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OMB No. 1124-0002; Expires September 30, 2029

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended

For 6 Month Period Ending 09/30/2026
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Rathmell Short LLP

(b) Registration Number
7554

(c) Primary Business Address
1050 30th St NW, Washington, DC 20007

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes ☐	No ☐
(2) Citizenship	Yes ☐	No ☐
(3) Occupation	Yes ☐	No ☐

(b) If an organization:

(1) Name	Yes ☐	No ☒
(2) Ownership or control	Yes ☐	No ☒
(3) Branch offices	Yes ☐	No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C[1], 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.)

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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

(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

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 ☐

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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)[2] 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.

XH Smart Tech China Co. Ltd.
Sergei Chemezov
Vasily Brovko

10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A[3] and/or B[4] 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

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.

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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
XH Smart Tech China Co. Ltd.	During this six-month reporting period, the registrant engaged in legal services exempt from registration under 22 U.S.C. § 613(g).
	No Activities
	No Activities
Sergei Chemezov	
Vasily Brovko	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity[5] 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

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.

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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.

See Appendix for Response

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

Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign[7], 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[8] 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 [9] 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
Sergei Chemezov				None
Vasily Brovko				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.

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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.

See Appendix for Response

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

Total

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

During this 6 month reporting period, has the registrant disposed of anything of value[10] 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
Sergei Chemezov				None
Vasily Brovko				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 value[11] 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.

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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.

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)* _____

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)*_____

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 ☐

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.

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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 [13]
10/30/2026	Robin Rathmell	Sign	/s/Robin Rathmell
10/30/2026	Robert Stryk	Sign	/s/Robert Stryk
10/30/2026	Jason M. Short	Sign	/s/Jason M. Short
10/30/2026	Timothy Curry	Sign	/s/Timothy Curry

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.

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Date	Printed Name	Signature
10/30/2026	Jason Short	/s/ Jason M. Short
10/30/2026	Robin Rathmell	/s/ Robin Rathmell
10/30/2026	Robert Stryk	/s/ Robert Stryk
10/30/2026	Timothy Curry	/s/ Timothy Curry

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Appendix
Response to Item 12-Description

XH Smart Tech China Co. Ltd.: During the reporting period, Registrant provided guidance and support in the provision of sub-registrant communications with certain U.S. governmental agencies and/or departments responsible for the implementation and enforcement of U.S. sanctions regulations.

Sergei Chemezov: No Political Activity

Vasily Brovko: No Political Activity

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Appendix
Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
XH Smart Tech China Co. Ltd.	04/30/2026	U.S. Department of State	Email	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	05/16/2026	U.S. Department of State	Email	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	07/21/2026	U.S. Department of State	Email	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	07/23/2026	U.S. Department of the Treasury	Meeting	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	07/24/2026	U.S. Department of State	Email	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	08/05/2026	U.S. Department of State	Email	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	09/17/2026	U.S. Department of State	Email	Addressing inquiries regarding delisting application review process.
XH Smart Tech China Co. Ltd.	09/22/2026	U.S. Department of State	Meeting	Addressing inquiries regarding delisting application review process.

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Appendix
Response to Item 14(a)-Description

XH Smart Tech China Co. Ltd.: The registrant received funds in the interests of the foreign principal for legal services exempt from registration under 22 U.S.C. § 613(g) during the initial six-month reporting period.
Sergei Chemezov: The registrant received funds in the interests of the foreign principal for legal services exempt from registration under 22 U.S.C. § 613(g) during the initial six-month reporting period.
Vasily Brovko: The registrant received funds in the interests of the foreign principal for legal services exempt from registration under 22 U.S.C. § 613(g) during the initial six-month reporting period.

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Appendix
Response to Item 15(a)-Description

XH Smart Tech China Co. Ltd.: The registrant disbursed funds in the interests of the foreign principal for legal services exempt from registration under 22 U.S.C. § 613(g) during the initial six-month reporting period.
Sergei Chemezov: The registrant disbursed funds in the interests of the foreign principal for legal services exempt from registration under 22 U.S.C. § 613(g) during the initial six-month reporting period.
Vasily Brovko: The registrant disbursed funds in the interests of the foreign principal for legal services exempt from registration under 22 U.S.C. § 613(g) during the previous six-month reporting period.

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