

U.S. Department of Justice

Washington, DC 20530

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

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by 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 this 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 online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .22 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 Imperium Strategies LLC	2. Registration Number 7559
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3. Primary Address of Registrant
2677 Avenir Place, Vienna, VA 22180

4. Name of Foreign Principal Turkish Republic of Northern Cyprus	5. Address of Foreign Principal 1667 K Street, NW Washington, DC 20006
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6. Country/Region Represented
CYPRUS

7. Indicate whether the foreign principal is one of the following:

☒ Government of a foreign country¹

☐ Foreign political party

☐ Foreign or domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☐ Corporation

☐ Voluntary group

☐ Association

☐ Other (*specify*) _____

☐ Individual-State nationality _____

8. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant

Government of the Turkish Republic of Northern Cyprus

b) Name and title of official(s) with whom registrant engages

Ms. Damla Guclu, Turkish Cypriot Representative

Ms. Sonay Özmen, Washington Representative for TRNC

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

9. If the foreign principal is a foreign political party, state:

- a) Name and title of official(s) with whom registrant engages

- b) Aim, mission or objective of foreign political party

10. If the foreign principal is not a foreign government or a foreign political party:

- a) State the nature of the business or activity of this foreign principal.

b) Is this foreign principal:

- | | |
|---|--|
| Supervised by a foreign government, foreign political party, or other foreign principal | Yes ☐ No ☐ |
| Owned by a foreign government, foreign political party, or other foreign principal | Yes ☐ No ☐ |
| Directed by a foreign government, foreign political party, or other foreign principal | Yes ☐ No ☐ |
| Controlled by a foreign government, foreign political party, or other foreign principal | Yes ☐ No ☐ |
| Financed by a foreign government, foreign political party, or other foreign principal | Yes ☐ No ☐ |
| Subsidized in part by a foreign government, foreign political party, or other foreign principal | Yes ☐ No ☐ |

11. Explain fully all items answered "Yes" in Item 10(b).

12. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

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

_____	_____	Sign	_____
_____	_____	Sign	_____
_____	_____	Sign	_____
_____	_____	Sign	_____

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 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
Imperium Strategies LLC

2. Registration Number
7559

3. Name of Foreign Principal
Turkish Republic of Northern Cyprus

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, and the fees and expenses, if any, to be received.
7. What is the date of the contract or agreement with the foreign principal? 06/15/2026
8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Registrant has no direct written agreement with the foreign principal. Registrant performs services on behalf of the Turkish Republic of Northern Cyprus pursuant to a written subcontract with LB International Solutions, which is retained by the Turkish Republic of Northern Cyprus. Registrant is compensated by LB International Solutions.

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

Provide government relations services before the United States Congress and Executive Branch, including educating Members of Congress and the Administration on issues of importance to the TRNC; monitoring and reporting on congressional and executive branch developments; preparing brief analyses and correspondence; and identifying official meetings and events to advance the TRNC's interests.

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

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.

Registrant will engage in government relations and political activities on behalf of the foreign principal, including outreach to Members of Congress and Executive Branch officials; monitoring legislative and policy developments; providing strategic advice; preparing and disseminating informational materials; facilitating meetings and communications; and supporting advocacy efforts concerning matters of interest to the foreign principal.

11. Prior to the date of registration² for this foreign principal has the registrant engaged in any registrable activities, including 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.

Since June 15, 2026, the registrant has engaged in government relations activities on behalf of the foreign principal, including monitoring and analyzing congressional and executive branch developments; developing and implementing government relations strategies; preparing briefing materials; communicating with congressional staff; identifying and facilitating meetings; and advising the foreign principal on U.S. legislative and policy matters.

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

Date	Contact	Method	Purpose
See Appendix for Response			

12. During the period beginning 60 days prior to the obligation to register³ to the date of registration 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
06/24/2026	LB International Solutions		\$ 2,500.00
08/03/2026	LB International Solutions		\$ 5,000.00

\$ 7,500.00

Total

13. During the period beginning 60 days prior to the obligation to register⁴ to the date of registration 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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¹ "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.

^{2,3,4} 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

_____	_____	Sign	_____
_____	_____	Sign	_____
_____	_____	Sign	_____
_____	_____	Sign	_____

Appendix

Response to Item 11-List

Item 11-List: 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 in the required detail the registrant's political activities.

