U.S. Department of Justice
Washington, DC 20530

Amendment to Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

OMB NO. 1105-0004

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials 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 of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average 1.5 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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant
O'Neill and Athy, P.C.
1310 19th St., NW
Washington, DC 20036

2. Registration No.
#4808
#5076

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☒ To correct a deficiency in

☐ To give a 10-day notice of change in information as required by Section 2(b) of the Act.

☒ Initial Statement

☒ Supplemental Statement for the period ending 31-May-1996

☐ Other purpose *(specify)* _____

☐ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list-
-Initial agreement letter -- June 1, 1995

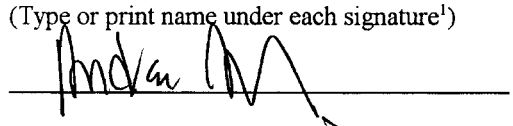
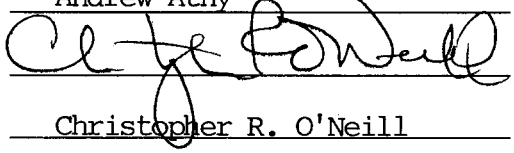
-Signed agreement -- August 30, 1995 (For period 8/30/95 - 11/30/95)
-Signed agreement -- December 1, 1995 (for period 8/30/95 - 12/30/95)

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. *(If space is insufficient, a full insert page must be used.)*

See in the attached contracts paragraphs designated "First" and "Second" which contain a complete description of registrants duties and responsibilities under the contract.

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 the 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)	(Type or print name under each signature[1])
	
September 4, 1998	Andrew Athy
	
September 4, 1998	Christopher R. O'Neill

1 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.

U.S. Department of Justice
Washington, DC 20530

Exhibit B
To Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, an amended

OMB No. 1105-0007

REVISED

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. One original and two legible photocopies of this form shall be filed for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials 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 of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration No.
O'Neill and Athy, P.C. 1310 19th St., NW Washington, DC 20036	#4808 #5076

3. Name of Foreign Principal
The General Directorete for International Economic Relations of the Ministry of Foreign Affairs of the Republic of Chile (DIRECON)

Check Appropriate Boxes:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.

5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.

6. ☐ 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 expenses, if any , to be received.

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

See attached -- June 1, 1995 correspondence

Formerly OBD-65

FORM CRM-155
SEP. 1996

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

See attached -- June 1, 1995 correspondence

9. Will the activities on behalf of he above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? 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.

See attached -- June 1, 1995 correspondence

Date of Exhibit B	Name and Title	Signature
September 4, 1998	Andrew Athy, Partner	

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which 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 the political interests, policies, or relations of a government of a foreign country or a foreign political party.

LAW OFFICES
O'NEILL AND ATHY, P. C.
1310 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 466-6555

June 1, 1995

His Excellency John Biehl
Embassy of Chile
1732 Massachusetts Avenue, NW
Washington, DC 20036

Dear Ambassador Biehl:

It is a pleasure to submit a proposal for a relationship between our firm and the Chilean government. We believe that our experience with and knowledge of the Congress, the Office of the President, the departments of the Executive Branch, and various private interests here will benefit your country and its Embassy and enhance your efforts to advance Chile's interests in a wide range of areas.

The Congress and the Administration are moving quickly to resolve issues relative to the necessary fast track authority for Congressional approval of a negotiated free trade agreement. Continuing this progress and the establishment of a free trade agreement certainly remain primary objectives for Chile. Our extensive experience with the NAFTA should help your already impressive efforts in support of this process. Our meetings with you have impressed us with your personal determination to strengthen lines of communication between Chile and the United States and to create additional areas, especially commercial, of bilateral cooperation. We are well suited to work with you towards those goals. This proposal presents our services relative to the areas of mutual opportunity awaiting Chile and the U.S. including a free trade agreement.

Regular contact with decision makers in the Congress and the Administration is our business. We have established a particular strength in helping clients form solid working relationships with these individuals. Our own relationships fashioned through years of experience, especially before the Congress, will prove a valuable complement to you and your highly regarded Embassy. We also believe that our reputation for trustworthiness and credibility will serve you well and reflect positively on your Embassy.

We commit to you the attention and participation of both of us. We will be available to meet with you or your staff at all times to provide insightful advice and counsel. We would report to you regularly with our observations, findings, and suggestions and to do evaluations and analyses for you. Our responsibilities would not be delegated, other than to

COPY

individuals to cover and report on hearings and other public events at your request. We believe our firm is distinguished for its dedication to its clients.

