

THE BROOKS LAW FIRM, P.C.  
REQUEST FOR FUNDING PARTNERS



## Rare Earth Minerals

The Brooks Law Firm, P.C. are registered as agents for the Republic of Burundi with the U.S. Department of Justice (F.A.R.A. #7178)

# Introduction

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BASED UPON THE FOREGOING, ANY PRIVATE FUNDER MUST BE PREPARED TO BEAR THE ECONOMIC RISK OF INVESTMENT IN THIS PRIVATE FUNDING REQUEST FOR AN INDEFINITE PERIOD OF TIME. ANY POTENTIAL PRIVATE FUNDER IS ENCOURAGED TO SEEK INDEPENDENT LEGAL, INVESTMENT, ACCOUNTING AND TAX ADVICE BEFORE REMITTING ANYTHING OF VALUE TO THIS PRIVATE FUNDING REQUEST.

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## Political Environment<sup>1</sup>

On March 4, 2025, U.S. President Donald Trump argued before Congress in favor of reducing the budget for USAID, the agency responsible for international development assistance. Illustrating his point, Trump singled out Lesotho, criticizing an \$8 million allocation to a nation “no one has ever heard of.” While Trump’s remark sparked indignation among Lesotho’s authorities, it raises broader questions about the U.S. administration’s approach to Africa at a time when geopolitical power balances across the continent are rapidly changing.

Within this shifting landscape, Burundi – often seen as a peripheral – demands particular attention, despite being similar in size to Lesotho at around 27,900 square kilometers, Burundi has six times the population of its southern African counterpart, with 13.7 million inhabitants as of 2023. A former Belgian colony, independent since 1962, Burundi is in the Great Lakes region, bordering the Democratic Republic of Congo (DRC), Uganda and Rwanda. Historically marked by recurrent conflicts and deep ethnic tensions between Hutus and Tutsis, Burundi plunged into a decade-long civil war in 1993, resulting in hundreds of thousands of civilian deaths. Although agriculture – primarily coffee, tea and cotton – accounts for approximately 80 percent of its workforce, Burundi remains one of the world’s poorest nations, with nearly 90 percent of its population living below the poverty line. Beyond agriculture, Burundi possesses significant and largely untapped mineral potential, notably rare earth elements – assets becoming increasingly vital as international competition intensifies. Far from being another blind spot on Washington’s radar, Burundi could soon become a pivotal link in the restructuring of global supply chains for critical minerals.

### The Great Lakes Region: A Strategic Hub for Critical Resources

Africa’s Great Lakes region occupies a central position in global strategic mineral supply chains. Supplying approximately half of the world’s tantalum – essential in the production of

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aircraft turbines and nuclear reactors, as well as substantial volumes of tin, gold and tungsten – this region is a crucial node in industrial supply chains.

Mining in the Great Lakes has historically been characterized by substantial foreign intervention and informal networks largely outside state control. In response, the International Conference on the Great Lakes Region (ICGLR), comprising twelve member states, aims to enforce better-regulated frameworks. In 2010, the ICGLR launched the Regional Initiative against Illegal Exploitation of Natural Resources, structured around six mechanisms to formalizing mining and curb illicit trade. Continuing these efforts, the European Union recently committed €7 million (\$7.5 million) for the project “Peace and Security in the Great Lakes Region” (2024 to 2027). Managed by the ICGLR and the Canadian NGO IMPACT, the initiative focuses on modernizing mineral surveillance systems, reinforcing regional mineral certification, and facilitating market integration between Great Lakes states and international markets.

#### Burundi: A Modest Player with Significant Resources

While Burundi remains a modest player compared to mining giants such as the DRC or Rwanda, it possesses considerable untapped mineral wealth. In 2006, the World Bank’s Poverty Reduction Strategy report highlighted Burundi’s mineral potential, estimating reserves at 11,641 tons of nickel, 1,580 tons of vanadium, and 1.5 tons of gold. Recent reports by IMPACT broadened the spectrum of Burundi’s mineral wealth to include copper, uranium, tin, platinum, tantalum, and cobalt. In 2019, the US Geological Survey attributed around 2 percent of global tantalum production to Burundi.

