

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 04/30/2025  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant  
The Bennett Group DC, LLC
- (b) Registration Number  
7479
- (c) Primary Business Address  
122 C Street NW, Suite 515, Washington, DC 20001

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
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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 (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
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(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
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(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
Timothy Stewart	Partner	African Export-Import Bank	04/30/2025

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**

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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
African Export-Import Bank	04/30/2025

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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
African Export-Import Bank	Registrant acted as back-office support for the Cormac Group and the Whitaker Group in their engagement with U.S. Congressional members, Congressional Committees, industry groups, other relevant stakeholders, and the Executive Branch to advocate on the Foreign Principal's behalf and execute a comprehensive lobbying and communications strategy related to the renewal and expansion of the African Growth and Opportunity Act.

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	Date Received	From Whom	Purpose	Amount	Subtotal
African Export-Import Bank	11/20/2024	African Import-Export Bank	Consulting Fee	\$200,010.00	
African Export-Import Bank	-----	-----	-----	----->	\$200,010.00
				\$ 200,010.00	
					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
African Export-Import Bank	11/21/2024	The Whitaker Group	Reimbursement for microphone & audiovisual costs for October event	\$ 1,350.00	
African Export-Import Bank	11/21/2024	The Cormac Group	Consulting Fee	\$40,000.00	
African Export-Import Bank	11/25/2024	The Whitaker Group	Consulting Fee	\$64,000.00	
African Export-Import Bank	12/11/2024	Frontier Media	web design and publishing	\$ 2,600.00	
African Export-Import Bank	-----	-----	-----	----->	\$107,950.00

\$ 107,950.00

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
03/20/2025	Timothy Stewart	Rep. Burgess Owens, Burgess 4 Utah	Online	\$ 5.00
03/20/2025	Timothy Stewart	Rep. Burgess Owens, Burgess 4 Utah	Online	\$ 1,000.00
03/31/2025	Timothy Stewart	Sen. Marsha Blackburn, Marsha for Senate	Online	\$ 500.00

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.

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 type="checkbox"/> Email                               |   |   |  |
| <input type="checkbox"/> Website URL(s): _____               |   |   |  |
| <input type="checkbox"/> Social media websites URL(s): _____ |   |   |  |
| <input type="checkbox"/> Other ( <i>specify</i> ) _____      |   |   |  |

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 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 ( <i>specify</i> ) _____ |   |   |

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>
05/30/2025	Tim Stewart	<input data-bbox="854 501 922 531" type="text" value="Sign"/> /s/Tim Stewart
_____	_____	<input data-bbox="854 590 922 619" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 674 922 703" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 758 922 787" 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
5.30.25	TIM STEWART	
_____	_____	_____
_____	_____	_____
_____	_____	_____

## **Appendix**

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

African Export-Import Bank: Registrant acted as back-office support for the Cormac Group and the Whitaker Group in their engagement with U.S. Congressional members, Congressional Committees, industry groups, other relevant stakeholders, and the Executive Branch to advocate on the Foreign Principal's behalf and execute a comprehensive lobbying and communications strategy related to the renewal and expansion of the African Growth and Opportunity Act.

