

For Six Month Period Ending JUN 10 1990  
(Insert date)

Name of Registrant **Rogers & Wells**

Registration No. **3428**

Business Address of Registrant  
200 Park Avenue  
New York, New York 10166  
(Principal)

1737 H Street, N.W.  
Washington, D.C. 20006  
(and other offices)

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

- |                       |                              |                             |
|-----------------------|------------------------------|-----------------------------|
| (1) Residence address | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship       | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation        | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- |                          |                              |  |
|--------------------------|------------------------------|--|
| (1) Name                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

2. Explain fully all changes, if any, indicated in item 1.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes  No

If yes, furnish the following information:

Name	Position	Date Connection Ended
See attached sheet.		

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes  No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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See attached sheet.

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes  No

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes  No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes  No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes  No

If yes, furnish the following information:

*Name of foreign principal*  
Mr. Bassam Namani  
Charge d'Affaire  
Embassy of Lebanon

*Date of Termination*

3/1/90

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes  No

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

See attached sheet.

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

Paribas Corporation  
LAICA  
Manufacturers Life Insurance Company of Canada

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes  No

If yes, identify each such foreign principal and describe in full detail your activities and services:

See attached sheet.

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization 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. (See Rule 100(a)(9))

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?  
Yes  No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See attached sheet.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes  No

If yes, describe fully.

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<sup>2</sup>The term "political activities" 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, foreign country or a foreign political party.

**IV—FINANCIAL INFORMATION**

**14. (a) RECEIPTS—MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?      Yes       No

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

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See attached sheet.

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Total

**(b) RECEIPTS—THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?      Yes       No

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).  
<sup>4</sup>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.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes       No

(2) transmitted monies to any such foreign principal?      Yes       No

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

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See attached sheet.

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Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?  
Yes  No

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, 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<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?  
Yes  No

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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See attached sheet.

**V—POLITICAL PROPAGANDA**

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes  No

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

17. Identify each such foreign principal.

N/A

<sup>5</sup>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.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes  No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N/A

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

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

Other (specify) N/A

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- Public Officials
- Newspapers
- Libraries
- Legislators
- Editors
- Educational institutions
- Government agencies
- Civic groups or associations
- Nationality groups
- Other (specify) N/A

21. What language was used in this political propaganda:

- English
- Other (specify) N/A

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes  No

N/A

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act?

- Yes  No

N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes  No

N/A

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

- Exhibit A<sup>6</sup> Yes  No
- Exhibit B<sup>7</sup> Yes  No

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes  No

If yes, have you filed an amendment to these exhibits? Yes  No

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes  No  N/A

If yes, have you filed an amendment to the Exhibit C? Yes  No

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes  No  N/A

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

*Anthony F. Essaye*  
Anthony F. Essaye

*Eugene T. Rossides*  
Eugene T. Rossides

06 JUN 10 AM 08:28  
WASHINGTON, D.C.

Subscribed and sworn to before me at \_\_\_\_\_

this 9th day of \_\_\_\_\_, 1990

RECEIVED  
JUN 06 1990  
DEPT. OF JUSTICE  
CRIMINAL DIVISION

*Judith M. Dye*  
(Signature of notary or other officer)

My Commission Expires April 14, 1992

<sup>8</sup>The Exhibit C, 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 upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U. S. Department of Justice, Washington, D.C. 20530.)

