

U.S. Department of Justice

Washington, DC 20530

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

INSTRUCTIONS. Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. 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 FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. 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 and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .23 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, FARA Unit, Counterintelligence and Export Control Section, National Security 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 Mr. Jacob Sand	2. Registration Number 6878
3. Residence Address Provided under separate cover to the FARA Unit	4. Primary Business Address 50 S. 16th St., Suite 2925 Philadelphia, PA 19102
5. Year of Birth 1986 Nationality UNITED STATES Present Citizenship UNITED STATES	6. If present citizenship was not acquired by birth, indicate when, and how acquired.
7. Occupation Attorney	

8. What is the name and address of the primary registrant?
Name Wiggin and Dana LLP Address 265 Church Street, One Century Tower, New Haven, CT 06510

9. (a) Indicate your connection with the primary registrant:

- partner director employee consultant
 officer associate agent subcontractor
 other (*specify*) _____

(b) Specify your position/title: Associate

10. List the foreign principal to whom you will render services in support of the primary registrant.
International Criminal Court

11. Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

See Appendix for Response

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act¹?

Yes No

If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

See Appendix for Response

13. The services described in Items 11 and 12 are to be rendered on a

full time basis part time basis special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

Salary: Amount \$ _____ per _____ Commission at _____ % of _____

Salary: Not based solely on services rendered to the foreign principal(s).

Fee: Amount \$ _____ Other thing of value _____

15. During the period beginning 60 days prior to the date of your obligation to register under FARA, 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 value in connection with an election to 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
------	-------	----------------------------------	--------	-----------------------

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 statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, 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.

10/14/2020

Mr. Jacob Sand

/s/Mr. Jacob Sand

Date

Printed Name

Signature

¹ "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 or public interests, policies, or relations of a government of a foreign country or a foreign political party.

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 statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, 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.

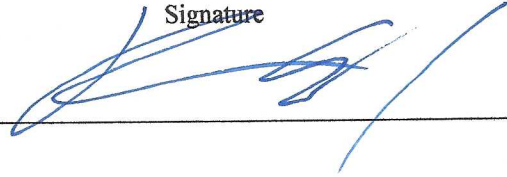
Date

Printed Name

Signature

10/12/20

JACOB SAND



Appendix

Response to Item 11

Item 11: Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

Wiggin and Dana has been engaged to (1) provide legal advice concerning the consequences of the June 11, 2020 "Executive Order on Blocking Property of Certain Persons Associated with the International Criminal Court" and the Sept. 2, 2020 addition of ICC officials Fatou Bensouda and Phakiso Mochochoko to the Dept. of the Treasury's Specially Designated Nationals ("SDN") List; (2) provide legal advice regarding the potential initiation of legal action in the United States concerning the Executive Order and the SDN designations; and (3) engage in administrative outreach to U.S. Government agencies concerning the Executive Order and the SDN designations. Wiggin and Dana also may initiate civil litigation in federal court on behalf of Fatou Bensouda and Phakiso Mochochoko.

Appendix

Response to Item 12

Item 12: Do any of the above described services include political activity as defined in Section 1(o) of the Act? If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

It is uncertain whether Wiggin and Dana will engage in political activities as defined in 22 U.S.C. sec. 611(o). The above-described legal advice that Wiggin and Dana shall provide to the ICC's Office of the Prosecutor, Fatou Bensouda, and Phakiso Mochochoko is outside the scope of the Foreign Agents Registration Act (FARA), and any litigation the firm may conduct would come within the exemption from registration set forth at 22 U.S.C. section 613(g). Advisory opinions previously issued by the FARA Unit indicate that administrative outreach by Wiggin and Dana to U.S. federal agencies or departments on behalf of the firm's clients would not require registration. Because of the close relationship between the apparent policy grounds for the June 11, 2020 Executive Order and the factual bases for the SDN designations of Ms. Bensouda and Mr. Mochochoko, however, Wiggin and Dana is registering in an abundance of caution in case the FARA Unit would construe any aspect of the firm's potential administrative outreach as registrable conduct not subject to an exemption.