

For Six Month Period Ending OCT 31 2002
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Shea & Gardner
- (b) Registration No.
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.

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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.)

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
R. James Woolsey	Partner	7/15/02

- (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
Lawrence S. Kirsch	[withhold pursuant to prior discussions]	U.S.	Partner	9/18/02

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
Ross E. Davies	Associate	July 19, 2002

- (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

Not applicable.

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 A ³	Yes ☐	No ☐	Not applicable.
Exhibit B ⁴	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 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 this page.

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
------	---------	---------	--------

See Attachment 3 following this page.

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
5/4/02	\$100.00	Democratic National Committee	N/A
10/22/02	\$200.00	Van Hollen for Congress	Rep. Christopher Van Hollen
10/29/02	\$200.00	Friends of Kathleen Kennedy Townsend	Kathleen Kennedy Townsend
10/29/02	\$150.00	Democratic National Committee	N/A

**/ Individual contributions by short-form registrant
John Townsend Rich*

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:

☐ 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?

Not applicable.

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)

Nov. 27, 2002

(Type or print name under each signature¹³)

John Townsend Rich
 John Townsend Rich

(authorized by firm to
 sign)

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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.)

John Townsend Rich
Signature

Nov. 27, 2002
Date

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John Townsend Rich
Please type or print name of
signatory on the line above

Partner
Title

THIS FORM IS TO BE AN OFFICIAL ATTACHMENT TO YOUR CURRENT
SUPPLEMENTAL STATEMENT - PLEASE EXECUTE IN TRIPLICATE

SHORT-FORM REGISTRATION INFORMATION SHEET

SECTION A

The Department records list active short-form registration statements for the following persons of your organization filed on the date indicated by each name. If a person is not still functioning in the same capacity directly on behalf of the foreign principal, please show the date of termination.

Short Form List For Registrant: Shea & Gardner

Last Name	First Name and Other Names	Registration Date	Termination Date	Role
Aldock	John D.	10/30/86	5/30/2001	
Breckinridge	Charles D.	1/25/02		
Davies	Ross E.	3/14/01	7/19/2002	
Goodman	Collette C.	10/31/00		
Hanlon	Patrick M.	11/30/87	5/30/2001	
Rich	John Townsend	10/31/00		

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SECTION B

In addition to those persons listed in Section A, list below all current employees rendering services directly on behalf of the foreign principal(s) who have not as yet filed short-form registration statements. (Do not list clerks, secretaries, typists or employees in a similar or related capacity. If there is some question as to whether an employee has an obligation to file a short-form, please address a letter to us describing the activities and connection with the foreign principal.)

Name	Function	Date Hired
None		

Signature:

John Townsend Rich

Date:

Nov. 27, 2002

Title:

Partner

John Townsend Rich

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Shea & Gardner

Registration No. 3901

Supplemental Statement for April 30, 2002 -- October 31, 2002

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, and subsequent extensions, 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 the INCSF concerning FARA, Lobbying Disclosure Act and Byrd Amendment issues; (c) 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; (d) researching OFAC sanctions, applying for OFAC licenses on the INCSF's behalf, and communicating with government officials concerning the scope of those licenses; (e) advising the INC/INCSF and local counsel in Virginia regarding litigation in the Western District of Virginia; and (f) advising the INC/INCSF regarding certain contract disputes with third parties. We also advised the INC/INCSF with respect to the extensions of its Cooperative Agreement and other routine organizational legal issues.

Shea & Gardner personnel also communicated on several occasions with the Department of Treasury (OFAC) and the Department of State concerning the INCSF's OFAC licenses and license applications. The government officials contacted are listed below, followed by a parenthetical notation indicating the Shea & Gardner attorney involved in the contact.

Officials contacted:

Department of State, Office of the Inspector General: Fay Ropella (contacted by Collette Goodman), Richard Reback (contacted by John Rich, Collette Goodman, Charles Breckinridge)

Department of State, Iraq Desk: Yael Lempert (contacted by Charles Breckinridge)

Department of State, Office of Economic Sanctions Policy: Arnold Sierra (contacted by Charles Breckinridge)

Department of the Treasury, OFAC: Rochelle Stern (contacted by Collette Goodman)

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Shea & Gardner

Registration No. 3901

Supplemental Statement for April 30, 2002 -- October 31, 2002

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

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.

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 April 30, 2002 -- October 31, 2002
Attachment 2 (Item 14(a) - Receipts - Monies)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
6/11/02	INCSF	Payment for legal services	\$1,690.00
6/11/02	INCSF	Reimbursement for expenses	\$82.83
6/11/02	INCSF	Payment for legal services	\$4,224.75
6/11/02	INCSF	Reimbursement for expenses	\$1,434.70
9/11/02	INCSF	Payment for legal services	\$14,740.12
9/11/02	INCSF	Reimbursement for expenses	\$853.11
9/11/02	INCSF	Payment for legal services	\$3,349.00
9/11/02	INCSF	Reimbursement for expenses	\$36.08
9/11/02	INCSF	Payment for legal services	\$2,914.13
		TOTAL	\$29,324.72

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Shea & Gardner
 Registration No. 3901
 Supplemental Statement for April 30, 2002 -- October 31, 2002
Attachment 3 (Item 15(a) - Disbursements - Monies) – Page 1

May 2002

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	11.50
Telephone	1.03
Telex, telecopier	21.00
Postage, courier services	75.12
Taxi	0.00
Computer research	0.00
Miscellaneous	<u>1,360.50*</u>
	\$1,469.15

* CT Corporation System	\$479.00
Delaware Secretary of State	271.50
FARA Registration Unit	610.00

June 2002

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	45.70
Telephone	2.45
Telex, telecopier	84.50
Postage, courier services	27.13
Taxi	0.00
Computer research	0.00
Miscellaneous (CT Corporation System)	<u>204.00</u>
	\$363.78

July 2002

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	37.85
Telephone	4.27
Telex, telecopier	10.00
Postage, courier services	0.00
Taxi	0.00
Computer research	259.21
Miscellaneous (CT Corporation System)	<u>204.00</u>
	\$515.33

Shea & Gardner
Registration No. 3901
Supplemental Statement for April 30, 2002 -- October 31, 2002
Attachment 3 (Item 15(a) - Disbursements - Monies) -- Page 2

August 2002

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	37.85
Telephone	4.28
Telex, telecopier	10.00
Postage, courier services	0.00
Taxi	0.00
Computer research	259.21
Miscellaneous	<u>0.00</u>
	\$311.34

September 2002

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	9.30
Telephone	3.46
Telex, telecopier	17.00
Postage, courier services	24.97
Taxi	0.00
Computer research	3.12
Miscellaneous (CT Corporation System)	<u>0.00</u>
	\$57.85

October 2002

Travel, lodging, food	\$0.00
Temporary and overtime secretarial services	0.00
Duplicating	74.50
Telephone	3.52
Telex, telecopier	58.00
Postage, courier services	112.00
Taxi	0.00
Computer research	0.00
Miscellaneous (CT Corporation System)	<u>0.00</u>
	\$248.02

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