

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 05/31/2026  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant (b) Registration Number  
 Vision Americas International LLC 7413
- (c) Primary Business Address  
 800 Connecticut Ave., NW Suite 300, Washington, DC 20006

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 <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship           | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- |                          |                              |  |
|--------------------------|------------------------------|--|
| (1) Name                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
- (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
------	-------------------	-------------	----------	--------------

(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Name	Position	Date Ceased
------	----------	-------------

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

Yes  No

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

Name	Foreign Principal(s) Represented	Services
------	----------------------------------	----------

(b) During this 6 month reporting period, did any employee or individual working in any capacity (including a partner, officer, director or similar official), 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
------	-------------------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals (including partners, officers, directors or similar officials), 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
Mr. Jose Vicente Carraquero	Subcontractor/Political analyst	03/01/2026
Maria Camila Reina Rivera	Consultant	01/10/2026

(d) Have any employees or individuals (including partners, officers, directors or similar officials), 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
See Appendix for Response			

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

**II - FOREIGN PRINCIPAL**


---

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

Yes  No

If yes, furnish the following information:

Foreign Principal

Date of Termination

---

8. Has the registrant 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

---

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.

Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP

---

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

Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins  
LLP

01/21/2026

---

<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, or from any other source, for or in the interests of any 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
---	---------------	-----------	---------	--------	----------

\$ 850,679.63

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
-------------------	---------------	-----------	---------	----------------

<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
See Appendix for Response					

\$ 281,241.99
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
-------------------	------	-----------	---------	----------------

**(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
------	-------	----------------------------------	--------	-----------------------

---

<sup>10, 11</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.

## 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.

Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP

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

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

Foreign Principal	Period of Time	Amount
-------------------	----------------	--------

Total

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

- Magazine or newspaper     Advertising campaigns     Press releases     Pamphlets or other publications  
 Lectures or speeches     Radio or TV broadcasts     Motion picture films     Letters or telegrams  
 Email

Website URL(s): https://pdvsa-adhoc.com/en/home/

Social media websites URL(s): \_\_\_\_\_

Other (specify) Podcasts, documentary film, and newsletters

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

- Public officials     Newspapers     Libraries  
 Legislators     Editors     Educational institutions  
 Government agencies     Civic groups or associations     Nationality groups  
 Other (specify) website visitors

20. Indicate the language used in the informational materials:

English

Other (specify) spanish

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.

---

**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>
06/24/2026	Marcela Prieto-Botero	<input data-bbox="854 499 922 529" type="text" value="Sign"/> /s/Marcela Prieto-Botero
_____	_____	<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"/> _____

---

<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
June 22, 2026	Marcela Prieto-Botero	
_____	_____	_____
_____	_____	_____
_____	_____	_____

## Appendix Response to Item 5(d)

**Item 5(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? If yes, furnish the following information:**

<b>Name</b>	<b>Position or Connection</b>	<b>Foreign Principal</b>	<b>Date Terminated</b>
Mr. Jose Vicente Carraquero	Subcontractor/Political analyst	Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/01/2026
Maria Camila Reina Rivera	Consultant	Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/10/2026

## 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
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	As subcontractor to Vinson & Elkins LLP, provided communications and public relations services in assistance of the Foreign Principal's interests in interacting with U.S. government officials, media, and interest groups in connection with the Foreign Principal's interests and US litigation pending against it and various subsidiaries. Services consisted of communications data analysis, communications and relationship strategy development and execution, and advocating in Client's interests to key decisionmakers, in accordance with Counsel's legal strategy. The Services included support before, during, and after the meetings with American public figures. Coaching activity was carried out for the interlocutors designated by the Ad Hoc Board. The Registrant monitored these meetings and held meetings directly with the stakeholders to continue these conversations.

## **Appendix**

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

Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP: As subcontractor to Vinson & Elkins LLP, provided communications and public relations services in assistance of the Foreign Principal's interests in interacting with U.S. government officials, media, and interest groups in connection with the Foreign Principal's interests and US litigation pending against it and various subsidiaries. Services consisted of communications data analysis, communications and relationship strategy development and execution, and advocating in Client's interests to key decisionmakers, in accordance with Counsel's legal strategy. The Services included support before, during, and after the meetings with American public figures. Coaching activity was carried out for the interlocutors designated by the Ad Hoc Board. The Registrant monitored these meetings and held meetings directly with the stakeholders to continue these conversations.