We are confident that our firm's extensive cumulative experiences in our previous work as congressional committee staff and in our successful representation of our clients' interests will allow us to provide you with creative and practical solutions to public policy questions and political problems. We also have a record of achievement in designing political strategies to both promote initiatives and to address unfavorable developments and misunderstandings which may arise. Finally, a matter for further discussion is our ability on a selective basis to identify and create opportunities for Chilean businesses with our private sector contacts.

For the described services we propose a fee of $10,000 per month plus related expenses for a period extending to the adjournment sine die of the 104th Congress. The expiration of the agreement will offer an opportunity for both parties to re-evaluate the relationship. At the same time, we offer to re-open and renegotiate the terms of an agreement if the need for our services by your Government is more or less intensive than anticipated.

For your information, enclosed is a description of the members of our firm and our client list. We look forward to meeting with you at your earliest convenience in order to initiate this relationship.

Thank you for this opportunity and we look forward to hearing from you.

Sincerely,

Christopher R. O'Neill

Andrew Athy, Jr.

CRO'N/AA:ltw

Enclosures

O'Neill and Athy, P.C.

List of Clients

American Hospital Association
American Telephone & Telegraph Company
Beth Israel Hospital
Coalition of Boston Teaching Hospitals
General Mills, Inc.
Glass Packaging Institute
Harvard University
Lehman Brothers Inc.
Massachusetts General Hospital
National Cable Television Association
National Football League
New England Deaconess Hospital
New England Medical Center
Northeastern University
Northwestern Memorial Hospital
Raytheon Company
Southeast Toyota Distributors, Inc.
Teledyne, Inc.
Temple University Hospital
Texas Utilities Services Inc.
USX Corporation
Viacom International Inc.

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O'NEILL AND ATHY, P.C.

1310 Nineteenth Street, Northwest
Washington, D.C. 20036

Telephone: (202) 466-6555
Telecopier: (202) 466-6596

General, Administrative and Legislative Practice including Energy, Public Utilities, Trade, Government Contracts, Securities, Corporate Finance, Commodities, Communications, Banking, Environmental and Health Law.

CHRISTOPHER R. O'NEILL, born Cambridge, Massachusetts, September 27, 1949; admitted to bar, 1977, Massachusetts and District of Columbia; 1978, U.S. Court of Appeals, District of Columbia Circuit. Education: Boston College (B.S., 1972); Georgetown University (J.D., 1976). Counsel to Senate Committee on Commerce, Science and Transportation, 1976-1977. Founding Board Member, Congressional Award Board. Counsel to Democratic Congressional Campaign Committee, 1981--. Member, National Advisory Board, Center for National Policy, 1981--. Member: The District of Columbia Bar; Bar Association of the District of Columbia; Massachusetts and American Bar Associations.

ANDREW ATHY, JR., born Worcester, Massachusetts, February 18, 1948; admitted to bar, 1973, Massachusetts; 1974, U.S. District Court, District of Massachusetts; 1980, District of Columbia. Education: University of Pennsylvania (B.A., 1969); Georgetown University (J.D., 1973). Assistant Attorney General, Commonwealth of Massachusetts, 1973-1975. Attorney, Office of General Counsel of the Federal Election Commission, 1976-1977. Counsel, House Committee on Interstate and Foreign Commerce, U.S. House of Representatives, 1978-1980. Member: The District of Columbia Bar; Massachusetts Bar Association.

MARTHA LINCOLN CASEY, born Brockton, Massachusetts, April 14, 1955; admitted to bar, 1982, Rhode Island; 1985, District of Columbia. Education: Wellesley College (B.A. 1977); University of Maine (J.D., 1982). Legislative Assistant to U.S. Congressman Joseph D. Early, 1977-1979. Counsel to U.S. Congressman Brian J. Donnelly, 1982-1987. Member: The District of Columbia Bar; Rhode Island Bar Association.

OF COUNSEL

THOMAS C. WILLIAMS, born Grosse Pointe, Michigan, June 29, 1926; admitted to bar, 1958, District of Columbia. Education: Georgetown University (B.S.S., 1952, J.D., 1957). Assistant Counsel, U. S. Senate Subcommittee on Antitrust and Monopoly, 1958-1962, 1965-1968. Staff Counsel to U. S. Senator Philip A. Hart, 1969-1972. Member, Board of Trustees, Maryland Historical Trust, 1990--. Member: The District of Columbia Bar.

