

For Six Month Period Ending **30 JUL 1991**
(Insert date)

Name of Registrant

Registration No. 3931

Perley & Hurley Ltd.

Business Address of Registrant

112 St. Clair Avenue West, Suite 401,
Toronto, Ontario. M4V 2Y3

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 No
- (2) Citizenship Yes No
- (3) Occupation Yes No

N / A

(b) If an organization:

- (1) Name Yes No
- (2) Ownership or control Yes No
- (3) Branch offices Yes No

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

N / A

If yes, furnish the following information:

Name

Position

Date Connection Ended

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RECEIVED
N / A

N

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

N / A

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

N / A

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

Date of Termination

Canadian Coalition on Acid Rain

April 1, 1991

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes No

If yes, furnish following information:

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

NONE

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:

Foreign Principal: Canadian Acid Precipitation Foundation. On behalf of the Canadian Acid Precipitation Foundation, Adele M. Hurley and Michael Perley of Perley & Hurley Ltd. have disseminated copies of the Foundation's AirWatch to various government officials and representatives of U.S. organizations and media interested in the acid rain issue. These reports have been labelled according to the requirements of the FARA, and dissemination reports filed.

AirWatch program reports are not political propaganda as defined on page 4 of this report. Rather, the reports contain descriptions of progress made in implementing existing acid rain and other air pollution control legislation in Canada and the U.S. Because AirWatch reports are not political propaganda their dissemination is described here rather than under Section V of this report.

In addition to the AirWatch reports, Perley & Hurley Ltd. organized a seminar on behalf of the Canadian Coalition on Acid Rain on February 4, 1991 in Toronto, Ontario, Canada which was addressed by several U.S. speakers, including two employees of U.S. Congressional offices, on the contents of the Clean Air Act as amended November, 1990. This seminar was for the benefit of Canadian public officials and environmental groups. (continued on separate page)

¹The 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 activity² 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.

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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.

²The 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 of a 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.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Apr. 1/91	Canadian Acid Precipitation Foundation	Retainer	\$10,000.00
May. 1/91	Canadian Acid Precipitation Foundation	Retainer	10,000.00
Jun. 1/91	Canadian Acid Precipitation Foundation	Retainer	10,000.00
Jul. 1/91	Canadian Acid Precipitation Foundation	Retainer	10,000.00

Please see ATTACHMENT II for complete list of monies received by the Canadian Acid Precipitation Foundation during the reported period. Perley & Hurley Ltd. has supervised and recorded the receipts, deposit and expenditure of these funds.

\$40,000.00

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ 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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N / A

³A 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).
⁴Things 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 ATTACHMENT III

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ 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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N / A

(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 value⁵ 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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N / A

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.

Although Perley & Hurley Ltd. does not believe AirWatch program reports are "political propaganda" as defined above, we have labelled the reports
17. Identify each such foreign principal. sent to the U.S. and filed relevant dissemination reports in order to err on the side of disclosure.

⁵Things 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.

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) _____

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) _____

21. What language was used in this political propaganda:

- English
- Other (specify) _____

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

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes No

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

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 A⁶ Yes No
- Exhibit B⁷ 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 represent 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.

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

⁷The 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 C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes No

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

If no, please attach the required amendment. The bylaws of the Foundation were recently amended, and a copy is enclosed.

27. SHORT FORM REGISTRATION STATEMENT

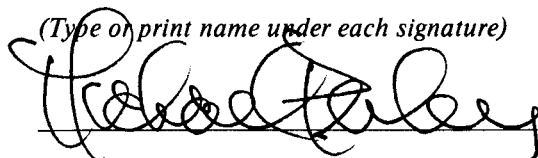
Have short form registration statements been filed by all of the persons named in Items 5 and / of the supplemental statement? Yes No

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

N / A

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.

(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.)

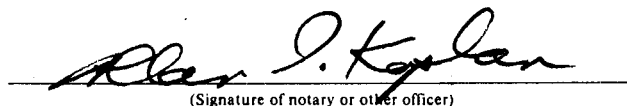
(Type or print name under each signature)


Michael Perley - Vice President

for Perley & Hurley Ltd.

Subscribed and sworn to before me at Toronto, Ontario, Canada

this 29th day of August, 19 91


(Signature of notary or other officer)

⁸The 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.)

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 CRM-154, formerly Form OBD-64 - Supplemental Statement):

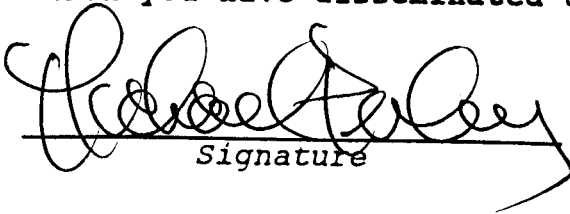
Yes _____ or No _____ X

(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 _____ X _____ or No _____

(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.)


