

U.S. Department of Justice
Washington, DC 20530

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

I--REGISTRANT

1. Name of Registrant

Foley & Lardner LLP

2. Registration Number (To be assigned by the FARA Unit)

6787

3. Primary Business Address

777 East Wisconsin Ave., Milwaukee, WI 53202

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

N/A

(b) Nationality N/A

(c) Year of birth N/A

(d) Present citizenship N/A

(e) If present citizenship not acquired by birth, state when, where and how acquired N/A

(f) Occupation N/A

5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee Association Partnership Voluntary group

Corporation Other (specify) N/A

(b) Date and place of organization 01/01/1842, Milwaukee, WI

(c) Name of responsible individual Jay O. Rothman
(e.g., officer, director or partner)

(d) Other business address(es), if any, including locations of branch or local offices
3000 One American Center, 600 Congress Avenue, Austin, TX 78701
111 Huntington Avenue, Suite 2500, Boston, MA 02199-761
Boulevard Saint Michel, 47, Brussels, BELGIUM 1040

(e) If a membership organization, provide number of members N/A

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address(es)	Position	Nationality
Mr. Jay O. Rothman	1101 East Circle Drive Whitefish Bay, WI 53217	Chairman & CEO	UNITED STATES
Mr. Stanley S. Jaspan	6590 North Crestwood Drive Milwaukee, WI 53209	Managing Partner	UNITED STATES

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s) Represented	Services
N/A	N/A	N/A

(h) Describe the nature of the registrant's regular business or activity.

Law firm

(i) Give a complete description of the ownership and control structure of the registrant.

Foley & Lardner LLP is a limited liability partnership organized under Wisconsin law.

6. List all individuals, other than those listed in Item 5(g), who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s) Represented	Services
See Appendix 6 for response			

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal

Mr. Reinaldo Munoz Pedroza

Foreign Principal Address

Calle Juan Grilc, Edif San Marino Plazo Piso 3, Apt.
B
Urb Chacao Caracas (Caracas) Miranda
VENEZUELA 1060

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes No

If yes, describe fully.

N/A

IV--FINANCIAL INFORMATION**9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of your obligation to register² under FARA, did the registrant receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation on, or for disbursement, or otherwise? Yes No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	From Whom	Purpose	Amount
Mr. Reinaldo Munoz Pedroza	01/06/2020	Fang Ming Limited	Legal fees; legal consultant and expert fees; associated expenses.	\$49,848.88
Mr. Reinaldo Munoz Pedroza	01/09/2020	Chengfa Trade Co. Ltd.	Legal fees; legal consultant and expert fees; associated expenses.	\$3,000,000.00

\$3,049,848.88

¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual 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.

² An agent must register within 10 days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of your obligation to register⁴ under FARA, did the registrant receive from any foreign principal named in Item 7 anything of value⁵ other than money, either as compensation on, or for disbursement, or otherwise? Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
N/A	N/A	N/A	N/A	N/A

10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of your obligation to register⁶ under FARA, did the registrant spend or disburse any money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7?

Yes No

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	To Whom	Purpose	Amount
Mr. Reinaldo Munoz Pedroza	01/16/2020	Sonoran Policy Group, LLC	Legal consultant and expert fees; associated expenses.	\$2,000,000.00

(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of your obligation to register⁷ under FARA, did the registrant dispose of any thing of value⁸ other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7? Yes No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
N/A	N/A	N/A	N/A	N/A

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of your obligation to register⁹ under FARA, did the registrant or any short form registrant make any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes No

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
		See Appendix 10(c) for response		

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 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.

V--INFORMATIONAL MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ did the registrant prepare, disseminate or cause to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes No

If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
N/A	N/A	N/A

12. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

13. Identify each such foreign principal.

Mr. Reinaldo Munoz Pedroza

14. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes No

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
N/A	N/A	N/A

15. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes No

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
N/A	N/A	N/A

16. Activities in preparing or disseminating informational materials will include the use of the following:

- Magazine or newspaper Advertising campaigns Press releases Pamphlets or other publications
 Lectures or speeches Radio or TV broadcasts Motion picture films Letters or telegrams

Email

Website URL(s): N/A

Social Media website URL(s): N/A

Other (specify) N/A

¹⁰ 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, electronic communications, 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.

¹¹ See Footnote 2, on page 3.

