U.S. Department of Justice
Washington, DC 20530

Supplemental Statement
Pursuant to Section 2 of the Foreign Agents Registration Act of 1938, as amended.

OMB No. 1105-0002
Approval Expires Oct. 31, 1986

For Six Month Period Ending _____
(Insert date)

Name of Registrant | Registration No.
Sontheimer Hazlett, Ltd. also d/b/a/ Sontheimer Group, also through Mallory Factor Inc. St. Maarten Tourist Information Office
Business Address of Registrant
1500 Broadway
New York, NY 10035

I—REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	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 ☒

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. 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*

4. 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. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
Yes ☐ No ☐ Not Applicable

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, 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*

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	*Residence Address*	*Position or connection*	*Date connection began*

II—FOREIGN PRINCIPAL

8. Has your connection with any foreign prinicpal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal *Date of Termination*

9. Have you acquired any new foreign principal[1] during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal *Date acquired*

10. In addition to those named in Items 8 and 9, if any, list the foreign principals[1] whom you continued to represent during the 6 month reporting period. Government of the Island Territory, the Windward Islands Section, St. Maarten.

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 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services: Registrant is engaged as public relations counsel in the United States for the purpose of promoting tourism on the islands of St. Maarten, Saba and St. Eustatius.

[1]The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or 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 foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity[2] 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.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

[2]The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other 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 the 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 8, 9 and 10 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 yes, set forth below in the required detail and separately for each foreign principal an account of such monies.[3]

Date	*From Whom*	*Purpose*	*Amount*
Amortized over a six month period	Government of Island Territory, the Windwards Section, St. Maarten	Payment for New York office suite for tourism and services rendered on behalf of the tourism office	$112,530.00
		Total	$112,530.00

(b) **RECEIPTS—THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value[4] other than money from any foreign principal named in Items 8, 9 and 10 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:

Name of foreign principal	*Date received*	*Description of thing of value*	*Purpose*

[3] A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).
[4] 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 8, 9 and 10 of this statement? Yes ☒ No ☐

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

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. Government of the Island Territory, the Windward Island Section of St. Maarten.

Date	*To Whom*	*Purpose*	*Amount*
	See Schedule I (attached)		
		Total	$15,655.44

15. (b) **DISBURSEMENTS—THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value[5] other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?
Yes ☐ No ☒

If yes, furnish the following information:

Date disposed	*Name of person to whom given*	*On behalf of what foreign principal*	*Description of thing of value*	*Purpose*

(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 value[5] 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*	*Name of political organization*	*Name of candidate*

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

[5]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.

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 political propaganda? 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 political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams

☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other *(specify)* _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda 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 this political propaganda:

☐ English ☐ Other *(specify)* _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. **EXHIBITS A AND B**

(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A[6] Yes ☐ No ☐
Exhibit B[7] Yes ☐ No ☐

Not Applicable

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.

[6]The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.
[7]The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. **EXHIBIT C**

If you have previously filed an Exhibit C[8], state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

Not Applicable

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

If no, please attach the required amendment.

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27. **SHORT FORM REGISTRATION STATEMENT**

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

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

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

x [signature]

Mallory Factor

Subscribed and sworn to before me at 1500 Broadway, New York, NY 10036

this 3rd day of February, 19 86

[signature]

(Signature of notary or other officer)

[8] The Exhibit C, 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 upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

