

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 06/30/2025
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
vinson & Elkins LLP
- (b) Registration Number
7498
- (c) Primary Business Address
845 Texas Avenue, Suite 4700, Houston, TX 77002

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 C¹, 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.

¹ 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 |
|-----------------------|--|---------------|----------|--------------|
| Matthew X. Etchemendy | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 01/01/2025 |

(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 |
|---------------------------|-------------------|-------------------|-------------|----------|--------------|
| See Appendix for Response | | | | | |

(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 |
|------|------------------------|-----------------|
|------|------------------------|-----------------|

(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 |
|-------------------------------|---------------------|
| Mr. Artyom Khachatryan | 06/04/2025 |
| Autoridad del Canal de Panamá | 02/28/2025 |

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

Yes No

If yes, furnish the following information:

| Foreign Principal | Date Registered |
|--|-----------------|
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/10/2024 |
| Mr. Artyom Khachatryan | 12/18/2024 |
| Autoridad del Canal de Panamá | 01/31/2025 |

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

10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A³ and/or B⁴ 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 |
|------------------------|--------------|
| Mr. Artyom Khachatryan | 06/04/2025 |

² 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.)

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

⁴ 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 |
|--|---|
| Junta Administradora ad hoc de Petr leos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | Strategic advice and services relating to public relations and government affairs and non-registerable legal services. |
| Mr. Artyom Khachatryan | Engagement with the U.S. government relating to visa matters and non-registerable legal services. |
| Autoridad del Canal de Panam  | Legal and strategic advice relating to U.S. government engagement, congressional inquiries, legislative actions, executive decisions, treaties, laws, and U.S. policy relating to the Panama Canal. |

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ 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 |
|-------------------|------|---------|--------|---------|
|-------------------|------|---------|--------|---------|

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 |
|-------------------|---------------------|
|-------------------|---------------------|

⁵ "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.⁶

| Foreign Principal | Date Received | From Whom | Purpose | Amount | Subtotal |
|---------------------------|---------------|-----------|---------|--------|----------|
| See Appendix for Response | | | | | |

\$ 5,097,027.19

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, 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 D⁸ 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 value⁹ 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 |
|--|---------------|-----------|---------|----------------|
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | | | | None |
| Mr. Artyom Khachatryan | | | | None |
| Autoridad del Canal de Panamá | | | | None |

^{6, 7} 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)).

⁸ 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.

⁹ 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 | | | | | |

\$ 1,409,830.68

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ 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 |
|--|------|-----------|---------|----------------|
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | | | | None |
| Mr. Artyom Khachatryan | | | | None |
| Autoridad del Canal de Panamá | | | | None |

(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 value¹¹ 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 |
|------|-------|----------------------------------|--------|-----------------------|
|------|-------|----------------------------------|--------|-----------------------|

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?¹² 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.

Mr. Artyom Khachatryan

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): _____
 Social media websites URL(s): _____
 Other (*specify*) _____

See Appendix for Response

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*) _____

See Appendix for Response

20. Indicate the language used in the informational materials:

- English Other (*specify*) _____

See Appendix for Response

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.

See Appendix for Response

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes No

See Appendix for Response

¹² 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

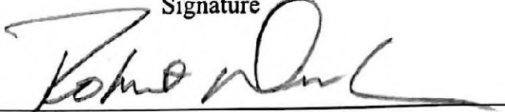
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 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 ¹³ |
|------------|--------------|---|
| 07/30/2025 | Robert Denby | <input data-bbox="854 499 922 529" type="text" value="Sign"/> /s/Robert Denby |
| _____ | _____ | <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"/> _____ |

¹³ 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 |
|---------|--------------|--|
| 7/30/25 | ROBERT DENBY |  |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

Appendix Response to Item 5(b)

Item 5(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)?

| Name | Foreign Principal | Residence Address | Citizenship | Position | Date Assumed |
|----------------------------|--|--|----------------|------------------|--------------|
| Camilo Cardozo | Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | Providing to FARA Unit by Separate Cover | COLOMBIA | Partner | 12/10/2024 |
| Ephraim Wernick | Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 12/10/2024 |
| Peter Thomas | Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | Providing to FARA Unit by Separate Cover | UNITED STATES | Senior Associate | 12/10/2024 |
| Ephraim Wernick | Mr. Artyom Khachatryan | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 12/10/2024 |
| Peter Thomas | Mr. Artyom Khachatryan | Providing to FARA Unit by Separate Cover | UNITED STATES | Senior Associate | 12/18/2024 |
| Peter Thomas | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Senior Associate | 01/26/2025 |
| Lauryn Preheim | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Associate | 01/26/2025 |
| Gabrielle Gunshol | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Associate | 01/26/2025 |
| Madison Torrez | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Associate | 01/26/2025 |
| Nathan Campbell | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Associate | 01/26/2025 |
| Nicholas Henchie | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover UNITED KINGDOM | UNITED KINGDOM | Partner | 01/26/2025 |
| Michael S. Dry | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 01/26/2025 |
| George Zachary Terwilliger | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 01/26/2025 |
| Jeremy Marwell | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 01/26/2025 |
| Matthew X. Etchemendy | Autoridad del Canal de Panamá | Providing to FARA Unit by Separate Cover | UNITED STATES | Partner | 01/26/2025 |