Resource management falls under the jurisdiction of Burundi’s Ministry of Hydraulic Energy and Mines. Since taking office in 2020, President Évariste Ndayishimiye has adopted an assertive stance towards natural resource governance. In 2021, he halted foreign mining operations, denouncing unfair profit-sharing arrangements and the exploitation of national resources. In 2022, the government solidified this position by announcing that the Comptoirs

miniers des exploitations minières du Burundi (COMEBU), Burundi's national mining company, would become the exclusive operator authorized to conduct mining activities. Such nationalization has not dampened enthusiasm for exploration. A significant discovery announced in July 2024 revealed an estimated tin and cobalt reserves of approximately 12.7 million tons, valued at over \$50 billion.

### Rare Earth Potential

Rare earth elements, comprising seventeen essential metals indispensable to modern technologies, have become focal points of economic and geopolitical rivalry. From neodymium used in wind turbines to gadolinium in medical imaging, rare earth elements – often described as economic vitamins – play critical roles in advanced technologies, including military equipment like America's F-35 fighter jets. However, their extraction and refining processes are notoriously energy-intensive, expensive and environmentally damaging.

In 2021, Burundi produced around 200 tons of these elements, ranking eleventh globally, but accounting for only 0.1 percent of worldwide production. Although modest, this figure requires contest: Burundi's entry into the rare earth sector is recent, beginning only in 2017 with the Gakara mine (which is rich in bastnasite and monazite), whereas the United States, China and Japan established their industries in the 1990s. Moreover, Burundi's political instability has significantly hindered the sector's sustainable development.

### Gakara: A Promising Yet Stalled El Dorado

With rare earth oxide concentrations ranging between 47 percent and 67 percent, Gakara, located in western Burundi, is among Africa's most promising rare earth deposits. At the same time, it highlights Burundi's structural challenges in fully leveraging its mineral potential.

Gakara was operated by the UK-based Rainbow Rare Earths (RRE) under a twenty-five-year contract which was abruptly halted by the Burundian government in 2021. This sudden halt underscored intensifying global competition for Rare Earths, jeopardizing Burundi and RRE's

ambitions to offer credible alternatives to Chinese dominance in this sector. George Bennett, RRE's CEO, recently reiterated his commitment to prioritizing Western clients in order to reduce global dependence. This strategy is explicitly linked to the Phalaborwa project in South Africa, where RRE collaborates with the US government which invested \$50 million in January 2024. With the current deterioration of US-South African relations, however, the future of this project remains uncertain. Still, it has reignited speculation about potential American backing for RRE's return to the Gakara project.

The relationship between RRE and the Burundian government is uncertain. In September 2023, RRE announced a reduction in its investments in Gakara, shifting its focus toward more stable projects – a decision that raises doubts about the future of this promising mining site.

### Foreign Interest and Rivalries

#### China



China is the dominant player in the global rare earth market. With its industrial supremacy, comprehensive control of the value chain, and geopolitical leverage, Beijing enjoys an undeniable advantage over its competitors. As of 2023, China accounted for 69 percent of the world's rare earth mineral production, but its dominance is even more pronounced in refining, controlling 85 percent of global processing capacity for light rare earth elements and a staggering 100 percent for heavy rare earth elements.

By comparison, the United States (12 percent), Myanmar (11 percent) and Australia (5 percent) lag far behind, underscoring China's near-total control. Currently, no Western power can match China's sophisticated and tightly integrated industrial ecosystem, making any attempt at supply diversification extraordinarily challenging and further solidifying China's strategic indispensability.

Africa occupies a pivotal position in this geopolitical equation. China has steadily increased its foothold on the continent through extensive trade agreements and substantial investments. By 2023, Sino-African trade had reached \$300 billion, making China Africa's leading importer of mineral resources, consuming around one-third of the continent's total mineral exports. In the Great Lakes region, Beijing deploys a comprehensive, multi-sector strategy, gradually expanding its influence.

China, for example, dominates much of the DRC's mining industry – 60 percent of Chinese cobalt consumption originates from Congolese mines.

In September 2024, Rwanda reached a significant milestone in its relations with China, elevating bilateral ties to the level of a strategic partnership. China invests heavily in Rwandan infrastructure and agriculture, illustrated by a \$60 million loan provided during the COVID-19 pandemic, a \$40 million investment into the Giseke irrigation project, and the cancellation of a \$6 million debt.

