

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement

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

For Six Month Period Ending 11/30/2014 (Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration No.

Orion Strategies 5437

(c) Business Address(es) of Registrant

611 Pennsylvania Avenue SE #437 Washington, DC 20003

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.

Yes, main office has moved to new business address listed above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

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 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 Connection Ended

(b) 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

5. (a) Has any person named in Item 4(b) 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.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render 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 Residence Address Citizenship Position Date Assumed

(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

(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

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes No

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No
 If yes, furnish the following information:

Foreign Principal	Date of Termination
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8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No
 If yes, furnish th following information:

Name and Address of Foreign Principal(s)	Date Acquired
Embassy of Mongolia 2833 M Street NW Washington, DC 20007	August 2014
Embassy of Japan 2520 Massachusetts Ave. NW Washington, DC	October 2014

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No

Exhibit B⁴ Yes No

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach 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

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11. During this 6 month reporting period, have you 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 your activities and services:

Embassy of Mongolia: Provided assistance on outreach to Congress on security, trade and bilateral cooperation issues.

Embassy of Japan: Provided assistance on public affairs outreach to the administration and Congress to strengthen bilateral ties.

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes No

If yes, identify each such 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 or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

please see attached

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

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.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 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 otherwise? Yes No

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
please see attached			

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, have you filed an Exhibit D⁸ to your registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date: _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 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	Thing of Value	Purpose
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^{6, 7} 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. (See Rule 201(e)).

⁸ An Exhibit D, 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.

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, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

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.

Date	To Whom	Purpose	Amount
please see attached			

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you 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:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your 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	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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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, did you prepare, disseminate or cause to be disseminated any informational materials?¹²
 Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?
 Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

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

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any 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 websites URL(s): _____
- Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause 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) _____

21. What language was used in the informational materials:

- English
- Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label 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.

VI - 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 signature¹³)

December 31, 2014

/s/ Michael Mitchell

eSigned

December 31, 2014

/s/ Randy Scheunemann

eSigned

¹³ 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.

Attachment A

11. During this 6 month period, have you engaged in any activities for or rendered any services to any foreign principal in Items 7, 8 and 9 of statement? Yes

If yes, identify such foreign principal and describe in detail our activities and services:

The Republic of Montenegro through Paige Reffe, as represented by the Ministry of Foreign Affairs in Podgorica, Montenegro, The Government of Mongolia as represented by the Embassy in Washington D.C and the Embassy of Japan in Washington, DC, Orion Strategies LLC has engaged in the following activities.

Week of June 1

Montenegro

- RANDY SCHEUNEMANN - Email with Chris Socha, Sen Risch, on Montenegro's NATO aspirations
- RANDY SCHEUNEMANN - Email with Chris Brose, Sen. McCain on Montenegro's NATO aspirations

Week of June 8

Montenegro

No activities

Week of June 15

Montenegro

- RANDY SCHEUNEMANN - Meeting with Sen. McCain, Chris Brose (Sen. McCain) to discuss Montenegro's NATO aspirations

Week of June 22

Montenegro

- RANDY SCHEUNEMANN - Telephone conversation with Chris Brose (Sen. McCain) to discuss Montenegro's NATO aspirations

Week of June 29

Montenegro

No activities

Week of July 6

Montenegro

No activities

Week of July 13

Montenegro

No activities

Week of July 20

Montenegro

No activities

Week of July 27

Montenegro

No activities

Week of August 3

Montenegro

No activities

Week of August 10

Montenegro

No activities

Week of August 17

Montenegro

No activities

Week of August 24

Montenegro

No activities

Mongolia

- Mike Mitchell meeting with Michael Schiffer, SFRC, on Mongolia-US relations.

Week of August 31

Montenegro

No activities

Mongolia

No activities

Week of September 7

Montenegro

No activities

Mongolia

No activities

Week of September 14

Montenegro

No activities

Mongolia

- Mike Mitchell phone conversation with Parson Middleton, office of Rep. Joe Pitts regarding Mongolia caucus.
- Mike Mitchell phone conversation with Laura Hughes, office of Rep. McDermott regarding Mongolia Caucus.

Week of September 21

Montenegro

No activities

Mongolia

No activities

Week of September 28

Montenegro

No activities

Mongolia

No activities

Week of October 5

Montenegro

No activities

Mongolia

No activities

Week of October 12

Montenegro

No activities

Mongolia

No activities

Week of October 19

Montenegro

No activities

Mongolia

No activities

Week of October 26

Japan

- RANDY SCHEUNEMANN - Meeting with Jamie Kirchick, Foreign Policy Initiative, to discuss Japan's evolving national security policies

Montenegro

No activities

Mongolia

No activities

Week of November 2

Japan

- RANDY SCHEUNEMANN - Meeting with Fred Kagan, American Enterprise Institute, and Kim Kagan, Institute for the Study of War, to discuss Japan's evolving national security policies.

Montenegro

No activities

Mongolia

- Mike Mitchell-Discussion with Millennium Challenge press office regarding MCC process for a second compact.
- Mike Mitchell-Discussion with Laura Hughes, officer of Rep. McDermott regarding Mongolia and second MCC compact.

Week of November 9

Japan

- RANDY SCHEUNEMANN - Meeting with Jamie Fly, Senator Rubio, to discuss Japan's evolving national security policies.

Montenegro

No activities

Mongolia

- Mike Mitchell-Discussion with Mort Halperin, Soros Foundation, on MCC compact for Mongolia.

Week of November 16

Japan

- RANDY SCHEUNEMANN - Meeting with John Lee, Hudson Institute, to discuss Japan's evolving national security policies
- RANDY SCHEUNEMANN - Meeting with Max Boot, Council on Foreign Relations, to discuss Japan's evolving national security policies

Montenegro

No activities

Mongolia

No activities

Week of November 23

Japan

- RANDY SCHEUNEMANN - Phone conversation with James Auer, Vanderbilt University, to discuss Japan's evolving national security policies

Montenegro

No activities

Mongolia

No activities

ATTACHMENT B

14(A) during this 6 month period have you received from any foreign principal in Items 7,8 and 9 of this statement, of from any other source, for or in the interests of any foreign principal, any contributions, income or money either as compensation or otherwise? Yes

Republic of Montenegro through Paige Reffe

Monies - receipts

July 7, 2014	Paige Reffe	Retainer	\$31,875
October 9, 2014	Paige Reffe	Retainer	\$31,875
		Total	\$63,750

Embassy of Japan

Monies - receipts

November 28, 2014	Embassy of Japan	Retainer	\$29,032
		Total	\$29,032

Mongolian Foreign Ministry

Monies - receipts

October 9, 2014	Embassy of Mongolia	Retainer and Fara filing fee	\$7,805
November 17, 2014	Embassy of Mongolia	Retainer	\$6,500
			\$14,305

Total **\$107,087**

ATTACHMENT C

15 (A) During this 6 month reporting period, have you

(1) Disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7,8 or 9 of this statement?

Yes

(2) Transmitted monies to any such foreign principal? No

Monies - disbursements Republic of Montenegro through Paige Reffe

6/2014	FARA Registration	\$305.00
6/2014	Taxis	\$65.00
6/2014	Parking	\$20.00
	Total	\$390.00

Monies- disbursements Mongolia

6/2014	FARA Registration	\$305.00
7/2014	Taxis	\$125.00
8/2015	Parking	\$ 80.00
	Total	\$515.00

Monies- disbursements Japan

10/2014	FARA Registration	\$305.00
11/2014	Taxis	\$100.00
Oct, Nov, Dec	Parking	\$180.00
	Total	\$585.00