

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 10/31/2020
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number
- KARV Communications 6162
- (c) Primary Business Address
- 122 East 42nd Street - Suite 2005
New York, NY 10168

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 <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
- (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 C¹, 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.)

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
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(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
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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
NA		

(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, 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
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(d) Have any employees or individuals, 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
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6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes No

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

NA

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 added any new foreign principal(s)² during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Foreign Principal

Date Added

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 the 6 month reporting period.

Emirate of Ras Al Khaimah (RAK)
The Public Investment Fund (PIF)

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No N/A

Exhibit B⁴ Yes No N/A

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes No

If yes, has the registrant filed an amendment to these exhibits? Yes No

If no, please file the required amendment.

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.

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
See attached	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ 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 Attached

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

Foreign Principal	Date	Contact	Method	Purpose
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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
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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.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received 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, any contributions, income or money either as compensation or otherwise? Yes No

If no, please explain why no monies were received.

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
See attached					

\$1,380,000.00

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, 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 D⁸ 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 value⁹ 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

^{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.

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.

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
See attached					

\$22,077.29

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ 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
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(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 value¹¹ 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
See attached				

^{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.

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.

Emirate of Ras Al Khaimah (RAK)

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
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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): www.rakinfo.ae
 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) General Public (website)

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 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.

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
November 21, 2020	Andrew Frank	<input type="text" value="Sign"/> /s/ Andrew Frank eSigned
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____

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.

KARV Communications – 6162
Supplemental
Attachment for Question 11

Q. 11 During this 6-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail your activities and services.

Yes.

Emirate of Ras Al Khaimah (RAK):

The registrant provided public affairs and communications advice to the foreign principal on various issues facing RAK in the U.S., and elsewhere. Additionally, the registrant provided business development guidance to RAK and oversees the maintenance of the www.rakinfo.ae website.

The Public Investment Fund of Saudi Arabia (PIF):

The registrant provided investor and public relations advice and counsel to the foreign principal by providing analysis, and providing outreach and counsel on relationship-building to various stakeholders in business and the media.

KARV Communications – 6162
 Supplemental
 Attachment for Question 12

Q. 12 During this 6 month period, have you on behalf of any foreign principal engaged in political activity as defined below? If yes, identify each such 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 or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Yes.

Emirate of Ras Al Khaimah (RAK):

The registrant provided public affairs and communications advice to the foreign principal on various issues facing RAK in the U.S., and elsewhere. Additionally, the registrant provided business development guidance to RAK and oversees the maintenance of the www.rakinfo.ae website.

The Public Investment Fund of Saudi Arabia (PIF):

The registrant provided investor and public relations advice and counsel to the foreign principal by providing analysis, and providing outreach and counsel on relationship-building to various stakeholders in business, think tanks, and the media. Specific media contacts are listed below.

Andrew Frank

5/14/20	Email and text with Saeed Azhar (Reuters) regarding PIF investments.
5/18/20	Email and phone call with Stacy Perman (LA Times) regarding PIF investments.
5/18.20	Phone call and text with Lydia Moynihan (Fox) regarding PIF investments.
5/26/20	Phone call with Stacy Perman regarding PIF investments.
6/23/20	Text with Lydia Moynihan (Fox) regarding PIF investments.

Eric Andrus

10/8/2020 – 10/14/2020	Emails and phone calls with Kip McDaniel (Institutional Investor) regarding invitation to meet virtually with Kevin Foster, PIF Global Head of Communications.
10/14/2020 – 10/29-2020	Emails to Leanna Orr (Institutional Investor) to provide an invitation to meet virtually with Kevin Foster, PIF Global Head of Communications; provide background information related to PIF; participate in virtual meeting, and emails following.
6/2/2020	Email with Stacy Perman (LA Times) regarding PIF investments.
6/3/2020 – 6/9/2020	Emails and phone calls with Avi Salzman (Barron's) regarding a request for an interview with PIF leadership.

Kevin Nolan

8/6/2020 – 10/30/2020	Emails and phone calls with Diego Lopez (Global SWF) regarding potential interview with PIF and editorial.
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KARV Communications – 6162
 Supplemental
 Attachment for Question 14(a)

Q. 14(a) During this 6 month reporting period, have you received 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, any contributions, income or money either as compensation or otherwise? If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

Yes.

Emirate of Ras Al Khaimah (RAK)

6/3/2020	Payment of Fees and Cost per agreement	\$40,000.00
7/9/2020	Payment of Fees and Cost per agreement	\$40,000.00
8/3/2020	Payment of Fees and Cost per agreement	\$40,000.00
8/25/2020	Payment of Fees and Cost per agreement	\$40,000.00
9/24/2020	Payment of Fees and Cost per agreement	\$40,000.00
10/22/2020	Payment of Fees and Cost per agreement	\$40,000.00

Public Investment Fund of Saudi Arabia (PIF)

8/13/2020	Payment of Fees and Cost per agreement	\$798,000.00 (Jan – Jul)
9/14/2020	Payment of Fees and Cost per agreement	\$114,000.00
10/13/2020	Payment of Fees and Cost per agreement	\$114,000.00
10/26/2020	Payment of Fees and Cost per agreement	\$114,000.00

TOTAL \$1,380,000.00

KARV Communications – 6162
 Supplemental
 Attachment for Question 15(a)(1)

Q. 15(a)(1) During this 6 month reporting period, have you disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? 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.

Yes.

Emirate of Ras Al Khaimah (RAK)

6/15/2020	Payment to vendor for web hosting www.rakinfo.ae	600.00
6/15/2020	Payment to vendor for web hosting www.rakinfo.ae	60.00
5/31/2020	Telephone calls	193.00
6/15/2020	Modifications and design changes for www.rakinfo.ae	16,725.00
6/30/2020	Telephone calls	175.00
7/31/2020	Telephone calls	198.00
8/31/2020	Telephone calls	210.00
9/31/2020	Telephone calls	198.00
10/31/2020	FARA Filing Fee	305.00

The Public Investment Fund of Saudi Arabia (PIF)

1/1 – 2/29/2020	Telephone calls	400.93
3/1 – 4/30/2020	Telephone calls	661.04
5/1 – 6/30/2020	Telephone calls	1,088.65
7/1 – 8/31/2020	Telephone calls	886.15
9/20/2020	Copies of Barons newspaper	27.38
9/20/2020	Mailing/Fed Ex	44.14
10/31/2020	FARA filing fee	305.00

Total: \$22,077.29

KARV Communications – 6162
Supplemental
Attachment for Question 15(c)

Q. 15 (c)

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value 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. Short Form Registrant, Andrew Frank, made the below political contributions.

8/26/2020	Lance Simmens 4 Malibu City Council 2020	\$100.00
8/30/2020	Joe Biden for President 2020*	\$250.00

**Joe Biden for President returned the above 8/30/2020 contribution on 9/18/2020*