

OMB No. 1124-0001; Expires May 31, 2020

U.S. Department of Justice  
Washington, DC 20530

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

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**I--REGISTRANT**

1. Name of Registrant

Schillings International (USA) LLP

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2. Registration No. (To Be Assigned By the FARA Registration Unit)

6603

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3. Principal Business Address

One World Trade Center,  
Suite 8500,  
New York  
NY 10007

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4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) Occupation

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5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee  Association  Partnership  Voluntary group

Corporation

Other (specify) LLP

(b) Date and place of organization Delaware, 3 Jan 2017

(c) Address of principal office One World Trade Center,  
Suite 8500,  
New York

(d) Name of person in charge Keith Schilling

(e) Locations of branch or local offices London, UK

(f) If a membership organization, give number of members

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address(es)	Position	Nationality
Keith Schilling		Partner	Great Britain
Rod Christie-Miller	Residence addresses are on file with the Department of Justice	Partner	Great Britain
Allan Dunlavy		Partner	United States

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?  
Allan Dunlavy

(i) Describe the nature of the registrant's regular business or activity.  
Law practice

(j) Give a complete statement of the ownership and control of the registrant.  
Schillings (USA) LLP is owned and controlled by its two members Rod Christie-Miller and Keith Schilling

6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address(es)	Nature of Services
Allan Dunlavy	Residence addresses are on file with the Department of Justice	Legal and consulting advice and research in support of work of public relations advisors to the Foreign Principal
David Imison		

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal Low Taek Jho	Principal Address(es) 69 Tanjung Bunga Park 11200 Tanjung Bungah Pulau Pinang
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**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals?      Yes       No

If yes, describe fully.

**IV--FINANCIAL INFORMATION**

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

During the period beginning 60 days prior to the date of your obligation to register<sup>2</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation or for disbursement or otherwise?      Yes       No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	Purpose	Amount
See attached addendum		Legal and consulting advice and research in support of public relations advisors to the Foreign Principal	\$340,680

\$340,680

Total

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual 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.

<sup>2</sup> An agent must register within ten days of becoming an agent, and before acting as such.

<sup>3</sup> 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. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>4</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value<sup>5</sup> other than money, either as compensation, or for disbursement, or otherwise? Yes  No

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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**10. (a) DISBURSEMENT-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>6</sup> to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes  No

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>7</sup> to the time of filing this statement, did you dispose of any thing of value<sup>8</sup> other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? 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 the period beginning 60 days prior to the date of your obligation to register<sup>9</sup> to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any 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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<sup>4, 6, 7 and 9</sup> See Footnote 2, on page 3.

<sup>5 and 8</sup> 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<sup>10</sup>**

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes  No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.  
Low Taek Jho

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes  No

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

14. Will any public relations firms or publicity agents participate in the preparation or dissemination of such informational materials? Yes  No

If yes, furnish the names and addresses of such persons or firms.

- PRCG Haggerty, 45 Broadway, Suite 3140, New York, NY 10006
- Marathon Strategies, 38 East 29th Street, 4th Floor, New York, NY 10016
- Five Blocks Inc., 450 Lexington Ave, New York, NY 10017
- The PHA Group, 117 Wardour Street, London, W1F 0UN

15. Activities in preparing or disseminating informational materials will include the use 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): http://www.jho-low.com/
- Social media website URL(s): \_\_\_\_\_
- Other (specify) \_\_\_\_\_

16. Informational materials will be disseminated among the following groups:

- Public officials
- Civic groups or associations
- Legislators
- Libraries
- Government agencies
- Educational groups
- Newspapers
- Nationality groups
- Editors
- Other (specify) broadly to public through website and media

17. Indicate language to be used in the informational materials:

- English
- Other (specify) Chinese

<sup>10</sup> 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--EXHIBITS AND ATTACHMENTS**

18. (a) The following described exhibits shall be filed with an initial registration statement:

*Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.

*Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, 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. (See Rule 201 (e)).

**VII--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 signature<sup>11</sup>)

October 31, 2018

/s/ Allan Dunlavy

eSigned

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<sup>11</sup> 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.

**Addendum to Question 9(a)**

The registrant has not received funds from the foreign principal. The registrant has received funds from another party on behalf of the foreign principal which the registrant has used in connection with the registrable activities (as specified on the Registration Statement) as well as legal services exempt from registration under 22 U.S.C. § 613(g).