

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 10/31/2023
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant
Paul Hastings LLP
- (b) Registration Number
6743
- (c) Primary Business Address
2050 M Street, N.W., 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 ☐ | No ☐ |
| (2) Citizenship | Yes ☐ | No ☐ |
| (3) Occupation | Yes ☐ | No ☐ |

(b) If an organization:

- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes ☐ | No ☒ |
| (2) Ownership or control | Yes ☐ | No ☒ |
| (3) Branch offices | Yes ☐ | No ☒ |

(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 C
- ¹
- , 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
See Appendix for Response				

(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
See Appendix for Additional Names		

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, did any employee or individual working in any capacity, other than in a clerical or secretarial capacity or in a related or similar capacity, begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s)?

Yes ☐ No ☒

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
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(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
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(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 registered for any new foreign principal(s)² during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Registered

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 this 6 month reporting period.

NSO Group

10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A³ and/or B⁴ previously filed for any foreign principal(s)? Yes ☐ No ☒

If no, and there is a change to any Exhibit A and/or B, please file an amendment if it is required.

If yes, furnish the following information:

Foreign Principal

Date Amended

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

NSO Group

Activities/Services

Provide legal advice and support for engagements with business partners and other stakeholders, including the American Bar Association, about NSO's technology.

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.

NSO Group: Provide legal advice and support for engagements with business partners and other stakeholders, including the American Bar Association, about NSO's Technology.

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

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

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**

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.

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

If no, please explain why no monies were received.

\$ 118,089.42

Total

If no, please file the required Exhibit D.

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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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
NSO Group	05/01/2023- 10/31/2023	NSO Group	Funds disbursed in the provision of legal services.	\$ 1,786.33	
NSO Group	06/07/2023	NSO Group	05/24/2023; FARA registration filing; FARA REG UNIT 202-307-0517 #REF 242409831456001233995 29.	\$ 305.00	
NSO Group	09/13/2023	NSO Group	07/13/2023; Restaurant: bartaco; City: Arlington; Dinner; Number of people: 1.	\$ 35.00	
NSO Group	-----	-----	-----	----->	\$ 2,126.33

\$ 2,126.33
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
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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.

NSO Group

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
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Total

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): _____ | | | |
| ☐ Social media websites URL(s): _____ | | | |
| ☒ Other (specify) <u>Resolution</u> | | | |

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) <u>American Bar Association</u> | | |

20. Indicate the language used in the informational materials:

- ☒ English ☐ Other (specify) _____

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>11/29/2023</u>	<u>Scott M. Flicker</u>	<u>/s/Scott M. Flicker</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.

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.

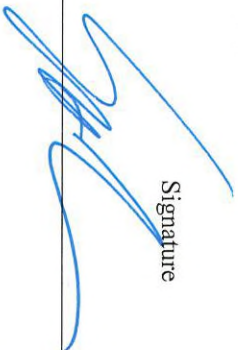
Date

Printed Name

Signature

11/29/2023

Scott M. Huxell



Appendix
Response to Item 4(a) Attached

Item 4(a): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? If yes, furnish the following information:

