

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 Gibney, Anthony & Flaherty 665 Fifth Avenue, Second Floor, New York, NY 10022	2. Registration No. 4805
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3. Name of foreign principal Consulate General of Switzerland in New York 665 Fifth Avenue, 8th Floor, New York, NY 10022	4. Principal address of foreign principal
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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:

<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee
<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input type="checkbox"/> Other (specify) _____

Individual—State his nationality _____

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

a) Branch or agency represented by the registrant. **Consulate General of Switzerland in New York**

b) Name and title of official with whom registrant deals. **Eric Dardenne, Deputy Consul General**

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

a) Principal address

b) Name and title of official with whom registrant deals.

c) Principal aim

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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.)

The Consulate General of Switzerland in New York is an official agency of the Government of Switzerland, and to the best of our knowledge is wholly financed by the Swiss 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.

Date of Exhibit A <i>May 6, 1993</i>	Name and Title <i>Barry Zakarnick, Partner</i>	Signature <i>Barry Zakarnick</i>
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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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Name of Registrant Gibney, Anthony & Flaherty	Name of Foreign Principal Consul General of Switzerland in New York
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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.

As more fully explained in the memorandum of understanding attached hereto, the registrant, through its partners and associates who are attorneys qualified to practice under the law of New York State, will provide legal counsel on matters of U.S. law to the Consulate General of Switzerland in New York, and to parties (individuals, companies, etc.) who are referred to us for legal consultation on U.S. laws.

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

Same as answer to question 4.

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.

Date of Exhibit B	Name and Title	Signature
<i>May 6, 1993</i>	<i>Barry Zalarnick Partner</i>	<i>Barry Zalarnick</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.



CONSULATE GENERAL OF SWITZERLAND
 CONSULAT GÉNÉRAL DE SUISSE
 SCHWEIZERISCHES GENERALKONSULAT
 NEW YORK

NEW YORK, N. Y. 10022 March 2nd, 1993
 Rolex Building
 665 Fifth Avenue - 8th Floor
 Telephone: (212) 758 2560
 Telex: 220517 swisco ur
 Fax: (212) 207 8024
 Visiting Hours: 9 A.M.-1 P.M.

Ref. 051.52 - EH/DN/OR

Mr. John F. Flaherty
 Attorney at Law
 GIBNEY, ANTHONY & FLAHERTY
 665 Fifth Avenue
 New York, NY 10022

Dear Mr. Flaherty,

Referring to the meeting, as held in my office on Friday, February 26, 1993, I herewith have the great pleasure to officially appoint, as of January 1st, 1993, the firm of GIBNEY, ANTHONY & FLAHERTY, as " Official Legal Adviser " of the Consulate General of Switzerland in New York.

The appointment of your firm is a well deserved recognition for the reliable services the attorneys of GIBNEY, ANTHONY & FLAHERTY have so readily extended to this representation and to Swiss citizens during the past two years.

I would be grateful if you would let me know of the formal acceptance by your firm of the appointment as Official Legal Adviser which status and functions are described in the enclosed memorandum of understanding. Please, inform me which person will represent your firm at official events of the Consulate General, respectively will speak for the firm in policy matters and which persons should be contacted in cases involving American laws and/or Swiss laws.

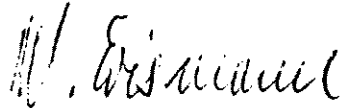
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Thanking you in advance for the past and future assistance of your firm in helping this representation carry out its official duties and provide the Swiss community of the New York area with reliable legal services, I remain

Very truly yours,

THE CONSUL GENERAL OF SWITZERLAND



Hans-Peter Erismann
Ambassador

Encl. Memorandum of understanding

Memorandum of understanding

Le Département fédéral des affaires étrangères prévoit dans sa directive 144 que les représentations suisses à l'étranger ont l'entière compétence de désigner un avocat de confiance. Il incombe de ce fait à chaque représentation de déterminer les critères que doit remplir un avocat de confiance pour être nommé au regard des particularités du lieu de service.