## Appendix Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/03/2026	Rey Anthony, Staffer for Rep. Carlos Gimenez (R-FL)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/04/2026	Rep. Mario Díaz- Balart (R-FL)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/04/2026	Rep. Brian Mast (R- FL)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/04/2026	Sen. Rick Scott (R- FL)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/05/2026	Sen. Ted Cruz (R- TX)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/05/2026	Sen. Bernie Moreno (R-OH)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Sam Parker - Deputy Assistant Secretary and PDO Sanctions Coordinator Bureau of Economic, Energy, and Business Affairs (DOS)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Caleb Orr - Assistant Secretary of State for Economic, Energy, and Business Affairs (DOS)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Brittany Kelm - Senior Policy Advisor on the National Energy Dominance Council (NEDC) in the White House.	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Jarrold Agen - Deputy Assistant to the President & Executive Director, National Energy Dominance Council in the White House	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Angie Madero - Foreign Policy & Sanctions (DOS)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Jonathan Greenstein - Deputy Under Secretary at the U.S. Department of the Treasury	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Kathleen Cochran - Senior Counsel, Office for International Affairs at the U.S.	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.

		Department of the Treasury		
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Gene Lange - Acting Undersecretary for Terrorism & Financial Intelligence (TFI) - U.S. Department of Treasury	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Pete Broadbent - Venezuela Desk - Economic Unit Chief (DOS)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Daniel Kennedy - U.S. Department of State - Bureau of Economic and Business Affairs. (DOS)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	02/25/2026	Robert Almelor Delfield - Senior Advisor, U.S. Department of State (DOS)	Meeting	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	03/02/2026	Patrick Nelson - National Security Council NSC	Zoom Call	Update on litigation involving CITGO following the events of January 3, 2026.
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	04/02/2026	Jarrold Agen - Deputy Assistant to the President & Executive Director, National Energy Dominance Council in the White House	Meeting	Discussion regarding an orderly operational wind-down of PDVSA Ad Hoc
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	04/02/2026	Caleb Orr - Assistant Secretary of State for Economic, Energy, and Business Affairs (DOS)	Meeting	Discussion regarding an orderly operational wind-down of PDVSA Ad Hoc
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	04/02/2026	Brittany Kelm - Senior Policy Advisor on the National Energy Dominance Council (NEDC) in the White House	Meeting	Discussion regarding an orderly operational wind-down of PDVSA Ad Hoc
Ad Hoc Board of Petr6leos de Venezuela S.A through Vinson & Elkins LLP	05/13/2026	Pete Broadbent - Venezuela Desk - Economic Unit Chief (DOS)	Zoom Call	Discussion regarding an orderly operational wind-down of PDVSA Ad Hoc, including transition, payment procedures, and asset protection during the transfer of control.

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

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/23/2025	Vinson & Elkins LLP	Fee for Services	\$172,900.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/25/2026	Vinson & Elkins LLP	Fee for Services	\$172,900.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/25/2026	Vinson & Elkins LLP	Reimbursement for Expenses	\$ 4,831.80	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/25/2026	Vinson & Elkins LLP	Fee for Services	\$172,900.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/25/2026	Vinson & Elkins LLP	Reimbursement for Expenses	\$127,885.83	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/30/2026	Vinson & Elkins LLP	Fee for Services	\$199,262.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	-----	-----	-----	----->	\$850,679.63

