

For Six Month Period Ending OCT 31 2001
(Insert date)

I - REGISTRANT

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

Shea & Gardner

3901

- (c) Business Address(es) of Registrant

1800 Massachusetts Avenue, N.W.
Washington, D.C. 20036

2. 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 ☒ |

- (c) Explain fully all changes, if any, indicated in items (a) and (b) above.

Not applicable.

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.

Not applicable.

Yes ☐ No ☐

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

If no, please attach the required amendment.

On October 28, 1986, Shea & Gardner requested a waiver of the requirement that it file its partnership agreement as Exhibit C. That waiver was granted on December 23, 1986.

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, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

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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
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Not applicable.

- (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
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Not applicable.

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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 his service.

- (b) Have any employee or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or connection	Date terminated
Chris L. Sagers	Associate	10/1/01

- (c) 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 ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes ☐ No ☐ Not applicable

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:

Name of foreign principal

Date of termination

Not applicable.

8. Have you acquired any new foreign principal² during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principals² whom you continued to represent during the 6 month reporting period.

Iraqi National Congress (INC)

Iraqi National Congress Support Foundation (INCSF)

10. **EXHIBITS A AND B**

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A³

Yes ☐

No ☐

Not applicable.

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.

To be filed as a supplement upon receipt of the required amendment form from DOJ, FARA Registration Unit.

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 CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁴ 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.

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, and 9 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment 1 following this page.

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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.

See Attachment 1 following this page.

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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 any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

⁵ The term "political activities" 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, 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, and 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 monies⁶

Date	From Whom	Purpose	Amount
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See Attachment 2 following page 6.

Total

(b) RECEIPTS - FUND RAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fund raising campaign⁷, any money on behalf of any foreign principal named in items 7, 8, and 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D 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, and 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:

Name of foreign principal	Date received	Description of 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, money, or other things of value for a foreign principal, as part of a fund raising 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 fund raising 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, and 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
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See Attachment 3 following this page, listing disbursements for INC and INCSF by month.

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, and 9 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
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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	Name of political organization	Name of candidate
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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. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials¹²?
 Yes ☐ No ☒

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

17. Identify each such foreign principal.

Not applicable.

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 ☐

Not applicable.

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:

Not applicable.

☐ 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 informational materials among any of the following groups:

Not applicable.

☐ 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: Not applicable.

☐ 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 ☐

Not applicable.

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐

No ☐

Not applicable.

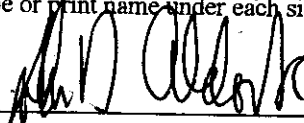
12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign 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)

November 30, 2001

(Type or print name under each signature¹³)


John D. Aldock
Chair, Executive Committee

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.

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

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 (Informational Materials - page 8 of Form CRM-154, formerly Form OBD-64-Supplemental Statement):

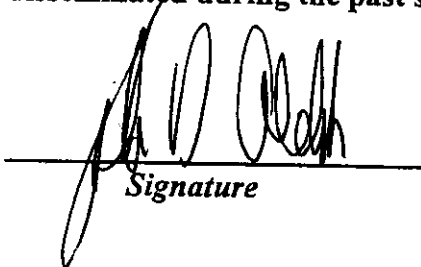
YES _____ or NO XX _____

(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 XX _____

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



Signature

November 30, 2001

Date

John D. Aldock

Please type or print name of
signatory on the line above

Chair, Executive Committee
Title

02 FEB - 3 11 10:00
RECEIVED

Shea & Gardner

Registration No. 3901

Supplemental Statement for April 30, 2001 – October 31, 2001

Attachment 1 (Item 11, Activities, and Item 12, Political Activities) – Page 1

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, and 9 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

All of our reportable activities during this period were with regard to the Iraqi National Congress (INC) and the Iraqi National Congress Support Foundation (INCSF).

Shea & Gardner provided professional and technical advice to the INC/INCSF during this period in connection with Cooperative Agreement S-LMAQM-00-H-0152, entered into by the Department of State and the INCSF on September 29, 2000, to fund "Channeling Humanitarian Assistance and Restoration of Civil Society in Iraq." Specifically, Shea & Gardner advised the INCSF in its efforts to operate under and comply with the conditions of that Agreement, including (a) advising the INCSF concerning tax issues and exemptions and preparing tax forms; (b) researching and advising concerning FARA, Lobbying Disclosure Act and Byrd Amendment issues; (c) researching and advising the INCSF concerning State Department and Office of Management and Budget regulations governing cooperative agreements; (d) facilitating the INS's processing of a refugee travel document application; (e) facilitating the INC/INCSF's development of their accounting and financial controls, including liaising with accountants, working with the INC/INCSF's financial officer, and providing information in connection with a State Department audit; (h) researching OFAC sanctions, applying for OFAC licenses on the INCSF's behalf, and communicating with government officials concerning the scope of those licenses; (i) researching and advising the INC/INCSF concerning satellite broadcasting options. We also advised the INC/INCSF with respect to the extensions of its Cooperative Agreement and other routine organizational legal issues.

