

U.S. Department of Justice

Washington, DC 20530

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

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

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

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

1. Name of Registrant

Jonathan McCollum

2. Registration Number

6960

3. Primary Address of Registrant

201 Massachusetts Avenue NE, Suite C-5, Washington, DC 20002

4. Name of Foreign Principal

UNIPEC America Inc.

5. Address of Foreign Principal3050 Post Oak Blvd, Suite 900
Houston, TX 77056**6. Country/Region Represented**

CHINA

7. Indicate whether the foreign principal is one of the following:☐ Government of a foreign country¹☐ Foreign political party☒ Foreign or domestic organization: If either, check one of the following:☐ Partnership☐ Committee☒ Corporation☐ Voluntary group☐ Association☐ Other (*specify*) _____☐ Individual-State nationality _____**8. If the foreign principal is a foreign government, state:**

a) Branch or agency represented by the registrant

b) Name and title of official with whom registrant engages

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

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

- a) Name and title of official with whom registrant engages

- b) Aim, mission or objective of foreign political party

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

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

Commodity Trading and Supply Company

- b) Is this foreign principal:

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

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

See Appendix for Response

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

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

05/11/2021Jonathan McCollum/s/Jonathan McCollum

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
5/10/2021	Jonathan McCollum	<div>DocuSigned by: <i>Jonathan McCollum</i> CAB123C4D91048D...</div>

Appendix

Response to Item 11

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

Item 10(b)(1): UNIPPEC America Inc. is a subsidiary of China International United Petroleum & Chemicals Co., LTD. itself a subsidiary of SINOPEC Corp. which is a publicly traded company, approximately 84% of which is owned by SINOPEC Group, a PRC state owned company.

Item 10(b)(2): UNIPPEC America Inc. is a subsidiary of China International United Petroleum & Chemicals Co., LTD. itself a subsidiary of SINOPEC Corp. which is a publicly traded company, approximately 84% of which is owned by SINOPEC Group, a PRC state owned company.

Item 10(b)(3): UNIPPEC America Inc. is a subsidiary of China International United Petroleum & Chemicals Co., LTD. itself a subsidiary of SINOPEC Corp. which is a publicly traded company, approximately 84% of which is owned by SINOPEC Group, a PRC state owned company.

Item 10(b)(4): UNIPPEC America Inc. is a subsidiary of China International United Petroleum & Chemicals Co., LTD. itself a subsidiary of SINOPEC Corp. which is a publicly traded company, approximately 84% of which is owned by SINOPEC Group, a PRC state owned company.

Item 10(b)(5): UNIPPEC America Inc. is a subsidiary of China International United Petroleum & Chemicals Co., LTD. itself a subsidiary of SINOPEC Corp. which is a publicly traded company, approximately 84% of which is owned by SINOPEC Group, a PRC state owned company.

Item 10(b)(6): UNIPPEC America Inc. is a subsidiary of China International United Petroleum & Chemicals Co., LTD. itself a subsidiary of SINOPEC Corp. which is a publicly traded company, approximately 84% of which is owned by SINOPEC Group, a PRC state owned company.

U.S. Department of Justice

Washington, DC 20530

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

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

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

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

1. Name of Registrant
Jonathan McCollum

2. Registration Number
6960

3. Name of Foreign Principal
UNIPEC America Inc.

Check Appropriate Box:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. What is the date of the contract or agreement with the foreign principal? 05/03/2021
8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

DHC was retained by UNIPEC America, Inc. for government relations consulting to provide regular updates and insights into policy and regulations related to commodities and trade. As part of the representation, DHC may schedule meetings with Congressional and/or Administration staff if requested by UNIPEC America, Inc.

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

Provide reports and briefings on legislative activities. If requested, scheduling meetings with Congressional and/or Administration staff.

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

Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Representation will include regular updates on legislative and regulatory activities. Representation may also include meetings before the United States Congress, Executive Branch and Departments and Agencies of the Federal Government to discuss and understand regulations and policy related to commodities trading.

11. Prior to the date of registration² for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?

Yes ☐ No ☒

If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's activities, including political activities.

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

Date	Contact	Method	Purpose
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-
12. During the period beginning 60 days prior to the obligation to register³ for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes ☐ No ☒

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

Date Received	From Whom	Purpose	Amount/Thing of Value
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13. During the period beginning 60 days prior to the obligation to register⁴ for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal?

