

U.S. Department of Justice
Washington, DC 20530

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

For 6 Month Period Ending 3/1/2020 - 8/31/2020
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number
Waxman Consulting, Inc. DBA Waxman Strategies 6710
- (c) Primary Business Address
1150 Connecticut Ave, NW
Suite 800
Washington, DC 20036

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 type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input 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 RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes No
- If yes, has the registrant filed an updated Exhibit C? Yes No
- If no, please file the updated Exhibit C.

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

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 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
See Attachment 1.				

(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
Abdul Cole	Senior Director	5/12/2020
Liviya James	Senior Associate	6/26/2020
Mathew Jacobson	Vice President	4/24/2020
Sarah Brickman	Senior Associate	5/16/2020

(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 previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes No

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Foreign Principal

Date Added

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

European Federation for Transport and Environment (under grant from the Norwegian Agency for Development Cooperation)
National Wildlife Federation (under grant from the Norwegian Agency for Development Cooperation)
Center for International Policy (under grant from the Norwegian Agency for Development Cooperation)
Aidenvironment (under grant from the Norwegian Agency for Development Cooperation)

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No N/A

Exhibit B⁴ Yes No N/A

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes No

If yes, has the registrant filed an amendment to these exhibits? Yes No

If no, please file 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, has the registrant 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 all activities and services:

Foreign Principal	Activities/Services
See Attachment 2.	

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

If yes, identify each 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, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.
See Attachment 2.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
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13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes No

If yes, describe fully.

Foreign Principal	Activities/Services
European Federation for Transport and Environment (under grant from the Norwegian Agency for Development Cooperation)	Waxman Strategies always has been and always will be an active advocate for pro-environmental policies and educational efforts. The firm's promotion of environmentally sustainable policies and practices occurs regardless of whether it is formally "on the clock" for this or another client.
National Wildlife Federation (under grant from the Norwegian Agency for Development Cooperation)	
Center for International Policy (under grant from the Norwegian Agency for Development Cooperation)	
Aidenvironment (under grant from the Norwegian Agency for Development Cooperation)	

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, has the registrant 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, please explain why no monies were received.

See Attachment 3.

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

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
					Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant 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, has the registrant previously filed an Exhibit D⁸ to its registration? Yes No

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

If no, please file the required Exhibit D.

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

During this 6 month reporting period, has the registrant 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	From Whom	Purpose	Thing of Value
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^{6, 7} A registrant is required to file an Exhibit D if he/she 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, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes No

If no, explain why no disbursements were made.

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.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Attachment 4.					

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant 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:

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

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its 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	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
See Attachment 5.				

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, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes No

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

European Federation for Transport and Environment (under grant from the Norwegian Agency for Development Cooperation)
National Wildlife Federation (under grant from the Norwegian Agency for Development Cooperation)
Center for International Policy (under grant from the Norwegian Agency for Development Cooperation)
Aidenvironment (under grant from the Norwegian Agency for Development Cooperation)

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes No

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

Foreign Principal	Period of Time	Amount
European Federation for Transport and Environment (under grant from NORAD)	Yearly	\$19,000
National Wildlife Federation (under grant from NORAD)	Yearly	\$30,000
Center for International Policy (under grant from NORAD)	Yearly	\$14,000
Aidenvironment (under grant from NORAD)	Yearly	\$175,000

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- Magazine or newspaper Advertising campaigns Press releases Pamphlets or other publications
 Lectures or speeches Radio or TV broadcasts Motion picture films Letters or telegrams
 Email
 Website URL(s): www.waxmanstrategies.com; www.mightyearth.org
 Social media websites URL(s): _____
 Other (specify) _____

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused 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) _____

20. Indicate the language used in the informational materials:

- English Other (specify) French, Portuguese, and German

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes No

If no, please file the required informational materials.





22. Has the registrant labeled 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, 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 ¹³
<u>9/30/2020</u>	<u>Michael Waxman</u>	<u> <i>Michael Waxman</i></u>
<u> </u>	<u> </u>	<u> _____</u>
<u> </u>	<u> </u>	<u> _____</u>
<u> </u>	<u> </u>	<u> _____</u>

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.

