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OMB No. 1124-0002; Expires July 31, 2023

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 10/31/2022
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Rubin Turnbull & Associates, Inc.

(b) Registration Number
6944

(c) Primary Business Address
401 E Las Olas Blvd, Ste. 130-447, Ft. Lauderdale, FL 33301

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.)

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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

(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

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

(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed

(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

(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

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

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

II - FOREIGN PRINCIPAL

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

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date of Termination

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

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Added

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

Embassy of the State of Qatar

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

Exhibit A[3]	Yes ☐	No ☐	N/A ☒
Exhibit B[4]	Yes ☐	No ☐	N/A ☒

If no, please file the required exhibit.

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

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

If no, please file the required amendment.

2 The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

3 The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

4 The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

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

Foreign Principal	Activities/Services
Embassy of the State of Qatar	Registrant provided advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural, and other exchanges to advance the mutual interests of Florida and the State of Qatar. During this period, the Registrant planned meeting logistics and itineraries for the foreign principal with federal, state, and local officials.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity[5] 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

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 named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, please explain why no monies were received.

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					

$ 210,000.00
Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign[7], 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 D[8] 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 registraint received any thing of value[9] 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
Embassy of the State of Qatar				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.

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
Embassy of the State of Qatar	05/04/2022	Edge Communications	Communications Consulting	$17,500.00	
Embassy of the State of Qatar	06/09/2022	Edge Communications	Communications Consulting	$17,500.00	
Embassy of the State of Qatar	07/15/2022	Edge Communications	Communications Consulting	$17,500.00	
Embassy of the State of Qatar	09/29/2022	Edge Communications	Communications Consulting	$35,000.00	
Embassy of the State of Qatar	----------	----------	----------	---------->	$87,500.00

$ 87,500.00

Total

(b) **DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value[10] 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
Embassy of the State of Qatar				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 value[11] in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
See Appendix for Response				

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.

Embassy of the State of Qatar

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
	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)* _____

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

☒ Public officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other *(specify)*_____

20. Indicate the language used in the informational materials:

☒ English ☐ Other *(specify)* _____

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.

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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]
11/29/2022	Heather Turnbull	/s/Heather Turnbull
11/29/2022	William Rubin	/s/William Rubin

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.

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EXECUTION

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Date	Printed Name	Signature
11/28/2022	William Rubin	
11/29/2022	Heather Turnbull	Heather Turnbull

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Appendix
Response to Item 12-Description

Embassy of the State of Qatar: Registrant provided advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural, and other exchanges to advance the mutual interests of Florida and the State of Qatar. During this period, the Registrant planned meeting logistics and itineraries for the foreign principal with federal, state, and local officials.

Appendix
Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Embassy of the State of Qatar	05/02/2022	Embassy of the State of Qatar	Consulting Fee	$35,000.00	
Embassy of the State of Qatar	06/06/2022	Embassy of the State of Qatar	Consulting Fee	$35,000.00	
Embassy of the State of Qatar	07/08/2022	Embassy of the State of Qatar	Consulting Fee	$35,000.00	
Embassy of the State of Qatar	09/06/2022	Embassy of the State of Qatar	Consulting Fee	$35,000.00	
Embassy of the State of Qatar	09/29/2022	Embassy of the State of Qatar	Consulting Fee	$35,000.00	
Embassy of the State of Qatar	10/24/2022	Embassy of the State of Qatar	Consulting Fee	$35,000.00	
Embassy of the State of Qatar	----------	----------	----------	--------->	$210,000.00

Appendix
Response to Item 15(c)

