

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 10/31/2025
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Covington & Burling LLP
- (b) Registration Number
6876
- (c) Primary Business Address
850 10th Street, Washington, DC 20001

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.

2(b)(2): From time to time, partners not associated with foreign principals join or leave the partnership.

2(c): From time to time, partners not associated with foreign principals join or leave the partnership.

From time to time, partners not associated with foreign principals join or leave the partnership.

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, did any employee or individual working in any capacity (including a partner, officer, director or similar official), 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 (including partners, officers, directors or similar officials), 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 (including partners, officers, directors or similar officials), 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 this supplemental statement or submitted with this filing? Yes No

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.

OCP S.A.
SCM Consulting Limited
Dr. Esther Kitimbo Kisaakye

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	Activities/Services
See Appendix for Response	

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 Appendix for Response

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.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS-MONIES

During this 6 month reporting period, has the registrant received from any foreign principal, or from any other source, for or in the interests of any foreign principal, any contributions, income or money either as compensation or otherwise?

Yes No

If no, please explain why no monies were received.

OCP S.A.: The registrant received payments from OCP S.A. in connection with nonregistrable activities during the reporting period.
 Dr. Esther Kitimbo Kisaakye: Registrant represents Dr. Esther Kitimbo Kisaakye on a pro bono basis.

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
See Appendix for Response					
					\$ 96,107.00
					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
OCP S.A.				None
SCM Consulting Limited				None
Dr. Esther Kitimbo Kisaakye				None

^{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.

See Appendix for Response

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
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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
OCP S.A.				None
SCM Consulting Limited				None
Dr. Esther Kitimbo Kisaakye				None

(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
05/01/2025	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
05/01/2025	Gerald Masoudi	Covington & Burling PAC	Payroll deduction	\$ 292.00
05/01/2025	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
05/16/2025	Timothy Duncheon	Eric Chung for Michigan	Online credit card payment	\$ 500.00
06/02/2025	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
06/02/2025	Gerald Masoudi	Covington & Burling PAC	Payroll deduction	\$ 292.00
06/02/2025	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
07/01/2025	Gerald Masoudi	Covington & Burling PAC	Payroll deduction	\$ 292.00
07/01/2025	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
07/01/2025	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
08/01/2025	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
08/01/2025	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
08/01/2025	Gerald Masoudi	Covington & Burling PAC	Payroll deduction	\$ 292.00
09/02/2025	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
09/02/2025	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
09/02/2025	Gerald Masoudi	Covington & Burling PAC	Payroll deduction	\$ 292.00
09/23/2025	Timothy Duncheon	Eric Chung for Michigan	Online credit card payment	\$ 100.00
10/01/2025	Gerald Masoudi	Covington & Burling PAC	Payroll deduction	\$ 292.00
10/01/2025	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
10/01/2025	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00

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.

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:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | | |

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:

- | | | |
|---|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | |

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>11/25/2025</u>	<u>James M. Garland</u>	<input type="text" value="Sign"/> <u>/s/James M. Garland</u>
<u> </u>	<u> </u>	<input type="text" value="Sign"/> <u> </u>
<u> </u>	<u> </u>	<input type="text" value="Sign"/> <u> </u>
<u> </u>	<u> </u>	<input type="text" value="Sign"/> <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.

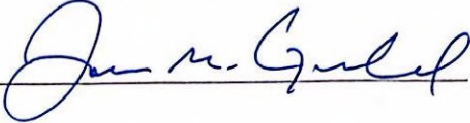
Date

Printed Name

Signature

24-Nov-2025

James M. Garland



Appendix Response to Item 11

Item 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? If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal(s)	Activities/Services
OCP S.A.	The registrant is outside counsel to OCP S.A. and provided various, non-registerable legal services for OCP S.A., including representation of OCP S.A. in the pending injury proceeding at the International Trade Commission, Inv. No. 701-TA-CEO-651, and the countervailing duty investigation at the Department of Commerce.
SCM Consulting Limited	<p>Registrant provided strategic and policy advice, as well as associated lobbying and public affairs services, in support of measures designed to seek reparations for damage inflicted on Ukrainians in the course of Russia's invasion of Ukraine. Additionally, the registrant (1) participated in an episode of the "What the Hell is Going On?" podcast (https://www.whatthehellisgoingonpodcast.com/wth-could-ukraine-do-with-300-billion-russian-dollars-stephen-rademaker-explains/), and (2) attended an event in Washington, D.C. on May 22, 2025, regarding Ukraine featuring a former U.S. government official.</p> <p>Registrant also engaged in nonregistrable activities on behalf of SCM Consulting Limited and System Capital Management (SCM) affiliated persons, including communications with foreign government officials and the provision of services related to the resolution of legal disputes before non-U.S. bodies.</p> <p>In addition to the information reported in item 14, the registrant received payments from SCM Consulting Limited and System Capital Management (SCM) affiliated persons in connection with nonregistrable activities during the reporting period.</p>
Dr. Esther Kitimbo Kisaakye	Registrant engaged in nonregistrable activities on behalf of Dr. Kisaakye, including preparation of legal action before an intergovernmental organization.

Appendix Response to Item 12-Description

OCP S.A.: No Political Activity

SCM Consulting Limited: See response to item 11.

