

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 10/31/2024
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Prism Strategy, Inc.
- (b) Registration Number
6419
- (c) Primary Business Address
1331 Pennsylvania Avenue, NW, 4th Floor, Washington, DC 20004

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, 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
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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

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 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

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.

Government of Japan - Japan External Trade Organization
Mr. Arben Ahmetaj

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

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.

See Appendix for Response

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

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

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

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.

Government of Japan - Japan External Trade Organization: No compensation was due, invoiced, nor received during the reporting period.

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
Mr. Arben Ahmetaj	08/06/2024	Eljona Hoxha	Professional Fees	\$25,000.00	
Mr. Arben Ahmetaj	09/06/2024	Armand Hoxha	Professional Fees	\$50,000.00	
Mr. Arben Ahmetaj	10/24/2024	Eljona Hoxha	Professional Fees	\$15,000.00	
	-----	-----	-----	----->	\$90,000.00
					\$ 90,000.00
					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.

Government of Japan - Japan External Trade Organization: No monies were owed nor paid to any entity during the reporting period.

Mr. Arben Ahmetaj : No monies were owed or disbursed during the time period.

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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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
08/05/2024	Edward Stewart	Rogers for Senate	Credit Card	\$ 1,000.00

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.

Mr. Arben Ahmetaj

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:

- Magazine or newspaper Advertising campaigns Press releases Pamphlets or other publications
- Lectures or speeches Radio or TV broadcasts Motion picture films Letters or telegrams
- Email
- Website URL(s): _____
- Social media websites URL(s): _____
- 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:

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

20. Indicate the language used in the informational materials:

- English Other (*specify*) _____

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.

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

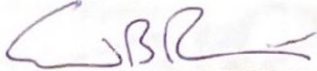
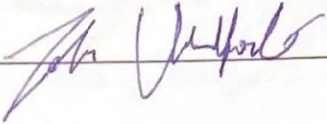
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 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
11/30/2024	Edward Stewart	<input type="text" value="Sign"/> /s/Edward Stewart
11/30/2024	John Stanford	<input type="text" value="Sign"/> /s/John Stanford
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input 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.

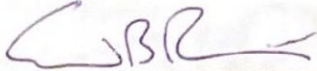
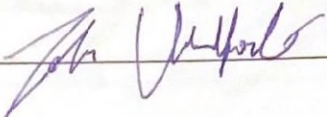
EXECUTION

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
11/30/2024	EDWARD STEWART	
11/30/2024	JOHN SIMONFOLD	

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
11/30/2024	EDWARD STEWART	
11/30/2024	JOHN SIMONFOLD	

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
Government of Japan - Japan External Trade Organization	Japan-Japan External Trade Organization: Monitored and provided analysis on Congressional activities and leadership. Provided analysis on U.S. Presidential and Congressional elections.
Mr. Arben Ahmetaj	<p>Provided advice and counsel on the Client's legal, political, and human rights and violations of those rights by government and political actors in Albania.</p> <p>Directly lobbied the U.S. Government (federal executive branch departments and agencies and Congress) on matters pertaining to U.S-Albania bilateral relations, including foreign assistance programs, official corruption, economic and trade support, legal and justice assistance, and various regional partnerships.</p> <p>Developed relationships with other interested stakeholders to support the goals of this project.</p> <p>Conducted regular weekly meetings with Client to inform them of activities undertaken on their behalf and to plan future activities.</p>

Appendix

Response to Item 12-Description

Government of Japan - Japan External Trade Organization: No Political Activity

Mr. Arben Ahmetaj : Mr. Arben Ahmetaj : Advised and counseled on the Client's legal, political, and human rights and violations of those rights by government and political actors in Albania. Directly lobbied the U.S. Government (federal executive branch departments and agencies and Congress) on matters pertaining to U.S-Albania bilateral relations, including foreign assistance programs, official corruption, economic and trade support, legal and justice assistance, and various regional partnerships. Developed relationships with other interested stakeholders to support the goals of this project. Conducted regular weekly meetings with Client to inform them of activities undertaken on their behalf and to plan future activities

