OMB No. 1124-0005; Expires July 31, 2023

**U.S. Department of Justice**
Washington, DC 20530

# Short Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at https://www.fara.gov.

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

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .23 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

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| 1. Name<br>Luisa Palacios | 2. Registration Number<br>6955 |
| 3. Residence Address<br>Provided to FARA Unit | 4. Primary Business Address<br>N/A |
| 5. Year of Birth 1969<br>Nationality Venezuela<br>Present Citizenship Venezuela, France, United States | 6. If present citizenship was not acquired by birth, indicate when, and how acquired.<br>U.S. citizenship obtained in 2014 |

7. Occupation CITGO Petroleum Corporation Director and Chairwoman

8. What is the name and address of the primary registrant?
Name CITGO Holding, Inc. ("CITGOH") Address 1293 Eldridge Parkway, Houston TX 77077

9. (a) Indicate your connection with the primary registrant:

- ☐ partner
- ☒ director
- ☐ employee
- ☐ consultant
- ☒ officer
- ☐ associate
- ☐ agent
- ☐ subcontractor
- ☐ other *(specify)*_____

(b) Specify your position/title: Director (2/15/2019-10/30/2020), President & Chief Executive Officer (2/15/2019-10/30/2020)

10. List the foreign principal to whom you will render services in support of the primary registrant.

The Foreign Principal is the Ad Hoc Board of PDVSA (or, "PDVSA Ad Hoc Board"), which directly or indirectly owns PDVH, CITGOH, and CPC. The registrant understands that under the Department of Justice's interpretation of the Foreign Agents Registration Act ("FARA"), PDVSA's ownership of these companies may, under certain circumstances, render them an agent of the PDVSA Ad Hoc Board.

11. Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

Acting on behalf of the U.S.-based CITGO entities, sometimes collectively and other times separately, the registrant engaged with representatives of the U.S. Government to discuss how a contemplated default by the Maduro regime on the so-called PDVSA 2020 bonds would harm the interests of the CITGO entities, and to urge the U.S. Government to take steps to protect the CITGO entities from those harms. This included discussions of the need to reform, suspend, or repeal General License 5. In making these arguments, the registrant explained how modifying or repealing General License 5 would promote the policy objectives of the U.S. sanctions regime. For more information on the details of these activities, please see the index of communications filed as an attachment to the short-form registration statements.

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act[1]?

Yes ☒ No ☐

If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

Please see the index of communications filed as an attachment to the short-form registration statements.

13. The services described in Items 11 and 12 are to be rendered on a

☐ full time basis ☐ part time basis ☒ special basis

14. What compensation or thing of value have you received to date or will you receive for the above services? N/A

☐ Salary: Amount $ _____ per _____ ☐ Commission at _____ % of _____

☐ Salary: Not based solely on services rendered to the foreign principal(s).

☐ Fee: Amount $ _____ ☐ Other thing of value _____

15. During the period beginning 60 days prior to the date of your obligation to register under FARA, have you, from your own funds and on your 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 political office or in connection with any primary election, convention, or caucus held to select candidates for any political office?

Yes ☐ No ☒

If yes, furnish the following information:

| Date | Donor | Political Organization/Candidate | Method | Amount/Thing of Value |
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## 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.

| April 30, 2021 | Luisa Palacios | /s/ Luisa Palacios |
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| *Date* | *Printed Name* | *Signature* |

1 "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Attachment to Short Form Registration Statement

