

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 11/30/2015

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No.

Finsbury LLC

6293

(c) Business Address(es) of Registrant

3 Columbus Circle, Floor 9
New York, NY 10019

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.

None

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

3. If you have previously filed Exhibit C¹, 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.

¹ 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
None		

(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
None				

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.

None

(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
See attached				

(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
Kevin Carpenter	Vice President	6/30/2015
Eve Zibel	Vice President	7/3/2015
Kyle Giunta	Senior Vice President	6/17/2015

(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
Kevin Carpenter	Vice President	IE Singapore Board	6/30/2015
Eve Zibel	Vice President	Kreab Gavin Anderson K.K.	7/3/2015
Kyle Giunta	Senior Vice President	Kreab Gavin Anderson K.K.	6/17/2015

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.

None

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
None

Date of Termination

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name and Address of Foreign Principal(s)
Kreab Gavin Anderson K.K.
Shibakoen Ridge Building
1-8-21 Shibakoen, Minato-ku Tokyo
105-0011 Japan

Date Acquired

5/26/2015

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.

International Enterprise Singapore Board

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

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:

Kreab Gavin Anderson K.K. - media outreach on behalf of the Ambassadors to discuss policies of the Government of Japan.

International Enterprise Singapore Board - work involves reaching out to key US and global media to enhance or raise the profile and public perception of IE Singapore Board.

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.

See attached.

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.

None

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.

N/A

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
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 N/A

(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
N/A			

^{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.

None

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
4/2/15 - 4/10/15	Airfare, Hotel, Ground Transportation, Meals, Voice/Data	Craig Horowitz, et al, trip to Singapore to meet with IE Singapore Board - These expenses were not incurred for a U.S. Government official or media representative.	\$18,536.13
5/2/15 - 5/7/15	Airfare, Hotel, Ground Transportation, Meals	Craig Horowitz trip to Singapore to meet with IE Singapore Board	\$10,504.12
6/30/15	Business Wire, Inc.	Press Release Fee for Kreab Gavin Anderson K.K.	¥42,056.00
7/31/15	Business Wire, Inc.	Press Release Fee for Kreab Gavin Anderson K.K.	¥68,926.00
9/25/15	Business Wire, Inc.	Press Release Fee for Kreab Gavin Anderson K.K.	¥82,174.00

 \$29040.25, ¥193156

 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
None				

(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
None			

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.

Kreab Gavin Anderson K.K., International Enterprise Singapore Board

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.

N/A

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): http://www.japan.go.jp/tomodachi/Features/walk_talk.html
 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 30, 2015

/s/ Michael Gross

eSigned

December 30, 2015

/s/ Patrick Gallagher

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.

Question 12 – Political Activity on Behalf of Foreign Principals

Kreab Gavin Anderson K.K.

- Pitched regional and local outlets in Colorado and Utah on behalf of Ambassador Ken Shimanouchi from November 9 – 13, 2015
- Pitched regional and local outlets in Connecticut, Maine and Massachusetts on behalf of Ambassador Ichiro Fujisaki from October 12 – 16, 2015
- Pitched regional and local media outlets in Minnesota, Wisconsin and Illinois on behalf of Ambassador Mitsuo Sakaba from September 14 – 18, 2015
- Pitched regional and local media outlets in California on behalf of Ambassador Kenko Sone from July 20 – 24, 2015
- Pitched regional and local media outlets in Texas on behalf of Ambassador Yasuo Saito from June 15 – 19, 2015

All pitches can be summed up with the same description: With regard to the content of the pitch, we include an overview of the “Walk in U.S., Talk on Japan” program, biographical details on the former Ambassador, the socioeconomic ties between Japan and the state in which the reporter is based (e.g., \$ in imports, \$ in exports, famous Japanese public figures living in the state, etc.), and any relevant international news hooks (e.g., the recent TransPacific Partnership agreement).

Media Contacts include: American Metal Market; Associated Press; Barron's; Bloomberg; Boston Business Journal; Chicago Business Journal; Chicago Daily Newspapers; Chicago Sun-Times; Chicago Tribune; Christian Science Monitor; CNBC; Crain's Chicago Business; CU Independent; Denver Business Journal; Deseret News; Dow Jones; Financial Times; Forbes; Fortune; Futures Magazine; Global Trade; Harvard Gazette; Harvard Kennedy School Citizen; Institutional Investor; KCBS-AM; KCNC-TV; KCPW-FM; KDVR-TV; KFBK-AM ; KKTV-TV; KMGH-TV; KNRS-AM; OAA-TV; KQED-FM; KQED-TV; KRDO-TV; KSFO-AM; KSL-AM; KSL-TV; KSTE-AM; KSTU-TV; KSVC-AM; KTVX-TV; KUED-TV; KUER-FM; KUSA-TV; KUTV-TV; KXJZ-FM; KXRM-TV; Metal Bulletin; Millard County Chronicle; Millard County Chronicle Progress; National Publications with Chicago Bureaus; New York Times; Oil and Gas Journal; Platts Bunkerworld; Reuters; Sacramento Bee; Sacramento Business Journal; Salt Lake City Weekly; San Francisco Business Times; San Francisco Chronicle; San Francisco Examiner; San Jose Mercury News; Steel First; Steel Markets Daily; The Boston Globe; The Boston Herald; The Catalyst; The Colorado Springs Business Journal; The Daily Universe; The Daily Utah Chronicle; The Denver Post; The Economist; The Enterprise; The Gazette; The Harvard Crimson; The New Boston Post; The New York Times; The Salt Lake Tribune; The Signpost; The Wall Street Journal; The Washington Post; Trinity Tripod; USA Today; Wall Street Journal; WBBM-AM; WBBM-AM; WBEZ-FM; WBUR-FM; WBZ-AM; Wesleyan Argus; WFLD-TV; WGBH-TV; WGN-AM; WIND-AM; WLS-AM; WMAQ-TV; WTTW-TV; YahooFinance; Yale Daily News.