List of Persons Who Were Added As Partners/Officers/Directors

Last Name	First Name	Office	Title	Start Date	Country of Citizenship
Birmingham	Samantha	London	Partner	5/1/2023	United Kingdom
Patrow	Paul	Chicago	Partner	5/2/2023	United States
Kim	Rudolph	Palo Alto	Partner	5/3/2023	United States
Chiang	Tun-Yu	New York	Partner	5/15/2023	United States
Kubek	Jonathan	New York	Partner	5/15/2023	United States
Barash	David	New York	Partner	5/20/2023	United States
Lashbrook	Marc	New York	Partner	5/20/2023	United States
Zelig	Joshua	New York	Partner	5/20/2023	United States
Leader	Susan	Century City	Partner	5/25/2023	United States
Deutsch	Kenneth	Century City	Partner	5/27/2023	United States
Muehl	Frederik	Frankfurt	Partner	6/1/2023	Germany
Boehm	Josh	New York	Partner	6/17/2023	United States
Syracuse	Dana V.	New York	Partner	6/17/2023	United States
Donahue	Sean M.	Washington, D.C.	Partner	7/1/2023	United States
Phair	Ryan	Washington, D.C.	Partner	7/1/2023	United States
Lee	Craig Y.	Washington, D.C.	Partner	7/1/2023	United States
Simpson	Carter C.	Washington, D.C.	Partner	7/1/2023	United States
Salimi	Siavosh	New York	Partner	7/3/2023	United States
Magioncalda	Will A.	New York	Partner	7/22/2023	United States
Fee	Adam J.	Century City	Partner	7/29/2023	United States
Genender P.C.	Paul R.	Houston	Partner	9/16/2023	United States
Lipsey	Kirk D.	New York	Partner	9/26/2023	United Kingdom / United States
Vance	Charles P.	Chicago	Partner	10/5/2023	United States
Knox	Ruth L.	London	Partner	10/9/2023	Ireland / United Kingdom
Tata	Sanjiv J.	New York	Partner	10/9/2023	United States
Joachim	Scott	Palo Alto	Partner	10/10/2023	United States
Ambler	David	Palo Alto	Partner	10/13/2023	United States
Baars	Kaitlin	Century City	Partner	10/13/2023	United States
LaForce	Ryan	New York	Partner	10/21/2023	United States

Appendix
Response to Item 4(b) Attached

Item 4(b): Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? If yes, furnish the following information:

List of Persons Who Were Ceased As Partners/Officers/Directors

Last Name	First Name	Office	Title	Withdrawal Date	Country of Citizenship
Goldfarb	Jeff	New York	Partner	05/01/23	United States
Leitch	Alex	London	Partner	05/01/23	United Kingdom
Bremond	Guilhem	Paris	Partner	05/26/23	France
Carrillo	Arturo	New York	Partner	06/09/23	United States
Gallup	Joy K.	New York	Partner	06/09/23	United States
Fitzgerald	Mike	New York	Partner	06/11/23	United States
Nelson	Gregory V.	Houston	Partner	07/03/23	United States
Nowak	John P.	New York	Partner	07/14/23	United States
Pollock	Thomas R.	San Francisco	Partner	08/01/23	United States
Abutbul P.C.	Kfir	Houston	Partner	08/05/23	Israel / Permanent Resident United States
Bouchez El Ghozi	Philippe	Paris	Partner	09/01/23	France
Jenkinson	Derwin	London	Partner	09/15/23	United Kingdom
Schwartz	Todd M.	Palo Alto	Partner	09/28/23	United States
Bryan	Steven	London	Partner	10/01/23	United Kingdom
Dickerson	Christopher L.	Chicago	Partner	10/01/23	United States
Emanuel	Craig A.	Century City	Partner	10/31/23	Australia / United States

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
NSO Group	05/16/2023	American Bar Association; International Association of Lawyers	Panel	Attending ABA "Surveillance Spyware Technologies Raise Alarm Bells" panel and seeking to advocate on behalf of NSO Group.
NSO Group	06/14/2023	Deborah Enix-Ross/ American Bar Association	Email and Letter	Requesting that NSO Group be able to participate in future ABA conversations relating to the cyber intelligence community and the development of industry-wide best practices and standards governing the development, sale, and use of cyber intelligence tools.
NSO Group	07/25/2023	American Bar Association	Email	Corresponding with the ABA to ensure that Paul Hastings could speak at the Annual House of Delegates discussion of pending resolutions. Paul Hastings did not attend the annual meeting.
NSO Group	07/31/2023	Marcos Rios / American Bar Association	Email and Draft Resolution	Responding to and amending the ABA's proposed resolution calling for a moratorium on the sale, purchase, and use of commercial spyware.
NSO Group	08/04/2023	ABA International Law Section	Meeting	Attending ABA SIL Council meeting relating to the ABA's proposed resolution calling for a moratorium on the sale, purchase, and use of commercial spyware.

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
NSO Group	05/01/2023-10/31/2023	NSO Group Technologies Ltd.	Legal services	\$87,784.42	
NSO Group	10/05/2023	NSO Group Technologies Ltd.	Payment for registrable work conducted by Paul Hastings LLP, including support for engagement with business partners, government officials, and other stakeholders about NSO's technology, and for FARA supplemental statement fee. The payment was for services provided from January 2022 - March 2022.	\$30,305.00	
NSO Group	-----	-----	-----	----->	\$118,089.42