Item 15(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 value 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? If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/ Thing of Value
05/03/2022	Heather Turnbull	Alexis Calatayud	Mail	$ 1,000.00
05/03/2022	Jacqui Carmona	Kevin Cabrera	Event	$ 1,000.00
05/03/2022	William Rubin	Kevin Cabrera	Event	$ 1,000.00
05/03/2022	Heather Turnbull	Kevin Cabrera	Event	$ 1,000.00
05/13/2022	Rubin Turnbull & Associates	Keith Truenow	Mail	$ 1,000.00
05/17/2022	Rubin Turnbull & Associates	Allison Tant	Online	$ 1,000.00
05/18/2022	Heather Turnbull	Allison Tant	Event	$ 1,000.00
05/24/2022	Rubin Turnbull & Associates	Shawn Harrison	Mail	$ 1,000.00
05/27/2022	Rubin Turnbull & Associates	Juan Porras	Mail	$ 1,000.00
05/31/2022	Rubin Turnbull & Associates	Alexis Calatayud	Mail	$ 1,000.00
05/31/2022	Rubin Turnbull & Associates	Kevin Cabrera	Online	$ 1,000.00
05/31/2022	Rubin Turnbull & Associates	Monica Colucci	Online	$ 1,000.00
06/01/2022	Heather Turnbull	Laurel Lee; Laurel Lee for Congress	Online	$ 5,800.00
06/13/2022	William Rubin	Lawrence McClure	Mail	$ 1,000.00
06/15/2022	Rubin Turnbull & Associates	Dan Marquith	Mail	$ 1,000.00
06/22/2022	Rubin Turnbull & Associates	Michelle Salzman	Mail	$ 1,000.00
06/23/2022	William Rubin	Jonathan Martin	Mail	$ 1,000.00
06/29/2022	Rubin Turnbull & Associates	Chip LaMarca	Mail	$ 1,000.00
06/29/2022	Rubin Turnbull & Associates	Jay Trumbull	Mail	$ 1,000.00
06/29/2022	Heather Turnbull	Jay Trumbull	Mail	$ 1,000.00
06/30/2022	William Rubin	Jay Trumbull	Mail	$ 1,000.00
06/30/2022	Rubin Turnbull & Associates	Jonathan Martin	Mail	$ 1,000.00
07/21/2022	William Rubin	Wallace Aristide	Mail	$ 1,000.00
07/21/2022	Jacqui Carmona	Wallace Aristide	Mail	$ 1,000.00
07/22/2022	Heather Turnbull	JC Bermudez	Mail	$ 1,000.00
07/26/2022	Rubin Turnbull & Associates	Jeff Holcomb	Mail	$ 1,000.00
07/26/2022	Christian Ulvert	Sabrina Cohen	Mail	$ 500.00
08/02/2022	Rubin Turnbull & Associates	Audrey Henson	Mail	$ 1,000.00
08/18/2022	Rubin Turnbull & Associates	Tiffany Hughes	Mail	$ 1,000.00
08/25/2022	Rubin Turnbull & Associates	Demi Cabrera	Mail	$ 1,000.00

Date	Donor	Political Organization/Candidate	Method	Amount/ Thing of Value
08/31/2022	Heather Turnbull	Kevin Cabrera	Mail	$ 1,000.00
08/31/2022	Rubin Turnbull & Associates	Kevin Cabrera	Mail	$ 1,000.00
08/31/2022	Jacqui Carmona	Kevin Cabrera	Mail	$ 1,000.00
09/08/2022	Rubin Turnbull & Associates	Jessica Baker	Mail	$ 1,000.00
09/12/2022	Rubin Turnbull & Associates	Alexis Calatayud	Mail	$ 1,000.00
09/12/2022	Heather Turnbull	Alexis Calatayud	Mail	$ 1,000.00
09/15/2022	Rubin Turnbull & Associates	Michelle McGovern	Event	$ 1,000.00
09/19/2022	Rubin Turnbull & Associates	Jason Brodeur	Mail	$ 1,000.00
09/28/2022	Rubin Turnbull & Associates	Webster Barnaby	Mail	$ 1,000.00
09/28/2022	Rubin Turnbull & Associates	Adam Brandon	Mail	$ 1,000.00
09/29/2022	Rubin Turnbull & Associates	Katherine Waldron	Mail	$ 1,000.00
09/29/2022	Rubin Turnbull & Associates	Juan Fernandez-Barquin	Mail	$ 1,000.00
09/30/2022	Rubin Turnbull & Associates	Peggy Gossett-Seidman	Mail	$ 1,000.00
10/03/2022	Rubin Turnbull & Associates	Hillary Cassel	Mail	$ 1,000.00
10/04/2022	Rubin Turnbull & Associates	Steven Julian	Mail	$ 1,000.00
10/07/2022	Rubin Turnbull & Associates	A Stronger Florida	Mail	$ 1,000.00
10/14/2022	Rubin Turnbull & Associates	Martin Kiar	Event	$ 1,000.00
10/17/2022	William Rubin	Dade First PC	Mail	$ 1,000.00
10/17/2022	Rubin Turnbull & Associates	Kevin Beiderman	Mail	$ 1,000.00
10/20/2022	William Rubin	Kevin Cabrera	Mail	$ 1,000.00
10/20/2022	Jacqui Carmona/VAD Strategies LLC	Kevin Cabrera	Mail	$ 1,000.00
10/27/2022	Heather Turnbull	Martin Kiar	Mail	$ 1,000.00
10/28/2022	Rubin Turnbull & Associates	Michele Rayner	Mail	$ 1,000.00
10/31/2022	Rubin Turnbull & Associates	Michele Rayner	Mail	$ 1,000.00
10/31/2022	Jacqui Carmona	Mike Lambrechts	Mail	$ 250.00