

U.S. Department of Justice

Washington, DC 20530

Registration Statement

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

I-REGISTRANT

1. Name of Registrant

Kobre & Kim, LLP

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

6604

3. Principal Business Address

800 Third Avenue  
New York, NY 10022

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

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 New York - established February 3, 2003

(c) Address of principal office 800 Third Avenue  
New York, NY 10022

(d) Name of person in charge Keith Whitman, Chief Operating Officer

(e) Locations of branch or local offices Washington, DC; Miami, FL; San Francisco, CA; Chicago, IL; London, England; Seoul, South Korea; Cayman Islands; British Virgin Islands; Shanghai, China; Hong Kong SAR, China; Buenos Aires, Argentina; Tel Aviv, Israel; Rio de Janeiro, Brazil

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

(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
Michael S. Kim	Provided to DOJ under separate cover	Founding Partner	United States of America
Steven Kobre	Provided to DOJ under separate cover	Founding Partner	United States of America

The firm's remaining partners are listed on the firm's website at [www.kobrekim.com](http://www.kobrekim.com)

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?  
Michael S. Kim

(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.  
The registrant is owned and controlled by the partners of Kobre & Kim LLP.

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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
Michael Kim	Provided to DOJ under separate cover	Public relations strategy and advice
Robin Rathmell	Provided to DOJ under separate cover	Public relations strategy and advice
Danielle Rosborough	Provided to DOJ under separate cover	Public relations strategy and advice
Jason Short	Provided to DOJ under separate cover	Public relations strategy and advice

**II--FOREIGN PRINCIPAL**

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

Foreign Principal	Principal Address(es)
Low Taek Jho	69 Tanjung Bunga Park 11200 Tanjung Bungah Pulau Pinang, Malaysia

**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 rider 9(a)		Public relations	\$818,434.30

\$818,434.30

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
See rider 10(a)			

**(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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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 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 30, 2018

/s/ Keith Whitman

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.

**Rider 9(a)**

The registrant has not received funds from the foreign principal. The registrant has received funds on behalf of the foreign principal, which it has used principally in connection with legal services exempt from registration under 22 U.S.C. § 613(g), and for disbursements in connection with registrable activities as set forth in Section 9(a).

**Rider 10(a)**

<b>Date</b>	<b>To Whom</b>	<b>Purpose</b>	<b>Amount</b>
6/7/2018	PRCG Haggerty	Public relations	\$100,000
7/23/2018	PRCG Haggerty	Public relations	\$50,607.75
8/8/2018	PRCG Haggerty	Public relations	\$133,460
8/20/2018	Five Blocks Inc.	Digital Search Strategies and Analytics	\$70,000
8/27/2018	Marathon Strategies	Public relations	\$50,000
8/30/2018	PRCG Haggerty	Public relations	\$120,000
9/12/2018	Five Blocks Inc.	Digital Search Strategies and Analytics	\$70,000
9/27/2018	The PHA Group	Public relations	\$13,315
9/30/2018	PRCG Haggerty	Public relations	\$141,051.55
10/9/2018	Five Blocks Inc.	Digital Search Strategies and Analytics	\$70,000