Attachment 1**Question 5(b)**

Name	Registrant Address	Citizenship	Position	Date Assumed
Mark Hays	Residence address provided to the FARA Registration Unit under separate cover at request	United States	Senior Director	5/4/2020
Alexander Wijeratna		British	Campaign Director	4/1/2020
Asha Sharma		United States	Director	5/7/2020
Philip Aikman		British	Campaign Director	7/14/2020
Melia Armington Manter		United States	Director	6/23/2020
Phelim Kyne		Canadian	Senior Director	8/3/2020

Attachment 2
Question 11

CIP: Interacted with media and corporations to: (1) reduce the impact of large-scale agricultural investments, with a particular focus on rubber production that sources its raw materials in the Mekong Region in Southeast Asia; and (2) reduce deforestation and protect Indigenous Peoples' rights in Latin America through organizing, communications, and policy.

EFTE: Worked to educate policymakers, organizations, and individuals about the impacts of unsustainable biofuels.

NWF: Advocated for private-sector actors adopt zero deforestation practices into their commercial supply chain analyses and purchases. Conducted and presented global soy producers about the essential need to improve and expand the Brazilian Soy Moratorium, which is a private agreement among soy traders not to purchase soy grown in the Brazilian Amazon. Encouraged the formation of private-public partnerships.

AE: Provided overview of relevant trader/buyer and producer/supplier networks and competitive relations between traders. Collaborated with relevant civil society organizations and platforms to enable public availability of alerts.

Question 12

CIP: Reach out to academics, corporations, non-governmental organizations, civil society organizations, and others working on rubber industry issues and deforestation in Latin America. Issuing research materials, press releases, and media statements regarding Amazon fires.

EFTE: Conducted research, held discussions with media and corporations, monitored relevant news, advocated for federal- and state-level renewable fuels standards, and promoted the adoption of advanced biofuels mandates that utilize proper carbon accounting. Waxman Strategies has interacted with officials from the U.S. Senate and the U.S. House of Representatives as part of this project related to renewable fuel standards and the Greener Fuels Act.

NWF: Waxman Strategies works to influence corporations' commercial product sourcing practices that utilize natural resources, with particular focus on palm oil production. This was accomplished through holding private meetings with businesses, contacting media, and conducting consumer-awareness campaigns.

AE: Issued public reports about soy production and held discussions with agricultural companies related to deforestation risk.

<u>Foreign Principal</u>	<u>Date Received</u>	<u>Purpose</u>	<u>Amount</u>
European Federation for Transport and Environment (under grant from the Norwegian Agency for Development Cooperation)	6/2/2020	Promote deforestation-free biofuels policies	\$ 181,771.05
European Federation for Transport and Environment (under grant from the Norwegian Agency for Development Cooperation)	6/2/2020	Promote deforestation-free biofuels policies	\$ 12,737.39
			<u>\$ 194,508.44</u>
National Wildlife Federation (under grant from the Norwegian Agency for Development Cooperation)	8/28/2020	Improve governance/implementation of corporate No Deforestation practices for palm oil	\$ 219,087.18
			<u>\$ 219,087.18</u>
AidEnvironment (under grant from the Norwegian Agency for Development Cooperation)	4/3/2020	Deploy a rapid response tropical deforestation remote monitoring system	\$ 153,942.97
			<u>\$ 153,942.97</u>

Attachment 4

Aidenvironment (under grant from the Norwegian Agency for Development Cooperation)

Personnel \$9,805.85

Center for International Policy (under grant from the Norwegian Agency for Development Cooperation)

Personnel \$39,078.32

Direct Expenses \$11,568.95

European Federation for Transport and Environment (under grant from the Norwegian Agency for Development Cooperation)

Personnel \$70,535.53

Direct Expenses \$10,739.66

National Wildlife Federation (under grant from the Norwegian Agency for Development Cooperation)

