

U.S. Department of Justice  
Washington, DC 20530

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

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

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

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

1. Name of Registrant Dr. Ian M HUME	2. Registration Number 7440
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3. Name of Foreign Principal Glass Block Bopoma Dam Company (GBBDC)
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Check Appropriate Box:

- 4.  The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
- 5.  There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 6.  The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
- 7. What is the date of the contract or agreement with the foreign principal? 07/02/2024
- 8. Describe fully the nature and method of performance of the above indicated agreement or understanding.  
See Appendix for Response

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

See Appendix for Response

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10. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act<sup>1</sup>.

Yes  No

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

See Appendix for Response

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11. Prior to the date of registration<sup>2</sup> for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?

Yes  No

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

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

See Appendix for Response

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

Date	Contact	Method	Purpose
			No Political Activity Contacts to Report

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12. During the period beginning 60 days prior to the obligation to register<sup>3</sup> for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes  No

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

Date Received	From Whom	Purpose	Amount/Thing of Value
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13. During the period beginning 60 days prior to the obligation to register<sup>4</sup> for this foreign principal, has the registrant disbursed or expended monies, or disposed of anything of value other than money, in connection with activity on behalf of the foreign principal or transmitted monies to any such foreign principal?

Yes  No

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

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

<sup>2,3,4</sup> Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

**EXECUTION**

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

Date	Printed Name	Signature
09/08/2024	Ian Hume	<input data-bbox="889 457 959 485" type="text" value="Sign"/> /s/ Ian Hume
_____	_____	<input data-bbox="889 541 959 569" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="889 632 959 659" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="889 716 959 743" type="text" value="Sign"/> _____

**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.

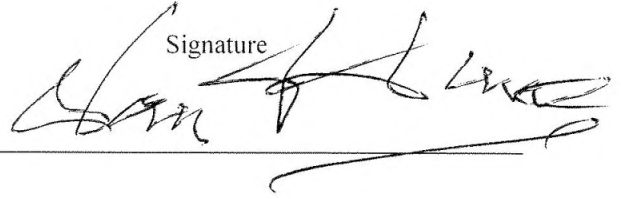
Date

Printed Name

Signature

09.09.24

LAW HUME



## **Appendix Response to Item 8**

**Item 8: Describe fully the nature and method of performance of the above indicated agreement or understanding.**

IMH will act, as a first step, to introduce GBBDC and its affiliates to DFC, presenting materials to DFC to describe the GBBDC water supply project in sufficient detail to enable DFC to establish whether the project (and its country setting), in principle, is eligible to be considered for DFC funding. If no, the matter will end. If yes, then IMH will (as needed) advise GBBDC and DFC during the process of due diligence and appraisal (which will be conducted chiefly by DFC itself and may or may not involve intermediation by IMH) on matters related to the assessment of the project. That will likely be a process conducted by email and phone/zoom calls but may or may not also involve attending meetings with DFC staff in Washington DC. The appraisal process may also involve solicitation of co-financiers of the project, including commercial banks (local or regional in southern Africa) and/or other sources of official funding, to possibly include International Financial Institutions (IFIs). The process will conclude with either a rejection of the project by DFC, or, in the positive case, in a Financial Closing and signing of agreements. In that event IMH will be compensated in a manner and amount still to be determined.

## Appendix Response to Item 9

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

It is anticipated that the registrant's main activity will be fielding emails and phone calls between the parties that convey questions to be answered in which the registrant may be called upon to assist in explaining or interpreting. Emphasizing that the registrant is not a principal but an intermediate between the principal parties, the registrant sees his role as being able to offer perspective, interpretation and judgment based on his background which may assist both principals in understanding and drawing conclusions about the project. Since the registrant (now a US citizen) is of Zimbabwe heritage his background country knowledge may be helpful to DFC in clarifying certain questions; equally, following a long career in the World Bank the registrant may be helpful to GBBDC in explaining aspects of DFC procedures and appraisal criteria with which GBBDC may not be familiar.

The country context in which Zimbabwe currently operates is fraught with sensitivities stemming from a combination of factors, including its governance structure, the presence of international sanctions, the evidence of pervasive corruption in certain quarters, the fragility of economic performance and the suspension of IFI operations due to a situation of arrears in payments of debt service, all of which are debilitating to the climate for investment in Zimbabwe. The registrant hopes that the combination of his country background and World Bank experience will provide grounds to be a useful advisor to the GBBDC.

