



11. Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

See Appendix for Response

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act<sup>1</sup>

Yes  No

If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

In the course of providing the services described above, the short form registrant is providing counsel and assistance to the foreign principal on communications matters and may engage in communications with members of the U.S. media as well as other relevant stakeholders.

13. The services described in Items 11 and 12 are to be rendered on a

full time basis  part time basis  special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

Salary: Amount \$ \_\_\_\_\_ per \_\_\_\_\_  Commission at \_\_\_\_\_ % of \_\_\_\_\_

Salary: Not based solely on services rendered to the foreign principal(s).

Fee: Amount \$ \_\_\_\_\_  Other thing of value \_\_\_\_\_

15. During the period beginning 60 days prior to the date of your obligation to register under FARA, 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 value in connection with an election to 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	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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**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.

06/10/2024	Isabella Santucci	<span style="border: 1px solid black; padding: 2px;">Sign</span>	/s/Isabella Santucci
<i>Date</i>	<i>Printed Name</i>		<i>Signature</i>

<sup>1</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity which 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 the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**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.

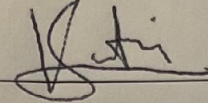
Date

Printed Name

Signature

5/28/24

ISABELLA SANTUCCI



## **Appendix Response to Item 11**

**Item 11: Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.**

The short form registrant is providing COP29 Azerbaijan Operations Company with communications and corporate strategy advisory services. As described in the agreement with the foreign principal, this includes helping to establish the COP29's communications function, including narrative development, initial content development, communications and engagement campaign planning, issues management, organizational development, establishing media relations capability, and media training. The registrant will also provide the foreign principal with initial stakeholder mapping, polling and research.