

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
03/31/2021	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.

**Sanitas International Inc. (Registration No. 6530)
Supplemental Statement for Six Month Period Ending 31 March 2021**

Response to 5(d)

Name	Position or Connection	Foreign Principal
Bruce Fryer	Employee	Alliance PNE

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
Nicaraguans for Security & Prosperity	March 31, 2021

Further Details in Response to Question 11

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

- **Alliance PNE:** Registrant advised foreign principal on political strategy, messaging, and engaging with U.S. and international media, especially with respect to Benin's national elections in April and the democratic process in Africa.
- **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. The contract did not operationalize and registrant has noted termination as the final day of this reporting period.

Response to 12

Foreign Principal:
Alliance PNE

Short Form Registrant:
Bruce Fryer

Contact	Outlet	Date contacted	Type of contact	Subject Matter
Danielle Paquette	Washington Post	3/4/21	Email	Emailed about upcoming Benin election and connecting journalist with Mr. Rogatien Biaou.

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Olivia Acland	The Economist	3/4/21	Email	Emailed about upcoming Benin election and connecting journalist with Mr. Rogatien Biaou.
Sophie Neiman	Freelance Journalist	3/4/21	Email	Emailed about upcoming Benin election and connecting journalist with Mr. Rogatien Biaou.
Sophie Neiman	Freelance Journalist	Multiple messages between 03/05/2021 & 03/12/2021,	Whats App	Coordinated time for a telephone conversation and messaged generally about Benin thereafter.
Sophie Neiman	Freelance Journalist	3/9/21	Teleph one	Discussed democratic backsliding in Benin and prospects for a free & fair election
Danielle Paquette	Washington Post	3/11/21	Email	Emailed about upcoming Benin election and connecting journalist with Mr. Rogatien Biaou.
Kinley Salmon	The Economist	3/12/21	Email	Offered to connect journalist with Mr. Biaou
Kinley Salmon	The Economist	3/15/21	Email	Discussed possible interview with Mr. Biaou
Julian Pecquet	Foreign Lobby	3/16/21	Email & Teleph one	Responded to reporter inquiry and connected reporter with Alliance PNE spokesperson over the telephone later that day.
Mark Goldberg	UN Dispatch	Multiple emails between 3/18/2021 and 3/26/2021	Email	Emailed reporter about featuring Mr. Biaou on Global Dispatches podcast about democratic backsliding in Benin
Danielle Paquette	Washington Post	3/22/21	Email	Shared an op-ed by Mr. Biaou

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Tom Wilson	Financial Times	3/22/21	Whats App	Messaged reporter asking whether he planned any coverage of upcoming election in Benin. Reporter recommended I reach out to his colleague who covers West Africa.
Neil Munshi	Financial Times	3/22/21	Email	Offered to connect journalist with Mr. Biaou
Kinley Salmon	The Economist	3/22/21	Email	Discussed possible interview with Mr. Biaou
Kinley Salmon	The Economist	3/25/21	Email	Discussed possible interview with Mr. Biaou
Mark Goldberg	UN Dispatch	3/26/21	Telephone	Spoke with reporter briefly before interview w/ Mr. Biaou occurred.
Danielle Paquette	Washington Post	3/26/21	Email	Followed up to see whether reporter was interested speaking with Mr. Biaou
Louise Dewast	AFP	3/26/21	Email	Emailed reporter to see whether she planned any coverage of Benin election and if so, whether she'd like to speak w/ Mr. Biaou. Reporter recommended I contact her colleague.
Matthieu Vendrely	TV5 (France)	3/26/21	Email	Offered to connect journalist with Mr. Biaou
Kinley Salmon	The Economist	3/26/21	Email	Coordinating interview with Mr. Biaou
Kinley Salmon	The Economist	3/26/21	Email	Followed up confirming interview later that day
Camille Malplat	AFP	3/26/21	Email	Offered to connect journalist with Mr. Biaou
Matthieu Vendrely	TV5 (France)	3/29/21	Email	Provided telephone number to reporter to schedule interview with Mr. Biaou directly.
Matthieu Vendrely	TV5 (France)	3/31/21	Email	Followed up with reporter to see if he had connected with Mr. Biaou