DFC indicates in its web site that it prefers to operate in the role of Lender of Last resort. In that sense it seeks to avoid crowding out private commercial funding and seeks opportunities to participate in funding alongside commercial banks who would not lend to a project except with the presence of DFC or other institutional source of funding. The scope for local commercial bank support for this project is inherently limited, but some scope may exist for syndicated funding, possibly including some regional banks (including from South Africa). The registrant does not see himself as a principal in sourcing commercial bank sources, and may defer to GGF (Africa) the appointed Financial Advisor to this project, but he does have contacts in South African and other regional banks which he could contribute if needed. The financing plan for the project has not yet been fully developed but in outline includes a combination of private equity, possible government and other grants, institutional debt funding and commercial banks.

## Appendix Response to Item 10

**Item 10: Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act. If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.**

By simply identifying and presenting the GBBDC project to the DFC, the registrant will have engaged in political activity in the sense described in the Act, because if the project is found eligible for funding by the DFC and even more if it is eventually actually financed by DFC, this will lead to a new development in the relations between the US Government and Zimbabwe. Beyond that limited but important sense, the registrant does not intend and his anticipated actions do not portend that, even though he may have an interest in the project being adopted, he will not engage in any activity of persuasion nor lobbying on behalf of the project, either with the US Government agencies nor with any other parties or population groups within the US. It will be entirely a matter for the DFC, along with whatever other US agencies whose involvement may be sought by DFC to decide the project's eligibility and ultimate funding. That decision will doubtless take into account US foreign policy considerations as well as the merits of the project itself and the benefits it will bring to the people and Government of Zimbabwe. The registrant does not see himself as contributing to the substance of those decisions. As with the presentation of materials to date, these have been related strictly to a description of the GBBDC project. To the extent that the registrant has made some suggestions to the project sponsors regarding the presentation of the materials, these suggestions have been entirely related to clarity of description and presentation, not in any way to the substance of the project. See the Questionnaire completed at the request of DFC, attached in Exhibit A.

The US presently conducts normal diplomatic relations with Zimbabwe (there are embassies in both countries). But these relations are also constrained by the fact that, alongside European and some other countries, the US has put in place a regime of selective sanctions against Zimbabwe, as manifested in two legislative Acts: The Magnitsky Act and the US State Department-sponsored Zimbabwe Development and Economy Recovery Act (ZIDERA). These two acts, among other constraints that may apply, will determine what activities can and cannot be supported in Zimbabwe. By submitting the GBBDC project to DFC the registrant assumes the decisions regarding its eligibility will be made in light of what these Acts may allow; there is nothing intended by this submission to alter the provisions and purview of those Acts and he will take no actions aimed at influencing those provisions. As the Introducer of the project the registrant sees himself as a neutral and passive agent whose role in the appraisal process will be, when called upon to do so, mainly to explain and help clarify issues, rather than to persuade. There will be no need for the co-opting of other agents, nor for any broader dissemination of project materials.

The BWC is a privately-sponsored project and the controlling interest during construction and the first 25 years of operating the dam and water pipeline will be private. The riparian nature of the project, however, is such as to require Government approval (at Cabinet level) and the project has been designed as a Public-Private Partnership (PPP), with the Zimbabwe National Water Authority (ZINWA) as a minority (non-income-earning) shareholder. The Zimbabwe Investment and development Agency (ZIDA) is promoting the project as a PPP. The Government of Zimbabwe is thus a stakeholder in the project but will not participate in its revenues until it takes over the facility after a 25 year concession period. To date the registrant has been communicating only with the private project sponsors and has had no direct nor indirect contacts with the government agencies here mentioned.

## Appendix Response to Item 11-Desc

**Item 11-Desc: Prior to the date of registration for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal? If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials. Set forth below a general description of the registrant's activities, including political activities.**

The Registration Statement contains an explanation of the fact that he had introduced the GBBDC project and its principals to the DFC BEFORE completing his registration with FARA because he had mistakenly assumed that registration might not be necessary if the GBBDC project was found to not be eligible for DFC funding. That assumption was corrected after he had filed for and received an Advisory Opinion from FARA on July 30, which then led to his registration which was completed on August 8, 2024. Exhibit A of the Registration Statement (Sections I, II, III and V contain the details). None of these activities involved dissemination of materials to any third parties, only to the DFC and there were no financial nor non-financial things of value conveyed between the registrant and the principals. As stated in his registration statement, the registrant did not engage in any lobbying-type activities either in the period prior to registration nor afterwards.

The two press articles that were published about the project were not initiated by the registrant but by journalists using the materials that became public as part of the FARA process after August 8 2024. For the record, the two articles were: Jeune Afrique ( Julian Pecquet), published August 22 and Africa Intelligence (Noe Michalon) published August 30.