	JSM Consulting, LLC	Communications consulting	2,500.00
07/13/2019	Gulf State Analytics	Communications consulting	4,000.00
07/15/2019	CTC International Group	Cyber consulting	6,500.00
08/29/2019	Youssef Haddad	Arabic Translations	364.00
09/05/2019	Voice Boy Productions, Inc.	Video Voice Over	2,000.00
10/01/2019	CTC International Group	Cyber consulting	5,000.00
06/07/19- 06/23/19	Google Ads	Digital promotion of news coverage	13,350.00
07/17/19 - 07/23/19	Google Ads	Digital promotion of news coverage	828.58
07/29/2019	Outbrain	Digital Advertising	1,250.00
	Cons Gen of Japa - No disbursements during reporting period		
			\$ 77,660.25
			Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you 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:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your 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	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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^{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, did you prepare, disseminate or cause to be disseminated any informational materials?¹²

Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- Radio or TV broadcasts Magazine or newspaper Motion picture films Letters or telegrams
 Advertising campaigns Press releases Pamphlets or other publications Lectures or speeches
 Other (*specify*) Event posters

Electronic Communications

Email

Website URL(s): _____

Social media websites URL(s): _____

Other (*specify*) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- Public officials Newspapers Libraries
 Legislators Editors Educational institutions
 Government agencies Civic groups or associations Nationality groups
 Other (*specify*) _____

21. What language was used in the informational materials:

English Other (*specify*) Arabic

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes No

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, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)

November 30, 2019



/s/ Phil Singer

eSigned

November 30, 2019



/s/ Anthony Hogrebe

eSigned

November 30, 2019



/s/ Blake Christy

eSigned

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.

SCHEDULE A

14(a). RECEIPTS-MONIES - Continued from Supplemental Filing Form: October 31, 2019

- KGL Investment Company K.S.C.C:

Date	From Whom	Purpose	Amount
05/08/2019	KGL Investment Company K.S.C.C	Monthly Retainer & Supplemental Fees	\$61,265.00
07/08/2019	KGL Investment Company K.S.C.C	Monthly Retainer & Supplemental Fees	\$103,433.06
07/29/2019	KGL Investment Company K.S.C.C	Monthly Retainer & Supplemental Fees	\$25,667.29

SCHEDULE B

17). Identify each such foreign principal.

Consulate General of Japan (NY)**Wall Street Journal**Japan Is Adhering to Its Treaty With Korea**Aug. 22, 2019**

The heart of the problem is whether promises made between two sovereign states will be kept or not. We strongly hope the government of South Korea will take actions to remedy the violation of the agreement

BloombergThe Real Issue Between Japan and Korea Is Trust**September 3, 2019**

Japan's foreign minister says the question is whether promises between two nations will be kept.

Wall Street JournalJapan Is Honoring Its Treaty Commitments**Oct. 2, 2019**

Article II-1 of the 1965 agreement between Japan and the ROK stipulates that all problems concerning claims between both countries and nationals were "settled completely and finally."

KGL Investment Company K.S.C.C – Media Placements**Forbes**Political Turmoil And Corruption Allegations Cast A Shadow Over Kuwait**November 19, 2019**

Kuwait finds itself consumed by allegations of corruption and political infighting, following the resignation of the government and amid warnings the country is becoming an "unsafe" environment for international investors.

Washington ExaminerOPINION: Will the Trump-Pence religious freedom platform save a 5-year old Christian trapped in Kuwait?**November 14, 2019**

Long before their election in 2016, both President Trump and Vice President Pence had developed a strong track record fighting for persecuted Christians and other religious groups. And no administration in history has been more focused on protecting religious freedom in the United States and abroad.

Daily Caller

Protesters Demand Release Of Christian Businesswoman And Mother Marsha Lazareva Sentenced To 15 Years In Kuwaiti Prison

November 13, 2019

Protesters demanded the release of a Christian businesswoman and mother sentenced to 15 years of prison in Kuwait outside the Embassy of Kuwait in Washington, D.C., on Tuesday.

Fox Business

Businesswoman trapped in Kuwait gets 15 more years in prison

November 13, 2019

A businesswoman with U.S. ties trapped in Kuwait for more than a year was sentenced to 15 more years in prison on Monday, her team told FOX Business. Marsha Lazareva, a Russian national and mother of a child with American citizenship, was released on bail in June after spending more than a year in Kuwait's Sulaibaya prison because of what her legal team describes as trumped-up embezzlement charges.

Main Line Times

Kuwaiti Court convicts Bryn Mawr woman of embezzlement

November 13, 2019

Marsha Lazareva continues to fight for her freedom in Kuwait. However, the Bryn Mawr business woman faced a setback on Nov. 11 when a Kuwaiti court convicted her of embezzlement and another charge and sentenced her to 15 years in prison.