In pursuing these activities, Shea & Gardner personnel accompanied INC personnel to a number of meetings with State Department officials concerning the Cooperative Agreement and the extensions of that agreement and, on occasion, had separate communications with such officials. Officials from other agencies, including the Office of the Vice President and the Defense Department also attended these meetings. Many of the meetings and contacts were held or made at the request of the agency officials. Shea & Gardner also communicated on several occasions with the Department of Treasury (OFAC) and the Department of Commerce concerning the INCSF's OFAC licenses and license applications, and with the Office of the Vice President concerning the Cooperative Agreement and related legal issues. The government officials contacted are listed below, followed by a chronological list of the specific contacts or communications with government officials, in which the particular government official or officials contacted are identified. Except as otherwise noted below, the Shea & Gardner attorney involved in each contact was Elena Baylis.

Officials contacted:

Dept. of Treasury, OFAC: R. Richard Newcomb, Andrew Sims
Dept. of State, Bureau of Near Eastern Affairs: Allen Keiswetter, Matthew Tueller, Rebecca King
Dept. of State, Acquisitions: Edward Muller, Michael Davis, Gregory Newsom
Dept. of State, Office of the Undersecretary for Arms Control and International Security Affairs: Bruce Thomas
Vice President's Office: John Hannah
Dept. of Defense: Randy Shunaman

Shea & Gardner

Registration No. 3901

Supplemental Statement for April 30, 2001 – October 31, 2001

Attachment 1 (Item 11, Activities, and Item 12, Political Activities) – Page 2

Dept. of Commerce, Bureau of Export Administration: Shelly Han
Immigration and Naturalization Service, Nebraska Service Center (no individual official)

- 5/29/01 Sent letter to R. Richard Newcomb regarding scope of Iraq information collection license, copy to Allen Keiswetter.
- 5/30/01 Faxed copy of 5/29/01 letter to Mr. Newcomb and Mr. Keiswetter.
- 6/19/01 Sent license application letter to Mr. Newcomb seeking authorization to transfer funds and goods to Iran, copy to Mr. Keiswetter.
- 6/26/01 Telephone call with John Hannah (Shea & Gardner attorneys: Elena Baylis and Collette Goodman); meeting with Mr. Hannah, Mr. Keiswetter, Matthew Tueller, Rebecca King, Bruce Thomas, Edward Muller, Randy Shunaman and INC representatives at the State Department regarding extending the INCSF's Cooperative Agreement with the State Department; received letter from Mr. Newcomb concerning scope of Iraq license.
- 6/27/01 Meeting with Mr. Muller, Ms. King, Michael Davis, Greg Newsom, Mr. Hannah and INC representatives at the State Department Annex regarding extending the INCSF's Cooperative Agreement with the State Department; faxed Shea & Gardner's engagement letter to Ms. King and Mr. Muller; received e-mail from Mr. Muller regarding extension.
- 6/28/01 Faxed copy of 5/29/01 letter to Mr. Hannah; received e-mail from Ms. King regarding extension of cooperative agreement..
- 7/10/01 Telephone call with Andrew Sims regarding INCSF's Iran license application.
- 7/13/01 Telephone call with Shelly Han regarding Iran license application.
- 7/19/01 E-mail to Ms. Han regarding Iran license application.
- 7/30/01 Telephone message for Mr. Muller regarding State Department hold on payment of past due amounts.
- 7/31/01 Telephone call with Mr. Muller regarding State Department hold.
- 8/1/01 Telephone call with Ms. King regarding Iran license application.
- 8/3/01 Telephone call with Mr. Muller regarding State Department hold.
- 8/6/01 Telephone call with Mr. Muller regarding State Department hold.
- 10/11/01 Sent letter to INS Nebraska Service Center concerning refugee travel document application.
- 10/24/01 Sent second letter to INS Nebraska Service Center regarding refugee travel document.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below? [footnote omitted] 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.

