

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 10/31/2018

(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 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 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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Please see attachment

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

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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. on behalf of the Government of the Democratic Republic of the Congo (DRC)	Contract Payment	\$150,000.00
	Government of Hungary and the US Embassy of Hungary on behalf of BSI Public Affairs	No Additional Payments	\$0.00
	Government of Azerbaijan on behalf of BGR Group	No Additional Payments	\$0.00
	Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz, Inc.	No Additional Payments	\$0.00
	Aeromax Project LP DBA Cartex Technologies	No Additional Payments	\$150,000.00
			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	Fee for introduction to Mer Security and Communications Systems, Ltd (Mer) on behalf of the Government of the Democratic Republic of the Congo (DRC)	\$24,000.00
Not Applicable	Government of Hungary and the US Embassy of Hungary on behalf of BSI Public Affairs	No disbursements made during reporting period	\$0.00
Not Applicable	Government of Azerbaijan on behalf of BGR Group	No disbursements made during reporting period	\$0.00
Not Applicable	Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz, Inc.	No disbursements made during reporting period	\$0.00
Not Applicable	Aeromax Project LP DBA Carlex Technologies	No disbursements made during reporting period	\$0.00

\$24,000.00

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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Please see attachment

^{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)

03/28/2019

Cheryl Harris

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)
Amendment to 10/31/2018 Supplemental Statement**

Sanitas International Roles & Responsibilities

Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz Inc.

Name	Position	Role
Christopher Harvin	Partner	Provided outreach to key US stakeholders on behalf of the Ministry
Bruce Fryer	Employee	Provided think tank and media outreach on behalf of the Ministry

Government of Azerbaijan on behalf of BGR

Name	Position	Role
Christopher Harvin	Partner	Provided key stakeholder outreach on behalf of the Embassy

Government of Hungary and the U.S. Embassy of Hungary on behalf of BSI Public Affairs

Name	Position	Role
Christopher Harvin	Partner	Provided strategic counsel to the Embassy (Ambassador, Deputy Chief of Mission and Director of Communications)

Aeromax Project LP DBA Carlex Technologies

Name	Position	Role
Christopher Harvin	Partner	Provided strategic counsel, policy analysis, and marketing advice

Outreach Conducted on Behalf of Foreign Principals

Foreign Principal:

Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz Inc.

Short Form Registrant:

Bruce Fryer

Contact Name	Affiliation	Date contacted	Type of contact	Subject matter
Luke Coffey	Heritage	02/15/2018	Email	Requested a meeting with the Minister

**Sanitas International Inc. (Registration No. 6530)
Amendment to 10/31/2018 Supplemental Statement**

Wesley Fox	American Enterprise Institute	02/15/2018	Email	Requested a meeting with the Minister
Lylah Alphonse	US News & World Report	02/15/2018	Email	Requested a meeting with the Minister
Daniel Drezner	The Washington Post	02/15/2018	Email	Requested a meeting with the Minister
John Sakellariadis	American Enterprise Institute	02/15/2018	Multiple Emails	Requested a meeting with the Minister
Eric Brattberg + Paul Stronski	Carnegie Endowment for International Peace	02/15/2018	Multiple Emails	Requested a meeting with the Minister/scheduling
Jim Swift	The Weekly Standard	02/15/2018	Multiple Emails	Requested a meeting with the Minister
Max Boot	CFR	02/15/2018	Email	Requested a meeting with the Minister
Michael Shephard	Bloomberg News	02/15/2018	Email	Requested a meeting with the Minister
Kent Hughes	The Wilson Center	02/15/2018	Multiple Emails	Requested a meeting with the Minister
Guy Taylor	Washington Times	02/15/2018	Email	Requested a meeting with the Minister
Anders Aslund	Atlantic Council	02/15/2018	Email	Requested a meeting with the Minister
John Drennan	IISS	02/15/2018	Email	Requested a meeting with the Minister
Milda Boyce	Center for European Policy Analysis	02/15/2018	Multiple Emails	Requested a meeting with the Minister/scheduling
Tracey Totten	Aspen Institute	02/15/2018	Multiple Emails	Requested a meeting with the Minister/scheduling
Steve Hanke	Johns Hopkins/CATO	02/15/2018	Multiple Emails	Requested a meeting with the Minister/scheduling
Tucker Jones	National Endowment for Democracy	02/15/2018	Multiple Emails	Requested a meeting with the Minister/scheduling

Foreign Principal:
Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz Inc.

Short Form Registrant:
Christopher Harvin

Contact Name	Affiliation	Date contacted	Type of contact	Subject matter
Jonathan Day	Cong. Wilson Office	2/21/18	Email	Meeting Request

**Sanitas International Inc. (Registration No. 6530)
Amendment to 10/31/2018 Supplemental Statement**

Drew Nichols	Cong. Wilson Office	2/21/18	Email	Meeting Request
Drew Nichols	Cong. Wilson Office	2/21/18	Email	Correspondence
Drew Nichols	Cong. Wilson Office	2/21/18	Email	Correspondence
Drew Nichols	Cong. Wilson Office	2/26/18	In person	Coordination /policy
Drew Nichols	Cong. Wilson Office	2/28/18	Email	Follow up

