

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda 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 is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

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, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 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 Edward M. Rogers, Jr. 600 New Hampshire Avenue, N.W., Suite 1010, Washington, D.C. 20037		2. Registration No. 4570
3. Name of foreign principal Sheikh Kamal Adham	4. Principal address of foreign principal Jeddah, Saudi Arabia	

5. Indicate whether your foreign principal is one of the following type:

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

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

- 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:

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

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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

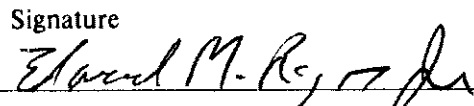
Extensive multi-national corporate and financial interests, with his principal interest being a Saudi Arabian-based construction company.

b) Is this foreign principal

- 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 whole 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 may be used.)

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.

Date of Exhibit A	Name and Title	Signature
September 20, 1991	Edward M. Rogers, 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. This form shall be filed in triplicate 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, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant	Name of Foreign Principal
Edward M. Rogers, Jr.	Sheikh Kamal Adham

Check Appropriate Boxes:

1.  The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
2.  There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
3.  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 the expenses, if any, to be received.

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

Provide legal representation for Sheikh Kamal in the United States, in conjunction with other attorneys, on the various matters arising out of First American Bankshares, Inc. Possible representation of Sheikh Kamal's commercial interests that may arise out of other business he has in the United States.

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

Because of the nature of the legal investigations within the Executive Branch and in Congress related to Sheikh Kamal's interests associated with the BCCI affair, it may be necessary for me to perform duties that could "border on political." Therefore, I am taking this step to register as a foreign agent in the event that I engage in such activity.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?

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.

Date of Exhibit B	Name and Title	Signature
September 20, 1991	Edward M. Rogers, Jr. Partner	

\*Political activity as defined in Section 1(o) of the Act 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.

# BARBOUR & ROGERS

ATTORNEYS AT LAW

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Washington, D.C. 20037

HALEY BARBOUR  
ED ROGERS

(202) 333-8767  
Fax (202) 338-5950

September 5, 1991

Maitre Moussa Raphael  
c/o Cossa  
52, Rue du Faubourg St. Honore  
75008 Paris  
France

Dear Moussa:

Thank you for inviting us to join the legal team of His Excellency Sheikh Kamal Adham and for the opportunity to spend so much time with him and you in Jeddah this week. It is clear to us why he is considered a man of stature and great integrity not only in Saudi Arabia but throughout the Middle East.

This letter will confirm our agreement for Barbour & Rogers to join the legal team you are constructing to represent Sheikh Kamal in the United States in the various matters arising out of First American Bankshares, etc. We will provide legal representation in conjunction with the firm of Cacheris and Towey and any other attorneys selected by you on the Sheikh's behalf in the future. It is understood this legal representation will not include public relations, political or lobbying representation.

Our fee for this representation will be \$120,000 to be paid as soon as practicable (because of your daughter's wedding, we realize this may not be until September 9 or 10) plus \$15,000 per month for 12 months beginning the end of September 1991 through the end of August 1992; plus \$25,000 per month for 12 months beginning the end of September 1992 through August 1993. Additionally Barbour & Rogers will be reimbursed all normal expenses such as long distance telephone and other telecommunications expenses, courier/FedEx, copying, travel, approved entertainment expenses, if any, etc. Such expenses shall be billed on a monthly basis beginning with the attached reimbursement request for expenses incurred during our trip to Jeddah August 31 through September 3. I have heretofore provided you the information needed to wire transfer the funds directly to the Barbour & Rogers account at Deposit Guaranty National Bank.

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Maitre Moussa Raphael  
September 5, 1991  
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We understand and agree that you may ask us to represent Sheikh Kamal's commercial interests that may arise out of other business he has in the United States. This representation would include private and nonpolitical activities in furtherance of His Excellency's business, trade or commercial interests, whether owned personally or through corporations he owns or in which he has substantial ownership. Again, none of this will be public relations, political or lobbying activity or any effort to change, maintain or in any way affect any policies, laws or regulations of our government. Although no specific example has been mentioned, we do understand such commercial representation may arise.

We look forward to working with you and your legal team to ensure His Excellency Sheikh Kamal Adham receives the fair hearing we believe will result in his total vindication.

Sincerely,

Barbour & Rogers

by:   
Ed Rogers

Agreed to and Accepted:

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