America's Voice Live

Businesswoman with U.S. ties trapped in Kuwait for more than a year was sentenced to 15 more years in prison

November 12, 2019

Guests Secretary Jim Nicholson Former US Ambassador to the Vatican and Peter Burns Government Relations and Policy Director at In Defense of Christians talk about A businesswoman with U.S. ties trapped in Kuwait for more than a year was sentenced to 15 more years in prison on Monday.

Newsmax: Liquid Lunch with John Tabacco

American Citizens Trapped in Another Country

October 24, 2019

Newsmax

Human Rights Activists Demand Marsha Lazareva's Release

September 25, 2019

An international team of human rights activists – including American businessman Neil Bush, British barrister Cheri Blair, and former Florida attorney general Pam Bondi turned up the heat on Kuwait on Wednesday for its highly dubious detention of a prominent Wharton Business School grad and investment firm CEO – demanding she be allowed to return to the United States immediately.

Fox Business

Amber Heard, Cherie Blair advocate for businesswoman trapped in Kuwait as UN leaders meet

September 25, 2019

As world leaders gather in New York City for the United Nations General Assembly, advocates for a businesswoman with U.S. ties trapped in Kuwait for more than a year worked to raise her profile on Wednesday.

NY Post

Why is Marsha Lazareva still being held captive in Kuwait?

September 13, 2019

Marsha Lazareva, a US-educated, Russian-born businesswoman and her 5-year-old son, a US citizen, have been kept prisoner in Kuwait for more than a year on dubious charges. The mystery is: Why?

Newsmax

Kuwait Could Face Magnitsky Act Probe Over Marsha Lazareva Case

August 21, 2019

A Wharton Business School graduate and investment CEO who spent over 470 days behind bars in Kuwait despite posting a bond of over \$35 million remains on tenterhooks as she awaits a September hearing that could finally determine her fate.

Daily Caller

Lawmakers From Both Parties Request Action From Treasury To Help Businesswoman Stuck In Kuwait

August 8, 2019

Four lawmakers, three Republicans and a Democrat, sent letters to the Treasury Department asking it to look into taking action on Kuwaiti officials in response to the detention of Christian businesswoman and Russian national Marsha Lazareva.

NY Observer

Political Elite Ask Trump to Address 'Human Rights Abuse' in Kuwait

July 10, 2019

While much of Washington remains distracted by breaking news on Jeffrey Epstein, a growing cadre of global influencers are sending out a flare that some argue signals a clear pivot away from the West and democratic values in one of America's most powerful allies in the Middle East, Kuwait. Marsha Lazareva was part of a new generation of female leaders living and working in the Kuwaiti business community when a series of accusations lobbed against her landed her in Kuwaiti prison. Lazareva spent a total of 494 days sharing a single cell with seven other female detainees in the Sulaibiya prison, a notorious detention center that lives up to its reputation.

Newsmax

<https://www.newsmax.com/newsfront/kuwait-bail-ceo-woman/2019/06/12/id/920102/>

Daily Caller

<https://dailycaller.com/2019/06/12/marsha-lazareva-kuwait-russia-2/>

Main Line Times

http://www.mainlinemedianews.com/mainlinetimes/bryn-mawr-businesswoman-free-in-kuwait-after-conviction-on-false/article_591f9474-9201-11e9-8e08-c7c94994350c.html

Arabian Business

<https://www.arabianbusiness.com/politics-economics/421973-russian-woman-jailed-in-kuwait-for-473-days-is-freed-on-395m-bail>

<https://www.arabianbusiness.com/culture-society/422759-marsha-lazareva-should-be-released-charges-dropped-says-former-fbi-director>

<https://www.arabianbusiness.com/banking-finance/423106-the-marsha-lazareva-case-the-inside-story>

Fair Observer

Kuwait Is Risking a Catastrophic Drop in Foreign Investment

May 30, 2019

Kuwait has a high-profile international case on its hands that threatens to harm the country's foreign investment climate. The case, which has now been brought to the [UN Working Group on Arbitrary Detention](#), coupled with several recent legal complaints from international investors, could damage the country's business environment and threaten its reputation during a sensitive period for the Gulf emirate.

International Policy Digest

Kuwaiti Judiciary Harms Country's Foreign Investment Climate

May 29, 2019

Kuwait has a high-profile international case on its hands that threatens to harm the country's foreign investment climate. The case, which has now been brought to the [UN Working Group on Arbitrary Detention](#), coupled with several recent legal complaints from international investors, could damage the country's business environment and threaten its reputation during a sensitive period for the Gulf emirate.

