

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda 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, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 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, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant	Gold and Liebengood 1455 Pennsylvania Avenue, N.W. Suite 950 Washington, D.C. 20004	2. Registration No.	3700
3. Name of foreign principal	BAA, plc	4. Principal address of foreign principal	130 Wilton Road London, SW1V1LQ England

5. Indicate whether your foreign principal is one of the following type:

- Foreign government
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
 - Partnership
 - Corporation
 - Association
 - Committee
 - Voluntary group
 - Other (specify) _____
- Individual—State his nationality _____

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6. If the foreign principal is a foreign government, state:

- a) Branch or agency represented by the registrant.
- b) Name and title of official with whom registrant deals. N/A

7. If the foreign principal is a foreign political party, state:

- a) Principal address N/A
- b) Name and title of official with whom registrant deals.
- c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes No
- Directed by a foreign government, foreign political party, or other foreign principal..... Yes No
- Controlled by a foreign government, foreign political party, or other foreign principal Yes No
- Financed by a foreign government, foreign political party, or other foreign principal..... Yes No
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes No
- Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes No

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

BAA, plc is a publicly traded company in the United Kingdom. The company was privatized by the government in 1986. However, approximately 5% of the company's shares are owned by the government.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

Date of Exhibit A	Name and Title	Signature
January 10, 1992	Howard S. Liebengood Vice President	<i>Howard S. Liebengood</i>

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 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, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant	Name of Foreign Principal
Gold and Liebengood	BAA, plc

Check Appropriate Boxes:

- The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
- There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

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4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Registrant has been retained to present the views of BAA with regard to charges and landing rights at airports located within the United Kingdom. Additionally, registrant will present the views of BAA with regard to matters falling within the purview of the Federal Aviation Administration. Registrant will contact Administration officials, Members of Congress and staff.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Registrant will contact Administration officials, Members of Congress and staff on behalf of BAA. These contacts will be through telephone calls, letters and the distribution of relevant fact sheets.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Registrant will engage in the contacts described above. Registrant will provide factual information regarding landing fees, landing slots and associated charges imposed on international carriers using those airports managed by BAA, plc. Additionally, registrant will engage in necessary contacts related to legislative or Federal Aviation Administration actions which impact BAA business activities.

Date of Exhibit B	Name and Title	Signature
January 10, 1992	Howard S. Liebengood Vice President	<i>Howard S. Liebengood</i>

¹Political activity as defined in Section 1(o) of the Act 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.

BAA International
Nassfield House, Gatwick Airport
West Sussex RH6 0HZ
Telephone (0293) 517755
Telex 877995 BAAVMM G
Fax (0293) 595553
Direct line (0293) 595013

From the International Director

BAA
International

10 January 1992

Mr David Bushong
Gold & Liebgood
Suite 950
1455 Pennsylvania Avenue N.W.
Washington D.C. 20004
USA

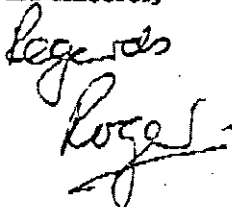
Dear David

It was a pleasure to meet you in Pittsburgh on my recent visit and to have the opportunity to explain our current US activities and future plans.

In view of our proposed expansion in the USA and anticipating our need for Gold & Liebgood's services in 1992, BAA plc wishes to extend your existing contract with us for one year at a fixed rate of \$10,000 per calendar month plus reasonable expenses commencing February 1st 1992 and subject to a 30 day written notice of termination. During this period I will assume responsibility for day to day oversight of your work for us. Please confirm that these terms are acceptable.

I look forward to working with you as our USA business develops.

Yours sincerely



Roger J Kitley

cc: Terry Morgan.

BAA plc

Corporate Office
130 Wilton Road
London SW1V 1LQ
Telephone 01-834 9449
Telex 919268 BAAPLC G
Fax 01-932 6659
Direct number 01-932 6650

From the Director Corporate Communications

David Bushong Esq
Gold and Liebengood, Inc
Suite 950
1455 Pennsylvania Avenue NW
Washington DC 20004
U.S.A.

B·A·A 

1 March 1989

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CORPORATE COMMUNICATIONS
130 WILTON ROAD
LONDON SW1V 1LQ

Dear David,

Thank you for your letter of 8 February which formalises the relationship between Gold and Liebengood and BAA plc.

We agree to the terms and conditions set out therein and a copy of the contract is enclosed, signed by Richard Everitt, Mike Toms and myself.

*Yours sincerely
Peter*

Peter Sanguinetti

GOLD AND LIEBENGOD, INC.
SUITE 950
1455 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20004
(202) 639-8899

February 8, 1989

Mr. Peter Sanguinetti
BAA, plc
Corporate Office
130 Wilton Road
London SW1V 1LQ

Dear Mr. Sanguinetti:

Gold and Liebengood, Inc., is honored to serve as lobbyist for BAA. This letter will formalize that relationship in concert with the conditions set out in your letter to David Bushong dated February 3, 1989. By signing one of the two originals of this letter, BAA agrees to the relationship described below.

Gold and Liebengood, Inc., is to undertake basic political development on behalf of BAA and to monitor activities directly and indirectly relating to the current arbitration between the U.S. and U.K. governments under Bermuda II. Gold and Liebengood, Inc., is to coordinate all its activity with the appropriate authorities at the British Embassy and to take direction in all matters from Richard Everitt, Mike Toms, Peter Sanguinetti, and Mark Pendlington or any other officer of BAA or employee authorized for such responsibility. Gold and Liebengood, Inc., will bill its time at a rate of \$250.00 per hour against a flat monthly retainer fee of \$4,000.00 per month to be paid quarterly in advance. Expenses and support will be billed without mark-up. Should our actual billings approach the retainer limit in any given month, Gold and Liebengood, Inc., will advise BAA and seek authorization for work above the retainer. Gold and Liebengood, Inc., will also seek BAA's authority before undertaking any work beyond the scope of monitoring and political development, regardless of billing amounts. Messrs. John Scruggs and David Bushong will jointly supervise your account for Gold and Liebengood, Inc. Please direct any instructions or inquiries to either of them, or to myself in their absence.

Gold and Liebengood, Inc., has this date filed registration notices with U.S. authorities attaching your February 3 letter as required. On receipt of an executed original of this letter, we will amend that registration accordingly.

page two

Our mutual commitments entered into here are terminable by either party on 30 days written notice by ordinary post. Gold and Liebengood, Inc., understands that the key to its successful representation of BAA's interest in these matters requires a strong measure of discretion.

Gold and Liebengood, Inc.

by Howard Liebengood

Howard Liebengood

BAA, plc

by Richard Everitt. Director Legal Services

Richard Everitt

by Peter Sanguinetti. Director Corporate Communications

Peter Sanguinetti

by Mike Toms. Economic Regulation Manager

Mike Toms