

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 09/30/2024  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant AND Partners LLC (b) Registration Number 7377  
(c) Primary Business Address 1725 19th Street NW, Washington, DC 20009

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<sup>1</sup>, 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.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes  No

If yes, identify each such person and describe the service rendered.

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

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes  No

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, 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
Ankit Desai	owner and sole member	Niels Troost	09/30/2024

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

**II - FOREIGN PRINCIPAL**

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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
Niels Troost	09/30/2024

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8. Has the registrant registered for any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

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

None

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10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A<sup>3</sup> and/or B<sup>4</sup> previously filed for any foreign principal(s)? Yes  No

If no, and there is a change to any Exhibit A and/or B, please file an amendment if it is required.

If yes, furnish the following information:

Foreign Principal	Date Amended
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<sup>2</sup> 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.)

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

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

**III - ACTIVITIES**

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

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

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity<sup>5</sup> as defined below? Yes  No

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

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

See Appendix for Response

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

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes  No

If yes, describe fully.

Foreign Principal	Activities/Services

<sup>5</sup> "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.<sup>6</sup>

Foreign Principal See Appendix for Response	Date Received	From Whom	Purpose	Amount	Subtotal
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\$ 610,252.57

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign<sup>7</sup>, 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<sup>8</sup> to its registration? Yes  No

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

If no, please file the required Exhibit D.

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant received any thing of value<sup>9</sup> 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
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<sup>6, 7</sup> 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)).

<sup>8</sup> 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.

<sup>9</sup> 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
Niels Troost	04/24/2024	Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.	Legal Fees	\$ 1,620.00	
Niels Troost	04/24/2024	Sandler Reiff Lamb Rosenstein & Birkenstock, P.C. Curb Mobility	Legal Fees	\$ 7,421.50	
Niels Troost	05/09/2024	Lyft	Taxi	\$ 41.60	
Niels Troost	05/09/2024	Lyft	Taxi	\$ 74.04	
Niels Troost	05/09/2024	American Airlines	Taxi	\$ 38.71	
Niels Troost	05/09/2024	The Edition	Taxi	\$ 33.87	
Niels Troost	05/09/2024	Uber	Flight from DC to NYC	\$ 400.19	
Niels Troost	05/10/2024	Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.	NYC Hotel	\$ 556.96	
Niels Troost	05/10/2024	Birkenstock, P.C.	Taxi	\$ 65.70	
Niels Troost	06/03/2024	Lyft	Legal Fees	\$ 476.50	
		Lyft			
		American Airlines			
		The Mercer			
Niels Troost	09/23/2024	-----	Taxi	\$ 124.82	
Niels Troost	09/24/2024		Taxi	\$ 87.97	
Niels Troost	09/24/2024		Airfare	\$ 368.95	
Niels Troost	09/24/2024		Hotel Lodging	\$ 1,064.93	
Niels Troost	-----		----->	----->	\$12,375.74

\$ 12,375.74  
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Total

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

During this 6 month reporting period, has the registrant disposed of anything of value<sup>10</sup> 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
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**(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<sup>11</sup> 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
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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?<sup>12</sup> 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.

Niels Troost

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes  No

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

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

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

<sup>12</sup> 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.