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:

| Name | Position or Connection | Foreign Principal | Date Terminated |
|----------------------------|-------------------------------|-------------------------------|------------------------|
| Ephraim Wernick | Partner | Mr. Artyom Khachatryan | 06/04/2025 |
| Peter Thomas | Senior Associate | Mr. Artyom Khachatryan | 06/04/2025 |
| Peter Thomas | Senior Associate | Autoridad del Canal de Panamá | 02/28/2025 |
| Lauryn Preheim | Associate | Autoridad del Canal de Panamá | 02/28/2025 |
| Gabrielle Gunshol | Associate | Autoridad del Canal de Panamá | 02/28/2025 |
| Madison Torrez | Associate | Autoridad del Canal de Panamá | 02/28/2025 |
| Nathan Campbell | Associate | Autoridad del Canal de Panamá | 02/28/2025 |
| Nicholas Henchie | Partner | Autoridad del Canal de Panamá | 02/28/2025 |
| Michael S. Dry | Partner | Autoridad del Canal de Panamá | 02/28/2025 |
| George Zachary Terwilliger | Partner | Autoridad del Canal de Panamá | 02/28/2025 |
| Jeremy Marwell | Partner | Autoridad del Canal de Panamá | 02/28/2025 |
| Matthew X. Etchemendy | Partner | Autoridad del Canal de Panamá | 02/28/2025 |

Appendix

Response to Item 12-Description

Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board"): Strategic advice and services relating to public relations and government affairs and non-registerable legal services.

Mr. Artyom Khachatryan: No Political Activity

Autoridad del Canal de Panamá: Legal and strategic advice relating to U.S. government engagement, congressional inquiries, legislative actions, executive decisions, treaties, laws, and U.S. policy relating to the Panama Canal.

Appendix Response to Item 14(a)-Detail

| Foreign Principal(s) | Date Received | From Whom | Purpose | Amount | Subtotal |
|--|---------------|------------------------|---|----------------|----------------|
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/12/2024 | PDVSA Ad Hoc Board | Non-registerable legal services and expenses. | \$350,615.09 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 01/14/2025 | PDVSA Ad Hoc Board | Registerable activities and non-registerable legal services and expenses. | \$448,930.95 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 01/15/2025 | PDVSA Ad Hoc Board | Non-registerable legal services and expenses. | \$1,026,703.52 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 02/25/2025 | PDVSA Ad Hoc Board | Non-registerable legal services and expenses. | \$452,105.42 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/19/2025 | PDVSA Ad Hoc Board | Non-registerable legal services and expenses. | \$29,784.60 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 04/02/2025 | PDVSA Ad Hoc Board | Registerable activities and non-registerable legal services and expenses. | \$310,365.50 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 04/11/2025 | PDVSA Ad Hoc Board | Non-registerable legal services and expenses. | \$603,451.80 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 04/29/2025 | PDVSA Ad Hoc Board | Non-registerable legal services and expenses. | \$1,038,151.24 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 05/23/2025 | PDVSA Ad Hoc Board | Registerable activities and non-registerable legal services and expenses. | \$150,847.05 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 06/11/2025 | PDVSA Ad Hoc Board | Registerable activities and non-registerable legal services and expenses. | \$167,119.25 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | ----- | ----- | ----- | -----> | \$4,578,074.42 |
| Mr. Artyom Khachatryan | 12/18/2024 | Artyom Khachatryan | Non-registerable legal services. | \$ 2,525.00 | |
| Mr. Artyom Khachatryan | 01/30/2025 | Artyom Khachatryan | Registerable activities and non-registerable legal services. | \$ 7,749.31 | |
| Mr. Artyom Khachatryan | 03/03/2025 | Artyom Khachatryan | Registerable activities and non-registerable legal services and expenses. | \$ 5,348.81 | |
| Mr. Artyom Khachatryan | 05/30/2025 | Artyom Khachatryan | Retainer for non-registerable legal services and expenses. | \$150,000.00 | |
| Mr. Artyom Khachatryan | ----- | ----- | ----- | -----> | \$165,623.12 |
| Autoridad del Canal de Panamá | 02/03/2025 | Panama Canal Authority | Legal services and expenses. | \$ 28.24 | |
| Autoridad del Canal de Panamá | 02/07/2025 | Panama Canal Authority | Legal services and expenses. | \$353,301.41 | |

| | | | | | |
|-------------------------------|-------|-------|-------|--------|--------------|
| Autoridad del Canal de Panamá | ----- | ----- | ----- | -----> | \$353,329.65 |
|-------------------------------|-------|-------|-------|--------|--------------|

