

For Six Month Period Ending **30 JUN 1992** **FINAL REPORT**
(Insert date)

Name of Registrant

Registration No.

Immigration Services Associates

#4602

Business Address of Registrant

1212 New York Avenue, NW, Suite 850
Washington, DC 20005

I—REGISTRANT

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

(a) If an individual: n/a

(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.

n/a

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 n/a

Position

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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:

<i>Name</i>	<i>n/a</i> <i>Residence</i> <i>Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date</i> <i>Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☐ n/a

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 ☒ (n/a)

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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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:

<i>Name</i>	<i>Residence</i> <i>Address</i>	<i>Position or</i> <i>connection</i>	<i>Date connection</i> <i>began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

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

Because this connection has ended, please terminate our registration & reporting requirements. Thank you.)

If yes, furnish the following information:

Name of foreign principal
Le Cirque du Soleil

Date of Termination
Date of last service: 11/26/91
Date of payment: 1/24/92
(from Paul, Weiss, Rifkind,
Wharton & Garrison)

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

n/a

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

There have been and are no others.

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:

1. Please note in the cover letter with our initial registration that we inadvertently registered late under the FARA. Our work for Le Cirque du Soleil was performed during the fall of 1991. No payment was received until January 1992.
2. Work for Le Cirque du Soleil concerned the O&P (non-immigrant) visa provisions of HR.3098 and S.296. Our objective on behalf of the client was to assure that the specific needs of circus personnel were taken into account so that these personnel would not be held to visa requirements not relevant to their line of work or to the nature of their occupation, specifically requirements relating to waiting periods for artists on non-immigrant visas.
3. We successfully met the needs of our client. The activities on the client's behalf are given in detail as an attachment to this Supplemental Statement. (pp. 10-13)
4. It should be stressed that Le Cirque du Soleil was part of a coalition of circuses, including American circuses, that favored and supported the provisions for non-immigrant visas for which we worked.

¹The 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 activity² 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.

As mentioned in Item 11 (#2), the objective on behalf of Le Cirque du Soleil as well as US members of the circus coalition was to assure that any circus bringing in skilled, temporary foreign personnel to work for the circus would not have to deal with bureaucratic provisions for non-immigrant visas that were not relevant to the positions or the nature of circus work.

Political activity was comprised of lobbying efforts in the legislative branch, specifically through the House and Senate Immigration Subcommittees, as well as through the appropriate offices at Department of State and INS. These lobbying efforts consisted of meetings and phone calls, and specific legislative recommendations.

(Meetings and calls are noted on the attached chronology of activities submitted in response to question 11.)

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.

²The 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

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
1/24/92	Paul, Weiss, Rifkind, Wharton & Garrison (counsel to Le Cirque du Soleil, through whom our services were billed and paid.)	Services for 9/91, 10/92 & 11/91, as detailed in item 11.	\$ 7000.00
Total			\$ 7000.00

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ 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:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A 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).

⁴Things 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.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
9/1/91	DC cab	transportation	\$ 9.00
9/5/91	"	" "	20.00
9/17/91	"	" "	10.00
10/8/91	"	" "	21.00

Total	\$60.00
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15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ 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:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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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 value⁵ 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:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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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.

⁵Things 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.

n/a

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: *n/a*

☐ 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: *n/a*

☐ 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: *n/a*
☐ 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? *n/a* Yes ☐ No ☐

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

VI-EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B *n/a*

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

Exhibit A⁶ Yes ☐ No ☐
Exhibit B⁷ 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 represent 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.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The 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 C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

n/a (No Exhibit C filed)

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

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

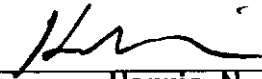
Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

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.

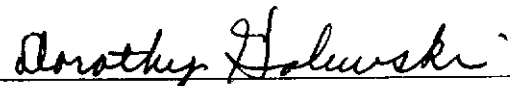
(Type or print name under each signature)

(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.)


Harris N. Miller

Subscribed and sworn to before me at Washington, D.C.

this 30th day of July, 19 92


Signature of notary or other officer

My Commission expires 6-30-96

⁸The 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.)

A T T A C H M E N T

Response to Item 11, Supplemental Statement
(For the period ending 30 June 1992)

Harris N. Miller
Detail of Professional Service
for Paul, Weiss, Rifkind, Wharton & Garrison
on behalf of Cirque du Soleil
Fall, 1991

September 1991

<u>Date</u>	<u>Hours</u>	<u>Description of Work Performed</u>
9/3	3.0	Meeting with Terry Fortune on O & P (non-immigrant visa) issues
9/4	1.5	Telephone calls to Gene Pugliese, Dick Scully, and Jonathan Ginsburg
9/5	2.75	Meeting with Cong. Mazzoli re: O & P Nonimmigrants
9/6	1.75	Meeting with John Brown re: HR.3048 Telephone call from Julie Strauss
9/11	.75	Meeting with Cong. Schumer, Terry Fortune & Jonathan Ginsburg
9/12	4.75	Meeting with Ginsburg Review bill; draft materials Conference call with Jerry Tinker and Fortune
9/16	.50	3 Telephone calls from Fortune
9/17	4.50	Review drafts with Fortune
9/19	2.75	Meeting with Ginsburg, Pugliese, Fortune 3 calls
9/20	2.50	Review documents Telephone calls from Fortune & Strauss
9/23	.75	Review draft bill (HR.3048) Telephone call to Fortune
9/24	1.0	Telephone calls from Strauss, Fortune & Ginsburg

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9/25	3.0	Meeting with Ginsburg Calls to the hill
9/26	1.0	Meeting with Ginsburg & Fortune Review Senate bill (S.296)
Total:	30.50	

October 1991

10/1	1.00	Telephone call to Fortune, Strauss Review amendment.
10/4	.50	Telephone call from Fortune & Ginsburg re: O & P's
10/8	2.75	Meeting with Cong. Mazzoli.
10/9	2.75	O & P hearing
10/10	.25	Telephone call from Fortune
10/16	.25	Telephone call from Tinker
10/18	1.00	Meeting with Fortune, Pugliese, Ginsburg
10/21	.50	Telephone calls from Fortune & Ginsburg
Total:	9.00	

November 1991

11/1	.75	Telephone calls to Fortune & Ginsburg
11/8	.50	Telephone calls to Fortune & Pugliese
11/13	.75	O & P Mark-up
11/19	1.00	O & P Mark-up
11/26	1.50	Monitoring bill passage (S.296)
Total:	4.50	

Names of Individuals Involved in our Work for Le Cirque du Soleil

Terry Fortune	Partner at Paul, Weiss, Rifkind, Wharton & Garrison Represents the circus clients
Jonathan Ginsburg	Partner at Ginsburg, Feldman & Bress Represents U.S. Labor Unions
Jerry Tinker	Counsel for Senate Immigration Subcommittee
Gene Pugliese	Counsel for House Immigration Subcommittee
Julie Strauss	Assistant General Counsel, Ringling Brothers Circus
Dick Scully	State Department official (visa & legislative office)
Cong. Mazzoli	Chair of House Immigration Subcommittee
Cong. Schumer	Member of House Immigration Subcommittee
John Brown	Immigration Examiner, INS

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