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OMB No. 1124-0001; Expires July 31, 2023

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

Arent Fox LLP

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

6952

3. Primary Business Address

1717 K Street NW, Washington, DC 20006

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 01/01/2007, Washington, DC

(c) Name of responsible individual (e.g., officer, director or partner) Cristina Carvalho

(d) Other business address(es), if any, including locations of branch or local offices See Appendix for Response

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

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

Name	Residence Address	Citizenship	Position
See Appendix for Response			

(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

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

Arent Fox LLP is a law firm.

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

Arent Fox LLP (the "Firm") is a limited liability partnership organized under the laws of the District of Columbia and owned and controlled by its partners. The Firm is managed by an Executive Committee ("EC"). The EC is composed of 13 members: 12 members who are elected by the equity partners of the Firm and the Managing Partner of the Firm.

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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
See Appendix for Response			

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II--FOREIGN PRINCIPAL

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

Foreign Principal	Foreign Principal Address
Kurdistan Regional Government	Council of Ministers Erbil, Kurdistan Region IRAQ 44001

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 register[2] under FARA, 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

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)).

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

During the period beginning 60 days prior to the date of the registrant's obligation to register[4] under FARA, has the registrant received anything of value[5] 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

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

During the period beginning 60 days prior to the date of the registrant's obligation to register[6] under FARA, 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

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

During the period beginning 60 days prior to the date of the registrant's obligation to register[7] under FARA, has the registrant disposed of any thing of value[8] 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

(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register[9] under FARA, 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
See Appendix for Response				

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.

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V--INFORMATIONAL MATERIALS[10]

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 and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type

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.

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 such informational materials?

Yes ☐ No ☐

If yes, furnish the names and addresses of such 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)* _____

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.

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16. Informational materials will be disseminated among the following groups:

- ☐ Public officials
- ☐ Legislators
- ☐ Government agencies
- ☐ Newspapers
- ☐ Editors
- ☐ Civic groups or associations
- ☐ Libraries
- ☐ Educational groups
- ☐ Nationality groups
- ☐ Other *(specify)* _____

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 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 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]
04/30/2021	Gerald Mitchell	/s/Gerald Mitchell

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.

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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
April 30, 2021	Gerald Mitchell	

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Appendix
Response to Item 5(d)

Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.

800 Boylston Street, 32nd Floor, Boston, MA 02199

555 West Fifth Street, 48th Floor, Los Angeles, CA 90013

1301 Avenue of the Americas, 42nd Floor, New York, NY 10019

55 Second Street, 21st Floor, San Francisco, CA 94105

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Appendix
Response to Item 5(f)

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.

Name	Residence Address	Citizenship	Position
Caroline English		UNITED STATES	Member of the Executive Committee
Christina Carvalho		UNITED STATES	Firmwide Managing Partner & Member of the Executive Committee
David Barbash		UNITED STATES	Member of the Executive Committee
Richard Brand		UNITED STATES	Member of the Executive Committee
Anthony Lupo		UNITED STATES	Chair of the Executive Committee
Richard Gale		UNITED STATES	Member of the Executive Committee
Aaron Jacoby		UNITED STATES	Member of the Executive Committee
Kay Georgi		UNITED STATES	Member of the Executive Committee
David Martin		UNITED STATES	Member of the Executive Committee
Aram Ordubegian		UNITED STATES	Member of the Executive Committee
Scott Peeler		UNITED STATES	Member of the Executive Committee
Andrew Silfen		UNITED STATES	Member of the Executive Committee
Brian Waldman		UNITED STATES	Member of the Executive Committee

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Appendix
Response to Item 6

Item 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)	Nature of Services
Jasmine Zaki		Kurdistan Regional Government	Provide advice on legal matters and policy-related matters to the foreign principal. These matters include advice to the foreign principal in relation to the U.S. Government policies on Iraq and the Middle East. Such assistance will include making contact with members of the Legislative and Executive Branch of the U.S. Government.
Oliver Spurgeon III		Kurdistan Regional Government	Provide advice on legal matters and policy-related matters to the foreign principal. These matters include advice to the foreign principal in relation to the U.S. Government policies on Iraq and the Middle East. Such assistance will include making contact with members of the Legislative and Executive Branch of the U.S. Government.
Philip English		Kurdistan Regional Government	Provide advice on legal matters and policy-related matters to the foreign principal. These matters include advice to the foreign principal in relation to the U.S. Government policies on Iraq and the Middle East. Such assistance will include making contact with members of the Legislative and Executive Branch of the U.S. Government.
Daniel Sjostedt		Kurdistan Regional Government	Provide advice on legal matters and policy-related matters to the foreign principal. These matters include advice to the foreign principal in relation to the U.S. Government policies on Iraq and the Middle East. Such assistance will include making contact with members of the Legislative and Executive Branch of the U.S. Government.

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Appendix
Response to Item 10(c)

Item 10(c): DISBURSEMENTS-POLITICAL CONTRIBUTIONS: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, 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? If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method/Event	Amount/Thing of Value
02/25/2021	Oliver Spurgeon	Rep. Joyce Beatty	Credit Card	$ 350.00
04/14/2021	Oliver Spurgeon	Sen. Raphael Warnock	Credit Card	$ 350.00
04/09/2021	Arent Fox LLP	DC Democratic State Committee - Emancipation Day Event Sponsorship	Check	$ 1,000.00
04/15/2021	Jasmine Zaki	Rep. Colin Allred, Andy Kim, Tom Malinowski, Abigail Spanberger, and Gregory Meeks	Credit Card	$ 250.00
02/22/2021	Philip English	Rep. Steve Chabot	Electronic Donation	$ 250.00
02/22/2021	Philip English	Rep. Dan Newhouse	Electronic Donation	$ 500.00
02/25/2021	Philip English	Rep. Tom Rice	Electronic Donation	$ 1,500.00
02/22/2021	Philip English	Rep. Neal Dunn	Electronic Donation	$ 500.00
02/28/2021	Philip English	Rep. Fred Upton	Electronic Donation	$ 500.00
03/04/2021	Philip English	Rep. Andrew Clyde	Electronic Donation	$ 250.00
03/19/2021	Philip English	Rep. Collin Allred - ACT BLUE	Electronic Donation	$ 125.00
03/19/2021	Philip English	Rep. Andy Kim - ACT BLUE	Electronic Donation	$ 125.00
03/19/2021	Philip English	Rep. Tom Malinowski - ACT BLUE	Electronic Donation	$ 125.00
03/19/2021	Philip English	Rep. Abigail Spanberger - ACT BLUE	Electronic Donation	$ 125.00
03/25/2021	Philip English	Rep. Jodey Arrington - Bulldog PAC	Electronic Donation	$ 2,000.00
03/29/2021	Philip English	Rep. David McKinley	Electronic Donation	$ 250.00
03/29/2021	Philip English	Rep. Jason Smith	Electronic Donation	$ 500.00
04/12/2021	Philip English	Sen. Jerry Moran	Electronic Donation	$ 500.00
04/12/2021	Philip English	Rep. Hal Rogers	Electronic Donation	$ 500.00
04/12/2021	Philip English	Citizens for Properity in America Today	Electronic Donation	$ 500.00
04/15/2021	Philip English	ARENT FOX LLP PAC	Electronic Donation	$ 278.00
06/28/4391	Philip English	Making America Prosperous PAC - Rep. Kevin Brady	Electronic Donation	$ 1,500.00
04/21/2021	Philip English	Brenton Davis	Electronic Donation	$ 600.00
04/23/2021	Philip English	Rep. Jeff Fortenberry	Electronic Donation	$ 500.00

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