Appendix Response to Item 15(a)-Detail

| Foreign Principal | Date | Recipient | Purpose | Amount | Subtotal |
|--|-----------------------|---|---|----------------|----------|
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/11/2024-06/23/2025 | Various Airlines | Travel relating to non-registerable legal services. | \$21,473.86 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/11/2024-05/28/2025 | Various food service providers | Business meals relating to non-registerable legal services. | \$ 5,629.38 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/11/2024-06/23/2025 | Telecommunications provider | Internet services relating to non-registerable legal services. | \$ 233.99 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/19/2024-06/23/2025 | Various taxi/rideshare providers | Transportation services relating to non-registerable legal services. | \$ 5,464.24 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/19/2024-06/18/2025 | Various adjudicative bodies | Filing fees relating to non-registerable legal services. | \$ 4,644.58 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/26/2024-04/07/2025 | Translation service provider | Translation services relating to non-registerable legal services. | \$ 3,750.00 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 12/31/2024-06/18/2025 | Various legal research / docket service providers | Expenses relating to non-registerable legal services. | \$ 2,313.30 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 01/10/2025-05/22/2025 | Federal Express | Expenses relating to non-registerable legal services. | \$ 1,156.95 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 01/15/2025-06/12/2025 | Vision Americas International LLC | Public and government relations services relating to registerable activities. | \$1,034,767.00 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 02/25/2025-02/25/2025 | Outside law firm | Outside/local counsel services relating to non-registerable legal services. | \$18,166.82 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/05/2025-03/26/2025 | Litigation services provider | Expenses relating to non-registerable legal services. | \$18,216.25 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/06/2025-05/28/2025 | Various hotel providers | Travel relating to non-registerable legal services. | \$13,037.34 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/06/2025-05/28/2025 | Parking vendors | Expenses relating to non-registerable legal services. | \$ 225.00 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/12/2025-05/28/2025 | Print services vendor | Expenses relating to non-registerable legal services. | \$ 349.09 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/12/2025-04/16/2025 | Various service providers | Expenses relating to non-registerable legal services. | \$ 996.45 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/26/2025-03/26/2025 | Telecommunications provider | Telephone services relating to non-registerable legal services. | \$ 14.95 | |

| | | | | | |
|--|-----------------------|----------------------------------|---|--------------|----------------|
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 03/26/2025-06/04/2025 | Airline | Travel relating to non-registerable legal services. | \$ 34.73 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 04/03/2025-04/03/2025 | Courier services provider | Expenses relating to non-registerable legal services. | \$ 14.30 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | 04/30/2025-04/30/2025 | Expert consultant | Expert services relating to non-registerable legal services. | \$11,173.84 | |
| Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board") | ----- | ----- | ----- | -----> | \$1,141,662.07 |
| Mr. Artyom Khachatryan | 02/20/2025 | Pacer | Research expense relating to non-registerable legal services. | \$ 1.20 | |
| Mr. Artyom Khachatryan | 04/16/2025 | State archive | Research expense relating to non-registerable legal services. | \$ 19.25 | |
| Mr. Artyom Khachatryan | ----- | ----- | ----- | -----> | \$ 20.45 |
| Autoridad del Canal de Panamá | 01/31/2025-02/06/2025 | Expert consultants | Expert services relating to non-registerable legal services. | \$186,865.80 | |
| Autoridad del Canal de Panamá | 01/31/2025-02/27/2025 | Various food service providers | Business meals relating to non-registerable legal services. | \$ 7,521.31 | |
| Autoridad del Canal de Panamá | 02/04/2025-02/04/2025 | Travel service provider | Travel relating to non-registerable legal services. | \$10,275.95 | |
| Autoridad del Canal de Panamá | 02/05/2025-02/28/2025 | Various taxi/rideshare providers | Transportation services relating to non-registerable legal services. | \$ 2,504.02 | |
| Autoridad del Canal de Panamá | 02/06/2025-02/10/2025 | Outside law firms | Outside/local counsel services relating to non-registerable legal services. | \$ 5,742.00 | |
| Autoridad del Canal de Panamá | 02/07/2025-02/07/2025 | E-Discovery vendor | Expenses relating to non-registerable legal services. | \$ 9,317.36 | |
| Autoridad del Canal de Panamá | 02/07/2025-02/07/2025 | Various hotel providers | Travel relating to non-registerable legal services. | \$29,930.99 | |
| Autoridad del Canal de Panamá | 02/12/2025-02/12/2025 | Travel service provider | Travel relating to non-registerable legal services. | \$ 519.96 | |
| Autoridad del Canal de Panamá | 02/12/2025-02/27/2025 | Various service providers | Expenses relating to non-registerable legal services. | \$ 817.00 | |
| Autoridad del Canal de Panamá | 02/12/2025-02/27/2025 | Various airlines | Travel relating to non-registerable legal services. | \$14,474.83 | |
| Autoridad del Canal de Panamá | 02/14/2025-02/28/2025 | Courier services provider | Expenses relating to non-registerable legal services. | \$ 156.05 | |
| Autoridad del Canal de Panamá | 02/20/2025-02/20/2025 | Telecommunications provider | Internet services relating to non-registerable legal services. | \$ 22.89 | |
| Autoridad del Canal de Panamá | ----- | ----- | ----- | -----> | \$268,148.16 |

Appendix Response to Item 20-List

Item 20-List: Indicate the language used in the informational materials:

| Foreign Principal | Language Used |
|--------------------------|----------------------|
| Mr. Artyom Khachatryan | English |