Yes ☐ No ☒

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

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

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

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this 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

05/11/2021

Jonathan McCollum

/s/Jonathan McCollum

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

DocuSigned by:

Jonathan McCollum

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5/10/2021

Jonathan McCollum



DAVIDOFF HUTCHER & CITRON LLP

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April 30, 2021

Lui Chambers
Head of Legal, Compliance & Contracts / Compliance Officer
Unipac America, Inc.
3050 Post Oak Blvd. Suite 900
Houston, TX 77056

Re: Federal Lobbying Retainer

Dear Ms. Chambers:

This letter shall serve as a retainer agreement (Agreement) between Unipac America, Inc. (Unipac) and Davidoff Hutcher & Citron LLP (DHC) for consulting services and government relations representation before the United States Congress, the Executive Branch, and departments and agencies of the Federal government.

The period of this agreement shall be for a 12-month term commencing on May 1, 2021 and concluding on April 31, 2022 for a fee of \$17,500 per month. Either party may cancel this agreement for any reason upon giving fifteen (15) days written notice to the other party.

Expenses and disbursements incidental to our representation will be billed separately. Billable expenses may include, but are not limited to, messenger fees, transportation, filing fees, telephone calls, photocopying, travel, accommodations, and lodging, etc. Billable expenses must be reasonable in relation to the engagement.

It is understood that the fees paid to DHC are not contingent upon success in achievement of favorable results of the services provided, and that they do not include litigation or formal appearances at administrative hearings, proceedings, or formal reviews which are in the nature of a court proceeding or an official administrative appeal. The State of New York has recently adopted a Fee Dispute Resolution Program that provides for informal and expeditious resolution of fee disputes between attorneys and clients. Among other things, that program permits a client under some circumstances to demand that a fee disputed be arbitrated. We will provide the necessary information concerning this program in the event of a dispute concerning our fee, or at your request.

In connection with this engagement, DHC will file all documents related to Unipac required by the Secretary of the Senate, the Clerk of the House of Representatives, and the Foreign Agent Registration Act (FARA).

Business Ethics, Facilitation Payments, Anti-Corruption, and Anti-Money Laundering

Unipac and DHC each agree and undertake to the other that in connection with this Agreement, they will each respectively act with proper business ethics and comply with all applicable laws, rules, regulations, decrees and/or official government orders of the United States of America relating to anti-bribery, anti-corruption and anti-money laundering. Unipac and DHC also agree that they shall each respectively take no action which would subject the other to fines or penalties under such laws, regulations, rules, or requirements.

Unipac and DHC each represent, warrant and undertake to the other that they shall not, directly or indirectly:

1. pay, offer, give, or promise to pay, or authorize the payment of any monies or the transfer of any financial or other advantage or other things of value to:
 - (a) a government official or an officer or employee of the United States Congress, the Executive Branch, or departments or agencies of the Federal government;
 - (b) any person acting in an official capacity for or on behalf of the United States Congress, the Executive Branch, or departments or agencies of the Federal government;
 - (c) any political party or official thereof or any candidate for political office, or their employee(s) or agent(s)/representative(s);
 - (d) any other person, individual, or entity at the suggestion, request, direction, or for the benefit of any of the above-described persons and entities, or
2. engage in other acts or transactions in each case if this is in violation of, or inconsistent with, any applicable anti-bribery or anti-money laundering legislation of the United States.

DHC expressly represents and warrants to Unipac that it will not make any payments or give anything of value to officials, officers, or employees of the United States Congress, the Executive Branch, or departments or agencies of the Federal government, in connection with this Agreement which would be inconsistent with or contravene any United States legislation.

Unipac or DHC may terminate the Agreement forthwith upon written notice to the other at any time, if in its reasonable judgment the other is in breach of any of the above representations, warranties, or undertakings.

Unipac Handbook

DHC agrees that all applicable employees providing consulting services and government relations representation on behalf of Unipac have read or will read Unipac's Compliance Handbook before providing any such services and will comply with said Compliance Handbook, incorporated by reference herein.

If the above is in accordance with your understanding, please sign and return. Thank you for your confidence in our firm.

Sincerely,



Jonathan McCollum

Agreed to and Accepted:

Unipac America, Inc.



Lui Chambers

05 / 03 / 2021









Audit Trail

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