Houston Chronicle

A Bush, a Yeltsin and a Blair turn up heat on Kuwait over CEO's imprisonment

WASHINGTON — Neil Bush, son of the late former president, is deeply involved in a legal fight playing out in the Middle East over the fate of an imprisoned Russian woman, a battle featuring a cast of global characters and an unusual alliance of American and Russian interests.

Forbes

Kuwaiti Court Dismisses Guilty Verdict In Port Fraud Case, Then Raises Defendants' Bail To \$168M

May 10, 2019

A Kuwaiti court has set additional bail demands of \$132m for two business executives charged with embezzling funds from a state-owned entity, despite the case against them appearing to have all but collapsed amid claims of forged documents and countervailing judgements by other local courts.

Other materials “distributed” by Marathon

Press releases:

<https://www.prnewswire.com/news-releases/female-ceo-still-imprisoned-in-kuwait-for-463-days-on-false-charges-despite-court-order-for-her-release-300860890.html>

<https://www.prnewswire.com/news-releases/marsha-lazareva-released-from-kuwait-prison-but-co-defendant-saeed-dashti-remains-behind-bars-after-their-convictions-overturned-300867251.html>

<https://www.prnewswire.com/news-releases/rep-paul-gosar-urges-treasury-secretary-mnuchin-to-consider-sanctions-against-kuwaiti-officials-holding-foreign-businesswoman-hostage-300896045.html>

<https://www.prnewswire.com/news-releases/fifh-member-of-us-congress-requests-global-magnitsky-investigation-into-kuwaiti-officials-300943171.html>

<https://www.prnewswire.com/ac/news-releases/corruption-in-kuwait-mother-of-5-year-old-american-citizen-falsely-convicted-reports-crowell--moring-300955904.html>

Videos (posted on YouTube, used for paid advertising)

<https://www.youtube.com/watch?v=XpN2oTuIuhU>

<https://www.youtube.com/watch?v=-cy7GpmkZ8I&t=3s>

Mark Williams Tweets (used for paid advertising)

See attached

Press Release and Post on GSA Site re: Crowell Letter to Agility Law Firm

Marsha Lazareva, a famous Russian businesswoman in the Middle East, previously served as the CEO and vice-chairman of KGLI Investment (KGLI), a private equity and venture capital firm. Lazareva, a graduate of the Wharton School of Business, began leading KGLI after its establishment in 2007. KGLI oversaw a financial house called The Port Fund, which invested in development projects all over the world. In November 2017, The Port Fund successfully completed the sale of a real estate project for about \$700 million to Udenna, a Philippines-based holdings company. Yet shortly after Lazareva announced the sale of the project and impending distribution of net profits, the money intended to pay investor, creditors, and other stakeholders was suddenly frozen and the Kuwait Attorney General charged her with embezzling money from the Kuwait Port Authority, one of the investors in The Port Fund.

Gulf State Analytics has been following Lazareva's file in Kuwait since charges were levied against her. Her case, which has recently garnered significant global attention in part due to her conditions behind bars in the Gulf country, is informative of how business dealings in the region can easily turn against an innocent individual and trigger a legal nightmare that requires major financial concessions in the form of bail and penalties.

Lazareva's case has major international stakes too given that prominent figures from the United States and Russia are working in communication with Kuwaiti government officials to reverse judicial decisions and give Lazareva her freedom. After working for over a year, Kuwait agreed to release its hold on the frozen Port Fund money and the investors were paid back their entire original investment plus a significant profit. But Lazareva remains charged with embezzling the money.

Gulf State Analytics has learned that a Washington, DC-based law firm, Crowell & Moring LLP, sent an official letter to Meysan Partners, a law firm in Kuwait, telling it to end its communication of false information to The Port Fund's investors. This relaying of this false information has been aimed at prompting the investors to take legal action in the Cayman Islands based on baseless allegations of misconduct on the part of The Port Fund's executives. The goal behind this legal action is to cause The Port Fund's around the world to freeze. What is unclear is why Meysan Partners, apparently acting on behalf of Agility, a local business rival, is taking this action given that, according to Crowell & Moring's letter, neither Agility or its CEO Tarek Sutan have any ownership or other legal interest in The Port Fund. Gulf State Analytics will continue monitoring the Lazareva file and efforts to inflict damage on The Port Fund's executives.

Below is the transcript of a press release that provides further information regarding this recent development.

Press release attached. No longer live on GSA website.

Magnitsky letters (shared with multiple reporters at various points):

<https://www.crowell.com/files/Lazareva-GMA-Letters-Binder.pdf>

In Defense of Christians Magnitsky Letter (attached)

Invitations to UNGA events:

See attached

Posters for UNGA events:

See attached