

U.S. Department of Justice
 Washington, DC 20530

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

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .22 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant Geopolitical Solutions LLC d/b/a/ Geopols	2. Registration Number 6740
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3. Primary Address of Registrant
2039 New Hampshire Ave # 109, Washington, DC 20009

4. Name of Foreign Principal Vnesheconombank, State Development Corporation, (VEB.RF)	5. Address of Foreign Principal Akademika Sakharova Prospekt, 9 Moscow, Russia, RU 107996
6. Country/Region Represented RUSSIA	

7. Indicate whether the foreign principal is one of the following:

Government of a foreign country¹

Foreign political party

Foreign or domestic organization: If either, check one of the following:

<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee
<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) <u>State corporation (non-profit organization)</u>

Individual-State nationality _____

8. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant

b) Name and title of official with whom registrant engages

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

9. If the foreign principal is a foreign political party, state:

- a) Name and title of official with whom registrant engages
- b) Aim, mission or objective of engagement

10. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

Supports and develops the Russian economy. In partnership with commercial banks, it provides financing for large-scale projects to develop the country's infrastructure, industrial production and social sphere, strengthen its technological potential and improve the quality of life.

b) Is this foreign principal:

- | | |
|---|---|
| Supervised by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Owned by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Directed by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Controlled by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Financed by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Subsidized in part by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

11. Explain fully all items answered "Yes" in Item 10(b).

See Appendix 11 for response.

12. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

U.S. Department of Justice

Exhibit A to Registration Statement

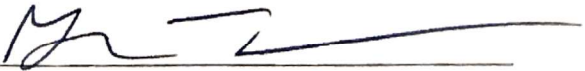
Washington, DC 20530

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 Exhibit A to Registration Statement, 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

9 Oct 2019 Grace Gayle Fenstermaker 

Response to Item 11

Question 11: Explain fully all items answered "Yes" in Item 10(b)

Item 10(b)(1): VEB.RF is established under the Federal Law "On State Development Corporation 'VEB.RF'". The highest governing body of VEB.RF is the Supervisory Board chaired by the Russian Prime Minister. One of VEB.RF's sources of funds is direct equity contributions from the Russian Federal Budget. The Russian Government provides direction with respect to certain governmental assets held by VEB.RF, but not with respect to other non-governmental assets held by VEB.RF.

Item 10(b)(4): VEB.RF is established under the Federal Law "On State Development Corporation 'VEB.RF'". The highest governing body of VEB.RF is the Supervisory Board chaired by the Russian Prime Minister. One of VEB.RF's sources of funds is direct equity contributions from the Russian Federal Budget. The Russian Government provides direction with respect to certain governmental assets held by VEB.RF, but not with respect to other non-governmental assets held by VEB.RF.

Item 10(b)(5): VEB.RF is established under the Federal Law "On State Development Corporation 'VEB.RF'". The highest governing body of VEB.RF is the Supervisory Board chaired by the Russian Prime Minister. One of VEB.RF's sources of funds is direct equity contributions from the Russian Federal Budget. The Russian Government provides direction with respect to certain governmental assets held by VEB.RF, but not with respect to other non-governmental assets held by VEB.RF.

Item 10(b)(6): VEB.RF is established under the Federal Law "On State Development Corporation 'VEB.RF'". The highest governing body of VEB.RF is the Supervisory Board chaired by the Russian Prime Minister. One of VEB.RF's sources of funds is direct equity contributions from the Russian Federal Budget. The Russian Government provides direction with respect to certain governmental assets held by VEB.RF, but not with respect to other non-governmental assets held by VEB.RF.

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

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant Geopolitical Solutions LLC d/b/a/ Geopols	2. Registration Number 6740
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3. Name of Foreign Principal
Vnesheconombank, State Development Corporation, (VEB.RF)

Check Appropriate Box:

- 4. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
- 5. There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 6. The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.

7. What is the date of the contract or agreement with the foreign principal? 10/01/2019

8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Public relations services and research that may include potential meetings with U.S. government officials and members of the media regarding potential new sanctions legislation (not existing sanctions) that could affect the activities of VEB.RF. The specific deliverables and project schedule shall be set forth in a project work plan.

9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Geopols may conduct meetings with US government officials and members of the media on behalf of VEB.RF regarding potential new sanctions legislation that could affect the activities of VEB.RF.

10. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act¹.

Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. 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.

Geopols may conduct meetings with US officials or members of the media on behalf of VEB.RF regarding potential new sanctions legislation that could affect the activities of VEB.RF.

