

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement

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

For Six Month Period Ending 10-3102018

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant	(b) Registration No.
Sanitas International	6530

(c) Business Address(es) of Registrant
 1629 K St. NW
 Suite 300
 Washington, DC 20006

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 checked="" type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input checked="" 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 RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

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 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 Connection Ended
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(b) 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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5. (a) Has any person named in Item 4(b) 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.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

Name	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 filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes No

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No
If yes, furnish the following information:

Foreign Principal	Date of Termination
Government of Hungary and the US Embassy of Hungary on behalf of BSI Public Affairs	15 July 2018
Government of Azerbaijan on behalf of BGR Group	15 October 2018
Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz, Inc.	15 July 2018
Aeromax Project LP DBA Carlex Technologies	15 October 2018

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No
If yes, furnish the following information:

Name and Address of Foreign Principal(s)	Date Acquired
Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)	01 October 2018

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No
Exhibit B⁴ Yes No

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

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, have you 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 your activities and services:

Please see attachment.

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes No

If yes, identify each such 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 or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please see attachment for all media outreach conducted during this reporting period.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

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, have you 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, explain why.

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

Date	From Whom	Purpose	Amount
	Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)	Contract payment	\$75,000
			<u>\$75,000</u>
			Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you 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, have you filed an Exhibit D⁸ to your registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you 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	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he 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, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

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.

Date	To Whom	Purpose	Amount
18 October 2018	Sonoran Policy Group	Introduction fee	\$25,000

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you 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:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your 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	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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^{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, did you prepare, disseminate or cause to be disseminated any informational materials?¹²

Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- Radio or TV broadcasts Magazine or newspaper Motion picture films Letters or telegrams
 Advertising campaigns Press releases Pamphlets or other publications Lectures or speeches
 Other (specify) _____

Electronic Communications

- Email
 Website URL(s): _____
 Social media websites URL(s): _____
 Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause 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) _____

21. What language was used in the informational materials:

- English Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label 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, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)

George Hamir

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.

**Sanitas International Inc. (Registration No. 6530)
Supplemental Statement for Six Month Period Ending 31 October 2018**

Response to 5(d)

Name	Position or Connection	Foreign Principal	Date of Termination
Bruce Fryer	Employee	Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)	Ongoing
Steve Ellis	Consultant	Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)	Ongoing

Response to 11

Bruce Fryer, Employee – Provided media relations to Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)

Steven Ellis, Consultant - Provided media counsel to Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)

Response to 22 and 23

Sanitas International has not distributed any materials related to its contract with Mer Security and Communications Systems, Ltd. (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC).

Response to 12

Foreign Principal:
Mer Security and Communications Systems, Ltd.

Short Form Registrant:
Bruce Fryer

Contact Name	Affiliation	Date contacted	Type of contact	Subject matter

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Ana Bickford	CNN	10/19/2018	Telephone	Pitched for interview
Ana Bickford	CNN	10/22/2018	SMS	Followed up phone conversation
David Ignatius	The Washington Post	10/22/2018	SMS & telephone	Discussed potential interview opportunity
Doug Rohrbeck	FOX News	10/22/2018	Telephone	Left voicemail about potential interview opportunity
Douglas Jehl	The Washington Post	10/24/2018	Email	Pitched interview opportunity
Doug Rohrbeck	FOX News	10/24/2018	Email	Pitched interview opportunity
Bret Baier	FOX News	10/24/2018	Email	Pitched interview opportunity
Andrew Meldrum	Associated Press	10/24/2018	Email	Pitched interview opportunity
Edward Cropley	Reuters	10/24/2018	Email	Pitched interview opportunity
Jonathan Rosenthal	The Economist	10/24/2018	Multiple emails	Discussed interview opportunity
John McDermott	The Economist	10/24/2018	Multiple emails	Discussed interview opportunity
Daniel Knowles	The Economist	10/24/2018	Multiple emails	Discussed interview opportunity
Guy Campanile	CBS	10/24/2018	Email	Pitched interview opportunity
Ana Bickford	CNN	10/24/2018	SMS	Followed up phone conversation
Ana Bickford	CNN	10/25/2018	SMS	Interview coordination
Siobhan O'Grady	Washington Post	10/26/2018	Email	Pitched interview opportunity
Joe Parkinson	Wall Street Journal	10/26/2018	Email	Pitched interview opportunity
Dionne Searcey	The New York Times	10/26/2018	Email	Pitched interview opportunity
Eyder Peralta	NPR	10/26/2018	Email	Pitched interview opportunity
Kimiko de Freytas-Tamura	The New York Times	10/29/2018	Email	Discussed media interview

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Joe Brock	Reuters	10/29/2018	Email	Pitched interview opportunity
Fran Blandy	AFP	10/29/2018	Email	Pitched interview opportunity
Gabriele Steinhauser	Wall Street Journal	10/29/2018	Multiple Emails	Pitched & discussed interview opportunity
Siobhan O'Grady	Washington Post	10/29/2018	Email	Discussed media interview
Gabriele Steinhauser	Wall Street Journal	10/29/2018	Emails	Discussed interview opportunity
Ana Bickford	CNN	10/29/2018	SMS	Interview coordination
Ofeibea Quist-Arcton	NPR	10/30/2018	Telephone & email	Interview coordination
Max Bearak	The Washington Post	10/30/2018	Telephone & SMS	Interview coordination
Ana Bickford	CNN	10/29/2018	Telephone & SMS	Interview coordination
Tim Cocks	Reuters	10/31/2018	Email	Pitched interview
Benjamin Sheppard	AFP	10/31/2018	Email	Pitched interview
Giulia Paravicini	Reuters	10/31/2018	SMS and Telephone	Discussed interview opportunity
Stuart Reid	Foreign Affairs	10/31/2018	Email	Interview coordination

Foreign Principal:

Mer Security and Communications Systems, Ltd.

Short Form Registrant:

Steven Ellis

Contact Name	Affiliation	Date contacted	Type of contact	Subject matter
Stuart Reid	Foreign Affairs	10/23/2018	Email	Op-ed and interview coordination
Stuart Reid	Foreign Affairs	10/26/2018	Multiple Emails	Interview coordination
Stuart Reid	Foreign Affairs	10/29/2018	Multiple Emails	Interview coordination
Stuart Reid	Foreign Affairs	10/30/2018	Multiple Emails	Interview coordination
Stuart Reid	Foreign Affairs	10/31/2018	Multiple Emails	Interview coordination

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