Date	Contact	Method	Purpose
06/18/2026	Michael Kraan, National Security Advisor (Rep. Max Miller)	Meeting	US-TRNC Relations
06/18/2026	Ryan Hein, Legislative Director (Rep Cory Mills)	Meeting	US-TRNC Relations
06/29/2026	Rodrigo Garza, Foreign Policy Advisor (Rep. Joaquin Castro)	Email	US-TRNC Relations
07/07/2026	Luke Burke, National Security Advisor (Sen. McCormick)	Email	US-TRNC Relations
07/07/2026	Margaret Sapia, Legislative Director (Sen. Chris Coons)	Email	US-TRNC Relations
07/22/2026	Ella Luprano, Legislative Correspondent (Sen Jim Banks)	Meeting	US-TRNC Relations
07/22/2026	Ryan Evans, Defense Fellow (Sen. Steve Daines)	Meeting	US-TRNC Relations



SERVICES AGREEMENT

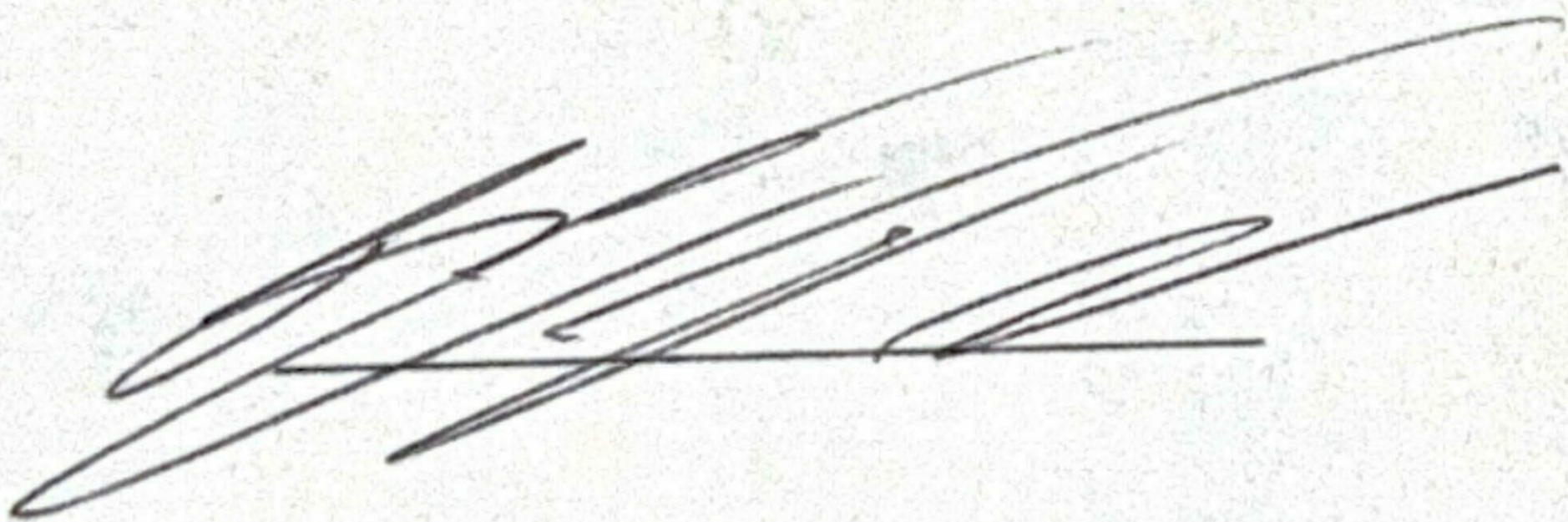
THIS AGREEMENT is made between LB International Solutions (LBIS) and Imperium Strategies (IS)

1. Term: This Agreement shall be through August 31, 2026 and renew if LBIS contract with the TRNC is renewed.
2. Services: AB agrees to provide government relations services to LBIS on the TRNC Contract, which shall consist of those services ordinarily and customarily provided in representing a foreign entity before the United States Congress and Executive Branch. These services shall include, but not be limited to:
 - (a) Educating Members of Congress and the Administration on issues of importance to the TRNC;
 - (b) Promptly notifying the TRNC of any action in Congress or the Executive Branch on issues of importance to the TRNC;
 - (c) Preparing brief analyses of developments in Congress and the Executive Branch on particular issues of concern to the TRNC;
 - (d) Identifying official gatherings and social events to which TRNC personnel ought attend, including to the extent possible, obtaining the necessary invitations;
 - (e) Identifying and/or arranging speaking engagements locally and nationally for TRNC personnel or their appointed or suggested proxies in settings that will improve TRNC's image and advance its causes on Capitol Hill.
 - (f) Maintaining and forging alliances with other interest groups whose goals are similar to or shared by the TRNC.
 - (g) Identify potential allies and develop relationships for the TRNC. Target Members who have already displayed an interest in Cyprus.
 - (h) Work with TRNC to develop talking points and materials to leave with officials.
 - (i) Draft TRNC correspondence.
 - (j) Work with broader U.S. foreign policy community, including prominent think-tanks to raise awareness of the Turkish Cypriot stance and positions.

