

OMB No. 1124-0006; Expires April 30, 2017

U.S. Department of Justice
Washington, DC 20530

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

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name and Address of Registrant S.G.R. LLC Government Relations and Lobbying, 1775 I St. NW, Suite 410, Washington, D.C. 20006		2. Registration No. 6379						
3. Name of Foreign Principal Inovo BV (as a result of work SGR did for Flynn Intel Group Inc.)	4. Principal Address of Foreign Principal Inovo BV - 47 Adireaanstraat, 3581 SC Utrecht, Netherlands							
5. Indicate whether your foreign principal is one of the following:								
<input type="checkbox"/> Government of a foreign country ¹ <input type="checkbox"/> Foreign political party <input checked="" type="checkbox"/> Foreign or domestic organization: If either, check one of the following: <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Partnership</td> <td><input type="checkbox"/> Committee</td> </tr> <tr> <td><input checked="" type="checkbox"/> Corporation</td> <td><input type="checkbox"/> Voluntary group</td> </tr> <tr> <td><input type="checkbox"/> Association</td> <td><input type="checkbox"/> Other (specify) _____</td> </tr> </table> <input type="checkbox"/> Individual-State nationality _____			<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group	<input type="checkbox"/> Association	<input type="checkbox"/> Other (specify) _____
<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee							
<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group							
<input type="checkbox"/> Association	<input type="checkbox"/> Other (specify) _____							
6. If the foreign principal is a foreign government, state:								
a) Branch or agency represented by the registrant NA								
b) Name and title of official with whom registrant deals NA								
7. If the foreign principal is a foreign political party, state:								
a) Principal address NA								
b) Name and title of official with whom registrant deals NA								
c) Principal aim NA								

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

Inovo BV is a Dutch company incorporated in 2005 to provide business consultancy services.

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Owned by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Directed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Controlled by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Financed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page must be used.)

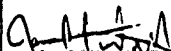
NA

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

According to information received by SGR, Inovo BV is owned and controlled by Ekhim Alptekin.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and 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 of Exhibit A	Name and Title	Signature
3/2/2017	James C. Courtovich, Managing Partner	

OMB No. 1124-0004; Expires April 30, 2017

U.S. Department of Justice
Washington, DC 20530

**Exhibit B to Registration Statement
Pursuant to the Foreign Agents Registration Act of
1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant S.G.R. LLC Government Relations and Lobbying	2. Registration No. 6379
---	---------------------------------

3. Name of Foreign Principal
Inovo BV (as a result of work SGR did for Flynn Intel Group Inc.)

Check Appropriate Box:

- 4. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
 - 5. There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
 - 6. The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

See Attached

FORM NSD-4
Revised 03/14

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

See Attached

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

See Attached

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and 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 of Exhibit B	Name and Title	Signature
3/2/2017	James C. Courtovich, Managing Partner	

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which 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 the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Attachment to Exhibit B

Note: Effective October 2016, SGR LLC Government Relations and Lobbying (“SGR”) elected to register under the Lobbying Disclosure Act (“LDA”) for a subcontracting project from Flynn Intel Group (“FIG”), which had been hired by Inovo BV. SGR registered under the LDA based on information it received from FIG and based on the fact that FIG registered under the LDA for its work for Inovo BV. SGR understood from FIG that Inovo BV is a private entity not owned or controlled by a foreign government. Recently, SGR learned that FIG now plans to file under the Foreign Agents Registration Act (“FARA”) for its work for Inovo BV. FIG has explained that this is due to the subject matter of the overall engagement between FIG and Inovo BV. Because SGR’s work under the subcontract related to FIG’s engagement with Inovo BV, SGR is also now filing under FARA.

Responses to Items 7-9.

In late September 2016, FIG hired SGR to provide services to FIG. SGR and FIG entered into a contract formalizing the scope of this work in early October 2016. Pursuant to SGR’s contract with FIG, SGR agreed to perform public affairs work designed to encourage and strengthen relations between the governments and business communities of the United States, Turkey, and Europe. This work included research and analysis of the political environment and related third party groups in the United States. It also included providing strategic support for message development and communications strategies, including government and media outreach. SGR understood that the goal of these efforts was to improve the business climate and investment opportunities related to Turkey by demonstrating stability. SGR received no direction, input, or funding from anyone other than FIG.

Pursuant to SGR’s contract with FIG, SGR performed research, support, and outreach activities for a period of time that was less than two months. Contacts with media personnel and government officials are summarized in the below chart. As part of these efforts, SGR engaged several journalists and policy-makers on national security and education issues concerning how these related to the relationships between the countries of Turkey and the United States. SGR also researched and analyzed the effect of Mr. Fetullah Gulen’s presence in the United States in this context. It monitored media and policy updates as they related to Mr. Gulen and charter schools to assist in advance planning related to a public affairs campaign designed to provide information regarding these issues. Also, at the specific request of FIG, SGR created a graphic summarizing important issues based on publicly available materials. SGR exchanged multiple versions of this graphic with FIG that included revisions based on FIG’s feedback and input. SGR did not publish or otherwise disseminate this graphic or any other materials based on the above work.

