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OMB No. 1124-0001; Expires October 31, 2026

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

Rathmell Short LLP

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

7554

3. Primary Business Address

1519 28th Street NW, Washington, DC 20007

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)* Limited Liability Partnership

(b) Date and place of organization 02/26/2025, Washington, D.C.

(c) Name of responsible individual (e.g., officer, director or partner) Jason M. Short

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

(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
Mr. Jason Michael Short	Provided to DOJ Under Separate Cover	UNITED STATES	Partner
Mr. Robin Rathmell	Provided to DOJ Under Separate Cover	UNITED STATES	Partner
See Appendix for Additional Names			

(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
See Appendix for Response		

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

Law practice

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

The registrant is owned and controlled by the Partners of Rathmell Short LLP

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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
XH Smart Tech China Co. Ltd.	No. 6 Hengli Industry Zone, Lianfeng Road Zuhai, Guangdong CHINA 519060

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 to the date of registration, 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	Subtotal
See Appendix for Response					

$ .01

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 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* 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 to the date of registration, 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 to the date of registration, 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	Subtotal
See Appendix for Response					
					$ .01
					Total

(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 to the date of registration, 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 to the date of registration, 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

4, 6, 7 and 9 *See supra* note 2, at 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, list the type of informational materials, and file the informational materials.

Foreign Principal	Type of Informational Materials

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 informational materials?

Yes ☐ No ☐

If yes, furnish the names and addresses of the 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 supra* note 2, at 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* 28 C.F.R. § 5.201(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 fund raising campaign and transmitted for a foreign principal (*See* 28 C.F.R. § 5.201(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]
03/11/2025	/s/ Jason M. Short	Sign	/s//s/ Jason M. Short
		Sign	
		Sign	
		Sign	

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
03/11/2025	Jason M. Short	/s/ Jason M. Short (e-signed)

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Appendix
Response to Item 5(f) Attached

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.

List of Partners/Officers/Directors

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Rathmell Short LLP

Partnership Information

Name	Residence Address(es)	Position	Nationality
Jason M. Short	Filed with DOJ under separate cover	Partner	United States of America
Robin Rathmell	Filed with DOJ under separate cover	Partner	United States of America

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Appendix
Response to Item 5(g)

Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s)	Services
Mr. Jason Michael Short	XH Smart Tech China Co. Ltd.	Provide legal counsel and guidance on government strategy with respect to prospective and/or ongoing United States judicial or administrative proceedings.
Mr. Robin Rathmell	XH Smart Tech China Co. Ltd.	Provide legal counsel and guidance on government strategy with respect to prospective and/or ongoing United States judicial or administrative proceedings.

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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
Mr. Robert Daniel Stryk	4915 E Sharon Drive Scottsdale, AZ 85254	XH Smart Tech China Co. Ltd.	Provide consulting services to Rathmell Short LLP, in support of the Primary Registrant's legal representation of the foreign principal - XH Smart Tech China Co. Ltd. - before U.S. government officials regarding prospective and/or ongoing United States judicial or administrative proceedings
Mr. Christian Bourge	1881 N Nash Street Arlington, VA 22209	XH Smart Tech China Co. Ltd.	Provide consulting services to Rathmell Short LLP, in support of the Primary Registrant's legal representation of the foreign principal - XH Smart Tech China Co. Ltd. - before U.S. government officials regarding prospective and/or ongoing United States judicial or administrative proceedings
Mr. Timothy Curry	475 K Street NW Washington, DC 20001	XH Smart Tech China Co. Ltd.	Provide consulting services to Rathmell Short LLP, in support of the Primary Registrant's legal representation of the foreign principal - XH Smart Tech China Co. Ltd. - before U.S. government officials regarding prospective and/or ongoing United States judicial or administrative proceedings

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Appendix
Response to Item 9(a)

Item 9(a): RECEIPTS-MONIES: During the period beginning 60 days prior to the date of the registrant's obligation to register 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? If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
XH Smart Tech China Co. Ltd.	02/07/2025	Intemath Trading Limited	The Registrant has not received funds from the foreign principal. The Registrant has received funds on behalf of the foreign principal from a third-party funder, Intemath Trading Limited. Funds received by the Registrant have been and shall be used in connection with the provision of legal services exempt from registration pursuant to 22 U.S.C. § 613(g). For the avoidance of doubt, because the e-File system required a non-zero numerical entry, the amount listed as the "Total" ($0.01) was entered as a placeholder and does not represent the amount of monies disbursed or otherwise expended on behalf of the foreign principal.	$ .01	
XH Smart Tech China Co. Ltd.	----------	----------	----------	---------->	$ .01

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Appendix
Response to Item 10(a)

Item 10(a): DISBURSEMENTS-MONIES: During the period beginning 60 days prior to the date of the registrant's obligation to register 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? 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	Subtotal
XH Smart Tech China Co. Ltd.	02/07/2025	Sonoran Policy Group, LLC (d/b/a/ Stryk Global Diplomacy)	The Registrant has disbursed funds to Sonoran Policy Group, LLC (d/b/a/ Stryk Global Diplomacy), in connection with and in support of the Registrant's provision of legal services exempt from registration pursuant to 22 U.S.C. § 613(g). For the avoidance of doubt, because the e-File system required a non-zero numerical entry, the amount listed as the "Total" ($0.01) was entered as a placeholder and does not represent the amount of monies disbursed or otherwise expended on behalf of the foreign principal.	$ .01	
XH Smart Tech China Co. Ltd.	----------	----------	----------	---------->	$ .01

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