

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

Eversheds Sutherland (US) LLP

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

7681

3. Primary Business Address

700 6th St. NW, Washington, DC 20001

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*) Limited Liability Partnership

(b) Date and place of organization 01/09/2017, Georgia

(c) Name of responsible individual Lino Mendiola, U.S. CEO
(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
Mr. Theodore H Cominos Jr.		UNITED STATES	Partner
Mr. Mark Herlach		UNITED STATES	Partner
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
See Appendix for Response		

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

Eversheds Sutherland (US) LLP is a law firm based in the United States that provides legal services across a broad array of sectors and industries.

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

Eversheds Sutherland (US) LLP is a limited liability partnership governed by an executive committee which is lead by Lino Mendiola as U.S. CEO and Adam Cohen as U.S. Executive Partner.

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
------	-------------------	----------------------	----------

II--FOREIGN PRINCIPAL

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

Foreign Principal	Foreign Principal Address
Romanian-American Strategic Advancement Initiative	c/o CIS GAS SA,, 686 Str Voincenilor Santana de Mures ROMANIA 547565

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 INFORMATION9. (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
See Appendix for Response					

\$ 600,000.00

Total

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
-------------------	---------------	-----------	---------	----------------

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
-------------------	------	-----------	---------	--------	----------

See Appendix for Response

\$ 300,000.00

Total

(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
-------------------	------	-----------	---------	----------------

(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
------	-------	----------------------------------	--------	-----------------------

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
-------------------	---------------------------------

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.

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
-------------------	----------------	--------

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)
------	---------	----------------------

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 type="checkbox"/> Letters or telegrams |
| <input 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 type="checkbox"/> Public officials | <input type="checkbox"/> Civic groups or associations |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Libraries |
| <input 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
12/24/2025	Theodore Cominos	<input type="text" value="Sign"/> /s/Theodore Cominos
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<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
12/24/2025	Theodore Cominos	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

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.

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.

List of Branch/Local Office Addresses

DRAFT

Confidential and Privileged

Appendix to Registration Statement

**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.

1. Washington, DC (Headquarters)
 - 700 Sixth Street NW, Suite 700
Washington, DC 20001-3980
Tel: +1 202 383 0100
2. Atlanta, GA
 - 999 Peachtree Street NE, Suite 2300
Atlanta, GA 30309-3996
Tel: +1 404 853 8000
3. Houston, TX
 - 1001 Fannin Street, Suite 3700
Houston, TX 77002-6760
Tel: +1 713 470 6100
4. New York, NY
 - The Grace Building, 40th Floor
1114 Avenue of the Americas
New York, NY 10036-7703
Tel: +1 212 389 5000
5. Austin, TX
 - One American Center
600 Congress Avenue, Suite 2000
Austin, TX 78701
Tel: +1 512 721 2700
6. Chicago, IL
 - 227 West Monroe Street, Suite 6000
Chicago, IL 60606
Tel: +1 312 724 9006
7. San Diego, CA
 - 12255 El Camino Real, Suite 100
San Diego, CA 92130-2071
Tel: +1 858 252 6502
8. San Francisco, CA
 - 101 California Street, Suite 4750
San Francisco, CA 94111
Tel: +1 415 521 1701

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

DRAFT**Confidential and Privileged****Appendix to Registration Statement****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.

Name	Citizenship	Position	Address
Lino Mendiola	USA	CEO, Executive Committee	700 Sixth Street NW, Suite 700 Washington, DC 20001-3980
Adam Cohen	USA	Executive Partner, Executive Committee	700 Sixth Street NW, Suite 700 Washington, DC 20001-3980
Stephanie Hildebrandt	USA	Executive Committee	700 Sixth Street NW, Suite 700 Washington, DC 20001-3980
Michael Gurion	USA	Executive Committee	999 Peachtree Street NE, Suite 2300 Atlanta, GA 30309-3996
Stacy Kern	USA	Executive Committee	227 West Monroe Street, Suite 6000 Chicago, IL 60606
Michael Sweeny	USA	Executive Committee	700 Sixth Street NW, Suite 700 Washington, DC 20001-3980
John Pruitt	USA	Executive Committee	The Grace Building, 40th Floor 1114 Avenue of the Americas New York, NY 10036-7703
Clay Howell	USA	Executive Committee	999 Peachtree Street NE, Suite 2300 Atlanta, GA 30309-3996
Maria Todorova	USA	Executive Committee	999 Peachtree Street NE, Suite 2300 Atlanta, GA 30309-3996

Appendix Response to Item 5(g)

Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s)	Services
Mr. Theodore H Cominos Jr.	Romanian-American Strategic Advancement Initiative	Short-form registrant will advise and represent the Romanian-American Strategic Advancement Initiative in its efforts to strengthen economic, security, and diplomatic relations between the U.S. and Romania, with an immediate focus on developing support for the Vertical Corridor initiative within Central and Eastern Europe and the Balkans.
Mr. Mark Herlach	Romanian-American Strategic Advancement Initiative	Short-form registrant will advise and represent the Romanian-American Strategic Advancement Initiative in its efforts to strengthen economic, security, and diplomatic relations between the U.S. and Romania, with an immediate focus on developing support for the Vertical Corridor initiative within Central and Eastern Europe and the Balkans.

Appendix Response to Item 9(a)

Item 9(a): RECEIPTS-MONIES: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, 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? If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Romanian-American Strategic Advancement Initiative	11/26/2025-11/26/2025	Romanian-American Strategic Advancement Initiative	Funds to be held in escrow on behalf of the Romanian-American Strategic Advancement Initiative for disbursement related to services performed under the Agreement once it took effect.	\$ 200,000.00	
Romanian-American Strategic Advancement Initiative	12/10/2025-12/10/2025	Romanian-American Strategic Advancement Initiative	Funds to be held in escrow on behalf of the Romanian-American Strategic Advancement Initiative for disbursement related to services performed under the Agreement once it took effect.	\$ 300,000.00	
Romanian-American Strategic Advancement Initiative	12/11/2025-12/11/2025	Romanian-American Strategic Advancement Initiative	Funds to be held in escrow on behalf of the Romanian-American Strategic Advancement Initiative for disbursement related to services performed under the Agreement once it took effect.	\$ 100,000.00	
Romanian-American Strategic Advancement Initiative	-----	-----	-----	----->	\$ 600,000.00

Appendix Response to Item 10(a)

Item 10(a): DISBURSEMENTS-MONIES: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, 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? 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	To Whom	Purpose	Amount	Subtotal
Romanian-American Strategic Advancement Initiative	11/25/2025-11/25/2025	Putala Strategies	Disbursement of funds from the Romanian-American Strategic Advancement Initiative for services performed under the Agreement.	\$ 150,000.00	
Romanian-American Strategic Advancement Initiative	12/15/2025-12/15/2025	Putala Strategies	Disbursement of funds from the Romanian-American Strategic Advancement Initiative for services performed under the Agreement.	\$ 150,000.00	
Romanian-American Strategic Advancement Initiative	-----	-----	-----	----->	\$ 300,000.00