

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 <https://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: <https://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: <https://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, Counterintelligence and Export Control 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**

Gordon Christopher Benjamin  
PO Box 5129, Salisbury, MD 21802

**2. Registration No.**

6482

**3. Name of Foreign Principal**

Kili/Bikini/Ejit Local Government Council

**4. Principal Address of Foreign Principal**

Bikini Town Hall  
PO Box 1096  
Majuro, MH 96960  
Marshall Islands

**5. Indicate whether your foreign principal is one of the following:**

- Government of a foreign country<sup>1</sup>
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
- |                                      |  |
|--------------------------------------|--|
| <input type="checkbox"/> Partnership | <input type="checkbox"/> Committee             |
| <input type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group       |
| <input type="checkbox"/> Association | <input type="checkbox"/> Other (specify) _____ |
- Individual-State nationality \_\_\_\_\_

**6. If the foreign principal is a foreign government, state:**

- a) Branch or agency represented by the registrant  
Local Government in the Marshall Islands
- b) Name and title of official with whom registrant deals  
Anderson Jibas, Mayor of Kili/Bikini/Ejit Local Government

**7. If the foreign principal is a foreign political party, state:**

- a) Principal address  
N/A
- b) Name and title of official with whom registrant deals N/A
- c) Principal aim N/A

<sup>1</sup> "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.

N/A

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal Yes  No

Owned by a foreign government, foreign political party, or other foreign principal Yes  No

Directed by a foreign government, foreign political party, or other foreign principal Yes  No

Controlled by a foreign government, foreign political party, or other foreign principal Yes  No

Financed by a foreign government, foreign political party, or other foreign principal Yes  No

Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes  No

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

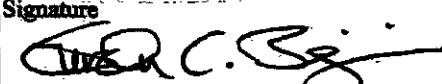
N/A

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.

N/A

**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  |
|-------------------|--------------------------|--|
| 10/31/2017        | Gordon C. Benjamin, Esq. |  |

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 <https://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: <https://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: <https://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, Counterintelligence and Export Control 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 20303.

1. Name of Registrant

Gordon Christopher Benjamin

2. Registration No.

0482

3. Name of Foreign Principal

Kill/Bikini/Ejit Local Government Council

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.

To represent the Kill/Bikini/Ejit Local Government Council's ("KBE") interests to Congressmen and Senators, and relevant Agencies; to file lawsuits where necessary and represent KBE in legal actions.

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


Engage with Agency personnel, specifically the Office of Insular Affairs in the Department of the Interior, regarding Kili/Bikini/Ejit Local Government Council ("KBE") matters, including but not limited to the annual budgets, technical assistance programs, and resettlement matters. Also to engage with Congress, specifically the Senate Energy and Natural Resources Committee who has oversight over the economic and political relationship between the U.S. and Pacific Island former US Territories, such as the Marshall Islands.

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.

**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  |
|-------------------|--------------------------|--|
| 10/31/17          | Gordon C. Benjamin, Esq. |  |

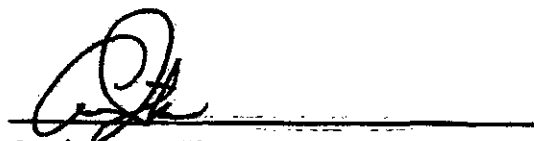
Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States 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.

## Professional Services Agreement

This Professional Services Agreement (the "Agreement") is between Kili-Bikini-Ejit Council ("KBE") and Gordon C. Benjamin, Esq. ("Lawyer") for the period beginning June 1, 2017 onward, until terminated in writing by KBE. Lawyer agrees to provide legal services and representation for KBE in the US Mainland as the "Mainland Representative" to the U.S. Government and its agencies and representatives, as more fully described in the attachment, Exhibit "A". In consideration thereof, upon execution of this Agreement, KBE shall pay a retainer fee of two hundred fifty thousand dollars (\$250,000.00) for every twelve-month period, payable as a retainer in advance. KBE and Lawyer pledge to work together for the primary purpose of bettering the lives of the people of Bikini on Kili, Bikini, Ejit, Majuro, and elsewhere in the Marshall Islands, the United States, and around the world.



Gordon C. Benjamin, Esq.  
Lawyer



Anderson Jibas, Mayor  
Kili-Bikini-Ejit Council

**Benjamin Law Group, LLC**  
*Gordon C. Benjamin, Esq.*

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Gordon C. Benjamin, Esq., recognizing that KBE is entering a new era in the relationship with the United States, commits and offers to KBE the following:

1. Full-time equivalent legal and lobbying representation for KBE interests in Washington D.C. and the U.S. mainland, including Springdale, Arkansas;
2. Improved and productive relationship with Department of the Interior Office of Insular Affairs (where I previously was employed), including relationships with the Deputy Policy Director (Joseph McDermott), the Director of Policy (Basil Ottley), the Director of Insular Affairs (Nik Pula), and the Assistant Secretary of Insular Affairs (Douglas W. Domenech);
3. Increased Technical Assistance ("T.A.") funding for KBE, as I have worked with the officials who administer the T.A. program at the Office of Insular Affairs, including the Budget Director, Tom Bussanich, and am familiar with their requirements and biases;
4. Daily monitoring of the Trust Funds and the Trust Fund management team at M&T in Baltimore, and UBS in Atlanta. Improving the relationship and trust between M&T and KBE involving expenditures and approval for expenditures, and ensuring that the trust funds are invested to yield as much income as possible, with active management from UBS.
5. Improved relationships with Congressional committees and their staff, especially the Committees directly concerned with KBE issues, such as the Senate Committee on Energy and Natural Resources (I have worked with the Chairperson, Ms. Murkowski, in the past);
6. Constructive relationship with DOE officials especially Dr. Terry Hamilton (who I have worked with before) who conducts the environmental monitoring of Bikini Island and the "pantry islands" in Bikini Atoll.
7. Work with the KBE Annex office in Springdale, Arkansas, with approval of KBE Council, to ensure the concerns and needs of the 1,200 Bikinians living in Springdale are heard and addressed in Washington.
8. Ensuring that the KBE Mayor and Council are well-respected in D.C., and the mainland.

  
Gordon C. Benjamin, Esq.

**Exhibit "A"**