

U.S. Department of Justice

Washington, DC 20530

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

**INSTRUCTIONS.** File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at <http://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 Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://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 in print and online at: <http://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average 1.5 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, Counterespionage 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 of Registrant  Patton Boggs LLP	2. Registration No.  2165
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- To give a 10-day notice of change in information as required by Section 2(b) of the Act.
- To correct a deficiency in
- Initial Statement
- Supplemental Statement for the period ending \_\_\_\_\_
- Other purpose (*specify*) \_\_\_\_\_
- To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:

Revised Engagement Letter, dated April 24, 2014, between Registrant and Foreign Principal.

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. (*If space is insufficient, a full insert page must be used.*)

On April 24, 2014, Registrant modified its original agreement, dated September 9, 2013, with the foreign principal by agreeing to engage in the more comprehensive effort in relation to determinations made under the Immigration and Nationality Act, 8 U.S.C. 1182, section 212(a)(3)(B)(vi)(III), for a revised retainer of \$33,000 per month for 3 months.

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**EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>1</sup>)

May 19, 2014

/s/ Edward J. Newberry, Managing Partner

eSigned

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<sup>1</sup> 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.

**PATTON BOGGS** LLP  
ATTORNEYS AT LAW

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April 24, 2014

David M. Tafuri  
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Karwan Zebari  
Director, Congressional & Academic Affairs  
The Kurdistan Regional Government  
1532 16<sup>th</sup> Street, NW  
Washington, DC 20036

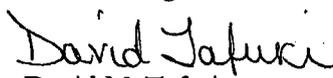
**Re: Engagement of Patton Boggs LLP**

Karwan:

The attached engagement letter continues to provide the terms under which we are assisting the KRG with the Tier III issue. As per paragraph 5, we agreed to provide you with a budget and seek approval if we engage in a more comprehensive advocacy effort on your behalf.

Per our discussion, we have begun to engage in the more comprehensive effort for a retainer amount of \$33,000 per month for 3 months. This monthly retainer amount begins on April 21, 2014 and ends on July 21, 2014. If the goals of the effort have not been met within the 3 months, you may extend these terms and the monthly retainer for another 3 months. If the goals of the effort are met before the expiration of the first 3 months, you may advise us of this in writing and we will cease to charge this retainer amount on that day, but the KRG shall be responsible for a pro rata amount based on the number of days worked during that month.

Warmest regards,

  
David M. Tafuri  
for PATTON BOGGS LLP

**PATTON BOGGS** LLP

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September 9, 2013

David M. Tafuri  
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H.E. Mr. Falah Bakir  
Head of the Department of Foreign Relations  
The Kurdistan Regional Government (KRG)  
Erbil, Iraq

Karwan Zebari  
Director, Congressional & Academic Affairs  
The Kurdistan Regional Government (KRG)  
1532 16<sup>th</sup> Street, NW  
Washington, DC 20036

**Re: Engagement of Patton Boggs LLP**

Messrs. Zebari and Bakir:

Thank you for retaining Patton Boggs LLP to represent the Kurdistan Regional Government ("KRG") in connection with analyzing the law relating to Tier III consideration under US law and to research and draft a legal brief regarding the same. We look forward to working with you on this engagement.

To ensure that the Kurdistan Regional Government and we have a common understanding of the terms of our representation and to comply with the rules of professional conduct for the jurisdictions in which we practice, I have enclosed a statement describing the standard terms of engagement for legal services to be provided by Patton Boggs LLP. The terms of engagement cover such matters as our procedure for handling potential conflicts of interest, fees, costs and expenses, billing arrangements and terms of payment. Please review the document carefully to ensure that it comports with your understanding. This letter supplements and modifies the enclosed terms of engagement.

I will be primarily responsible for the work done on behalf of client and will supervise the lawyers and other professionals who may work on this project. I anticipate that associates, staff attorneys, legal assistants, specialists and/or in-house consultants will assist in the matter.

As explained more fully in the terms of engagement, we will determine our legal fees based on our standard hourly billing rates in effect when the work is performed and the number of hours



September 9, 2013

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worked by each attorney. To keep fees down we will provide a special 10% discount across the board on all billable hourly rates. Generally, our billing rates for Partners range from \$440 to \$995, for Associates from \$270 to \$595, and for Legal Assistants from \$100 to \$295. This range varies, slightly, based on geographic location. The billing rates of certain lawyers with special expertise or extensive experience may be outside these ranges. My time is billed at \$610 per hour. If you would like to know the hourly billing rates of other billers most likely to work on a particular project, please call me. Generally, we adjust our billing rates at least once annually, typically in October. In addition to our fees for legal services, we also charge separately for certain costs and expenses as described in the enclosed statement.

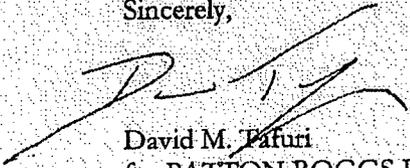
The work on analyzing Tier III and drafting a legal brief we will not exceed \$25,000 USD. If subsequent phases are required, including to perform advocacy, we will provide a budget and estimated fees and costs.

If you agree with these terms and conditions, including those set forth in the standard terms of engagement, no further action is required. If you have any questions about these terms or would like to discuss them, please call me as soon as possible so as not to impede our commencing work on your behalf.

These terms and conditions will apply to any future work we undertake for you unless we send you a new letter reflecting different terms and conditions.

We look forward to working with the Kurdistan Regional Government to achieve a successful result.

Sincerely,



David M. Pafuri  
for PATTON BOGGS LLP