

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 12/31/2021
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant

Summit Information Services Inc.

(b) Registration Number

6760

(c) Primary Business Address

110 2nd Ave, Suite 201, PO Box 4683, Frisco, CO 80443

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 ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(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
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(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering 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	Foreign Principal	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.

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.

Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.

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

Exhibit A³Yes ☐No ☐N/A ☒Exhibit B⁴Yes ☐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

Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.

Activities/Services

For Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC., Provide strategic and government affairs advice, public relations and communications advice and services, and outreach and engagement with the public and media groups.

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.

Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.: See Appendix for Response

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

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

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**

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.

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

If no, please explain why no monies were received.

\$	15,000.00
	Total

If no, please file the required Exhibit D.

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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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.

Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.: No disbursements were made during this 6 month reporting period.

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
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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
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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.

Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.

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): <u>See Appendix for Response</u> | | | |
| ☒ Social media websites URL(s): <u>See Appendix for Response</u> | | | |
| ☒ Other (specify) <u>See Appendix for Response</u> | | | |

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) _____ | | |

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.

Received by NSD/FARA Registration Unit 01/31/2022 1:08:18 PM
I, DAVID CUNNINGHAM, do hereby certify 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

1/31/22

DAVID Cunningham

David Cunningham

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/01/2021	Tye Stockton - Board Member - Ski & Snowboard Club Vail	Phone	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/01/2021	Judith Kohler - Reporter - Denver Post	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/01/2021	Jimmy Senenberger - Radio Talk Show Host - KNUS	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/07/2021	Debbie Brown - President - Colorado Business Roundtable	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/08/2021	Tye Stockton - Board Member - Ski & Snowboard Club Vail	Phone	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/13/2021	Debbie Brown - President - Colorado Business Roundtable	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/15/2021	Heidi Swartzloff - Brand Marketing Manager - Vail Resorts	Phone	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/19/2021	Heidi Swartzloff - Field Marketing Manager - Vail Resorts	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/23/2021	Michaela Foley - Senior National Sales Manager - Vail Resorts	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	07/29/2021	Michaela Foley - Senior National Sales Manager - Vail Resorts	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/02/2021	Michaela Foley - Senior National Sales Manager - Vail Resorts	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/03/2021	Michaela Foley - Senior National Sales Manager - Vail Resorts	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/04/2021	David Hendrickson - Professor - Colorado College	Email	See above answer to question 12

Foreign Principal(s)	Date	Contact	Method	Purpose
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/04/2021	Peter Harris - Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/04/2021	Michaela Foley - Senior National Sales Manager - Vail Resorts	Zoom	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/04/2021	Brook Blair - Professor - University of Northern Colorado	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/05/2021	Floyd Ciruli - Professor - University of Denver	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/05/2021	Peter Harris - Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/06/2021	Floyd Ciruli - Professor - University of Denver	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/06/2021	Debbie Brown - President - Colorado Business Roundtable	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/09/2021	Michaela Foley - Senior National Sales Manager - Vail Resorts	Zoom	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/11/2021	Darlene Nolting - wife of Jon Nolting	Phone	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/11/2021	Peter Harris - Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/12/2021	Sue Wilcox - School Board Member - Summit County Schools	In person	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/12/2021	Jon Nolting - Associate Executive Director - Steamboat Springs Winter Sports Club	Phone	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/16/2021	Jon Nolting - Associate Executive Director - Steamboat Springs Winter Sports Club	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/18/2021	Jon Nolting - Associate Executive Director - Steamboat Springs Winter Sports Club	Email	See above answer to question 12

Foreign Principal(s)	Date	Contact	Method	Purpose
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/19/2021	Allison White - Assistant Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/19/2021	Pamela Dixon - Director of Sales, Vail, Beaver Creek & Tahoe Regional Team	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/20/2021	Allison White - Assistant Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/25/2021	Allison White - Assistant Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/25/2021	Kevin Burns - Consultant - Self-Employed	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/26/2021	Laura Steben - Public Accountant	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	08/26/2021	Allison White - Assistant Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/02/2021	Bill Taylor - Environmental Engineer	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/03/2021	Dave Stewart - Athletic Director - Steamboat Springs Winter Sports Club	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/06/2021	Ryan Winger, Vice President - Magellan Strategies	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/08/2021	Allison White - Assistant Professor - Colorado State University	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/08/2021	Pamela Dixon - Director of Sales, Vail, Beaver Creek & Tahoe Regional Team	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/09/2021	Bryan Rooney - Chief Operating Officer, Ski & Snowboard Club Vail	Email	See above answer to question 12

Foreign Principal(s)	Date	Contact	Method	Purpose
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/10/2021	Jon Nolting - Associate Executive Director - Steamboat Springs Winter Sports Club	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/13/2021	Bryan Rooney - Executive Director - Ski Club Vail	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/13/2021	Jon Nolting - Associate Executive Director - Steamboat Springs Winter Sports Club	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/16/2021	Bob French Former County Commissioner - Summit County	In person	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	09/27/2021	Jeff Joseph - CEO - SIIA	In person	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	10/07/2021	Chad Vorthmann - Executive Vice President - Colorado Farm Bureau	In person	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	10/19/2021	Debbie Brown - President - Colorado Business Roundtable	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	10/20/2021	Debbie Brown - President - Colorado Business Roundtable	Email	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	10/21/2021	Julie Curnutte - Senior Project Manager - Goodbee & Associates	In person	See above answer to question 12
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	11/11/2021	Debbie Brown - President - Colorado Business Roundtable	Email	See above answer to question 12

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	11/01/2021	Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC. Royal Embassy of Saudi Ara	See above answer to question 12	\$15,000.00	
Royal Embassy of Saudi Arabia through Larson Shannahan Slifka Group, LLC.	-----	-----	-----	----->	\$15,000.00