Dr. Esther Kitimbo Kisaakye: No Political Activity

Appendix Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	05/09/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	05/09/2025	Bailey Wright, Deputy Legislative Assistant, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	05/09/2025	Corey Becker, Chief Counsel, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	05/19/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	05/19/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	05/20/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	05/28/2025	Marc Thiessen, Contributor, Washington Post	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	06/03/2025	Bailey Wright, Deputy Legislative Assistant, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/03/2025	Corey Becker, Chief Counsel, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/03/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/05/2025	Bailey Wright, Deputy Legislative Assistant, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/05/2025	Corey Becker, Chief Counsel, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/05/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/05/2025	Chris White,	Email	Provision of compensation to

		Counsel, House Committee on Foreign Affairs		Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/05/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/06/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/07/2025	John Thune, Senator, US Senate	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/07/2025	Lindsey Graham, Senator, US Senate	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/08/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/08/2025	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/09/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/09/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/10/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/11/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/11/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/12/2025	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/12/2025	Phil Breuder, National Security	Text, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants

		Counsel, Sen. Cornyn		for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/13/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/16/2025	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/16/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/17/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/17/2025	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/17/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/23/2025	Clark Gascoigne, Senior Policy Advisor, Sen. Whitehouse	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/23/2025	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Email, Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/23/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	06/24/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and PEACE Act (H.R. 4346).
SCM Consulting Limited	06/25/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and PEACE Act (H.R. 4346).
SCM Consulting Limited	07/07/2025	Phil Breuder, National Security Counsel, Sen.	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from

		Cornyn		Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/07/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/08/2025	Corey Becker, Chief Counsel, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/08/2025	Bailey Wright, Deputy Legislative Assistant, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/08/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/08/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/09/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/09/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/09/2025	Ryan Kaldahl, National Security Adviser to Senate Majority Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/10/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/10/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/11/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/11/2025	Bailey Wright, Deputy Legislative Assistant, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/11/2025	Corey Becker, Chief Counsel, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and

				Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/11/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/14/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/15/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and Sanctioning Russia Act of 2025 (S. 1241).
SCM Consulting Limited	07/22/2025	Marc Thiessen, Contributor, Washington Post	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/23/2025	Marc Thiessen, Contributor, Washington Post	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/23/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/23/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/23/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/24/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/24/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/24/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/25/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/28/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	07/29/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/01/2025	Anthony Chang, Staff Director, National Security,	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from

		Illicit Finance, and International Financial Institutions, House Committee on Financial Services		Russian invasion.
SCM Consulting Limited	08/01/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/01/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/05/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/06/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/22/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/27/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	08/28/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/03/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/03/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/03/2025	Corey Becker, Chief Counsel, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/03/2025	Bailey Wright, Deputy Legislative Assistant, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/04/2025	Tom Cotton, Senator, US Senate	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/04/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/04/2025	Ryan Kaldahl, National Security Adviser to Senate Majority Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/04/2025	Rick Berger, Budget and Policy Director, Senate Committee on Armed Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

SCM Consulting Limited	09/04/2025	Paul Massaro, Senior House Staff Representative, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/08/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/08/2025	Paul Massaro, Senior House Staff Representative, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/10/2025	Chris White, Counsel, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/10/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/15/2025	Paul Massaro, Senior House Staff Representative, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/15/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/16/2025	Paul Massaro, Senior House Staff Representative, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/16/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/16/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/18/2025	Phil Breuder, National Security Counsel, Sen. Cornyn	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/18/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/19/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/22/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Email, Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/23/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Meeting, Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

SCM Consulting Limited	09/23/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/24/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	09/25/2025	Francis Brooke, Counselor to the Secretary, Department of the Treasury	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/02/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/02/2025	Ryan Kaldahl, National Security Adviser to Senate Majority Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/03/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/08/2025	Ryan Kaldahl, National Security Adviser to Senate Majority Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/14/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and REPO Implementation Act (S. 2918).
SCM Consulting Limited	10/14/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and PEACE Act (H.R. 4346).
SCM Consulting Limited	10/15/2025	Anthony Chang, Staff Director, National Security, Illicit Finance, and International Financial Institutions, House Committee on Financial Services	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and PEACE Act (H.R. 4346).
SCM Consulting Limited	10/16/2025	Viviana Mazza, Reporter, Corriere della Sera	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/20/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/21/2025	Ryan Geary, Foreign Policy Advisor, Sen. Graham	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/21/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	10/22/2025	Katie Chaudoin, Republican Senior Counsel, Senate Committee on	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion and

		Foreign Relations		Designating the Russian Federation as a State Sponsor of Terrorism Act (S. 2978).
SCM Consulting Limited	10/23/2025	Viviana Mazza, Reporter, Corriere della Sera	Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

**Appendix
Response to Item 14(a)-Detail**

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
SCM Consulting Limited	05/27/2025	SCM Consulting Limited	Legal fees	\$23,400.00	
SCM Consulting Limited	06/12/2025	SCM Consulting Limited	Legal fees	\$ 8,840.00	
SCM Consulting Limited	06/27/2025	SCM Consulting Limited	Legal fees	\$ 8,190.00	
SCM Consulting Limited	09/11/2025	SCM Consulting Limited	Legal fees	\$27,552.00	
SCM Consulting Limited	09/19/2025	SCM Consulting Limited	Legal fees and expense reimbursement	\$28,125.00	
SCM Consulting Limited	-----	-----	-----	----->	\$96,107.00

Appendix

Response to Item 15(a)-Description

OCP S.A.: The registrant made disbursements on behalf of OCP S.A. in connection with nonregistrable activities during the reporting period.

SCM Consulting Limited: The registrant made disbursements on behalf of SCM Consulting Limited and System Capital Management (SCM) affiliated persons in connection with nonregistrable activities during the reporting period.

Dr. Esther Kitimbo Kisaakye: No disbursements were necessary.