

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 06/30/2026

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Bullpen Strategy Group, LLC

(b) Registration Number
6504

(c) Primary Business Address
1500 Wilson Boulevard, 5th Floor, Arlington, VA 22209

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 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 (including a partner, officer, director or similar official), 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
See Appendix for Response					

(c) Have any employees or individuals (including partners, officers, directors or similar officials), 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 (including partners, officers, directors or similar officials), 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 this 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.

Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates

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.

14. (a) **RECEIPTS-MONIES**

Yes ☒ No ☐

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

\$	212,500.00
	Total

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes ☐ No ☐

If no, please file the required Exhibit D.

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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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.

Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates: Disbursements were not required to serve the foreign principal during this reporting 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
06/10/2026	Christian Hertenstein	Bobby Pulido for Congress	Credit Card	\$ 1,500.00

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.

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) _____ | | | |

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
07/31/2026	Christian Hertenstein	Sign	/s/Christian Hertenstein
		Sign	
		Sign	
		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. S 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. S 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

July 31, 2026

Christian Herkenstein



Appendix
Response to Item 5(b)

Item 5(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)?

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
James Edgar Roberts	Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	864 Irving St. Arlington, 22204	UNITED STATES	Employee	03/12/2026

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
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	Strategic communications support and guidance in furtherance of the interests of the Embassy of the United Arab Emirates, with an emphasis on strengthening bilateral relations and regional security of the United Arab Emirates, in particular including issues relating to client's termination of relations with Qatar and accuracy and transparency of Qatar government-owned media. Activities and support engaged in by the registrant in furtherance of these efforts included one-on-one interactions with members of the news media in the United States, public records requests, research and news monitoring, strategic communications support and guidance, and assistance with content development to support and promote the aforementioned interests of the Embassy of the United Arab Emirates.

Appendix

Response to Item 12-Description

Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates: Strategic communications support and guidance in furtherance of the interests of the Embassy of the United Arab Emirates, with an emphasis on strengthening bilateral relations and regional security of the United Arab Emirates, in particular including issues relating to client's termination of relations with Qatar and accuracy and transparency of Qatar government-owned media. Activities and support engaged in by the registrant in furtherance of these efforts included one-on-one interactions with members of the news media in the United States, public records requests, research and news monitoring, strategic communications support and guidance, and assistance with content development to support and promote the aforementioned interests of the Embassy of the United Arab Emirates.

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	01/14/2026	IM_1776	Electronic / Phone / Meeting	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	01/16/2026	The Free Press	Electronic / Phone /Meeting	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	01/23/2026	The Washington Free Beacon	Electronic / Phone /Meeting	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	01/30/2026	The Washington Examiner	Electronic / Phone	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	01/30/2026	The Dispatch	Electronic	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	02/02/2026	The New York Times	Electronic / Phone /Meeting	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	04/01/2026	The New York Post	Electronic	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	04/17/2026	The Daily Wire	Electronic / Phone	bilateral relations
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	05/19/2026	The Wall Street Journal	Electronic / Phone	bilateral relations

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	02/26/2026	Akin Gump	Retainer	\$42,500.00	
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	03/11/2026	Akin Gump	Retainer	\$42,500.00	
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	04/28/2026	Akin Gump	Retainer	\$42,500.00	
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	05/27/2026	Akin Gump	Retainer	\$42,500.00	
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	06/26/2026	Akin Gump	Retainer	\$42,500.00	
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates	-----	-----	-----	----->	\$212,500.00