Washington, D.C., August 30th, 1995.

BETWEEN

(1) The General Directorate for International Economic Relations of the Ministry of Foreign Affairs of the Republic of Chile (DIRECON), a government department, of Avenida Libertador Bernardo O'Higgins 1315, Second Floor, Santiago, Chile, for the purposes herein, Chile Tax Registration # 70,020,190-2, represented as substantiated below by Mr. JOHN BIEHL (or MR. JOAQUIN MONTES), of 1732 Massachusetts Avenue, NW. Washington, D.C. 20036.

AND

(2) O'NEILL & ATHY, P.C., United States Federal Tax ID # 52-1460585, whose principal office address is 1310 Nineteenth Street, N.W., Washington, D.C. 20036, United States of America, represented as substantiated below by CHRISTOPHER R. O'NEILL, Social Security # 032-36-4450 (or ANDREW ATHY, JR., Social Security # 025-36-9657) of the foregoing address.

The parties hereto have therefore agreed to the following

CONTRACT

FIRST:

DIRECON hereby appoints O'Neill and Athy, P.C., which accepts the said appointment, to provide advice, legal counsel, and other services for the purpose of assisting Chile and its Embassy in its endeavors to expand and improve its economic and commercial relationship with the United States and to strengthen the lines of communication on economic issues between the two countries.

COPY

SECOND:

The advice, counsel, and representation includes:

a) written reports and analysis as requested by the Chilean government or its Embassy on specific topics, problems, and opportunities;

b) legal analysis relative to the development and implementation of a Free Trade Agreement and to other trade issues;

c) all necessary meetings with Chilean and Embassy officials to review key issues and to provide strategy; and

d) assistance in arranging meetings and appointments for Chilean officials and representatives with U.S. government officials.

The services provided relate to:

a) opportunities for increased trade, economic cooperation, and improved communication between the United States and Chile, including the establishment of a Free Trade Agreement; and,

b) all economic issues of interest to Chile before the United States Congress and the Executive Branch;

THIRD:

For these services, **DIRECON** agrees to pay to O'Neill and Athy, P.C. the fee of US$ 10,000 per month plus all directly related expenses for the period from August 30, 1995 to November 30, 1995. Expenses include, but may not be limited to, all travel, long distance calls, use of messenger services, photocopying, business meals and entertainment.

Expenses shall be paid by **DIRECON** to O'Neill and Athy, P.C. according to Clause Fourth provisions.

FOURTH:

Payment by **DIRECON** of all sums due under this Agreement shall be made through the Embassy of Chile in Washington, D.C. O'Neill and Athy, P.C. shall submit to the Embassy of Chile at the end of each month the invoices or receipts of the expenses made in that month. Each invoice or receipt submitted by O'Neill and Athy, P.C. to the Embassy must receive prior approval for payment from Mr. John Biehl or Mr. Joaquín Montes. **DIRECON** will pay the approved amount within 10 days following the receipt of the invoice.

FIFTH:

All information delivered, made available to or acquired by O'Neill and Athy, P.C. in relation to **DIRECON**, its policies or advertising, shall be deemed confidential and shall not be disclosed without the prior written consent of **DIRECON**. The employees, contractors or agents of O'Neill and Athy, P.C. who need to know the referred information for the purpose of providing the services under this Agreement are, themselves, bound by a like obligation of confidentiality.

SIXTH:

The parties hereto may, without citing cause and at any time, terminate this Contract by giving written notice to the other party of their intention not less than thirty days in advance.

SEVENTH:

This Contract is issued in two identical copies in English, both which shall be deemed equally valid. Upon legalization by the Consul of Chile in Washington, D.C., one copy will remain in possession of **DIRECON** and the other in possession of O'Neill and Athy, P.C.

AA

The legal capacity of Mr. **JOHN BIEHL** (or Mr. **JOAQUIN MONTES**) to represent the General Directorate for International Economic Relations of the Ministry of Foreign Affairs of the Republic of Chile (DIRECON) appears from the power granted on August 18, 1995, before the Notary Public Rubén Galecio Gómez, domiciled in Moneda 1356, Santiago, Chile.

CHRISTOPHER O'NEILL and ANDREW ATHY, JR. act on behalf and represent O'Neill and Athy, P.C. as certified by Andrew Athy, Jr., secretary of the professional corporation, on August 29th, 1995, signed before and witnessed by MARNIE M. OGDEN, Notary Public of the District of Columbia, United States of America, on the same date.
Legalized copies of said documents are attached hereto.