Appendix Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Mr. Arben Ahmetaj	06/03/2024	C Anderson and S Blurton of State Department	Email	Meeting request
Mr. Arben Ahmetaj	06/04/2024	Alec Damen of Office of Rep. Bill Huizenga	Email	Meeting request, general information on deterioration of democratic norms under Rama government
Mr. Arben Ahmetaj	06/04/2024	Margaret Dougherty, Victor Cervino of Senate Foreign Relations Committee	Email	Background on client, politicization of SPAK, General information on deterioration of democratic norms under Rama government
Mr. Arben Ahmetaj	06/04/2024	Courtney Kaufman, Office of Rep. Mike Lawler	Email	Meeting request, general information on deterioration of democratic norms under Rama government
Mr. Arben Ahmetaj	06/04/2024	Molly Joesph of Office of Rep. Ann Wagner	Email	Meeting request
Mr. Arben Ahmetaj	06/04/2024	Delayne Hyatt of Rep. Nathaniel Moran	Email	Meeting request
Mr. Arben Ahmetaj	06/04/2024	Brad Decker of Office of Rep. Keith Self	Email	Meeting request
Mr. Arben Ahmetaj	06/04/2024	Mark Milosch of Tom Lantos Human Rights Commission	Email	Meeting request
Mr. Arben Ahmetaj	06/05/2024	Nicole Sedaca of Freedom House	Email	Background on client, politicization of SPAK, General information on deterioration of democratic norms under Rama government
Mr. Arben Ahmetaj	06/11/2024	Everett Price of Commission on Security and Cooperation in Europe-U.S. Helsinki Commission	Email	Update on client situation
Mr. Arben Ahmetaj	06/11/2024	Laura Titus of Office of Rep. Robert Aderholt	Meeting	Background on client, politicization of SPAK, General information on deterioration of democratic norms under Rama government
Mr. Arben Ahmetaj	06/14/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	06/18/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	06/19/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	07/02/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	07/02/2024	Laura Titus of	Email	Update on client situation

		Office of Rep. Robert Aderholt		
Mr. Arben Ahmetaj	07/25/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	08/01/2024	Nadia Farra, Delphi Cleaveland of National Security Council	Email	Physical threats to Arben Ahmetaj
Mr. Arben Ahmetaj	08/01/2024	Mark Milosch of Tom Lantos Human Rights Commission	Email	Physical threats to Arben Ahmetaj
Mr. Arben Ahmetaj	08/01/2024	Everett Price and Janice Helwig of Commission on Security and Cooperation in Europe-U.S. Helsinki Commission	Email	Physical threats to Arben Ahmetaj
Mr. Arben Ahmetaj	08/01/2024	M. McGregor, S. Blurton, C. Anderson, B. Yoder of State Department	Email	Physical threats to Arben Ahmetaj and asking for U.S. assistance
Mr. Arben Ahmetaj	08/01/2024	John Robins of State Department	Email	Meeting request
Mr. Arben Ahmetaj	08/05/2024	Laura Titus of Office of Rep. Robert Aderholt	Email	General client update and lack of engagement by State Department
Mr. Arben Ahmetaj	08/14/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	08/14/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	08/14/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	08/14/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania
Mr. Arben Ahmetaj	08/15/2024	Brad Decker of Office of Rep. Keith Self	Email	Meeting request
Mr. Arben Ahmetaj	08/15/2024	Courtney Kaufman, Office of Rep. Mike Lawler	Email	Meeting request
Mr. Arben Ahmetaj	08/15/2024	Molly Joesph of Office of Rep. Ann Wagner	Email	Meeting request
Mr. Arben Ahmetaj	08/15/2024	Alec Damen of Office of Rep. Bill Huizenga	Email	Meeting request
Mr. Arben Ahmetaj	08/19/2024	Leah Stephenson of Office of Rep. Robert Aderholt	Email	Meeting request
Mr. Arben Ahmetaj	08/20/2024	Delayne Hyatt of Office of Rep. Nathaniel Moran	Email	Meeting request
Mr. Arben Ahmetaj	08/26/2024	Joshua Adams of Office of Rep. Keith Self	Email	Meeting request
Mr. Arben Ahmetaj	08/27/2024	Joshua Adams of Office of Rep. Keith Self	Meeting	Background on client, politicization of SPAK, General information on deterioration of democratic norms under Rama

				government, State Department inaction
Mr. Arben Ahmetaj	08/27/2024	Delayne Hyatt of Office of Rep. Nathaniel Moran	Meeting	Background on client, politicization of SPAK, General information on deterioration of democratic norms under Rama government, State Department inaction
Mr. Arben Ahmetaj	08/27/2024	Alec Damen of Office of Rep. Bill Huizenga	Meeting	Background on client, politicization of SPAK, General information on deterioration of democratic norms under Rama government, State Department inaction
Mr. Arben Ahmetaj	08/28/2024	Alec Damen of Office of Rep. Bill Huizenga	Email	Providing follow-up material
Mr. Arben Ahmetaj	08/28/2024	Joshua Adams of Office of Rep. Keith Self	Email	Providing follow-up material
Mr. Arben Ahmetaj	09/02/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania, travel of State Department officials to region
Mr. Arben Ahmetaj	09/02/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities in Albania, travel of State Department officials to region
Mr. Arben Ahmetaj	09/12/2024	Mark Milosch of Tom Lantos Human Rights Commission	Email	Meeting request follow up
Mr. Arben Ahmetaj	09/12/2024	Everett Price of Commission on Security and Cooperation in Europe-U.S. Helsinki Commission	Email	Meeting request follow up
Mr. Arben Ahmetaj	09/12/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities and funding
Mr. Arben Ahmetaj	09/24/2024	Alex Sutton, U.S. House Appropriations Committee (Foreign Ops)	Email	State Department-INL activities and funding

Appendix Response to Item 18

Item 18: 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: Website URL(s):

One-page papers containing basic information about the client and his political and legal case.