

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

The Spectrum Group Members, LLC

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

7764

3. Primary Business Address

99 Canal Center Plaza, STE 450, Alexandria, VA 22314

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 06/12/2008, Delaware

(c) Name of responsible individual George Close
(e.g., officer, director or partner)(d) Other business address(es), if any, including
locations of branch or local offices

(e) If a membership organization, provide number of members 50

(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. George Close	911 Rail Court McLean, VA 22102	UNITED STATES	President

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.

See Appendix for Response

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

See Appendix for Response

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
Mr. Michael Franken	722 E Custis Ave Alexandria, VA 22310	Desan Shipyard	The individual will provide strategic consulting and advisory support in connection with Spectrum's engagement with DESAN. Services may include providing subject-matter expertise; participating in meetings with DESAN representatives, U.S. government officials, maritime industry representatives, and other relevant stakeholders; advising on U.S. maritime market and business opportunities; supporting preparation for meetings and engagements; identifying relevant industry contacts and potential business partners; and providing analysis, recommendations, and follow-up support related to DESAN's business development objectives in the United States.

II--FOREIGN PRINCIPAL

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

Foreign Principal

Desan Shipyard

Foreign Principal Address

Evliya Çelebi Mah. Tersaneler Caddesi No:36
Tuzla 34944 Istanbul, Türkiye
TURKEY

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
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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.

Desan Shipyard

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:

- ☐ 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 website URL(s): _____
☒ Other (*specify*) See Appendix for Response

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:

- | | |
|---|---|
| ☒ Public officials | ☐ Civic groups or associations |
| ☐ Legislators | ☐ Libraries |
| ☒ Government agencies | ☐ Educational groups |
| ☐ Newspapers | ☐ Nationality groups |
| ☐ Editors | ☒ Other (<i>specify</i>) <u>See Appendix for Response</u> |

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
08/31/2026	Michael Franken	 /s/Michael Franken
08/11/2026	Niki Hearn	 /s/Niki Hearn
08/11/2026	George Close	 /s/George Close
		

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.

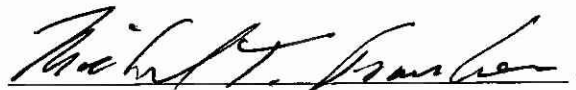
Date

Printed Name

Signature

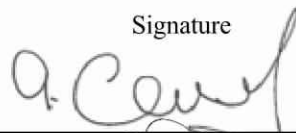
08/11/2026

Michael Franken



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
08/11/2026	George Close	
08/11/2026	Niki Hearn	

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



THE SPECTRUM GROUP MEMBERS, LLC
FARA REGISTRANT INFORMATION

Partners, Officers, Directors, or Persons Performing Similar Functions

Name	Title	Citizenship	Working for Foreign Principal?
Thomas Justin Campbell	Partner	United States	No
Teresa Gail Dady	Partner	United States	No
William Pearson	Partner	United States	No
Steven Loftus	Partner	United States	No
Gregory Sharp	Partner	United States	No
James Hinkle	Partner	United States	No
Charlie Dale	Partner	United States	No
Andrew Cambell	Executive Chairman	Unites States	No
George Close	President	United States	Yes
Hasmik Khachatryan	Chief Financial Officer	United States	No
Niki Hearn	Vice President - Operations	United States	No

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. George Close	Desan Shipyard	As President of Spectrum, the individual will provide executive oversight of the engagement and attend meetings with DESAN representatives, U.S. government officials, maritime industry representatives, and other relevant stakeholders, as appropriate. The individual may participate in discussions regarding the engagement's objectives, business opportunities, strategic priorities, and coordination of Spectrum's services on behalf of DESAN.

Appendix

Response to Item 5(h)

Item 5(h): If the registrant is not an individual, furnish the following information: Describe the nature of the registrant's regular business or activity.

Spectrum is a strategic consulting and advisory firm providing business development, government relations, market strategy, and management consulting services to domestic and international clients. The firm assists clients in understanding and navigating U.S. government and commercial markets, identifying business opportunities, developing market-entry and growth strategies, and engaging with relevant industry and government stakeholders.

Appendix

Response to Item 5(i)

Item 5(i): If the registrant is not an individual, furnish the following information: Give a complete description of the ownership and control structure of the registrant.

Spectrum is an independently owned and operated limited liability company with multiple individual owners. Ownership interests are held privately by the company's members. The company is governed and controlled in accordance with its organizational documents and applicable law, with management and operational authority exercised by its designated leadership.

No foreign government, foreign political party, foreign principal, or other foreign entity owns, controls, directs, finances, or otherwise exercises authority over the management or operations of The Spectrum Group Member, LLC. The company maintains independent authority over its business decisions, operations, personnel, client engagements, and strategic direction.

Appendix Response to Item 15(Other)

Informational materials may include business development materials, briefing materials, talking points, correspondence, presentations, capability information, and other materials related to DESAN Shipyard's maritime capabilities and potential business opportunities. Such materials may be prepared or distributed in connection with meetings, industry engagements, conferences, responses to requests for information or proposals, and communications with relevant U.S. government and maritime industry stakeholders.

Appendix
Response to Item 16(Other)

U.S. maritime industry representatives, shipyards, systems integrators, suppliers, potential business partners, and other relevant industry stakeholders.