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 3

<u>Name</u>	<u>Position</u>	<u>Date Connection Ended</u>
William E. Donovan	Partner	12/31/89
Eugene L. Bondy, Jr.	Partner	12/31/89
Stanley Godofsky	Partner	12/31/89
Alexis Fafendrodt	Partner	12/31/89
Joseph B. Hudson	Partner	02/28/90
Michael M. Murphy	Partner	02/28/90
Thomas H. McBryde	Partner	03/31/90
Victor Ganzi	Partner	05/01/90
Ronald Warner	Partner	05/31/90
David R. Decker	Partner	05/31/90
Michael I. Blaylock	Partner	05/31/90

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 4

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
David J. Gilberg	6012 Walton Rd. Bethesda, MD 20817	U.S.	Partner	01/01/90
William Chertok	124 Idaho Ave. Apt. 602 Santa Monica, CA 90403	U.S.	Partner	01/01/90
Klaus H. Jander	307 Stanwich Road Greenwich, CT 06830	U.S.	Partner	02/01/90
Johannes Gabel	495 First St. Apt. 1 Brooklyn, NY 11215	West German	Partner	02/01/90
Richard McDermott	46 E. 91st St. Apt. 8B New York, NY 10128	U.S.	Partner	02/01/90
Craig H. Walker	7 Lexington Ave. Apt. 8A New York, NY 10010	U.S.	Partner	02/01/90

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 9

Name and Address

Date Acquired

Mr. Bassam Namani  
Charge d'Affaire  
Embassy of Lebanon  
2560 28th Street, N.W.  
Washington, D.C. 20008

01/24/90

Marks & Spencer p.l.c.  
Michael House, Baker Street  
London W1A 1DN  
England

03/08/90

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 11

- (a) For Paribas Corporation: Registrant performed regulatory and other legal work, none of which was registerable.
- (b) For LAICA: Registrant performed regulatory and other legal work, none of which was registerable.
- (c) For Manufacturers Life: Registrant performed regulatory and other legal work, none of which was registerable.
- (d) For Mr. Bassam Namani: Registrant met and communicated with State Department officials, as well as performed other legal work.
- (e) For Marks & Spencer p.l.c.: Registrant met and communicated with Food & Drug Administration and other U.S. Government officials, as well as performed regulatory and other legal work.

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 12

- (a) For Mr. Bassam Namani: On January 24, 1990, Registrant accompanied foreign principal to a meeting at the State Department with David Newton (Deputy Assistant Secretary of State), Douglas Silliman (Desk Officer for Lebanon), Geoffrey Watson (Attorney Advisor, Legal Advisor's Office), and Ted Katoff (Desk Officer for Syria), regarding the resecuring of the Embassy of Lebanon premises and related litigation in Federal court. On January 25, 1990, Registrant accompanied foreign principal to a meeting at the State Department with David Newton, Douglas Silliman, and Geoffrey Watson regarding the same. On January 26, 1990, Registrant accompanied foreign principal to a meeting at the State Department with David Newton, Douglas Silliman, Geoffrey Watson, and Edward Gnehm, Jr. (Deputy Assistant Secretary of State) regarding the same. On January 27, 1990, Registrant accompanied foreign principal to a meeting at the State Department with David Newton, Douglas Silliman, and Geoffrey Watson regarding the same. During the period, Registrant communicated with Douglas Silliman and Geoffrey Watson at the State Department regarding the same.
- (b) For Marks & Spencer p.l.c.: On March 8-9, 1990, Registrant and foreign principal communicated and met with (i) officials of the Center for Food Safety and Applied Nutrition of the Food & Drug Administration, including Robert Lake (Director, Office of Compliance), Raymond Gill (Deputy Director of Regulatory Guidance), Raymond Newberry (Deputy Director, Division of Regulatory Guidance), Betty Campbell (Director, Guidelines Branch), and John Vanderveen (Director, Division of Nutrition); (ii) Dr. J. Michael McGinnis, Deputy Assistant Secretary for Health, Director, Office of Disease Prevention and Health of the Department of Health and Human Services; (iii) officials of the Department of Agriculture, including Ann M. Veneman (Deputy Under Secretary, International Affairs and Commodity Programs), Patricia F. Stolfa (Deputy Administrator, Food Safety and Inspection Service), Larry Fuell (Foreign Agricultural Service, International Trade Policy), and Stan Ferduk (Food Safety and Inspection Service); and (iv) officials of the Office of the Special Trade Representative, including Rick Rjicka (Director of Canadian Affairs) and Suzanne Torje (Office of GATT Affairs), regarding international food labelling and food safety issues.

