

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 November 30, 2021

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number

Capitol Counsel LLC 6328

(c) Primary Business Address

Capitol Counsel LLC
700 13th Street, NW, Suite 200
Washington, DC 20005

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.

n/a

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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n/a

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

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

n/a

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

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

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

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 the 6 month reporting period.

China-United States Exchange Foundation

US-China Transpacific Foundation

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³Yes ☐No ☐N/A ☒Exhibit B⁴Yes ☐No ☐N/A ☐

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☐No ☒

If yes, has the registrant filed an amendment to these exhibits?

Yes ☐No ☐

If no, please file 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, 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
China-United States Exchange Foundation	Periodic fact-finding meetings with Members of Congress on issues affecting U.S.-China Relations. Periodic travel by former Members of Congress to China on educational trips to exchange views on U.S.-China relations. NO meetings or travel occurred during this report period. Organizing panels on issues pertinent to US-China relations. Monitoring issues regarding US-China relations.
US-China Transpacific Foundation	NO ACTIVITY.

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.

For China-US Exchange Foundation:

November 16, 2021 Video Panel - "Assessing the Biden-Xi Virtual Summit" featuring former Senator Norm Coleman and Tsinghua University Professor Chen Qi.

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 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, 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	Date Received	From Whom	Purpose	Amount	Subtotal
SEE attachment.					

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	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.

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
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SEE attachment.

Total

(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
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(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
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SEE
attachment.

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.

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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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 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 type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | | |

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 type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input 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 type="checkbox"/> Other (<i>specify</i>) _____ | | |

20. Indicate the language used in the informational materials:

- | | |
|----------------------------------|---------------------------------------------------------|
| <input type="checkbox"/> English | <input type="checkbox"/> Other (<i>specify</i>) _____ |
|----------------------------------|---------------------------------------------------------|

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 please file the required informational materials.

22. Has the registrant labeled 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, 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	eSigned
December 31, 2021	John D. Raffaelli	/s/ John D. Raffaelli	

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.

Supplemental Statement
 Capitol Counsel LLC
 June 1, 2021 - November 30, 2021
 Question 14a

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
6/1/2021	China-United States Exchange Foundation	Retainer	\$ 15,000.00
7/1/2021	China-United States Exchange Foundation	Retainer	\$ 15,000.00
8/1/2021	China-United States Exchange Foundation	Retainer	\$ 15,000.00
9/1/2021	China-United States Exchange Foundation	Retainer	\$ 15,000.00
10/1/2021	China-United States Exchange Foundation	Retainer	\$ 15,000.00
11/1/2021	China-United States Exchange Foundation	Retainer	\$ 15,000.00
		Total Receipts	\$ 90,000.00

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
	US -China Transpacific Foundation	No contract	\$ -
		Total Receipts	\$ -

Supplemental Statement
Capitol Counsel LLC
June 1, 2021 - November 30, 2021
Question 15a

China-US Exchange Foundation

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
6/30/2021	FARA Filing Fee	\$ 305.00
Total Disbursements		\$ 305.00

US-China Transpacific Foundation

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
6/30/2021	FARA Filing Fee	\$ 305.00
Total Disbursements		\$ 305.00

Supplemental Statement**Capitol Counsel LLC****June 1, 2021 - November 30, 2021****Question 15c****Finley, Shannon**

<u>Date</u>	<u>Recipient</u>	<u>Amount</u>
6/29/2021	Granite Values PAC	\$ 1,000.00
6/29/2021	Friends of Schumer	\$ 200.00
6/29/2021	Blumenthal for Connecticut	\$ 1,000.00
6/29/2021	Murray Victory Fund 2022	\$ 2,000.00
6/29/2021	Cheri Beasley for North Carolina	\$ 2,900.00
6/29/2021	Carper for Senate	\$ 2,500.00
6/29/2021	People's Voice PAC	\$ 2,000.00
6/29/2021	Virgin Islands for Plaskett	\$ 1,000.00
6/29/2021	Maggie for NH	\$ 3,800.00
6/29/2021	Independent Medicine's Political Action Committee (IMPACT) PAC	\$ 5,000.00

Gold, Martin

<u>Date</u>	<u>Recipient</u>	<u>Amount</u>
6/19/2021	Peter Meijer for Congress	\$ 250.00
7/27/2021	2021 Senators Classic Committee	\$ 5,000.00
8/31/2021	Country First PAC	\$ 100.00
10/20/2021	Young Kim for Congress	\$ 100.00
10/21/2021	Liz Cheney for Wyoming	\$ 100.00
10/27/2021	Peter Meijer for Congress	\$ 100.00
10/31/2021	Liz Cheney for Wyoming	\$ 100.00
11/12/2021	Liz Cheney for Wyoming	\$ 50.00
11/30/2021	Nancy Mace for Congress	\$ 100.00

Jablon, Ann

<u>Date</u>	<u>Recipient</u>	<u>Amount</u>
6/3/2021	Stephanie Murphy for Congress	\$ 500.00
6/21/2021	Jeffries for Congress	\$ 500.00
6/22/2021	Katherine Clark for Congress	\$ 500.00
6/29/2021	Kuster for Congress, Inc	\$ 500.00
6/29/2021	Lori Trahan for Congress Committee	\$ 250.00
7/21/2021	Citizens for Boyle	\$ 500.00
9/10/2021	Lori Trahan for Congress Committee	\$ 500.00
9/13/2021	Jake Auchincloss for Congress	\$ 500.00
9/16/2021	Re-Elect McGovern Committee	\$ 500.00
10/27/2021	Pascrell for Congress	\$ 1,000.00
11/22/2021	Stephen Lynch for Congress	\$ 250.00
11/22/2021	Moulton for Congress	\$ 500.00
11/22/2021	Jake Auchincloss for Congress	\$ 1,000.00