

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 .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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 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 Pierson Semmes and Bemis, LLP 1054 Thirty-First Street, NW, Suite 300 Washington, DC 20007-4493	2. Registration No.  5252
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3. Name of foreign principal Secretariat of the Common Market of Eastern and Southern Africa	4. Principal address of foreign principal PO Box 30051 Lušaka 10101 Zambia
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5. Indicate whether your foreign principal is one of the following:

- Foreign government
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
  - Partnership
  - Corporation
  - Association
  - Committee
  - Voluntary group
  - Other (specify) Common Market
- Individual-State nationality \_\_\_\_\_

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

- a) Branch or agency represented by the registrant.
- b) Name and title of official with whom registrant deals.

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

- a) Principal address.
- b) Name and title of official with whom registrant deals.
- c) Principal aim

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

*The Common Market of Eastern and Southern Africa (Comesa) is a regional integration and economic cooperation organization consisting of 18 African countries, the goals of which are to promote economic development in the region through trade, regional integration and the reduction of tariff and other barriers to trade.*

b) Is this foreign principal


- Supervised by a foreign government, foreign political party, or other foreign principal Yes  No
- 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 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 must be used.)

*Comesa's activities are directly controlled by its Secretariat. Because Comesa consists of 18 nations in Africa, its activities are indirectly supervised, directed and controlled by the governments of its member states: Angola, Burundi, Comoros, Democratic Republic of Congo, Eritrea, Ethiopia, Kenya, Malawi, Mauritius, Namibia, Rwanda, Seychelles, Sudan, Swaziland, Tanzania, Uganda, Zambia and Zimbabwe. Comesa's activities are funded by contributions by its member nations and by donations by international institutions, such as the European Union.*

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.

N/A

Date of Exhibit A	Name and Title	Signature
4-16-98	Paul Ryberg, Jr. Partner	

**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.

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**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 Pierson Semmes and Bemis, LLP	2. Registration No. 5252
3. Name of Foreign Principal Common Market of Eastern and Southern Africa	

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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.

The understanding between the registrant and the foreign principal has not yet been finalized. Attached is a copy of the registrant's proposal for representing the foreign principal, which is currently under consideration by the foreign principal.

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

As described in the attached proposal, the registrant proposes to perform the understanding, subject to its confirmation by the foreign principal, by assisting Comesa in establishing a presence in Washington, including assisting in establishing and maintaining relationships between Comesa and appropriate Administration officials, members of Congress, international institutions located in Washington and possible funding institutions. The registrant proposes to arrange meetings for visiting delegations and to present Comesa's views in support of the African Growth and Opportunity Act, S. 778/H.R. 1432, to Congress.


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

As described in the attached proposal, the registrant proposes to perform the understanding, subject to its confirmation by the foreign principal, by assisting Comesa in establishing a presence in Washington, including assisting in establishing and maintaining relationships between Comesa and appropriate Administration officials, members of Congress, international institutions located in Washington and possible funding institutions. The registrant proposes to arrange meetings for visiting delegations and to present Comesa's views in support of the African Growth and Opportunity Act, S. 778/H.R. 1432, to Congress.

9. Will the activities on behalf of the 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.

The registrant proposes to present Comesa's views in support of initiatives for expanding U.S. trade and investment with Africa, including the African Growth and Opportunity Act, S. 778/H.R. 1432, the President's Partnership Initiative for Growth and Opportunity in Africa. The registrant proposes to encourage greater U.S. cooperation with and support for Comesa's activities aimed at promoting trade, investment, regional integration and economic development in Africa. The registrant proposes to assist Comesa in seeking funding for these activities.

Date of Exhibit B	Name and Title	Signature
4-16-98	Paul Ryberg, Jr. 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.

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PAUL RYBERG, JR.

DIRECT DIAL NUMBER

(202) 298-3644

April 13, 1998

*By E-mail and Post*

Mr. J.G.O. Mwencha  
Acting Secretary General  
COMESA  
P.O. Box 30051  
Lusaka 10101  
Zambia

Dear Mr. Mwencha:

It was a pleasure meeting your associates, Mark Pearson and Ali Mansoor, in Washington last week. We had a series of productive meetings with senior officials from USAID; the Departments of Treasury, State, and Commerce; the U.S. Trade Representative's Office; the U.S. Trade Development Agency; OPIC; the Ex-Im Bank; and several Members of Congress. It is now essential to maintain these contacts and conduct substantive follow-up.

Based on our prior correspondence and my discussions in Washington with Mark and Ali, I am writing to confirm that Comesa has retained Pierson Semmes and Bemis to represent Comesa in Washington, and the terms under which we will undertake the representation.

First, we agree to a retainer of \$6,000 for a period of 6 months (\$1,000 per month), effective April 1, 1998, plus reimbursement of actual out-of-pocket expenses incurred by the firm on behalf of Comesa. The monthly retainer fee and any expenses will be billed and reimbursed on a monthly basis. It is difficult to predict the amount of the expenses likely to be incurred, as this is dependent upon factors that are not known at this time, such as the amount of long distance/international telephone and fax traffic, etc. Nevertheless, as a rough estimate, I think you should plan on approximately \$500-\$700 per month in expenses. It is our understanding that the Comesa Clearing House has agreed to pay the fee and expenses for the first two months and that the remainder of the monthly fee and expenses will be paid by the Comesa Secretariat and the PTA Bank.

Second, the scope of the services to be rendered subject to the retainer will consist of assisting Comesa in establishing a presence in Washington, including assisting in establishing and maintaining relationships with appropriate Administration officials, members of Congress, international institutions located in Washington and possible funding institutions. These services would include arranging meetings for visiting

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April 13, 1998  
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delegations, etc. We will also lobby on Comesa's behalf in support of the African Growth and Opportunity Act. Any additional services for Comesa would be outside the scope of the retainer, and mutually acceptable terms of compensation would have to be negotiated.

As I am sure you can appreciate, the extent of the services we can provide for a \$6,000 retainer is limited, and it is prudent to have a clear understanding at the outset concerning the amount of time to be devoted to this representation. We have agreed that approximately 10 hours per month of my time is the maximum to be covered by the retainer. As I discussed with Mark and Ali, 10 hours per month of my time for a monthly fee of \$1,000 represents a substantial discount from our normal charges for such professional services.

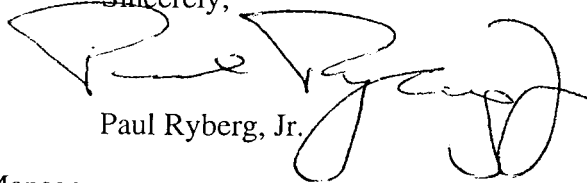
Third, we will provide office space and facilities to support a Comesa intern. It is contemplated that the intern will perform most of the day-to-day work on behalf of Comesa, under my supervision and training. While limited secretarial support can be provided, we will not be able to devote full-time secretarial support to the intern. There would be no charge for these support facilities for the intern during the term of the retainer, but any expenses incurred by or for the intern would be included in the out-of-pocket expenses to be reimbursed monthly by Comesa. Comesa will pay the intern's salary, and Pierson Semmes and Bemis will not be the intern's employer or have any obligation for the intern's salary.

You should also be aware that the type of services under consideration will require Pierson Semmes and Bemis to register as an agent for Comesa under the U.S. Foreign Agent Registration Act.

Please let me know if the foregoing does not accurately reflect our understanding.

Regards.

Sincerely,



Paul Ryberg, Jr.

cc: Messrs. M. Pearson and A. Mansoor

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