

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

Certus Insights, LLC

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

6801

3. Primary Business Address

1418 N. Rhodes Street, Arlington, VA 22209

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

(a) Residence address(es)

N/A

(b) Nationality N/A

(c) Year of birth N/A

(d) Present citizenship N/A

(e) If present citizenship not acquired by birth, state when, where and how acquired N/A

(f) Occupation N/A

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

(a) Type of organization: Committee Association Partnership Voluntary group

Corporation

Other (*specify*) See Appendix E(a) for response.

(b) Date and place of organization 04/02/2019, Arlington, VA

(c) Name of responsible individual Andrew Rugg, President
(e.g., officer, director or partner)

(d) Other business address(es), if any, including 1101 Wilson Blvd., Arlington, VA 22209
locations of branch or local offices

(e) If a membership organization, provide number of members N/A

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

Name	Residence Address(es)	Position	Nationality
Andrew Rugg	Provided separately to DOJ	President	UNITED STATES
Natalie Copeland	Provided separately to DOJ	Vice President	UNITED STATES
Ronald Faucheux	Provided separately to DOJ	Chief Analyst	UNITED STATES

(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) Represented	Services
See Appendix 5(g) for response		

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

Certus Insights, LLC is a market research firm that conducts polling and media analytics.

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

Andrew Rugg: 65%; Natalie Copeland: 20%; Ronald Faucheux: 15%

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

Name	Residence Address	Foreign Principal(s) Represented	Services
N/A	N/A	N/A	N/A

II--FOREIGN PRINCIPAL

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

Foreign Principal

The Kingdom of Saudi Arabia (through MSLGROUP Americas, LLC d/b/a Qorvis Communications)

Foreign Principal Address

601 New Hampshire Ave NW
Washington, DC 20037

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.

N/A

IV--FINANCIAL INFORMATION**9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of your obligation to register² under FARA, did the registrant receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation on, 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
N/A	N/A	N/A	N/A	N/A

Total: N/A

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 Rule 201(e), 28 C.F.R. § 5.201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of your obligation to register⁴ under FARA, did the registrant receive from any foreign principal named in Item 7 anything of value⁵ other than money, either as compensation on, or for disbursement, or otherwise? Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
N/A	N/A	N/A	N/A	N/A

10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of your obligation to register⁶ under FARA, did the registrant spend or disburse any money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7? 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	To Whom	Purpose	Amount
N/A	N/A	N/A	N/A	N/A

(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of your obligation to register⁷ under FARA, did the registrant dispose 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? Yes No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
N/A	N/A	N/A	N/A	N/A

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of your obligation to register⁹ under FARA, did the registrant or any short form registrant make 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
N/A	N/A	N/A	N/A	N/A

4, 6, 7 and 9 See Footnote 2, on page 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 did the registrant prepare, disseminate or cause 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 and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
N/A	N/A	N/A

12. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

13. Identify each such foreign principal.

N/A

14. 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
N/A	N/A	N/A

15. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes No

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

Name	Address	Foreign Principal(s)
N/A	N/A	N/A

16. 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): N/A
 Social Media website URL(s): N/A
 Other (*specify*) N/A

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 Footnote 2, on page 3.

17. 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>) <u>N/A</u> |

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

- English Other (*specify*) N/A

VI--EXHIBITS AND ATTACHMENTS

19. (a) The following described exhibits shall be filed with an initial 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 Rule 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 fundraising campaign and transmitted for a foreign principal. (See Rule 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 Registration Statement, 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
03/18/2020	Andrew Rugg	/s/Andrew Rugg


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.

U.S. Department of Justice

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Washington, DC 20530

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Date	Printed Name	Signature
3/12/2020	Andrew Rugg	
_____	_____	_____
_____	_____	_____
_____	_____	_____

Response to Item 5(a)

Limited Liability Corporation

Response to Item 5(g)

Question 5(g): Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s) Represented	Services
Andrew Rugg	The Kingdom of Saudi Arabia (through MSLGROUP Americas, LLC d/b/a Qorvis Communications)	Registrant will conduct quantitative surveys for Qorvis Communications on American attitudes and perceptions of Middle East and current event issues.
Natalie Copeland	The Kingdom of Saudi Arabia (through MSLGROUP Americas, LLC d/b/a Qorvis Communications)	Registrant will conduct quantitative surveys for Qorvis Communications on American attitudes and perceptions of Middle East and current event issues.
Ronald Faucheux	The Kingdom of Saudi Arabia (through MSLGROUP Americas, LLC d/b/a Qorvis Communications)	Registrant will conduct quantitative surveys for Qorvis Communications on American attitudes and perceptions of Middle East and current event issues.