## Appendix Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
African Export-Import Bank	11/15/2024	Ambassador Hilda Suka-Mafudze / AU Ambassador to the US / African Union Mission to the US	Email	Thank you letter
African Export-Import Bank	11/15/2024	Ambassador Elsie Kanza / Ambassador of Tanzania to the US and Mexico / Tanzania Embassy	Email	Thank you letter
African Export-Import Bank	11/15/2024	Pat Malloy / Senior Counsel for Trade and Policy, New Balance Trade Lead / New Balance	Email	Thank you letter
African Export-Import Bank	11/15/2024	Beth Hughes / Vice President, Trade and Customs Policy / American Apparel and Footwear Association	Email	Thank you letter
African Export-Import Bank	11/15/2024	Alexandra Whittaker / Chief Trade Counsel and Trade Subcommittee Staff Director; House Ways & Means Committee / US House of Representatives	Email	Thank you letter
African Export-Import Bank	11/15/2024	Angelle Kwemo / Deputy Chief of Staff & Legislative Director / Office of Congresswoman Sheila Cherfilus-McCormick	Email	Thank you letter
African Export-Import Bank	11/15/2024	Ambassador Woinshet Tadesse / Advisor / African Union Commission	Email	Thank you letter
African Export-Import Bank	11/15/2024	Ms Diane Mukundwa / Policy Officer / African Union Commission	Email	Thank you letter
African Export-Import Bank	11/15/2024	Ms Larissa Subira / Executive Assistant / African Union Commission	Email	Thank you letter
African Export-Import Bank	11/15/2024	Fanta Doumbia / Senior Legislative Advisor (Africa Diaspora) / Office of Congresswoman Yvette Clarke	Email	Thank you letter
African Export-Import Bank	11/15/2024	David Giordano / International Trade Policy Advisor / Ways and Means (Republicans)	Email	Thank you letter
African Export-Import Bank	11/15/2024	Hilary Pinegar / Legislative Director / Ways and Means (Republicans) - Rep. Jason Smith	Email	Thank you letter
African Export-Import Bank	11/15/2024	Jorge Reuda / Trade	Email	Thank you letter

Bank		Counsel / House Ways and Means Committee - Minority		
African Export-Import Bank	11/15/2024	Samantha Schifrin / Foreign Policy and Defense Adviser / Office of Senator Booker	Email	Thank you letter
African Export-Import Bank	11/15/2024	Benjamin Mossberg / Deputy Director, Africa Center / Atlantic Council; The Europe Centre	Email	Thank you letter
African Export-Import Bank	11/15/2024	Hon. Dr. Witney Schneidman / Non-Resident Senior Fellow / Brookings Institute	Email	Thank you letter
African Export-Import Bank	11/15/2024	Ndidi Nwuneli / President & CEO / ONE Campaign	Email	Thank you letter
African Export-Import Bank	11/15/2024	Sarah Troutman / Director, US Government Relations / ONE Campaign	Email	Thank you letter
African Export-Import Bank	11/15/2024	Melvin Foote / President and CEO / Constituency for Africa	Email	Thank you letter
African Export-Import Bank	11/15/2024	Florie Liser / President & CEO; Chair / Corporate Council on Africa; AGOA Renewal and Enhancement Alliance (AREA)	Email	Thank you letter
African Export-Import Bank	11/15/2024	Laird Treiber / Senior Adviser / Corporate Council on Africa	Email	Thank you letter
African Export-Import Bank	11/15/2024	Dr. Zainab Usman / Senior Fellow & Director, Africa Program / Carnegie Endowment for International Peace (CEIP)	Email	Thank you letter
African Export-Import Bank	11/15/2024	Darnley Howard / Partner / PAN Diaspora Capital Management/ Advansa International	Email	Thank you letter
African Export-Import Bank	11/15/2024	Dr. Edem Adzogenu / Co-Chair / Chairman / AfroChampions / African Cotton and Textile Industries Federation	Email	Thank you letter
African Export-Import Bank	11/15/2024	Rev. Dr. Jonathan Weaver / Founder and President / Pan African Collective	Email	Thank you letter
African Export-Import Bank	11/15/2024	Stephen Lande / President / Manchester Trade Limited, Inc.	Email	Thank you letter
African Export-Import Bank	11/15/2024	Jeannine Scott / Founder / America to Africa Consulting LLC	Email	Thank you letter
African Export-Import Bank	11/15/2024	Franklin Olakunle Amoo / Co-Founder & Managing Partner / Baylis Emerging Markets LLC	Email	Thank you letter

African Export-Import Bank	11/21/2024	Dr. Gloria Herndon / Founder, President & CEO / GB Group Global	Email	Thank you letter
African Export-Import Bank	11/21/2024	H. E. Monique Nsanzabaganwa / Deputy Chairperson / African Union Commission	Email	Thank you letter
African Export-Import Bank	11/21/2024	A. Mark Neuman / Counselor / International Trade & Global Strategies	Email	Thank you letter