In Burundi, Beijing follows a similar pattern, enhancing its strategic partnership through increased trade – with Burundian exports to China at \$10 million in 2023, contrasted with \$105 million in Chinese imports to Burundi – and infrastructural investments, notably the railroad connecting Dar es Salaam to Burundi, vital for exporting minerals such as nickel.

Nonetheless, Beijing's expansive approach across borders has drawn criticism, particularly due to opaque contractual agreements and limited tangible benefits for local populations.

Given these dynamics, it is difficult to envision China overlooking Burundi's potential in rare earth elements. Strengthening Beijing's presence in Burundi's rare earth sector would further solidify its near-monopoly across the entire value chain. Politically, China already benefits from favorable conditions: Burundi, Rwanda and the DRC formally support Beijing's "One-China" policy, deepening diplomatic alignment. As the United States and Europe urgently seek to diversify their sources of rare earths, expanded Chinese control over Burundi's reserves would further entrench global dependence on Beijing.

### The United States of America



Faced with China's growing dominance in the rare earth supply chain, the United States' strategic posture is increasingly uncertain. The Trump administration has made its objective clear: restoring American economic supremacy, particularly in regions and sectors where it has diminished. Within this broader geoeconomic context, securing access to critical natural resources, particularly rare earth elements, has become a top priority. In Ukraine, Greenland, or Canada, American mining initiatives primarily aim to consolidate control over strategic resources, sometimes at the expense of traditional multilateral diplomatic frameworks.

In this context, Burundi, though modest in production volumes, could represent a strategically valuable ally. The stakes extend far beyond mining. For Washington, Burundi offers an opportunity to establish a credible alternative to Chinese influence in Africa at a time when American presence on the continent is waning. Indeed, the recent defunding of USAID – a central pillar of American soft power in Africa – has created a strategic void quickly filled by Beijing. In Rwanda, for instance, the termination of approximately \$170 million in annual American aid was perceived as a withdrawal, opening space for China to strategically invest in healthcare and agriculture, sectors previously supported by the United States.

The Gakara project therefore holds significant potential as a geopolitical lever to reignite American influence in the Great Lakes region. Burundi's institutional environment admittedly remains unknown, and mistrust towards foreign actors has deepened following previous mining ventures perceived as exploitative. Thus, for Washington or any private investment group, the challenge transcends economic interests – it must convincingly demonstrate that its model offers greater sustainability and equity compared to the Chinese alternative. Failing this, the United States and other private funding groups, risk being sidelined in an increasingly competitive struggle for critical African resources.

### M23 Movement

The resurgence since 2022 of the March 23 (M23) Movement, an armed rebel group active in the eastern DRC, underscores a troubling geopolitical dynamic: the revival of hybrid conflicts that blend ethnic grievances, regional military strategies, and struggles over strategic resources. With support from Rwanda, M23 has recently seized control of Goma and Bukavu, two crucial urban centers in DRC's North and South Kivu provinces, thereby solidifying its grip over vital economic and logistical crossroads. Although ceasefire negotiations continue, fighting between M23 and the Congolese Armed Forces persists in the eastern DRC.

Though originally rooted in ethno-political tensions between Hutu and Tutsi groups, M23's contemporary agenda reveals a wartime political economy heavily focused on resource appropriation. The Movement's capture of the strategic Rubaya coltan mine in April 2024 serves as a clear illustration of this predatory logic. Coltan, a crucial mineral to digital technologies and defense industries, places these contested territories at the epicenter of a broader geopolitical competition over scarce resources. Beyond coltan, the DRC holds approximately 70 percent of the world's cobalt reserves and significant other minerals.

Burundi, a close DRC ally, carefully monitors these developments. Already hosting around 63,000 Congolese refugees, Burundi fears a potential spillover of violence onto its own territory. Beyond military solidarity, latent geopolitical tensions simmer between Burundi and Rwanda. Burundi's demographic majority of Hutus (comprising 83 to 85 percent of the population) contrasts sharply with President Paul Kagame's Tutsi-led regime in Rwanda, fueling underlying regional rivalries. In 2016, the United States accused Rwanda of interfering in Burundi's politics. More recently, in 2023 Kagame referred to the "pre-colonial borders of the Kingdom of Rwanda," encompassing Burundi, Uganda and eastern DRC – a statement hinting at an expansionist regional vision from Kigali.