## Appendix Response to Item 15(a)-Detail

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/02/2025- 12/29/2025	GOOGLE ADS	PAID MEDIA	\$ 2,057.22	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/03/2025	TABERNA DEL ALABARDERO	FOOD EXPENSE	\$ 225.42	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/05/2025- 12/24/2025	META ADS	PAID MEDIA	\$ 1,530.25	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/15/2025- 12/30/2025	X ADS	PAID MEDIA	\$ 1,612.94	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	ALTAMIRA CINEMA CORP	TRAVEL REIMBURSEMENT	\$ 6,140.86	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MAINTENANCE SERVICE	\$ 495.22	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	THE CORMAC GROUP	GOVERNMENT RELATIONS SERVICES FEE	\$21,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MANTAINENCE SERVICE	\$ 495.28	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	WORLDWIDE STRATEGIC CONSULTANTS LLC	TECHNOLOGY RELATED CONSULTING, RESEARCH AND INTERNATIONAL COMPARATIVE LAW SERVICES IN SUPPORT OF THE REGISTRANT'S ACTIVITIES	\$21,780.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	NELSON OXFORD	NONREGISTRABLE ADMINISTRATIVE ASSISTANCE ON PODCAST	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	VARIOUS	PAYMENTS TO CONSULTANTS OUTSIDE THE US FOR NONREGISTRABLE, NONREPORTABLE ACTIVITIES	\$ 1,700.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	PRODUCCIONES PH6391 LLC	FEE FOR COMMUNICATIONS CONSULTANT	\$ 3,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/19/2025	ASM INVESTING (short form registrant Jose Vicente Carrasquero)	FEE FOR CONSULTING SERVICES	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/29/2025	MAILER LITE	EMAIL MARKETING SERVICES FEE	\$ 25.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/30/2025	WORLDWIDE STRATEGIC CONSULTANTS LLC	TECHNOLOGY RELATED CONSULTING, RESEARCH AND INTERNATIONAL COMPARATIVE LAW SERVICES IN SUPPORT OF THE REGISTRANT'S ACTIVITIES	\$43,560.00	

Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	12/30/2025	THE CORMAC GROUP	GOVERNMENT RELATIONS SERVICES FEE	\$21,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/02/2026	GOOGLE ADS	PAID MEDIA	\$ 353.37	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/02/2026- 01/03/2026	X ADS	PAID MEDIA	\$ 2,170.65	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/02/2026	GOOGLE WORKSPACE	WORKSPACE PDVSA AD HOC	\$ 38.41	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/05/2026- 01/28/2026	META ADS	PAID MEDIA	\$ 1,526.32	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/20/2026	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MAINTENANCE SERVICE	\$ 511.22	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/20/2026	VARIOUS	PAYMENTS TO CONSULTANTS OUTSIDE THE US FOR NONREGISTRABLE, NONREPORTABLE ACTIVITIES	\$ 1,700.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/20/2026	ASM INVESTING (short form registrant Jose Vicente Carrasquero)	FEE FOR CONSULTING SERVICES	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/20/2026	PRODUCCIONES PH6391 LLC	FEE FOR COMMUNICATIONS CONSULTANT	\$ 3,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/20/2026	NELSON OXFORD	NONREGISTRABLE ADMINISTRATIVE ASSISTANCE ON PODCAST	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	01/28/2026	MAILER LITE	EMAIL MARKETING SERVICES FEE	\$ 25.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/02/2026- 02/27/2026	META ADS	PAID MEDIA	\$ 2,987.58	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/02/2026	GOOGLE WORKSPACE	WORKSPACE FEE	\$ 44.10	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/02/2026- 02/26/2026	X ADS	PAID MEDIA	\$ 959.73	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/04/2026	US HOUSE OF REPRESENTATIVES	FOOD EXPENSE	\$ 15.24	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/04/2026	TEAISM PENN QUARTER	FOOD EXPENSE	\$ 132.20	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/04/2026	METZ CULINARY	FOOD EXPENSE	\$ 36.48	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/05/2026	BOBBY VANS STEAKHOUSE	FOOD EXPENSE	\$ 150.70	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson &	02/18/2026- 02/26/2026	GOOGLE ADS	PAID MEDIA	\$ 710.00	