Foreign Principal:
Government of Azerbaijan on behalf of BGR

Short Form Registrant:
Christopher Harvin

Contact Name	Affiliation	Date contacted	Type of contact	Subject matter
C. Croft	NSC	10/10/2017	In person	Meeting scheduling
M. Molly Montgomery	NSC	2/9/2018	Email	Meeting scheduling
C. Croft	NSC	2/9/018	Email	Correspondence
M. Molly Montgomery	NSC	2/22/2018	Email	Correspondence
C. Croft	NSC	2//23/2018	Email	Correspondence
M. Molly Montgomery	NSC	2/23/2018	Email	Correspondence
C. Croft	NSC	2//24/2018	Email	Correspondence
M. Molly Montgomery	NSC	2/24/2018	Email	Correspondence
C. Croft	NSC	2//25/2018	Email	Correspondence
M. Molly Montgomery	NSC	2/25/2018	Email	Correspondence
C. Croft	NSC	2/27/2018	Email	Correspondence
M. Molly Montgomery	NSC	2/27/2018	Email	Correspondence

**Sanitas International Inc. (Registration No. 6530)
Amendment to 10/31/2018 Supplemental Statement**

C. Croft	NSC	2/27/2018	Email	Correspondence
M. Molly Montgomery	NSC	2/27/2018	Email	Correspondence
Fred Lee	NSC	2/5/2018	Email	Correspondence
Fred Lee	NSC	2/12/2018	Phone Call	Correspondence
Gen McMaster	NSC	2/7/2018	Phone Call	Discussion on policy
Justin Cobert	NSC	2/23/2018	Email	Correspondence
Justin Cobert	NSC	2/23/2018	Email	Correspondence
Justin Cobert	NSC	2/24/2018	Email	Correspondence
Justin Cobert	NSC	2/25/2018	Email	Correspondence
Justin Cobert	NSC	2/27/2018	Email	Correspondence
Yll Bajraktari	NSC	2/9/2018	Email	Correspondence
Yll Bajraktari	NSC	2/9/2018	Email	Correspondence
Yll Bajraktari	NSC	2/10/2018	Email	Correspondence

Foreign Principal:

Government of Hungary and the U.S. Embassy of Hungary
on behalf of BSI Public Affairs

Short Form Registrant:

Christopher Harvin

No direct outreach to U.S. government officials, Congress, or Media in the United States

Foreign Principal:

Aeromax Project LP DBA Carlex Technologies

Short Form Registrant:

Christopher Harvin

No direct outreach to U.S. government officials, Congress, or Media in the United States

**Sanitas International Inc. (Registration No. 6530)
Amendment to 10/31/2018 Supplemental Statement**

Response to Question 5(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?

Name	Position or Connection	Foreign Principal	Date Terminated
Bruce Fryer	Director	Government of Hungary and the US Embassy of Hungary on behalf of BSI Public Affairs	15 July 2018
Bruce Fryer	Director	Government of Azerbaijan on behalf of BGR Group	15 October 2018
Bruce Fryer	Director	Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz, Inc.	15 July 2018
Bruce Fryer	Director	Aeromax Project LP DBA Carlex Technologies	15 October 2018
Christopher Harvin	Partner	Government of Hungary and the US Embassy of Hungary on behalf of BSI Public Affairs	15 July 2018
Christopher Harvin	Partner	Government of Azerbaijan on behalf of BGR Group	15 October 2018
Christopher Harvin	Partner	Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz, Inc.	15 July 2018
Christopher Harvin	Partner	Aeromax Project LP DBA Carlex Technologies	15 October 2018

Response to Question 9 of Initial Registration Statement

Foreign Principal	Date Received	Purpose	Amount
Ministry of Tourism for the Republic of Bulgaria on behalf of Glanz, Inc.	February 26, 2018	Meeting scheduling	\$10,000 in fees \$601 in expenses
			TOTAL: \$10,601.00
Embassy of Hungary through BSI Public Affairs	January 11, 2018	Strategy and analysis	\$15,000
			TOTAL: \$15,000.00

**Sanitas International Inc. (Registration No. 6530)
Amendment to 10/31/2018 Supplemental Statement**

Aeromax DBA Carlex Technology	December 8, 2017	Marketing and policy analysis	\$30,000
Aeromax DBA Carlex Technology	November 16, 2017	Marketing and policy analysis	\$30,000.00
Aeromax DBA Carlex Technology	December 8, 2017	Marketing and policy analysis	\$30,000.00
Aeromax DBA Carlex Technology	October 5, 2017	Marketing and policy analysis	\$30,000.00
Aeromax DBA Carlex Technology	September 18, 2017	Marketing and policy analysis	\$30,000.00
Aeromax DBA Carlex Technology	July 26, 2017	Marketing and policy analysis	\$30,000.00
Aeromax DBA Carlex Technology	June 16, 2017	Marketing and policy analysis	\$30,000.00
			TOTAL \$210,000.00

Response to Question 15 of Short Form Statement (C. Harvin)

Date	Amount	Political Organization / Candidate	Location/Event
1/12/2018	\$250.00	Thomas Basile State Senate (NY-39)	Online
2/8/2018	\$100.00	Todd McKinley for Congress (TN-1)	Online
2/8/2018	\$100.00	Jason Emert for Congress (TN-2)	Online