The international community's inability to coordinate a unified response to the rising power of M23 has created a strategic vacuum. This situation may catalyze shifts in regional power dynamics, with profound implications for Burundi's stability, the territorial integrity of the DRC, and the security of global supply chains for critical resources. A territorial escalation of the conflict would not merely constitute a humanitarian crisis, but a significant geopolitical challenge whose ramifications would extend far beyond Central Africa.

#### Burundi: A Bulwark Against Terrorism

In a May 2022, attacks by the terrorist group, al-Shabab on an African Union (AU) base in Somalia, at least 30 Burundian soldiers were killed. The al-Shabab group claimed to have killed more than 170 AU soldiers, mostly from Burundi, in the attack, though this number is disputed by the Burundian army. The Burundian army reported 10 soldiers killed and 5 missing. Al-Shabab also claimed to have captured an unknown number of soldiers as prisoners of war.

The attack occurred in the town of El-Baraf, in the Middle Shabelle region of Somalia, and targeted an AU base. Al-Shabab used car bombs and heavy gunfire in the assault. There the Burundian soldiers, along with elements of the United States military fought against the spread of terrorism on the African continent. This commitment against terror is at the heart of H.E Évariste Ndayishimiye's administration, and aligns perfectly with U.S. interests.

#### Redefining Power through Resources: Burundi's Strategic Bet on Rare Earth Elements

Control over the rare earth value chain has emerged as a pivotal factor in contemporary geopolitical reconfigurations. These critical minerals, central to industrial, energy, and military competition, are reshaping global power dynamics between established and emerging nations. Mastering their extraction, refining, and commercialization processes is

becoming a major lever of national sovereignty. Within the context, Africa, and particularly the Great Lakes region, occupies a position of crucial strategic importance.

Burundi, grappling with governance, ongoing armed conflicts nearby, and concerns of predatory exploitation of its natural resources, must also confront the significant social challenges inherent in rare earth extraction.

A World Bank report identified the inability to manage natural resources “transparently and equitably” as a major driver of forced population displacement. By 2024, nearly 6.9 million internally displaced persons were recorded in the DRC, primarily concentrated in the mineral rich provinces of North Kivu, South Kivu, Ituri, and Tanganyika.

Burundi stands at a decisive crossroads. One of the world’s poorest nations, it now occupies a critical position within the highly strategic sector. It will require substantial support from both institutional and private actors to develop its rare earth resources sustainably. The decision to maintain COMEBU as the sole authorized operator reflects a broader pan-African trend toward asserting sovereignty over strategic economic sectors and reducing foreign interference. Burundi seeks private funding so it will not jeopardize its mining potential.

Globally, rare earth extraction projects are proliferating. In Africa, fields such as Songwe Hill in Malawi, operated by the Canadian company Mkango Resources Limited, or Marbounié in Gabon (temporarily suspended but run by the Compagnie minière de l’Ogooue, a subsidiary of Eramet and the Gabonese state), exemplify the continent’s promising yet technically complex and economically risky deposits. Beyond Africa, initiatives are advancing in Ukraine, Greenland, and even France, where a recently announced mega-refining plant dedicated to heavy rare earth elements underscores Europe’s determination to repatriate critical segments of the supply chain.

As a time when global powers are engaged in clashes over tariffs, targeted embargoes, and commercial rivalries over the control of natural resources, Burundi finds itself at a decisive crossroads in its history – if it succeeds in developing its rare earth potential in a sovereign and sustainable manner. In today’s global economy of critical minerals, mastering one’s natural wealth is no longer merely an economic issue; it is an act of sovereignty, a lever for emancipation, and a vital step toward enabling Burundi to advance onto the world stage.

## CIA World Factbook: Burundi

According to the CIA World Factbook, Burundi's top five export commodities based on value in dollars are: gold, coffee, tea, tin ores, iron bars (2023). Given the significant reserves of rare earth minerals found at the Gakara project, Burundi seems strategically stationed as a long term economic generator.