For The General Directorate for International Economic Relations (DIRECON) by

JOAQUIN MONTES

For O'Neill and Athy P.C. by

ANDREW ATHY, JR.

August 30, 1995

Subscribed and sworn to before me at
Washington, D.C. on this
Thirtieth day of August, 1995

Marnie M Ogden

Notary Public, District of Columbia
My commission Expires: August 31, 1998

LAW OFFICES
O'NEILL AND ATHY, P. C.
1310 NINETEENTH STREET, N. W.
WASHINGTON, D. C. 20036

(202) 466-6555

Certification

By the authority vested in me as secretary of O'Neill and Athy, a professional corporation, I certify that on all matters concerning the provision of services by O'Neill and Athy, p.c. either Christopher R. O'Neill or Andrew Athy, Jr. is authorized to execute all agreements, contracts or pledges relative to the services provided. All such executed agreements, contracts, or pledges are lawful and binding on the firm.

Andrew Athy, Jr.
Secretary

Witnessed this 29th day of August, 1995 by:

Marnie M. Ogden, Notary Public

Marnie M. Ogden
Notary Public District of Columbia
My Commission Expires: August 31, 1999

COPY

Washington, D.C., December 1st, 1995.

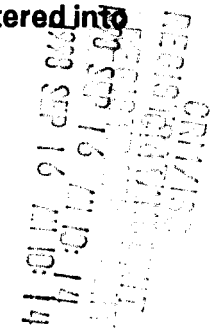
BETWEEN

(1) The General Directorate for International Economic Relations of the Ministry of Foreign Affairs of the Republic of Chile (DIRECON), a government department, of Avenida Libertador Bernardo O'Higgins 1315, Second Floor, Santiago, Chile, for the purposes herein, Chile Tax Registration # 70,020,190-2, represented as substantiated below by Mr. JOHN BIEHL (or MR. JOAQUIN MONTES), of 1732 Massachusetts Avenue, NW. Washington, D.C. 20036.

AND

(2) O'NEILL & ATHY, P.C., United States Federal Tax ID # 52-1460585, whose principal office address is 1310 Nineteenth Street, N.W., Washington, D.C. 20036, United States of America, represented as substantiated below by CHRISTOPHER R. O'NEILL, Social Security # 032-36-4450 (or ANDREW ATHY, JR., Social Security # 025-36-9657) of the foregoing address.

The parties hereto have therefore agreed to modify the CONTRACT entered into by them on August 30th, 1995, in the following way:



FIRST:

Clause Third is replaced by the following:

"THIRD:

For these services, DIRECON agrees to pay to O'Neill and Athy, P.C. the fee of US$ 10,000 per month plus all directly related expenses for the period from August 30, 1995 to December 30, 1995. Expenses include, but may not be limited to, all travel, long distance calls, use of messenger services, photocopying, business meals and entertainment.

Expenses shall be paid by **DIRECON** to O'Neill and Athy, P.C. according to Clause Fourth provisions."

COPY

SECOND:

This Contract is issued in two identical copies in English, both which shall be deemed equally valid. Upon legalization by the Consul of Chile in Washington, D.C., one copy will remain in possession of DIRECON and the other in possession of O'Neill and Athy, P.C.

The legal capacity of Mr. JOHN BIEHL (or Mr. JOAQUIN MONTES) to represent the General Directorate for International Economic Relations of the Ministry of Foreign Affairs of the Republic of Chile (DIRECON) appears from the power granted on August 18, 1995, before the Notary Public Rubén Galecio Gómez, domiciled in Moneda 1356, Santiago, Chile.

CHRISTOPHER O'NEILL and ANDREW ATHY, JR. act on behalf and represent O'Neill and Athy, P.C. as certified by Andrew Athy, Jr., secretary of the professional corporation, on August 29th, 1995, signed before and witnessed by MARNIE M. OGDEN, Notary Public of the District of Columbia, United States of America, on the same date.
Legalized copies of said documents are attached hereto.

For The General Directorate for International Economic Relations (DIRECON) by

JOAQUIN MONTES

1 Dec 95
(date)

For O'Neill and Athy P.C. by

ANDREW ATHY, JR.

Jan 22 '96
(date)

Marnie M Ogden

Marnie M. Ogden
Notary Public