Signature

August 29 1991
Date

Michael Perley

Please type or print name of signatory on the line above

Vice President - Perley & Hurley Ltd.
Title

RECEIVED
CRIMINAL DIVISION
DEPT. OF JUSTICE
AUG 30 11:26 AM '91
INTERNAL SECURITY
REGISTRATION UNIT

Information concerning PHL activities on behalf of both the Coalition and Foundation, including dissemination of AirWatch reports in the United States, and the above seminar, is included in Attachments I, II & III.

Because dissemination of AirWatch reports and the February 4th seminar held in Toronto, Canada, are not political activity as described on page 4 of this report, they are reported here, rather than under section 12.

ATTACHMENT I

Press and Media Contacted by Perley & Hurley ltd. on behalf of the
Canadian Coalition on Acid Rain

January 1, 1991 - July 30, 1991

<u>Date</u>	<u>Press Contacts</u>	<u>Purpose</u>
Feb. 27/91	Patti Adcroft Newsweek	Coalition Membership Activities
Mar. 8/91	Julie Edelson Inside E.P.A.	Canada-U.S. Air Agreement
Mar. 12/91	Bill McGrow Detroit Free Press	CCAR Activities & History
	Charlie Green Knight-Riddler Newspapers	Clean Air Accord
	Wyatt Andrews C.B.S. News	Canada-U.S. Air Quality Agreement

ATTACHMENT II

Financial Information: Monies Received by the Canadian Coalition on Acid Rain (Recorded and deposited by Perley & Hurley Ltd. on behalf of the Coalition)

ITEM 14a

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
Jan. 15/91	Canadian Federation of University Women	Donation	50.00
Jan. 31/91	Canadian Wildlife Scotia McLeod	Donation Investment	50.00 7,415.03
Feb. 15/91	Scotia McLeod Canadian Imperial Bank	Interest Acct. Closed	12.97 122.15
Feb. 20/91	Canadian Imperial Bank	Acct. Closed	1,370.71
Mar. 22/91	Jessie Lucas	Donation	25.00
Apr. 02/91	Scotia McLeod	Interest	3.98
Apr. 11/91	SIH Employees Charitable Fund	Donation	254.00
Apr. 23/91	CCHS Student Union Grace Chan	Donation	15.00 10.00
Apr. 26/91	CIBC Development Corp	Donation	89.33
May. 21/91	South Channel Assoc	Donation	200.00
Jun. 04/91	Belle Rebecca Community Assoc	Donation	100.00
Jul. 03/91	Investers Syndicate Ltd	Donation	5,000.00
Jul. 12/91	Robert Green	Donation	60.00
		TOTAL	<u>\$15,278.17</u>

cont'd

ATTACHMENT II

Funds Received From Government Sources For Use in Canada Only.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
Feb. 27/91	Government of Canada	Grant for use in Canada	40,000.00
		TOTAL	<u>\$40,000.00</u>

ATTACHMENT III

Financial Information: Monies Disbursed by the Canadian Coalition on Acid Rain on U.S. Activities (administered by Perley & Hurley Ltd. on behalf of the Coalition)

ITEM 15a, 1

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
Jan. 31/91	Bell Canada	Telephone	138.97
Jan. 31/91	Bell Canada	Fax	58.85
Feb. 28/91	Bell Canada	Telephone	26.21
Mar. 15/91	Federal Express	Courier	37.00
Mar. 31/91	Bell Canada	Fax	13.41
Mar. 31/91	Bell Canada	Telephone	32.91
Apr. 12/91	Federal Express	Courier	22.58
Apr. 18/91	American Law Institute	Seminar	565.63
Apr. 18/91	U.S. Air	Flight	272.94
Apr. 30/91	Bell Canada	Fax	6.10
Apr. 30/91	Bell Canada	Telephone	42.67
May. 3/91	U.S. Air	Flight	286.94
May. 3/91	American Express	Dinner	37.20
May. 8/91	American Express	Dinner	31.90
May. 10/91	American Express	Dinner	35.44
May. 10/91	Capital Hilton	Hotel	807.22
May. 31/91	Federal Express	Courier	74.00
May. 31/91	Bell Canada	Telephone	32.17
May. 31/91	Bell Canada	Fax	9.14
Jun. 30/91	Bell Canada	Telephone	12.80

TOTAL 2,544.08

CAPF Board of Directors

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