The Burundi military is comprised of approximately 30,000 active-duty troops (2024). It's military currently accounts for 3.7% of GDP (2023 est.).

As of February 21, 2025, the U.S. Department of State has issued a Level 3 Travel Advisory for Burundi (Reconsider Travel). However, the Brooks Law Firm's travel to Bujumbura, Burundi was under the assent of the Republic of Burundi.

## The Registered Agents

Since 2022 the Brooks Law Firm, P.C. ([www.thebrooksfirm.org](http://www.thebrooksfirm.org)) has been the Republic of Burundi's Registered Agents with the United States Department of Justice. The Foreign Agent Registration Act (F.A.R.A.) registration number is 7178. The law partners, Hycall Brooks, III (University of Virginia Law School graduate) and Charles I. Brooks (University of Miami Law School graduate) have acted at the behest of H.E. Évariste Ndayishimiye, Chief of Staff General Alloys, and current Ambassador to the U.S., Jean Bosco Barege.

## The Request

The Republic of Burundi seeks private investors desiring to purchase nickel, cobalt, rare earth minerals from it. This initial request seeks a private investment group willing to provide capital in the amount of 5 Billion USD in its mining sector, to create a sustainable income stream for the investors and Burundi.

This material is distributed by Charles & Hycall Brooks, Attorneys at Law, on behalf of the Republic of Burundi. Additional information is on file with the U.S. Department of Justice, Washington, D.C.

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## Political Environment<sup>1</sup>

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### The Great Lakes Region: A Strategic Hub for Critical Resources

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aircraft turbines and nuclear reactors, as well as substantial volumes of tin, gold and tungsten – this region is a crucial node in industrial supply chains.

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miniers des exploitations minières du Burundi (COMEBU), Burundi's national mining company, would become the exclusive operator authorized to conduct mining activities. Such nationalization has not dampened enthusiasm for exploration. A significant discovery announced in July 2024 revealed an estimated tin and cobalt reserves of approximately 12.7 million tons, valued at over \$50 billion.

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### Gakara: A Promising Yet Stalled El Dorado

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### Foreign Interest and Rivalries

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By comparison, the United States (12 percent), Myanmar (11 percent) and Australia (5 percent) lag far behind, underscoring China's near-total control. Currently, no Western power can match China's sophisticated and tightly integrated industrial ecosystem, making any attempt at supply diversification extraordinarily challenging and further solidifying China's strategic indispensability.

Africa occupies a pivotal position in this geopolitical equation. China has steadily increased its foothold on the continent through extensive trade agreements and substantial investments. By 2023, Sino-African trade had reached \$300 billion, making China Africa's leading importer of mineral resources, consuming around one-third of the continent's total mineral exports. In the Great Lakes region, Beijing deploys a comprehensive, multi-sector strategy, gradually expanding its influence.

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In Burundi, Beijing follows a similar pattern, enhancing its strategic partnership through increased trade – with Burundian exports to China at \$10 million in 2023, contrasted with \$105 million in Chinese imports to Burundi – and infrastructural investments, notably the railroad connecting Dar es Salaam to Burundi, vital for exporting minerals such as nickel.

Nonetheless, Beijing's expansive approach across borders has drawn criticism, particularly due to opaque contractual agreements and limited tangible benefits for local populations.

Given these dynamics, it is difficult to envision China overlooking Burundi's potential in rare earth elements. Strengthening Beijing's presence in Burundi's rare earth sector would further solidify its near-monopoly across the entire value chain. Politically, China already benefits from favorable conditions: Burundi, Rwanda and the DRC formally support Beijing's "One-China" policy, deepening diplomatic alignment. As the United States and Europe urgently seek to diversify their sources of rare earths, expanded Chinese control over Burundi's reserves would further entrench global dependence on Beijing.

### The United States of America



Faced with China's growing dominance in the rare earth supply chain, the United States' strategic posture is increasingly uncertain. The Trump administration has made its objective clear: restoring American economic supremacy, particularly in regions and sectors where it has diminished. Within this broader geoeconomic context, securing access to critical natural resources, particularly rare earth elements, has become a top priority. In Ukraine, Greenland, or Canada, American mining initiatives primarily aim to consolidate control over strategic resources, sometimes at the expense of traditional multilateral diplomatic frameworks.