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 14(a)

The following is a list of the fees and disbursements related to registerable work which were received during the period from the foreign principals for whom registerable work was done.

(a) Mr. Bassam Namani:

12/11/89-	Fees and disbursements	\$2,770.00
06/10/90		

(b) Marks & Spencer p.l.c.:

12/11/89-	Fees and disbursements	\$4,940.00
06/10/90		

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 15(a)

The following is a list of the disbursements related to registerable work which were made during the period on behalf of the foreign principals for whom registerable work was done.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
(a)	For Mr. Bassam Namani:		
12/11/89- 06/10/90		Misc. out-of-pocket expenses for copying, telephone, and local fares.	\$100.00
(b)	For Marks & Spencer p.l.c.:		
12/11/89- 06/10/90		Misc. out-of-pocket expenses for copying, telephone, local fares, postage, and couriers.	\$250.00

Attachment to Supplemental Statement for 6/10/90  
to Registration Statement of Rogers & Wells, No. 3428

Item 15(c)

<u>Date</u>	<u>Amount</u>	<u>Political Organization</u>	<u>Candidate</u>
12/21/89	\$500	Friends of Saul Weprin	Saul Weprin
01/05/90	\$5,000	N.Y. Republican County Committee	
01/18/90	\$100	Westchester Fund for a Republican Government	
01/25/90	\$250	Friends for the Election of Dean G. Skelos	Dean G. Skelos
01/25/90	\$5,000	N.Y. State Senate Republican Campaign Committee	
01/25/90	\$125	Committee To Re-elect Senator David A. Patterson	David A. Patterson
01/25/90	\$200	Citizens for Hevesi	Hevesi
01/31/90	\$1,000	Susan Molinari for Congress	Susan Molinari
02/05/90	\$125	Friends of Chris Mega	Chris Mega
02/06/90	\$5,000	Friends of Guiliani	Rudolph Guiliani
02/06/90	\$2,500	N.Y. Republican County Committee	
02/07/90	\$1,000	Friends of Ben Zwirn	Ben Zwirn
02/08/90	\$150	Senator Volker Campaign Committee	Senator Volker
02/20/90	\$1,500	N.Y. Republican State Committee	
02/21/90	\$1,000	Democratic Assembly Campaign Committee	
02/23/90	\$1,000	N.Y. County Democratic Committee	
03/05/90	\$1,000	Friends of Howard L. Lasher	Howard L. Lasher
03/12/90	\$1,000	Pete Wilson for Governor-1990	Pete Wilson
03/14/90	\$250	Friends of Larry Pressler	Larry Pressler
03/14/90	\$1,000	Democratic Senate Campaign Committee	
03/22/90	\$5,000	N.Y. State Democratic Committee	
03/22/90	\$100	Re-elect Assemblyman Prescott	Assemblyman Prescott
04/09/90	\$5,000	Friends of Guiliani	Rudolph Giuliani
04/17/90	\$1,000	Rob Mosbacher for Lt. Governor	Rob Mosbacher
04/19/90	\$250	Friends of Oliver Koppel	Oliver Koppel
04/23/90	\$400	Committee to Re-elect Senator Bruno	Senator Bruno
04/23/90	\$125	Friends of Mel Miller	Mel Miller
05/10/90	\$500	Ohrenstein Citizens Committee	Ohrenstein
05/23/90	\$150	Friends of Leichter	Leichter
05/04/90	\$500	Effective Government Committee	
01/16/90	\$500	Citizens for Schoemehl	Schoemehl

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes \_\_\_\_\_ or No X \_\_\_\_\_

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes \_\_\_\_\_ or No X \_\_\_\_\_

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

*Anthony P. ...*  
Signature

July 9, 1990  
Date

Anthony P. ...  
Please type or print name of signatory on the line above

Partner  
Title