11. Prior to the date of registration² for this foreign principal did the registrant engage in any activities, including political activities, for or render any services to this foreign principal?

Yes No

If yes, describe in full detail all such activities. The response should include, 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 also 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 activities.

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

Date	Contact	Method	Purpose
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12. During the period beginning 60 days prior to the obligation to register³ this foreign principal, did the registrant receive from the foreign principal any contribution, income, money, or thing of value either as compensation on, or for disbursement, or otherwise?

Yes No

If yes, set forth below in the required detail an account of such monies or things of value.

Date Received	From Whom	Purpose	Amount/Thing of Value
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Total

13. During the period beginning 60 days prior to the obligation to register⁴ this foreign principal, did the registrant spend or disburse any money in furtherance of or in connection with its activities on behalf of the foreign principal?

Yes No

If yes, set forth below in the required detail and separately an account of such monies, including monies transmitted, if any.

Date	To Whom	Purpose	Amount
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¹ "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.

^{2,3,4} Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

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 Exhibit B to Registration Statement, 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
10/09/2019	Grace Fenstermaker	/s/Grace Fenstermaker
_____	_____	_____
_____	_____	_____
_____	_____	_____

U.S. Department of Justice

Exhibit B to Registration Statement

Washington, DC 20530

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 Exhibit B to Registration Statement, 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

9 Oct 2019

Grace Gayle Fenstermaker





Washington, DC USA
+1 202 725 5623
www.geopols.com

1 October 2019

Mr. Andrey Kondakov, Director General
International Centre for Legal Protection
12 Krasnopresnenskaya Nab.
123610 Moscow, Russian Federation

Dear Mr. Kondakov,

This letter sets forth the terms under which International Centre for Legal Protection ("ICLP"), as an agent for Vnesheconombank, State Development Corporation, hereinafter ("VEB.RF,") is engaging Geopolitical Solutions d/b/a Geopols ("Geopols") related to the representation of VEB.RF's interests in connection with the provision of public relations services and research that may include potential meetings with U.S. government officials and members of the media regarding potential new sanctions legislation (not existing sanctions) that could affect the activities of VEB.RF. The specific deliverables and project schedule shall be set forth in a project work plan.

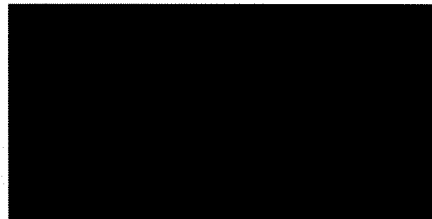
Fees and disbursements for the services shall be at the flat rate of \$62,500 per month, for a period of 12 months starting on October 1, 2019, and concluding on September 30, 2020. Fees for the first three months (October, November and December 2019) will be paid in advance. For the remaining quarters, detailed reports of services rendered will be submitted to ICLP no later than the fifteenth day following the end of the quarter, by electronic copy. Upon confirmation of the submission of each quarterly detailed report of services rendered, I will submit a quarterly invoice to ICLP, covering services rendered and disbursements incurred during the preceding quarter. Quarterly invoices are payable upon presentation and, pursuant to mandatory requirements of US sanctions law, shall be settled by the ICLP within 14 (fourteen) days of the date of the quarterly invoice (i.e., the value date of the payment should be not later than 14 days from the date of the final invoice.)

Payments shall be made to the account of Geopolitical Solutions d/b/a Geopols.

Please remit to:

GEOPOLS
Geopolitical Solutions LLC
2039 New Hampshire Ave NW #109
Washington, DC 20009
USA

EFT Instructions:



I confirm that ICLP shall have the right:

- to give instructions to me regarding its preferences for the representation of its interests and the protection of its rights;
- to demand and receive necessary explanations and information;
- to unilaterally terminate my engagement for any reason by submitting written notice to me.

If ICLP elects to terminate the engagement, ICLP shall take all steps necessary to free Geopols of any obligations to perform further work, and ICLP shall pay all unpaid fees accumulated up until the end of month at which the termination of the engagement shall take place, without an obligation to pay any further monthly fees.



Washington, DC USA
+1 202 725 5623
www.geopols.com

We thank you for this opportunity to work with you.

Sincerely,

A handwritten signature in black ink, appearing to read "GFenstermaker".

Grace Fenstermaker
Principal
Geopols

Understood and acknowledged by,

A handwritten signature in black ink, appearing to read "Kondakov".

Andrey Kondakov
International Centre for Legal Protection