In this context, Burundi, though modest in production volumes, could represent a strategically valuable ally. The stakes extend far beyond mining. For Washington, Burundi offers an opportunity to establish a credible alternative to Chinese influence in Africa at a time when American presence on the continent is waning. Indeed, the recent defunding of USAID – a central pillar of American soft power in Africa – has created a strategic void quickly filled by Beijing. In Rwanda, for instance, the termination of approximately \$170 million in annual American aid was perceived as a withdrawal, opening space for China to strategically invest in healthcare and agriculture, sectors previously supported by the United States.

The Gakara project therefore holds significant potential as a geopolitical lever to reignite American influence in the Great Lakes region. Burundi's institutional environment admittedly remains unknown, and mistrust towards foreign actors has deepened following previous mining ventures perceived as exploitative. Thus, for Washington or any private investment group, the challenge transcends economic interests – it must convincingly demonstrate that its model offers greater sustainability and equity compared to the Chinese alternative. Failing this, the United States and other private funding groups, risk being sidelined in an increasingly competitive struggle for critical African resources.

### M23 Movement

The resurgence since 2022 of the March 23 (M23) Movement, an armed rebel group active in the eastern DRC, underscores a troubling geopolitical dynamic: the revival of hybrid conflicts that blend ethnic grievances, regional military strategies, and struggles over strategic resources. With support from Rwanda, M23 has recently seized control of Goma and Bukavu, two crucial urban centers in DRC's North and South Kivu provinces, thereby solidifying its grip over vital economic and logistical crossroads. Although ceasefire negotiations continue, fighting between M23 and the Congolese Armed Forces persists in the eastern DRC.

Though originally rooted in ethno-political tensions between Hutu and Tutsi groups, M23's contemporary agenda reveals a wartime political economy heavily focused on resource appropriation. The Movement's capture of the strategic Rubaya coltan mine in April 2024 serves as a clear illustration of this predatory logic. Coltan, a crucial mineral to digital technologies and defense industries, places these contested territories at the epicenter of a broader geopolitical competition over scarce resources. Beyond coltan, the DRC holds approximately 70 percent of the world's cobalt reserves and significant other minerals.

Burundi, a close DRC ally, carefully monitors these developments. Already hosting around 63,000 Congolese refugees, Burundi fears a potential spillover of violence onto its own territory. Beyond military solidarity, latent geopolitical tensions simmer between Burundi and Rwanda. Burundi's demographic majority of Hutus (comprising 83 to 85 percent of the population) contrasts sharply with President Paul Kagame's Tutsi-led regime in Rwanda, fueling underlying regional rivalries. In 2016, the United States accused Rwanda of interfering in Burundi's politics. More recently, in 2023 Kagame referred to the "pre-colonial borders of the Kingdom of Rwanda," encompassing Burundi, Uganda and eastern DRC – a statement hinting at an expansionist regional vision from Kigali.

The international community's inability to coordinate a unified response to the rising power of M23 has created a strategic vacuum. This situation may catalyze shifts in regional power dynamics, with profound implications for Burundi's stability, the territorial integrity of the DRC, and the security of global supply chains for critical resources. A territorial escalation of the conflict would not merely constitute a humanitarian crisis, but a significant geopolitical challenge whose ramifications would extend far beyond Central Africa.

#### Burundi: A Bulwark Against Terrorism

In a May 2022, attacks by the terrorist group, al-Shabab on an African Union (AU) base in Somalia, at least 30 Burundian soldiers were killed. The al-Shabab group claimed to have killed more than 170 AU soldiers, mostly from Burundi, in the attack, though this number is disputed by the Burundian army. The Burundian army reported 10 soldiers killed and 5 missing. Al-Shabab also claimed to have captured an unknown number of soldiers as prisoners of war.

The attack occurred in the town of El-Baraf, in the Middle Shabelle region of Somalia, and targeted an AU base. Al-Shabab used car bombs and heavy gunfire in the assault. There the Burundian soldiers, along with elements of the United States military fought against the spread of terrorism on the African continent. This commitment against terror is at the heart of H.E Évariste Ndayishimiye's administration, and aligns perfectly with U.S. interests.