3. Fees: LBIS agrees to pay IS \$5,000/month. The payments to AB shall be made by LBIS as soon as LBIS gets paid, usually at the beginning of the following month.
4. Additional Costs and Expenses: Should IS incur extraordinary costs and expenses on TRNC's behalf that are not otherwise contemplated in the fees described above, LBIS shall reimburse these costs provided that LBIS gives explicit advance approval.
5. Termination:

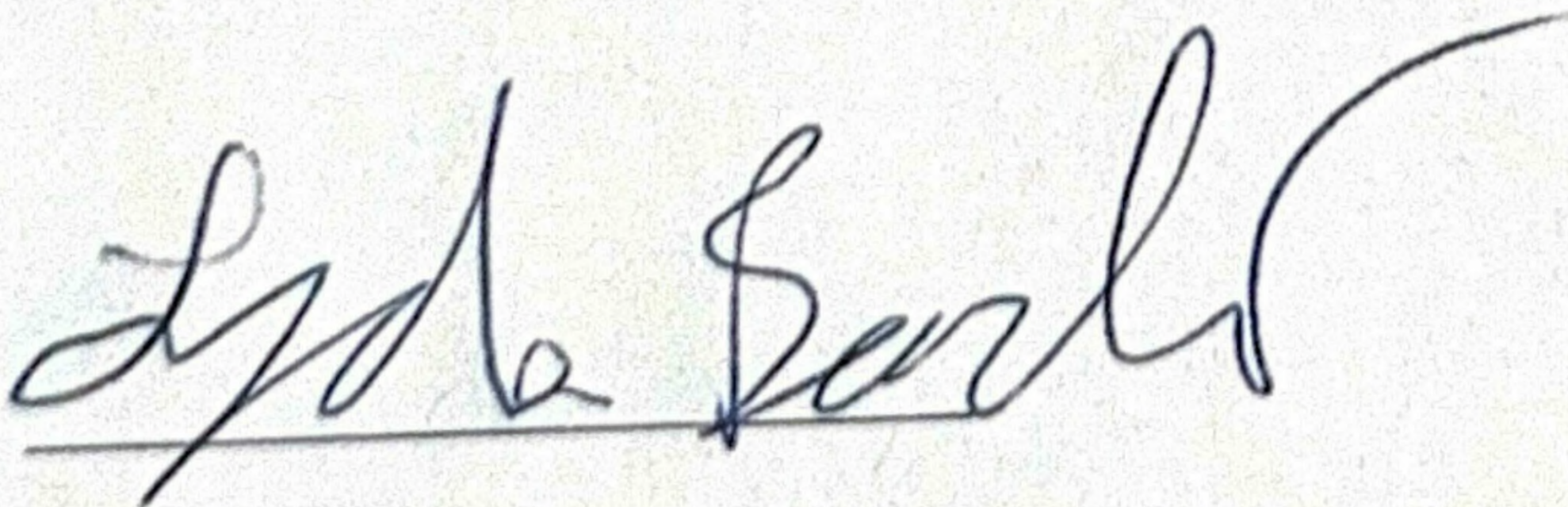
This Agreement shall terminate upon its natural expiration or with 7 days written notice by either of the sides.
7. Privileged Information: IS will use all permissible efforts to protect privileged communications or other confidential information developed by it or provided to it by LBIS or TRNC during the term of this Agreement. This obligation shall survive the termination of this Agreement and any renewals for a period of not less than two years. Upon the termination of this Agreement and any renewals LBIS may request from AB return of any documents or other information provided by TRNC or LBIS.
8. Registration and Disclosure: IS shall separately and individually comply with any and all restrictions and requirements, including filing and other disclosure, of the Foreign Agents Registration Act, the Lobbying Disclosure Act, the Ethics Reform Act of 1989, the Foreign Corrupt Practices Act, the Honest Leadership and Open Government Act, and other applicable laws and regulations of the United States and the District of Columbia.
9. Conflicts: IS shall endeavor not only to avoid actual conflicts, but the appearance of conflicts as well. It shall immediately assess whether it represents any clients whose Interests are contrary to the TRNC.
10. Choice of Law: This Agreement shall be governed by, and construed in accordance with, the laws of the District of Columbia.
11. Power to Bind: Absent the express written consent of TRNC, neither IS nor its consultants and subcontractors have authority to bind the TRNC in any manner whatsoever.

For IS:



6-15-2026^F
Date

For LBIS:



6-15-2026
Dat