Personnel \$4,347.00

Attachment 5**Waxman Strategies**

Date	Donor	Candidate/Committee	Method	Amount
3/1/2020	Ethel Higonnet	Amy McGrath for Senate, Inc.	Contribution	\$ 25.00
3/1/2020	Ethel Higonnet	McGrath for U.S. Senate	Contribution	\$ 25.00
3/1/2020	Ethel Higonnet	ActBlue	Contribution	\$ 1.00
3/3/2020	Ethel Higonnet	Doug Jones for U.S. Senate	Contribution	\$ 5.00
3/15/2020	Ethel Higonnet	Montanans for Bullock	Contribution	\$ 15.00
3/30/2020	Ethel Higonnet	Alexandria Ocasio-Cortez for Congress	Contribution	\$ 15.00
4/1/2020	Ethel Higonnet	McGrath for U.S. Senate	Contribution	\$ 25.00
4/1/2020	Ethel Higonnet	ActBlue	Contribution	\$ 1.00
4/1/2020	Ethel Higonnet	Amy McGrath for Senate, Inc.	Contribution	\$ 25.00
4/3/2020	Ethel Higonnet	Doug Jones for U.S. Senate	Contribution	\$ 5.00
4/17/2020	Ethel Higonnet	Mark Kelly for Senate	Contribution	\$ 10.00
4/17/2020	Ethel Higonnet	Moveon.org Political Action	Contribution	\$ 50.00
4/17/2020	Ethel Higonnet	Moveon.org Political Action	Contribution	\$ 35.00
4/19/2020	Ethel Higonnet	Sara Gideon for Maine	Contribution	\$ 10.00
5/1/2020	Ethel Higonnet	Amy McGrath for Senate, Inc.	Contribution	\$ 25.00
5/1/2020	Ethel Higonnet	ActBlue	Contribution	\$ 1.00
5/1/2020	Ethel Higonnet	McGrath for U.S. Senate	Contribution	\$ 25.00
5/3/2020	Ethel Higonnet	Doug Jones for U.S. Senate	Contribution	\$ 5.00
5/17/2020	Ethel Higonnet	Mark Kelly for Senate	Contribution	\$ 10.00
5/17/2020	Ethel Higonnet	Moveon.org Political Action	Contribution	\$ 50.00
5/17/2020	Ethel Higonnet	Moveon.org Political Action	Contribution	\$ 35.00
5/19/2020	Ethel Higonnet	Sara Gideon for Maine	Contribution	\$ 10.00
6/1/2020	Ethel Higonnet	Amy McGrath for Senate, Inc.	Contribution	\$ 25.00
6/1/2020	Ethel Higonnet	McGrath for U.S. Senate	Contribution	\$ 25.00
6/1/2020	Ethel Higonnet	ActBlue	Contribution	\$ 1.00
6/3/2020	Ethel Higonnet	Doug Jones for U.S. Senate	Contribution	\$ 5.00
6/6/2020	Ethel Higonnet	Texas Democratic Party - Federal Account	Contribution	\$ 10.00
6/17/2020	Ethel Higonnet	Moveon.org Political Action	Contribution	\$ 35.00
6/17/2020	Ethel Higonnet	Moveon.org Political Action	Contribution	\$ 50.00
6/17/2020	Ethel Higonnet	Mark Kelly for Senate	Contribution	\$ 10.00
6/19/2020	Ethel Higonnet	Sara Gideon for Maine	Contribution	\$ 10.00
7/1/2020	Ethel Higonnet	McGrath for U.S. Senate	Contribution	\$ 25.00
7/1/2020	Ethel Higonnet	ActBlue	Contribution	\$ 1.00
7/3/2020	Ethel Higonnet	Doug Jones for U.S. Senate	Contribution	\$ 5.00
7/17/2020	Ethel Higonnet	Mark Kelly for Senate	Contribution	\$ 10.00
7/19/2020	Ethel Higonnet	Sara Gideon for Maine	Contribution	\$ 10.00