#### Redefining Power through Resources: Burundi's Strategic Bet on Rare Earth Elements

Control over the rare earth value chain has emerged as a pivotal factor in contemporary geopolitical reconfigurations. These critical minerals, central to industrial, energy, and military competition, are reshaping global power dynamics between established and emerging nations. Mastering their extraction, refining, and commercialization processes is

becoming a major lever of national sovereignty. Within the context, Africa, and particularly the Great Lakes region, occupies a position of crucial strategic importance.

Burundi, grappling with governance, ongoing armed conflicts nearby, and concerns of predatory exploitation of its natural resources, must also confront the significant social challenges inherent in rare earth extraction.

A World Bank report identified the inability to manage natural resources “transparently and equitably” as a major driver of forced population displacement. By 2024, nearly 6.9 million internally displaced persons were recorded in the DRC, primarily concentrated in the mineral rich provinces of North Kivu, South Kivu, Ituri, and Tanganyika.

Burundi stands at a decisive crossroads. One of the world’s poorest nations, it now occupies a critical position within the highly strategic sector. It will require substantial support from both institutional and private actors to develop its rare earth resources sustainably. The decision to maintain COMEBU as the sole authorized operator reflects a broader pan-African trend toward asserting sovereignty over strategic economic sectors and reducing foreign interference. Burundi seeks private funding so it will not jeopardize its mining potential.

Globally, rare earth extraction projects are proliferating. In Africa, fields such as Songwe Hill in Malawi, operated by the Canadian company Mkango Resources Limited, or Marbounié in Gabon (temporarily suspended but run by the Compagnie miniere de l’Ogooue, a subsidiary of Eramet and the Gabonese state), exemplify the continent’s promising yet technically complex and economically risky deposits. Beyond Africa, initiatives are advancing in Ukraine, Greenland, and even France, where a recently announced mega-refining plant dedicated to heavy rare earth elements underscores Europe’s determination to repatriate critical segments of the supply chain.

As a time when global powers are engaged in clashes over tariffs, targeted embargoes, and commercial rivalries over the control of natural resources, Burundi finds itself at a decisive crossroads in its history – if it succeeds in developing its rare earth potential in a sovereign and sustainable manner. In today’s global economy of critical minerals, mastering one’s natural wealth is no longer merely an economic issue; it is an act of sovereignty, a lever for emancipation, and a vital step toward enabling Burundi to advance onto the world stage.

## CIA World Factbook: Burundi

According to the CIA World Factbook, Burundi's top five export commodities based on value in dollars are: gold, coffee, tea, tin ores, iron bars (2023). Given the significant reserves of rare earth minerals found at the Gakara project, Burundi seems strategically stationed as a long term economic generator.

The Burundi military is comprised of approximately 30,000 active-duty troops (2024). It's military currently accounts for 3.7% of GDP (2023 est.).

As of February 21, 2025, the U.S. Department of State has issued a Level 3 Travel Advisory for Burundi (Reconsider Travel). However, the Brooks Law Firm's travel to Bujumbura, Burundi was under the assent of the Republic of Burundi.

## The Registered Agents

Since 2022 the Brooks Law Firm, P.C. ([www.thebrooksfirm.org](http://www.thebrooksfirm.org)) has been the Republic of Burundi's Registered Agents with the United States Department of Justice. The Foreign Agent Registration Act (F.A.R.A.) registration number is 7178. The law partners, Hycall Brooks, III (University of Virginia Law School graduate) and Charles I. Brooks (University of Miami Law School graduate) have acted at the behest of H.E. Évariste Ndayishimiye, Chief of Staff General Alloys, and current Ambassador to the U.S., Jean Bosco Barege.

## The Request

The Republic of Burundi seeks private investors desiring to purchase nickel, cobalt, rare earth minerals from it. This initial request seeks a private investment group willing to provide capital in the amount of 5 Billion USD in its mining sector, to create a sustainable income stream for the investors and Burundi.

This material is distributed by Charles & Hycall Brooks, Attorneys at Law, on behalf of the Republic of Burundi. Additional information is on file with the U.S. Department of Justice, Washington, D.C.