Elkins LLP					
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/20/2026	VARIOUS	PAYMENTS TO CONSULTANTS OUTSIDE THE US FOR NONREGISTRABLE, NONREPORTABLE ACTIVITIES	\$ 2,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/20/2026	ASM INVESTING (short form registrant Jose Vicente Carrasquero)	FEE FOR CONSULTING SERVICES	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/20/2026	PRODUCCIONES PH6391 LLC	FEE FOR COMMUNICATIONS CONSULTANT	\$ 4,400.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	02/20/2026	NELSON OXFORD	NONREGISTRABLE ADMINISTRATIVE ASSISTANCE ON PODCAST	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/02/2026	MAILER LITE	EMAIL MARKETING SERVICES FEE	\$ 25.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/02/2026	GOOGLE WORKSPACE	WORKSPACE FEE	\$ 44.10	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/02/2026	GOOGLE ADS	PAID MEDIA	\$ 430.02	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/02/2026- 03/12/2026	META ADS	PAID MEDIA	\$ 531.51	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/06/2026- 03/11/2026	X ADS	PAID MEDIA	\$ 297.73	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/17/2026	90 GRADOS LLC	PODCAST MUGS	\$ 130.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/20/2026	VARIOUS	PAYMENTS TO CONSULTANTS OUTSIDE THE US FOR NONREGISTRABLE, NONREPORTABLE ACTIVITIES	\$ 2,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/20/2026	NELSON OXFORD	NONREGISTRABLE ADMINISTRATIVE ASSISTANCE ON PODCAST	\$ 2,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MAINTENANCE SERVICE	\$ 511.02	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	MAGAZINE STUDIOS LLC	DOCUMENTARY PREMIERE SERVICES	\$ 850.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	ALTAMIRA CINEMA CORP	DOCUMENTARY PRODUCTION	\$2,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	WORLDWIDE STRATEGIC CONSULTANTS LLC	TECHNOLOGY RELATED CONSULTING, RESEARCH AND INTERNATIONAL COMPARATIVE LAW SERVICES IN SUPPORT OF THE REGISTRANT'S ACTIVITIES	\$21,780.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	MAGAZINE STUDIOS LLC	FEE FOR PODCAST PRODUCTION	\$ 9,220.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MANTEINANCE SERVICE	\$ 511.00	

Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/26/2026	EDUARDO OROZCO	DESIGN SERVICES	\$ 400.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/27/2026	PANTOGLOT LTDA.	TRANSLATION SERVICES FEE	\$ 4,452.63	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	03/30/2026	MAILER LITE	EMAIL MARKETING SERVICES FEE	\$ 25.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/01/2026	GOOGLE WORKSPACE	WORKSPACE FEE	\$ 44.10	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/01/2026	GOOGLE ADS	PAID MEDIA	\$ 165.14	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/07/2026	META ADS	PAID MEDIA	\$ 35.64	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/20/2026	EDUARDO OROZCO	DESIGN SERVICES FEE	\$ 400.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/20/2026	NELSON OXFORD	NONREGISTRABLE ADMINISTRATIVE ASSISTANCE ON PODCAST	\$ 1,250.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/21/2026	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MAINTENANCE SERVICE	\$ 527.97	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/22/2026	VARIOUS	PAYMENTS TO CONSULTANTS OUTSIDE THE US FOR NONREGISTRABLE, NONREPORTABLE ACTIVITIES	\$ 1,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/28/2026	MAILER LITE	EMAIL MARKETING SERVICES FEE	\$ 25.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/30/2026	THE CORMAC GROUP	GOVERNMENT RELATIONS SERVICES FEE	\$17,500.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/30/2026	NELSON OXFORD	NONREGISTRABLE ADMINISTRATIVE ASSISTANCE ON PODCAST	\$ 1,250.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	04/30/2026	VARIOUS	PAYMENTS TO CONSULTANTS OUTSIDE THE US FOR NONREGISTRABLE, NONREPORTABLE ACTIVITIES	\$ 1,000.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	05/01/2026	GOOGLE WORKSPACE	WORKSPACE FEE	\$ 44.10	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	05/20/2026	D2 AGENCIA DE PUBLICIDAD	WEB PAGE MAINTENANCE SERVICE	\$ 508.84	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	05/20/2026	EDUARDO OROZCO	DESIGN SERVICES FEE	\$ 400.00	
Ad Hoc Board of Petróleos de Venezuela S.A through Vinson & Elkins LLP	-----	-----	-----	----->	\$281,241.99