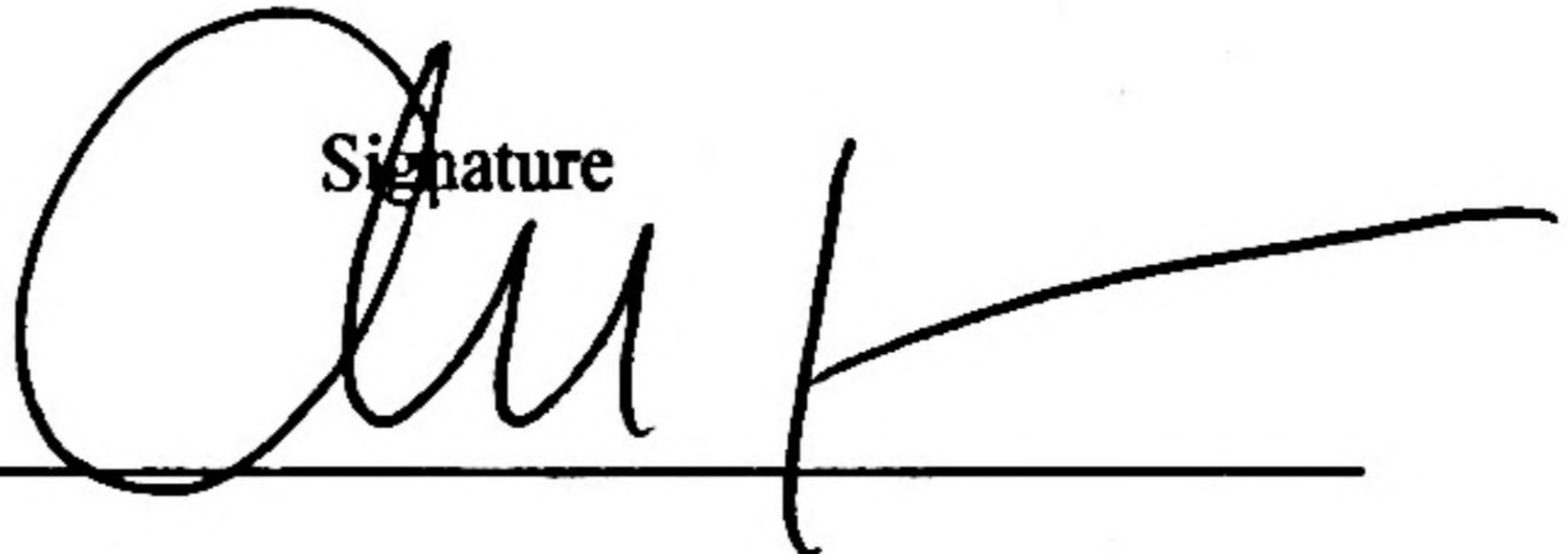
Date	Printed Name	Signature <sup>13</sup>
10/18/2024	Ankit Desai	<input data-bbox="854 499 922 529" type="text" value="Sign"/> /s/Ankit Desai
_____	_____	<input data-bbox="854 583 922 613" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 672 922 701" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 760 922 789" type="text" value="Sign"/> _____

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature
10/18/24	Ankit N. Desai	

## Appendix Response to Item 11

**Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:**

Foreign Principal(s)	Activities/Services
Niels Troost	<p>Registrant provided professional consulting services to the Foreign Principal in the form of researching potential sanctions by the United States Office of Foreign Assets Control; identifying key U.S. private sector and government personnel to advance the Foreign Principal's personal and commercial interests; and advocating and communicating with key U.S. private sector and government personnel regarding the Foreign Principal's personal and commercial interests.</p> <p>Aside from activities taken to wind down the representation and file this supplemental report, Registrant engaged in no additional substantive activities for the Foreign Principal between September 30, 2024 and October 16, 2024, which is the date that the relationship formally terminated. As of October 16, 2024, Registrant has ceased all activities on behalf of the Foreign Principal.</p>

## **Appendix**

### **Response to Item 12-Description**

Niels Troost: Registrant provided professional consulting services to the Foreign Principal in the form of researching potential sanctions by the United States Office of Foreign Assets Control; identifying key U.S. private sector and government personnel to advance the Foreign Principal's personal and commercial interests; and advocating and communicating with key U.S. private sector and government personnel regarding the Foreign Principal's personal and commercial interests.

## Appendix Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Niels Troost	04/10/2024	Donita Lucas-Brown, Scheduler, Treasury Dept., Office of Terrorist Financing and Financial Crimes	Email	Meeting request
Niels Troost	04/10/2024	Donita Lucas-Brown, Scheduler, Treasury Dept., Office of Terrorist Financing and Financial Crimes	Email	Meeting request
Niels Troost	05/01/2024	LeeAnn Holman, Senior Advisor to Assistant Secretary for Terrorist Financing, Treasury Dept.	Meeting	US sanctions regime
Niels Troost	08/11/2024	LeeAnn Holman, Senior Advisor to Assistant Secretary for Terrorist Financing, Treasury Dept.	Email	US sanctions regime
Niels Troost	08/26/2024	Neil Bhatiya, Senior Policy Advisor, Treasury Dept.; LeeAnn Holman, Senior Advisor to Assistant Secretary for Terrorist Financing, Treasury Dept.	Email	Meeting request

