

U.S. Department of Justice
 Washington, DC 20530

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

INSTRUCTIONS. File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents 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 FARA Unit in Washington, DC. Statements are also available online at the FARA 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 .75 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, FARA 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 of Registrant Sanitas International	2. Registration Number 6530
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3. This amendment is filed to accomplish the following indicated purpose(es):

- To give notice of change in information as required by Section 2(b) of the Act.
- To correct a deficiency in
 - Initial Statement
 - Supplemental Statement for the 6 month period ending 03/31/2020
 - Other purpose (*specify*) _____
- To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:


We have filed a supporting document to this amendment that explains deficiencies in full detail together with, where appropriate, specific references to and identity of the item(s) in the registration statement to which they pertain.

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains.

Please refer to the attachment cited in Question 4 of this Amendment.

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 ¹
03/31/2020	Christopher Harvin	Sign 
_____	_____	Sign _____
_____	_____	Sign _____
_____	_____	Sign _____

¹ 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.

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Amendment to Supplemental Statement Ending 03/31/2020

Further Details in Response to Question 7

Registrant failed to disclose the termination of the below account and is submitting this amendment to correct these deficiencies.

Foreign Principal	Date of Termination
Gainful Solutions, on behalf of the Government of South Sudan	October 19, 2020
Libya Institute for Advanced Studies (LIAS)	October 30, 2020

Further Details in Response to Question 11

We are providing more information regarding general activities undertaken for registered foreign principals during this time:

- **Expo2020 Dubai:** During this time, Registrant tracked media stories relating to Dubai and Expo2020, developed positive story concepts, and advised the client on international media stories of interest to Expo. Sanitas also advised on research and communications occurring outside of the U.S., in order to enable the client to combat negative media and accurately promote the goals and success of Expo2020.
- **Libya Institute for Advanced Studies (LIAS):** Registrant continued speaking with Dr. Aref Ali Nayed irregularly, but a formal engagement never materialized. Registrant reached out to a handful of media ahead of a DC visit in October and forgot to disclose those activities, now disclosed below. During this reporting period all other activity was limited to formerly mentioned, irregular phone calls with the foreign principal. Although a registration was filed, this matter never became operational, as the foreign principal did not sign a formal engagement. Registrant therefore is terminating this foreign principal as of October 30, 2020.
- **Gainful Solutions, on behalf of the Government of South Sudan:** Registrant did not undertake any further activities during this reporting period.

As noted in Registrant's original Supplemental Statement, Registrant would only make outreach to media and other stakeholders if the government addressed its obligations as outlined in the Revitalized Agreement on the Resolution of the Conflict in South Sudan (R-ARCSS). The Government of South Sudan did not address any of its obligations during this reporting period and consequently, Registrant did not engage in any reportable activities during this period.

- **Nicaraguans for Security & Prosperity:** Registrant continued discussions with NSP (a U.S.-registered organization owned by a U.S. citizen) about a media strategy to highlight oppression in Nicaragua.

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Further Details in Response to Question 12

- **Expo2020 Dubai:** Registrant did not undertake any political activities during this reporting period.
- **Libya Institute for Advanced Studies (LIAS):** Registrant offered to reconnect Dr. Aref with a handful of media, as captured in the table below:

Short Form Registrant: Bruce Fryer

Name	Outlet	Date Contacted	Method of Outreach	Topic
Missy Ryan	Washington Post	10/17/2019	Email	Offered to reconnect w/ Dr. Aref
Chris Isham	CBS News	10/17/2019	Email	Offered to reconnect w/ Dr. Aref
Michael Crowley	New York Times	10/21/2019	Email	Offered to reconnect w/ Dr. Aref
Jennifer Griffin	Fox News	10/21/2019	Email	Offered to reconnect w/ Dr. Aref
Bret Baier	Fox News	10/21/2019	Email	Offered to reconnect w/ Dr. Aref
Carla Babb	VOA News	10/22/2019	Email	Offered to reconnect w/ Dr. Aref
Zoey Leoudak	VOA News	10/24/2019	Email	Offered to reconnect w/ Dr. Aref
Guy Taylor	Washington Times	10/16/2019 – 10/28/2019	Multiple Emails	Offered to reconnect w/ Dr. Aref (no meeting occurred)

- **Gainful Solutions, on behalf of the Government of South Sudan:** Registrant did not undertake any political activities during this reporting period.
- **Nicaraguans for Security & Prosperity:** Registrant offered media an op-ed written by Nicaraguans for Security & Prosperity that was never published. See below for media contacted:

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Short Form Registrant: Bruce Fryer

Name	Outlet	Date Contacted	Method of Outreach	Topic
David Egner	Fox News	10/11/2019	Email	Offered op-ed on why Nicaraguan democracy is important to U.S.
Frank Craig	The Hill	10/21/2019	Email	Offered op-ed on why Nicaraguan democracy is important to U.S.
Lynne JordalMartin	Fox News	11/13/2019	Email	Offered op-ed on why Nicaraguan democracy is important to U.S.

Short Form Registrant: Christopher Harvin

Name	Outlet	Date Contacted	Method of Outreach	Topic
John Gizzi	Newsmax	12/25/2019	Email	Offered op-ed on why Nicaraguan democracy is important to U.S.

Further Details in Response to Question 14. (a)

- **Libya Institute for Advanced Studies (LIAS):** Registrant did not receive any receipts or monies from foreign principal during this reporting period.
- **Nicaraguans for Security & Prosperity:** Registrant did not receive any receipts or monies from foreign principal during this reporting period.
- **Gainful Solutions, on behalf of the Government of South Sudan:** Registrant did not receive any receipts or monies from foreign principal during this reporting period.
- **Expo2020 Dubai:** Registrant received a final payment of \$47,000.00 on 03/18/2020 that was accidentally not disclosed on original supplemental statement.

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Further Details in Response to Question 15. (a)

- **Libya Institute for Advanced Studies (LIAS):** Registrant did not make any disbursements related to the foreign principal during this reporting period.
- **Nicaraguans for Security & Prosperity:** Registrant did not make any disbursements related to the foreign principal during this reporting period.
- **Gainful Solutions, on behalf of the Government of South Sudan:** Registrant did not make any disbursements related to the foreign principal during this reporting period.