

U.S. Department of Justice

Washington, DC 20530

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

**INSTRUCTIONS.** File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at <http://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant  Prime Policy Group	2. Registration No.  6192
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- To give a 10-day notice of change in information as required by Section 2(b) of the Act.
- To correct a deficiency in
- Initial Statement
- Supplemental Statement for the period ending \_\_\_\_\_
- Other purpose (*specify*) Termination notice
- To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:  
Document attached.

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. (*If space is insufficient, a full insert page must be used.*)

Our relationship with the Government of Ukraine (through our client, JAI Holdings LLC) terminated March 15, 2014. We have not received the retainer fee mentioned in the contract thus far.

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**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 the 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<sup>1</sup>)

April 04, 2014

/s/ Theresa Weber

eSigned

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<sup>1</sup> 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.



1110 Vermont Avenue, NW  
Suite 1000  
Washington, DC 20005  
TEL (202) 530-0500  
FAX (202) 530-4800  
prime-policy.com

April 4, 2014

U.S. Department of Justice/NSD  
FARA Registration Unit  
600 E Street, NW  
BICN Building — Room 1300  
Washington, DC 20530

RE: Prime Policy Group – FARA Registration

To whom it may concern:

I am writing to provide additional information with respect to Prime Policy Group's ("Prime") recent submission of its Registration Statement pursuant to the Foreign Agents Registration Act of 1938, as amended ("FARA").

Prime has registered under FARA as a result of its work on behalf of the government of Ukraine ("Ukraine") as a subcontractor of a private entity, JAI Holdings, LLC ("JAI"). While the agreement between Prime and JAI contemplated various services to be provided by Prime, at the outset, the only services requested and provided on behalf of Ukraine were certain contacts and communications with officials of the International Monetary Fund designed to secure financing from the IMF. However, as the situation in Ukraine evolved, so too did the nature of Prime's engagement. As a result, at a certain point in late 2013 Prime began to contact United States federal officials in an attempt to secure loan guarantees from the U.S. government.

Upon consideration of the evolution of Prime's representation of Ukraine through JAI, Prime determined that it is appropriate to register under FARA and, accordingly, has filed a FARA Registration Statement along with the required supporting documents. Finally, as its engagement with JAI terminated on March 15, 2014, Prime is filing an amended registration statement reflecting the conclusion of this work.

Please let me know if you have any questions.

Sincerely,  
Theresa Weber