Pour le Consulat général de Suisse à New York, l'avocat de confiance, qu'il soit une personne ou un bureau d'avocats, doit avoir le profil suivant et être disposé à exercer ses fonctions aux conditions suivantes:

1. L'avocat de confiance jouit d'une excellente réputation sur la place de New York tant sur le plan professionnel que personnel. Il doit être capable de fournir des conseils et des services juridiques fiables. Cette condition autorise de son côté la représentation à recommander, en toute confiance, aux citoyens suisses ou américains qui en font la demande, d'avoir recours aux services de l'avocat de confiance.

2. L'avocat donne des conseils sur l'aspect juridique des affaires officielles qui lui sont soumises par la représentation. Les affaires officielles sont celles qui sont du ressort de la représentation à New York. Il en va en particulier des activités exercées par les agents de la représentation et des engagements financiers ou juridiques qu'ils prennent dans le cadre de l'exercice de leurs fonctions. L'avocat de confiance suit attentivement les affaires officielles qui lui sont soumises par la représentation et entreprend les démarches nécessaires pour les résoudre et pour sauvegarder au mieux les intérêts de la Confédération.

Pour couvrir les frais occasionnés dans ce contexte, l'avocat de confiance touche une indemnité forfaitaire annuelle. Lorsque qu'une affaire officielle risque de nécessiter un engagement considérable de la part de l'avocat de confiance ou d'occasionner des frais élevés de procédure, ce dernier peut au préalable demander à la représentation d'examiner dans quelle mesure la Confédération est disposée à poursuivre l'affaire et à s'acquitter des frais qui en résultent.

3. L'avocat de confiance traite les affaires non officielles et celles qui lui sont soumises par des particuliers selon les chiffres 3 et 4 de l'instruction 144.

4. L'avocat de confiance dispose des connaissances juridiques en droit américain dans les domaines qui sont particulièrement d'intérêt pour la communauté suisse, à savoir principalement le droit civil, le droit du travail, le droit de l'immigration, le droit foncier, le droit fiscal, le droit commercial et des sociétés, le droit des contentieux.

5. L'avocat de confiance dispose de connaissances approfondies en droit suisse afin de faciliter la résolution des cas et de permettre aux particuliers suisses d'exposer leur cas dans leur langue nationale.

Translation of the memorandum of understanding

In its directive 144, the Federal Department of Foreign Affairs provides that the Swiss Representations abroad are entirely competent to appoint an Official Legal Adviser. Therefore, it is the responsibility of each representation to determine the criteria to be met by the Official Legal Adviser to be appointed in accordance with the particular conditions of the place of duty.

For the Consulate General of Switzerland in New York, the Official Legal Adviser, either an individual or a law firm, must have the following profile and be willing to fulfill his duties according to the following conditions:

1. The Official Legal Adviser must have an excellent reputation in the New York community from the professional and personal standpoint and be able to provide trustworthy legal counselling and services. This condition entitles the Representation to recommend with full confidence the services of Official Legal Adviser to any Swiss or American citizen who might make such a request.
2. The Official Legal Adviser counsels on the legal aspects of official matters requested by the Representation. The official matters are those which fall within the competence of the Representation in New York. Those matters include in particular the activities carried out by the agents of the Representation and the financial or legal obligations that they incur within the scope of the execution of their duties. The Official Legal Adviser follows attentively the official matters submitted to him by the Representation, takes the necessary steps and does his utmost to resolve these matters and to safeguard the interests of the Confederation.

To cover the expenses incurred within this context, the Official Legal Adviser receive an annual fixed fee. In case an official matter may require considerable involvement on the part of the Official Legal Adviser or the payment of high expenses for legal proceedings, the latter may beforehand ask the Representation to determine whether the Confederation is willing to pursue the matter and to pay the resulting expenses.

3. The Official Legal Adviser counsels and treats non-official matters or matters submitted by private individuals in accordance to numbers 3 and 4 of directive 144.

4. The Official Légal Adviser has the legal knowledge of the American law in areas of particular interest to the Swiss community, especially in civil law, labor law, immigration law, real estate law, tax law, commercial law, corporate law, litigation law.

5. The Official Legal Adviser has an extensive knowledge in Swiss law so as to facilitate the resolution of cases and to allow the Swiss citizens to present their matter in their national language.