| Date | Government Contact | Method | Purpose | Company Participants |
|---|---|---|---|---|
| 6/11/19 | Staff, Sen. Marco Rubio | Meeting | Regarding detainees | Luisa Palacios, Rick Esser, Fernando Vera |
| 6/11/19 | Staff, Sen. John Cornyn | Meeting | Regarding detainees | Luisa Palacios, Rick Esser |
| 8/5/19 | Ben Jackson (Legislative Director) for Rep. Lizzie Fletcher | Meeting | Regarding sale of CPC assets | Larry Elizondo |
| 8/5/19 | Hugh Fike (Legislative Director) for Rep. Michael Cloud | Meeting | Regarding CPC's future and local presence | Larry Elizondo |
| 8/6/19 | Kathee Facciano (Chief of Staff) and Ward Cormier (Legislative Director) for Rep. Clay Higgins | Meeting | Regarding embargo, Crystallex, and CPC's future | Larry Elizondo |
| 8/6/19 | Sam Cooper (Deputy Chief of Staff) and Samantha Leahy (Legislative Counsel) for Sen. Ted Cruz | Meeting | Regarding embargo, Crystallex, and CPC's future | Larry Elizondo |
| 8/7/19 | Maria Sierra (Legislative Counsel) for Sen. Bill Cassidy | Meeting | Regarding detainees, embargo, Crystallex, bond issues, and CPC's future | Larry Elizondo |
| 8/12/19 | Staff for Sen. Dick Durbin | Meeting | Regarding detainees, embargo, Crystallex, bond issues, and CPC's future | Larry Elizondo, Thomas Coleman |
| 8/12/19 | Matt Lampert (Military Legislative Assistant) for Sen. Tammy Duckworth | Meeting | Regarding Crystallex and implications of General License 5 | Larry Elizondo, Thomas Coleman |
| 8/12/19 | Caitlyn McGuire (Legislative Assistant) for Rep. Daniel Lipinski | Meeting | Regarding embargo, Crystallex, and support for CPC | Larry Elizondo, Thomas Coleman |
| 8/27/19 | Kent D. Logsdon, Principal Deputy Assistant Secretary, Bureau of Energy Resources, Department of State | Meeting | Regarding CPC operations, concerns, and new CEO | Luisa Palacios, Rick Esser |
| 8/28/19 | Adam Lerrick, Department of Treasury | Meeting | Regarding CPC operations and concerns | Rick Esser, Luisa Palacios, Carlos Jordá |
| 8/29/19 | U.S. Chamber of Commerce - Secretary Wilbur Ross; Earl Comstock | Meeting | Regarding CPC operations, corporate structure, and concerns | Luisa Palacios, Carlos Jordá, Rick Esser |
| 8/29/19 | U.S. Department of Energy: Steven Winberg, Assistant Secretary, Fossil Energy Mark Maddox, Principal Deputy Assistant Secretary, Fossil Energy Shawn Bennett, Deputy Assistant Secretary, Oil and Natural Gas Matthew Cline Director, Office of American Affairs Elizabeth Urbanas, Deputy Assistant Secretary, Asia and the Americas – Office of International Affairs Michael Tadeo, Senior Advisor to Steven Winberg | Meeting | Regarding CPC operations, governance, and concerns | Luisa Palacios, Rick Esser |
| 9/11/19 | Sen. Bill Cassidy | Meeting | Regarding detainees, General License 5 | Luisa Palacios, Carlos Jordá, Rick Esser |
| 9/11/19 | Rep. Clay Higgins | Meeting | Regarding detainees, General License 5 | Luisa Palacios, Carlos Jordá, Rick Esser |
| 9/11/19 | Michael Needham (Chief of Staff) and Viviana Bovo for Sen. Marco Rubio | Meeting | Regarding detainees, General License 5 | Luisa Palacios, Carlos Jordá, Rick Esser |
| 9/11/19 | Brian Skretny and Harry Semerdjian, House Foreign Affairs Committee | Meeting | Regarding General License 5 | Larry Elizondo |
| 9/11/19 | Brian Skretny, Legislative Director and Senior Advisor, Harry Semerdjian, House Foreign Affairs Committee, Eric Jacobstein, Alex Sadler | Meeting | Regarding General License 5 | Luisa Palacios; Carlos Jordá; Rick Esser |
| 9/11/19 | Claudia Morales (Constiuent Services) for Congresswoman Lizzie Fletcher | Meeting | Regarding CPC's local presence and pending legislation | Thomas Coleman |
| 9/12/19 | David Stokes (Chief of Staff) for Sen. John Kennedy (R-LA) | Meeting | Regarding General License 5 | Luisa Palacios, Carlos Jordá, Rick Esser, Larry Elizondo |
| 9/12/19 | Gene Martorony, Chief of Staff, Rep. Albio Sires's Office | Call | Introductions to CPC CEO | Carlos Jordá |
| 9/12/19 | Sen. Ted Cruz | Meeting | Regarding detainees, General License 5 | Luisa Palacios, Rick Esser |
| 9/12/19 | Sen. Chris Murphy | Meeting | Regarding Crystallex, General License 5 | Carlos Jordá |
| 9/12/19 | Mr. Skiffington Holderness, Senate Foreign Relations Committee | Meeting | Regarding General License 5 | Larry Elizondo |