Date	Contact	Contact Title	Outreach Description
October 11-12, 2016	Tim Griffin	Lt. Gov. Arkansas	E-mails regarding media coverage related to charter schools
October 12, 2016	Michael Stratford	Politico Morning Edition	E-mail about media coverage related to charter schools
October 13-14, 2016	Tim Griffin	Lt. Gov. Arkansas	E-mail and a telephone conversation about charter schools
October 27, 2016	Miles Taylor	Staff, House Homeland Security Committee	Introduction meeting at FIG; discussion regarding H1B visas and charter schools
November 7, 2016	Taylor Shapiro	Washington Post	E-mail about possible meeting

SGR received three payments from FIG under the contract. It received \$15,000 on September 28, 2016; \$10,000 on October 20, 2016; and \$15,000 on November 15, 2016. SGR disbursed \$177.95 related to this work, for multiple Uber rides from October 4, 2016 through October 27, 2016.

On or about November 7, 2016, an employee at FIG contacted SGR to request assistance in placing an opinion piece that General Michael Flynn had written. As standard practice, SGR confirmed with FIG that the document was written within the company (a question that would be asked by any op-ed page editor). In recent discussions, FIG has explained that this article was not written under the direction or control of Inovo BV; rather it was an issue on which General Flynn wanted to opine. SGR assisted FIG by contacting The Hill to secure publication. Further, SGR e-mailed multiple U.S. and international media contacts with a copy of the article once it was published in The Hill.

By its terms, SGR's contract with FIG ran from September 20, 2016 through December 20, 2016. SGR completed all work related to this contract within the first two months of its term. SGR's work relating to FIG and Inovo BV and its indirect relationship with Inovo BV stopped at the same time as FIG suspended its operations, which was in November 2016.



FLYNN INTEL GROUP INC.

Independent Advisory Services Agreement

This agreement is executed by and between Flynn Intel Group, Inc., a U.S. entity with its principal offices located at 44 Canal Center Plaza, Suite 400, Alexandria, Virginia, 22314 hereinafter called The "company" and S.G.R. LLC Government Relations and Lobbying, a U.S. company with its principal offices located at 1775 I St. NW, Suite 410, Washington D.C. 20006, hereinafter called "advisor" or "SGR" on this date, September 20, 2016. Together, the Company and the advisor shall be referred to as the "parties" in this agreement.

Nature of the relationship between the client and the advisor

The advisor is not an employee or an agent of the Company. The advisor is an independent contractor engaged for specific purpose of providing services defined in the scope of services paragraph of this agreement for a specified period of time as described in the term and termination paragraph of this agreement.

Scope of services

SGR will work with the Company to develop and execute a public affairs plan to encourage and strengthen relations between the governments and business communities of Turkey, Europe and the United States. Activities will include but are not limited to the distribution of fact-based, actionable intelligence to targeted government officials and media in order to:

- Provide new and proprietary information and resources to relevant congressional committees, leadership, and Executive Branch officials.
- Leverage SGR's network of U.S. and international media contacts to obtain positive coverage that positions Turkey, and its adversaries, in an accurate light.
- Develop independent and credible surrogates to offer favorable, independent views about Turkey and the root causes of the country's ongoing political turmoil.

Term and termination

This agreement is effective as of September 20, 2016 and shall continue in effect for a period of 90 days until December 20, 2016. Parties to this agreement may terminate this agreement with or without cause at any time. Notifications may be made through electronic mail addressed to each party's respective electronic email address.

Compensation

As compensation for the performance of the services described above, SGR will be paid \$30,000. Payment for services shall correspond to specific deliverables at defined time interval. Team Leaders to define deliverables and time targets.

Example:

October 4, 2016 = Engagement and initial research / \$15,000.00
December 20, 2016 = Engagement completion / \$15,000.00

All expenses associated with the completion of defined deliverables shall be pre-approved by the Company. The advisor shall not incur any expenses without prior written approval of the company.

Confidentiality

The terms and conditions of this agreement shall remain confidential. Parties agree to maintain each other's information in strict confidence throughout the course of this engagement and after its termination. The advisor agrees to return all such confidential material to the client at the end of the engagement.

Signed by:

Brian R. Kier _____
The Client

Vice Chairman
Date: *10/6/2016*

_____ *J. Courtovich*
The Advisor
James C. Courtovich
S.G.R. LLC Government Relations and
Lobbying

Date: 10/5/2016