17. Informational materials will be disseminated among the following groups:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Public officials | <input type="checkbox"/> Civic groups or associations |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Libraries |
| <input checked="" type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups |
| <input checked="" type="checkbox"/> Newspapers | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Editors | <input type="checkbox"/> Other (<i>specify</i>) <u>N/A</u> |

18. Indicate language to be used in the informational materials:

- | | |
|---|--|
| <input checked="" type="checkbox"/> English | <input type="checkbox"/> Other (<i>specify</i>) <u>N/A</u> |
|---|--|

VI--EXHIBITS AND ATTACHMENTS

19. (a) The following described exhibits shall be filed with an initial registration statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

Exhibit B- This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, 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 shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

VII--EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Registration Statement, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature¹²

01/24/2020

Christopher M. Swift

/s/Christopher M. Swift

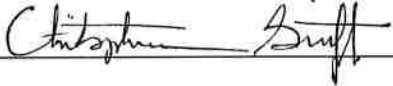
¹² This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

OMB No. 1124-0001; Expires May 31, 2020

U.S. Department of Justice
Washington, DC 20530

Registration Statement

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Registration Statement, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature
<u>24 January 2020</u>	<u>Christopher M. Swift</u>	<u></u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
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Response to Item 6

Question 6: List all individuals, other than those listed in Item 5(g), who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity

Name	Residence Address	Foreign Principal(s) Represented	Nature of Services
Mr. Christopher M. Kise	6788 Heartland Circle Tallahassee, FL 32312 106 East College Avenue, Suite 900 Tallahassee, FL 32312	Mr. Reinaldo Munoz Pedroza	<p>Mr. Kise will provide the Foreign Principal with legal services authorized by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") pursuant to 31 C.F.R. §591.506(a) (the "General License"), to the extent that such authorization is applicable or required. These legal services will include legal advice and counseling on the requirements of and compliance with the laws of the United States or any jurisdiction within the United States, representing the Foreign Principal in legal, administrative, or other proceedings occurring before U.S. courts and administrative agencies, and other activities authorized by the General License that may become necessary from time to time.</p> <p>These legal services will likely include: (i) a review of Foreign Principal files, publicly available documents, and/or interviews necessary to advise the Foreign Principal on the requirements of and compliance with laws of the United States, including the various economic sanctions OFAC and other U.S. Government authorities have imposed or may impose against the Bolivarian Republic of Venezuela (the "Republic") and related parties; (ii) advising the Foreign Principal regarding the scope and nature of OFAC and other U.S. economic sanctions programs that are or may be imposed against the Republic and related parties; (iii) developing a strategy to approach the U.S. Government in support of delisting the Foreign Principal or other parties subject to U.S. economic sanctions due to their connections to the Republic; and (iv) representing the Foreign Principal in initial discussions with officials at OFAC and other U.S. Government agencies regarding U.S. economic sanctions against the Republic and certain related parties.</p>

Name	Residence Address	Foreign Principal(s) Represented	Nature of Services
Dr. Christopher M. Swift	11101 Willowbrook Drive Potomac, MD 20854 3000 K Street, NW Suite 600 Washington, DC 20007	Mr. Reinaldo Munoz Pedroza	<p>Dr. Swift will provide the Foreign Principal with legal services authorized by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") pursuant to 31 C.F.R. §591.506(a) (the "General License"), to the extent that such authorization is applicable or required. These legal services will include legal advice and counseling on the requirements of and compliance with the laws of the United States or any jurisdiction within the United States, representing the Foreign Principal in legal, administrative, or other proceedings occurring before U.S. courts and administrative agencies, and other activities authorized by the General License that may become necessary from time to time.</p> <p>These legal services will likely include: (i) a review of Foreign Principal files, publicly available documents, and/or interviews necessary to advise the Foreign Principal on the requirements of and compliance with laws of the United States, including the various economic sanctions OFAC and other U.S. Government authorities have imposed or may impose against the Bolivarian Republic of Venezuela (the "Republic") and related parties; (ii) advising the Foreign Principal regarding the scope and nature of OFAC and other U.S. economic sanctions programs that are or may be imposed against the Republic and related parties; (iii) developing a strategy to approach the U.S. Government in support of delisting the Foreign Principal or other parties subject to U.S. economic sanctions due to their connections to the Republic; and (iv) representing the Foreign Principal in initial discussions with officials at OFAC and other U.S. Government agencies regarding U.S. economic sanctions against the Republic and certain related parties.</p>

Response to Item 10(c)

Question 10(c): DISBURSEMENTS-POLITICAL CONTRIBUTIONS: During the period beginning 60 days prior to the date of your obligation to register under FARA, did the registrant or any short form registrant make any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method/Event	Amount/Thing of Value
01/10/2020	Foley & Lardner LLP	Rep. Brendon Boyle (D)	Check	\$1,000.00
12/16/2019	Foley & Lardner LLP	Sen. Mitch McConnell (R)	Check	\$2,500.00
12/12/2019	Foley & Lardner LLP	Sen. Debbie Stabenow (D)	Check	\$1,000.00
12/12/2019	Foley & Lardner LLP	Rep. TJ Cox (D)	Check	\$1,000.00
11/18/2019	Foley & Lardner LLP	Sen. Thom Tillis (R)	Check	\$1,000.00
11/12/2019	Foley & Lardner LLP	Rep. Ron Kind (D)	Check	\$1,000.00
12/12/2019	Christopher M. Swift	Rep. TJ Cox (D)	Check	\$250.00