| Date | Government Contact | Method | Purpose | Company Participants |
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| 9/12/19 | Earl Comstock Secretary of Commerce | Call | Regarding General License 5 | Luisa Palacios |
| 9/19/19 | Adam Lerrick, Department of Treasury | Call | Treasury Update | Rick Esser |
| 9/24/19 | Rep. Adam Kinziger | Meeting | Regarding CPC and energy, commerce, and foreign affairs issues | Larry Elizondo, Thomas Coleman |
| 9/24/19 | Sen. Richard Durbin | Meeting | Regarding CPC proposals | Larry Elizondo, Thomas Coleman |
| 9/25/19 | Sofya Leonova (Legislative Director) for Rep. Daniel Lipinski | Meeting | Regarding CPC policy options and legal actions | Larry Elizondo, Thomas Coleman |
| 9/26/19 | Michael McKinley, Department of State | Meeting | Regarding 2020 Bonds | Luisa Palacios |
| 10/2/19 | Adam Lerrick, Department of Treasury | Email | Regarding CPC's financial condition | Rick Esser |
| 10/3/19 | Adam Lerrick, Department of Treasury | Email | Regarding Crystallex | Rick Esser |
| 10/4/19 | Adam Lerrick, Department of Treasury | Call | Regarding Crystallex | Rick Esser |
| 10/28/19 | Sen. James Risch, Chairman, Committee on Foreign Relations; Skiffington Holderness, Special Projects Director, Committee on Foreign Relations | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/28/19 | Kent Logsdon, State Dept., Principal Deputy Assistant Secretary, Bureau of Energy Resources | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/28/19 | David Peyman, State Dept., Deputy Assistant Secretary for Counter Threat Finance and Sanctions, Bureau of Economic and Business Affairs | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/28/19 | Brett Hamsik, State Dept., Economic Policy Advisor | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/28/19 | Adam Lerrick, Department of Treasury | Letter & Call | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Secretary Wilbur Ross, Department of Commerce | Letter & Call | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. Menendez | Letter & Call | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. John Kennedy | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. Bill Cassidy | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. Ted Cruz | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. John Cornyn | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. Marco Rubio | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios |
| 10/28/19 | Sen. John Kennedy | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/28/19 | Sen. Ted Cruz | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/28/19 | Sen. Marco Rubio | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/28/19 | Sen. Bob Menendez | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/29/19 | Sen. Bill Cassidy | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/29/19 | Sen. John Cornyn | Letter | Expressing appreciation for support of CPC matters | Luisa Palacios, Carlos Jordá |
| 10/31/19 | Rep. Lizzie Fletcher | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Ralph Abraham | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Michael McCaul | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Clay Higgins | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Sen. Chris Murphy | Letter & Call | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Chairman Engel | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Albio Sires | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Debbie Wasserman Schultz | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Shalala | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Mario Diaz Balart | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |
| 10/31/19 | Rep. Mucarsel Powell | Letter | Expressing appreciation for support of CPC matters | Carlos Jordá |

| Date | Government Contact | Method | Purpose | Company Participants |
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| 11/10/19 | Mark Maddox | Letter | Expressing appreciation for support of CPC matters | Rick Esser |
| 11/10/19 | Beth Urbanas | Letter | Expressing appreciation for support of CPC matters | Rick Esser |
| 11/10/19 | Ken Vincent | Letter | Expressing appreciation for support of CPC matters | Rick Esser |
| 11/10/19 | Steve Winberg, Assistant Secretary for Fossil Energy | Letter | Expressing appreciation for support of CPC matters | Rick Esser |
| 11/18/19 | Ward Cormier, Legislative Director, Rep. Clay Higgins | Meeting | Regarding detainees | Larry Elizondo, Jack Lynch |
| 11/18/19 | Abby McHan, Legislative Assistant, Rep. Michael Cloud | Meeting | Regarding detainees | Larry Elizondo, Jack Lynch |
| 11/18/19 | Samantha Leahy, Senior Legislative Assistant, Ricardo Pita, Legislative Correspondent, Sen. Ted Cruz | Meeting | Regarding detainees | Larry Elizondo, Jack Lynch |
| 11/18/19 | Don Bergin, Senior Counsel for National Security Affairs, Karthik Raja, Legislative Correspondent, Sen. John Cornyn's Office | Meeting | Regarding detainees | Larry Elizondo, Jack Lynch |
| 11/18/19 | Nick Hawatmeh, Legislative Counsel, and Hannah Fraher, Legal Aide, Sen. John Kennedy | Meeting | Regarding detainees | Larry Elizondo, Jack Lynch |
| 11/18/19 | Ben Jackson (Legislative Director) for Rep. Lizzie Fletcher | Meeting | Regarding detainees | Larry Elizondo, Jack Lynch |
| 11/18/19 | Rep. Donna Shalala | Call | Regarding Venezuela/2020 Bonds | Carlos Jordá, Larry Elizondo |
| 11/20/19 | Secretary Wilbur Ross, Department of Commerce | Letter | Expressing appreciation for support of CPC matters | Rick Esser |
| 1/6/20 | Rep. Pete Olson | Meeting | Regarding Venezuela/2020 Bonds | Carlos Jordá, Larry Elizondo |
| 1/31/20 | Erin Mincberg (District Director), Rep. Lizzie Fletcher | Meeting | Regarding CPC's local presence and pending legislation | Thomas Coleman |