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

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Niels Troost	03/12/2024	Niels Troost	Fee for services	\$49,975.00	
Niels Troost	03/13/2024	Niels Troost	Fee for services	\$50,000.00	
Niels Troost	04/03/2024	Niels Troost	Fee for services and reimbursement of legal fees	\$57,496.50	
Niels Troost	04/04/2024	Niels Troost	Fee for services	\$50,000.00	
Niels Troost	05/01/2024	Niels Troost	Fee for services and reimbursement of legal fees	\$51,595.00	
Niels Troost	05/03/2024	Niels Troost	Fee for services	\$49,975.00	
Niels Troost	06/04/2024	Niels Troost	Fee for services and reimbursement of travel expenses	\$51,211.07	
Niels Troost	06/12/2024	Niels Troost	Fee for services	\$50,000.00	
Niels Troost	07/03/2024	Niels Troost	Fee for services	\$100,000.00	
Niels Troost	08/13/2024	Niels Troost	Fee for services	\$100,000.00	
Niels Troost	-----	-----	-----	----->	\$610,252.57

## 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
03/04/2024	Ankit Desai	BackPAC; Rep. Don Beyer	Online	\$ 1,000.00
03/05/2024	Ankit Desai	Kaine Victory Fund; Sen. Tim Kaine, Democratic Party of Virginia	Online	\$ 3,300.00
03/11/2024	Ankit Desai	DSCC	Online	\$ 2,500.00
03/11/2024	Ankit Desai	Friends of Sherrod Brown; Sen. Sherrod Brown	Online	\$ 1,000.00
03/11/2024	Ankit Desai	Adelante Fund; Sen. Alex Padilla	Online	\$ 2,500.00
03/18/2024	Ankit Desai	Friends of Chris Murphy; Sen. Chris Murphy	Online	\$ 1,000.00
04/02/2024	Ankit Desai	Gallego for Arizona; Rep. Ruben Gallego	Online	\$ 3,300.00
04/04/2024	Ankit Desai	Jersey Values PAC; Rep. Josh Gottheimer	Online	\$ 1,500.00
04/04/2024	Ankit Desai	Bob Casey for Senate, Inc.; Sen. Bob Casey	Online	\$ 800.00
05/02/2024	Ankit Desai	Peters for Michigan; Sen. Gary Peters	Online	\$ 1,200.00
06/12/2024	Ankit Desai	Maggie for Congress; Maggie Goodlander	Online	\$ 1,000.00
06/12/2024	Ankit Desai	Nick Simmons for Senate; Nick Simmons	Online	\$ 250.00
06/20/2024	Ankit Desai	Suhas for Virginia; Suhas Subramanyam	Online	\$ 1,000.00
07/08/2024	Ankit Desai	Schiff for Senate; Rep. Adam Schiff	Online	\$ 2,000.00
07/23/2024	Ankit Desai	Narragansett Bay PAC; Sen. John Reed	Online	\$ 2,500.00
07/23/2024	Ankit Desai	Giddy Up PAC; Sen. John Hickenlooper	Online	\$ 2,500.00
07/23/2024	Ankit Desai	Cleo Fields for Congress; Cleo Fields	Online	\$ 2,000.00
07/23/2024	Ankit Desai	Blue Wave Project; Sen. Jeff Merkley	Online	\$ 500.00
08/19/2024	Ankit Desai	Alsobrooks Blunt Rochester Victory Fund	Online	\$ 2,000.00
08/25/2024	Ankit Desai	DNC	Online	\$ 3,300.00
09/16/2024	Ankit Desai	Suhas for Virginia; Suhas Subramanyam	Online	\$ 1,000.00
09/16/2024	Ankit Desai	Jacky Rosen Victory Fund; Sen. Jacky Rose	Online	\$ 2,500.00
09/16/2024	Ankit Desai	Brown Victory Fund; Sam Brown	Online	\$ 3,300.00
09/16/2024	Ankit Desai	Slotkin Victory Fund 2024; Rep. Elissa Slotkin	Online	\$ 2,500.00
09/17/2024	Ankit Desai	Robert Garcia for Congress; Rep. Robert Garcia	Online	\$ 1,000.00