

U.S. Department of Justice
Washington, DC 20530

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

I--REGISTRANT

1. Name of Registrant

Sandler, Travis & Rosenberg, P.A.

2. Registration Number (To be assigned by the FARA Unit)

7674

3. Primary Business Address

1300 Pennsylvania Ave. N.W., Suite 400, Washington, DC 20004

4. If the registrant is an individual, furnish the following information:

- (a) Residence address(es)

- (b) Nationality
- (c) Year of birth
- (d) Present citizenship
- (e) If present citizenship not acquired by birth, state when, where, and how acquired
- (f) Occupation

5. If the registrant is not an individual, furnish the following information:

- (a) Type of organization: Committee Association Partnership Voluntary group
Corporation Other (*specify*) _____
- (b) Date and place of organization 03/01/1980, Miami, FL

- (c) Name of responsible individual operating committee & see below
(e.g., officer, director or partner)

- (d) Other business address(es), if any, including locations of branch or local offices See Appendix for Additional Addresses

- (e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
J. Nicole Bivens Collinson	229 N Galveston St Arlington, VA 22203	UNITED STATES	Managing Principal, Operating Committee, Practice Leader

See Appendix for
Additional Names

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
J. Nicole Bivens Collinson	APEX-BRASIL CORPORATION	Assist with all areas related to the contract objectives stated above

(h) Describe the nature of the registrant's regular business or activity.

Law Firm

(i) Give a complete description of the ownership and control structure of the registrant.

The corporation is owned and controlled by an operating committee consisting of Lenny Feldman, Larry Ordet, David Cohen, Marilyn-Joy Cerny, and Charles Crowley.

6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
David Olave	5902 West Chester Street Alexandria, VA 22310	APEX-BRASIL CORPORATION	Assist with all areas related to the contract objectives stated above.
Edward Steiner	1211 Taylor St NE Washington, DC 20017	APEX-BRASIL CORPORATION	Assist with all areas related to the contract objectives stated above.

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal

APEX-BRASIL CORPORATION

Foreign Principal Address

201 South Biscayne Boulevard, Suite 1200
Miami, FL 33131**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes No

If yes, describe fully.

Foreign Principal

Activities/Services

IV--FINANCIAL INFORMATION

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA to the date of registration, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise? Yes No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
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¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual 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.

² An agent must register within 10 days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See 28 C.F.R. § 5.201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁴ under FARA to the date of registration, has the registrant received anything of value⁵ other than money, from any foreign principal named in Item 7 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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10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ under FARA to the date of registration, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes No

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
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(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA to the date of registration, has the registrant disposed of any thing of value⁸ other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 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 the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA to the date of registration, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes No

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
11/12/2025	J. Nicole Bivens Collinson	Candidate Joel Willet	Hosted Meet & Greet	Yogurt and Fruit Platter

4, 6, 7 and 9 See *supra* note 2, at 3.

5 and 8 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 MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes No

If yes, identify each foreign principal, list the type of informational materials, and file the informational materials.

Foreign Principal	Type of Informational Materials
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12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes No

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

APEX-BRASIL CORPORATION

13. 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 foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of informational materials?

Yes No

If yes, furnish the names and addresses of the individuals or organizations.

Name	Address	Foreign Principal(s)
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15. Activities in preparing or disseminating informational materials will include the use 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 checked="" type="checkbox"/> Letters or telegrams |
| <input checked="" type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social Media website URL(s): _____ | | | |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | | |

¹⁰ 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, electronic communications, 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.

¹¹ See *supra* note 2, at 3.

16. Informational materials will be disseminated among the following groups:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Public officials | <input checked="" type="checkbox"/> Civic groups or associations |
| <input checked="" type="checkbox"/> Legislators | <input type="checkbox"/> Libraries |
| <input checked="" type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups |
| <input type="checkbox"/> Newspapers | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Editors | <input type="checkbox"/> Other (<i>specify</i>) _____ |

17. Indicate the language to be used in the informational materials:

- English Other (*specify*) _____

VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

Exhibit B- This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (*See* 28 C.F.R. § 5.201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal (*See* 28 C.F.R. § 5.201(e)).

VII--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 ¹²
12/04/2025	Lenny Feldman	<input type="text" value="Sign"/> /s/Lenny Feldman
12/05/2025	Larry Ordet	<input type="text" value="Sign"/> /s/Larry ordet
12/05/2025	David Cohen	<input type="text" value="Sign"/> /s/David cohen
		<input type="text" value="Sign"/> _____

12 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
12/5/2025	Lenny Feldman	<small>Signed by:</small> <i>Lenny Feldman</i> <small>83E085F3900A4D5...</small>
12/5/2025	Larry Ordet	<small>DocuSigned by:</small> <i>Larry Ordet</i> <small>FE351CC9F2B84E6...</small>
12/5/2025	David Cohen	<small>DocuSigned by:</small> <i>David Cohen</i> <small>3A3363AB788A400...</small>

Appendix
Response to Item 5(d) Attached

Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.

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List of Branch/Local Office Addresses

ST&R | Sandler, Travis & Rosenberg, P.A.

International Trade Law Firm with a Global Presence

International trade attorneys, customs lawyers and consultants located in offices throughout the United States and Asia.

ST&R Global Office Locations

Washington, D.C.

1300 Pennsylvania Avenue NW
Suite 400
Washington, D.C. 20004
United States

(202) 216-9307

New York, NY

286 Madison Avenue
Suite 1200
New York, NY 10017
United States

(212) 883-1300

Hong Kong, China

Suite 4857, 59-60, 48/F, The Center
99 Queen's Road Central
Central, Hong Kong

852 2603 9276

Miami, FL

5835 Waterford District Drive
Suite 200 & 204
Miami, Florida 33126
United States

***Please note:** the street was formerly Blue Lagoon Drive and the address may continue to show as 5835 Blue Lagoon Drive in some navigation systems.*

(305) 267-9200

Portland, ME

111 Commercial Street
Suite 203
Portland, ME 04101
United States

(312) 279-2834

San Francisco, CA

414 Jackson Street
Suite 200
San Francisco, CA 94111
United States

(415) 986-1088

Houston, TX

2245 Texas Drive
Suite 300
Sugar Land, TX 77479

(713) 961-8000

Boston, MA

100 Trade Center
Suite G-700
Woburn, MA 01801
United States

(781) 897-1771

Guangzhou, China

Unit 2108, 21/F, Teemtower
No. 208 Tianhe Road
Tianhe District
Guangzhou, Guangdong Province, China

+86 188 1913 1502

Huntsville, AL

203 East Side Square
Suite C-8
Huntsville, AL 35801

(938) 867-4116

Buffalo, NY

HANSA Workspace
505 Ellicott Street
Buffalo, NY 14203

212.549.0143

Appendix
Response to Item 5(f) Attached

Item 5(f): If the registrant is not an individual, furnish the following information: List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

List of Partners/Officers/Directors

PARTNERS, OFFICERS, OR DIRECTORS

Larry Ordet

Marilyn-Joy Cerny

Lenny Feldman

Charles Crowley

David Cohen

Mark Tallo

Deb Stern

Rob DeCamp

Mark Segrist

Elise Shibles