Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

U.S. Department of Justice
Washington, DC 20530

OMB No. 1124-0001; Expires May 31, 2020

Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

I--REGISTRANT

1. Name of Registrant

Chartwell Strategy Group, LLC

2. Registration No. (To Be Assigned By the FARA Registration Unit) 6518

3. Principal Business Address

300 M Street, SE, Suite 402
Washignton, DC 20003

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

(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) 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 12/18/18 in Delaware

(c) Address of principal office 300 M Street, SE, Suite 402
Washington, DC 20003

(d) Name of person in charge Matthew Epperly

(e) Locations of branch or local offices Boston, New York

(f) If a membership organization, give number of members

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

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

Name	Residence Address(es)	Position	Nationality
David Tamasi	5435 30th Place, NW Washington, DC 20015	Managing Director	American
Matthew Epperly	37 Briar Patch Road Osterville, MA 02655	Managing Director	American
Oswaldo Palomo	446 Sturges Road Fairfield, CT 06824	Managing Director	American

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

David Tamasi, Matt Epperly, Oswaldo Palomo

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

Government relations and public affairs consulting

(j) Give a complete statement of the ownership and control of the registrant.

Chartwell Strategy Group, LLC is a wholly-owned subsidiary of Chartwell Holdings Group, LLC

---

6. List all employees 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(es)	Nature of Services
David Tamasi	5435 30th Place, NW Washington, DC 20015	Government relations
Matthew Epperly	37 Briar Patch Road Osterville, MA 02655	Public affairs
Oswaldo Palomo	446 Sturges Road Fairfield, CT 06824	Government relations

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

II–FOREIGN PRINCIPAL

7. List every foreign principal[1] for whom the registrant is acting or has agreed to act.

Foreign Principal	Principal Address(es)
Government of Georgia	Tbilisi, Georgia 0175 P. Ingorovka Str. N7

III–ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

IV–FINANCIAL INFORMATION

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

During the period beginning 60 days prior to the date of your obligation to register[2] to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, 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	Purpose	Amount
		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 ten 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, moneys, 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)).

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

(b) **RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register[4] to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value[5] other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose

10. (a) **DISBURSEMENT-MONIES**

During the period beginning 60 days prior to the date of your obligation to register[6] to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your 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.

Date	To Whom	Purpose	Amount

(b) **DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register[7] to the time of filing this statement, did you dispose of any thing of value[8] other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose

(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register[9] to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your 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	Amount or Thing of Value	Political Organization or Candidate	Location of Event
see attachment			

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.

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

V--INFORMATIONAL MATERIALS[10]

11. 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.

12. Identify each such foreign principal.

Government of Georgia

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes ☒ No ☐

If yes, identify each such foreign principal, specify amount and for what period of time.

Government of Georgia - $50,000 per month from 1/1/18 to 12/31/18

14. Will any 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 persons or firms.

15. Activities in preparing or disseminating informational materials will include the use of the following:

☒ Radio or TV broadcasts ☒ Magazine or newspaper ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☒ Press releases ☒ Pamphlets or other publications ☒ Lectures or speeches
☐ Other *(specify)* _____

Electronic Communications

☒ Email
☐ Website URL(s): _____
☐ Social media website URL(s): _____
☐ Other *(specify)* _____

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 *(specify)* _____

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

☒ English ☐ Other *(specify)* _____

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, 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 02/02/2018 12:52:20 PM

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

VI--EXHIBITS AND ATTACHMENTS

18. (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 7.

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, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)	(Print or type name under each signature or provide electronic signature[1])
2/2/18	David Tamasi

1 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.

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

Chartwell Strategy Group – Registration

10.c. Political Contributions

Oswaldo Palomo

Date	Amount	Political Organization	Location
11/20/17	$1,700	Ryan Costello for Congress	
11/20/17	$1,700	Katko for Congress	
11/27/17	$2,700	Trump Victory Fund	
11/29/17	$500	Kenny Marchant for Congress	
12/14/17	$1,000	Citizens for Turner (Mike Turner)	
12/19/17	$2,500	MAP PAC (Kevin Brady)	
12/20/17	$2,500	Team Ryan (Paul Ryan)	
12/21/17	$2,000	Cathy for Congress (Cathy McMorris Rodgers)	

David Tamasi

Date	Amount	Political Organization	Location
12/20/17	$2,700	Elect Kevin McCarthy	
12/20/17	$2,700	Rick Green for Congress	
1/1/17	$2,500	Team Ryan (Paul Ryan)	
1/3/18	$5,000	RNC	
1/26/18	$1,000	Rick Sacco for Congress	

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

Oswaldo Palomo – Short Form Registration

15. Political Contributions

Date	Amount	Political Organization	Location
11/20/17	$1,700	Ryan Costello for Congress	Washington, DC
11/20/17	$1,700	Katko for Congress	Washington, DC
11/27/17	$2,700	Trump Victory Fund	Washington, DC
11/29/17	$500	Kenny Marchant for Congress	Washington, DC
12/14/17	$1,000	Citizens for Turner (Mike Turner)	Washington, DC
12/19/17	$2,500	MAP PAC (Kevin Brady)	Washington, DC
12/20/17	$2,500	Team Ryan (Paul Ryan)	Washington, DC
12/21/17	$2,000	Cathy for Congress (Cathy McMorris Rodgers)	Washington, DC

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM

David Tamasi – Short Form Registration

15. Political Contributions

Date	Amount	Political Organization	Location
12/20/17	$2,700	Elect Kevin McCarthy	Washington, DC
12/20/17	$2,700	Rick Green for Congress	Washington, DC
1/1/17	$2,500	Team Ryan (Paul Ryan)	Washington, DC
1/3/18	$5,000	RNC	Washington, DC
1/26/18	$1,000	Rick Sacco for Congress	Washington, DC

Received by NSD/FARA Registration Unit 02/02/2018 12:52:20 PM