All of Shea & Gardner's activities for a foreign principal during this reporting period were with regard to the Iraqi National Congress (INC) and the Iraqi National Congress Support Foundation (INCSF).

Shea & Gardner has not arranged, sponsored, or delivered speeches, lectures, or radio and TV broadcasts. Nor has Shea & Gardner attempted to influence members of Congress or their staffs.

Shea & Gardner

Registration No. 3901

Supplemental Statement for April 30, 2001 – October 31, 2001

Attachment 1 (Item 11, Activities, and Item 12, Political Activities) – Page 3

While Shea & Gardner has engaged in contacts with executive branch officials on behalf of the INC and the INCSF during this period, we do not believe that these constitute “political activities” as defined in the Act. Shea & Gardner believes that its obligation to register and report stems from its activities in contacting certain government officials that come within § 1(c)(1)(iv) of the Act, 22 U.S.C. § 611(c)(1)(iv) (“within the United States represents the interests of such foreign principal before any agency or official of the Government of the United States”), not because those activities come within § 1(c)(1)(i) of the Act, 22 U.S.C. § 611(c)(1)(i) (“engages within the United States in political activities for or in the interests of such foreign principal”). Moreover, some of the INC/INCSF activities for which Shea & Gardner is providing representation come within the exemption for humanitarian aid provided by Section 3(d)(3) of the Act, 22 U.S.C. § 613(3)(d)(3). Nevertheless, because some of Shea & Gardner’s contacts with government officials might be deemed to be attempts to “influence [an] agency or official of the Government of the United States * * * with reference to the political or public interests, policies, or relations of * * * a foreign political party [the INC],” Section 1(o), 22 U.S.C. § 611(o), and not to be covered by any exemption, all of Shea & Gardner’s contacts with agency officials have been reported in the response to Item 11.

Shea & Gardner
 Registration No. 3901
 Supplemental Statement for May 1, 2001 - October 31, 2001
Attachment 2 (Item 14(a) - Receipts - Monies)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
8/15/01	INCSF	Payment for legal services	\$17,139.00
8/15/01	INCSF	Reimbursement for expenses	\$4,927.23
8/15/01	INCSF	Payment for legal services	\$5,713.00
8/15/01	INCSF	Reimbursement for expenses	\$242.22
8/15/01	INCSF	Payment for legal services	\$5,713.00
8/15/01	INCSF	Reimbursement for expenses	\$731.45
9/6/01	INCSF	Payment for legal services	\$13,830.00
9/6/01	INCSF	Reimbursement for expenses	\$220.21
		TOTAL	\$48,516.11

Shea & Gardner
Registration No. 3901
Supplemental Statement for May 1, 2001 - October 31, 2001
Attachment 3 (Item 15(a) - Disbursements - Monies) – Page 1

May 2001

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	14.20
Telephone	15.12
Telex, telecopier	15.50
Postage, courier services	3.34
Taxi	0.00
Computer research	194.06
Miscellaneous	<u>0.00</u>
	\$242.22

June 2001

Travel, lodging, food	\$7.55
Temporary and overtime secretarial services	0.00
Duplicating	24.60
Telephone	2.96
Telex, telecopier	34.50
Postage, courier services	21.19
Taxi	33.00
Computer research	10.65
Miscellaneous (FARA Registration)	<u>610.00</u>
	\$744.45

July 2001

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	17.60
Telephone	3.61
Telex, telecopier	4.00
Postage, courier services	0.00
Taxi	0.00
Computer research	0.00
Miscellaneous (CT Corporation System)	<u>195.00</u>
	\$220.21

Shea & Gardner
Registration No. 3901
Supplemental Statement for May 1, 2001 - October 31, 2001
Attachment 3 (Item 15(a) - Disbursements - Monies) – Page 2

August 2001

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	22.00
Telephone	2.40
Telex, telecopier	6.50
Postage, courier services	51.41
Taxi	0.00
Computer research	39.71
Miscellaneous	<u>0.00</u>
	\$122.02

September 2001

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	.40
Telephone	.54
Telex, telecopier	3.00
Postage, courier services	59.95
Taxi	0.00
Computer research	0.00
Miscellaneous (CT Corporation System)	<u>149.50</u>
	\$213.39

October 2001

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	6.40
Telephone	2.08
Telex, telecopier	23.50
Postage, courier services	4.62
Taxi	0.00
Computer research	0.00
Miscellaneous	<u>0.00</u>
	\$36.60