International Enterprise Singapore Board

- Secured background meetings for Satvinder Singh with NYC-based reporters from: New York Times, Bloomberg Businessweek, Reuters and trade publications American Metal Market and Platts. (October 2015)
- We reached out via email to U.S. commodities/markets/financial reporters (see attached media list) to share a new research report from IES on commodity trading hubs and Singapore's role and proposition. (November 2015) Bank of China and IE Singapore announced a partnership to promote Singapore's commodity trading and financial sectors and boost the Chinese bank's presence in Singapore. Shared press release with small group of U.S. banking reporters that report on BOC. (November 2015)
- Conducted media outreach to U.S.-based education reporters to publicize a public-private partnership between the International Chamber of Commerce (ICC) and IES – known as ICC Academy – offering a range of specialized programs to prepare students for successful careers in international trade. We linked to a press release in the email pitch. (November 2015)
- Distributed (via email) a monthly newsletter with key trade highlights from IE Singapore to the same group of U.S. commodities/markets/financial reporters. This email newsletter included hyperlinks to press releases, articles, speeches and remarks from CEO IES Eng Cheong that he had given at a Gas Tech trade conference in Singapore. (November and December 2015)

Contacted Media include: Associated Press; Barron's; Bloomberg; Dow Jones; The Economist; Financial Times; Forbes; Fortune; The New York Times; Institutional Investor; Reuters; USA Today; Wall Street Journal; American Metal Market; Global Trade; Metal Bulletin; Steel First; Steel Markets Daily; The Washington Post; Futures Magazine; Oil and Gas Journal; YahooFinance; AP; CNBC; Platts Bunkerworld

Receipts - Monies

International Enterprise Singapore Board	Amount	Payment Date
April retainer	66,667.00	9/8/2015
May retainer	31,667.00	9/8/2015
June retainer	31,667.00	9/8/2015
July retainer	51,667.00	10/2/2015
August retainer	31,667.00	11/3/2015
September retainer	31,667.00	12/4/2015
Travel Expense Reimbursement - 5/2/15 - 5/7/15 Craig Horowitz trip to Singapore to meet with IE Singapore Board	10,504.12	11/3/2015
Fees for time - 5/2/15 - 5/7/15 Craig Horowitz trip to Singapore to meet with IE Singapore Board	27,880.00	11/3/2015
Travel Expense Reimbursement - 4/2/15 - 4/10/15 Craig Horowitz, et al, trip to Singapore to meet with IE Singapore Board	18,536.13	11/3/2015
Additional fee for media outreach strategy - 4/2/15 - 4/10/15 Craig Horowitz, et al, trip to Singapore to meet with IE Singapore Board	1,600.00	11/3/2015
	USD \$303,522.25	

Kreab Gavin Anderson K.K.	Amount	Payment Date
Fees for Texas media outreach	500,000.00	8/18/2015
Expense reimbursement for Press Release Distribution to a Texas Media Delegation	42,056.00	8/18/2015
Fees for California media outreach	500,000.00	9/4/2015
Expense reimbursement for Press Release Distribution to a California Media Delegation	82,174.00	9/4/2015
Fees for Midwest media outreach	700,000.00	11/20/2015
Expense reimbursement for Press Release Distribution to a Midwest Media Delegation	68,926.00	11/20/2015
	JPY ¥1,893,156.00	

Question 5(b) - Employees added during the 6 month period

Name	Residence Address	Citizenship	Position	Date Assumed	Date Terminated
Amy Schultz	Brooklyn, NY	US	Senior Associate	6/2/2015	
Eve Zibel	Ridgefield, CT	US	Vice President	6/2/2015	7/3/2015
Herma Gjinko	New York, NY	US and Albania	Associate	6/2/2015	
Jonathan Lowe	Brooklyn, NY	US	Vice President	6/2/2015	
Kerry Golds	New York, NY	US	Senior Vice President	6/2/2015	
Kyle Giunta	Brooklyn, NY	US	Senior Vice President	6/2/2015	6/17/2015
Michael Dolan	New York, NY	US	Senior Vice President	6/2/2015	
Michael Gross	New York, NY	US	Partner	6/2/2015	
Stephen Labaton	Washington, DC	US	Partner	6/2/2015	
Danielle Nathan	New York, NY	US	Associate	10/26/2015	
Ben Gonin	Brooklyn, NY	US	Senior Associate	10/7/2015	