SCHEDULE 1

July 20, 1985 to December 31, 1985

DATE	TO WHOM	PURPOSE	AMOUNT
10-25-85	Luce press clippings	PR	285.20
10-30-85	Sabra Limo	PR	29.10
11-10-85	U.P.S	PR	47.25
11-4-85	U.P.S	PR	3.48
11-08-85	MCI	PR	82.69
11-08-85	N.Y. Telephone	PR	191.57
11-11-85	N.Y. Telephone	PR	188.81
11-13-85	American International	PR	1500.00
11-15-85	U.P.S.	PR	13.96
11-15-85	Photo Replicas	PR	18.00
11-15-85	N.Y. Telephone	PR	212.58
11-20-85	Copycare	PR	325.80
11-20-85	Yvonne Niche Expenses	PR	466.05
11-20-85	Gail Knopfler Expenses	PR	8.80
11-20-85	Copycare	PR	163.38
11-25-85	Gail Knopfler Expenses	PR	400.00
11-29-85	Luce Press Clippings	PR	426.26
11-29-85	U.P.S.	PR	52.73
11-29-85	Bronco Riders	PR	33.00
11-29-85	Travel Smart	PR	35.00
11-29-85	Photo Replicas	PR	63.00
12-05-85	Gail Knopfler Expenses	PR	680.39
12-06-85	DHL Airways	PR	24.14
12-06-85	Wheaton Plastic	PR	598.21
12-10-85	J. Rabinowitz & Sons	PR	133.67
12-13-85	U.P.S.	PR	143.88
12-13-85	N.Y. Telephone	PR	141.40
12-20-85	Yvonne Niche Expenses	PR	43.70
12-23-85	MCI	PR	80.82
12-27-85	U.P.S.	PR	3.76
12-30-85	Copycare	PR	100.02
12-30-85	Charles Glasser, Jr.	PR	165.00
12-31-85	Mary Fabio Expenses	PR	19.35
12-31-85	Gail Knopfler Expenses	PR	544.84
12-31-85	American Airlines	PR	52.60
	SUM TOTAL		$15,655.44

SCHEDULE 1

July 20, 1985 to December 31, 1985

DATE	TO WHOM	PURPOSE	AMOUNT
07-19-85	U.P.S.	PR	62.24
07-20-85	Gail Knopfler Expenses	PR	227.95
07-20-85	Robert Grode	PR	9.50
07-29-85	Federal Express	PR	9.75
07-30-85	Photo Replicas	PR	188.50
07-30-85	U.P.S	PR	46.45
07-30-85	Copycare	PR	201.16
08-05-85	Ed Clapperman Expenses	PR	133.85
08-09-85	Federal Express	PR	19.50
08-05-85	Yvonne Nichie Expenses	PR	201.74
08-09-85	N.Y.Telephone	PR	118.54
08-09-85	U.P.S.	PR	41.62
08-09-85	Sabra Service	PR	25.90
08-15-85	M & F Box Co.	PR	16.23
08-15-85	Travel Resourses	PR	40.00
08-23-85	United Expo Services	PR	200.50
08-23-85	Luce Press Clippings	PR	346.44
08-23-85	U.P.S.	PR	93.72
08-30-85	R.C.A. Global Commun.	PR	23.45
08-30-85	Copycare	PR	245.50
09-06-85	Bank of Nova Scotia	PR	50.00
09-06-85	N.Y. Telephone	PR	118.41
09-06-85	Federal Express	PR	9.25
09-06-85	Milton Paper Co.	PR	164.34
09-13-85	Summit Office Supply	PR	37.67
09-13-85	U.P.S.	PR	132.02
09-13-85	Sabra Service	PR	20.20
09-20-85	Yvonne Niche Expenses	PR	164.39
09-20-85	Photo Replicas	PR	24.45
09-20-85	Pic Pac Island Courier	PR	29.00
09-20-85	Copycare	PR	553.70
09-20-85	Gail Knopfler Expenses	PR	250.00
09-21-85	U.P.S.	PR	58.04
09-26-85	Federal Express	PR	22.00
09-27-85	Copycare	PR	63.20
10-04-85	Luce Press Clippings	PR	327.48
10-05-85	Postmaster	PR	3000.00
10-11-85	GTE Sprint	PR	5.33
10-11-85	U.P.S.	PR	284.09
10-11-85	N.Y. Telephone	PR	156.45
10-18-85	Drucker Lithography	PR	255.00
10-18-85	Unipax	PR	28.35
10-25-85	Copycare	PR	53.00
10-25-85	Photo Replicas	PR	307.00
10-25-85	Mid-America Wholesale	PR	11.09

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

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U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION
INTERNAL SECURITY SECTION
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

   Yes _____ or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

   Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

X _____ Signature

2-3-86
Date

Mallory Factor
Please type or print name of signatory on the line above

President
Title