

U.S. Department of Justice  
Washington, DC 20530

**Supplemental Statement**

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

For Six Month Period Ending 12/31/2015

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant	(b) Registration No.
Squire Patton Boggs (US) LLP	2165
(c) Business Address(es) of Registrant	
2550 M Street, NW	
Washington, DC 20037	

2. Has there been a change in the information previously furnished in connection with the following?

- (a) If an individual:
- |                           |                              |                             |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | 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"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.  
N/A

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**

3. If you have previously filed Exhibit C<sup>1</sup>, 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.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws 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, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) 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
Please see Attachment A		

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
From time to time, partners not associated with the foreign principals join or leave the partnership.				

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes  No

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes  No

Name	Residence Address	Citizenship	Position	Date Assumed
Maria-Esther Del-Carmen Gutierrez-Cordero	2814 Saint Croix Drive, Vienna, VA. 22180	Mexican	Public Policy Advisor	August 2015

(c) Have any employees or individuals, 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:

Name	Position or Connection	Date Terminated
See Attachment B - Schedule A		

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes  No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
See Attachment B - Schedule A			

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes  No

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

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes  No   
If yes, furnish the following information:

Foreign Principal	Date of Termination
1. The Confederation of Garment Exporters of the Philippines (CONGEP)	December 31, 2015
2. The Government of Turkey (through the Gephardt Group)	September 10, 2015

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes  No   
If yes, furnish th following information:

Name and Address of Foreign Principal(s)	Date Acquired
1. The Government of the Dominican Republic	July 17, 2015

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

1. The Government of the Republic of Cameroon; 2. The People's Republic of China; 3. The Government of Croatia; 4. The Government of the Gabonese Republic; 5. The Government of Kosovo; 6. The Palestinian Authority, 7. The Government of Qatar; and 8. Temasek Holdings .

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A <sup>3</sup>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Exhibit B <sup>4</sup>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual 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 principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

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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 7, 8, or 9 of this statement? Yes  No

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

See Attachment C

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</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 Attachment D

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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 your foreign principal(s)? Yes  No

If yes, describe fully.

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<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that 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 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 7, 8, or 9 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 no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
	See Attachment E		

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes  No

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes  No

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 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:

Foreign Principal	Date Received	Thing of Value	Purpose
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<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</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 7, 8, or 9 of this statement? Yes  No

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

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

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.

Date	To Whom	Purpose	Amount
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See Attachment F

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Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes  No

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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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>11</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:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
	See Attachment G		

10, 11 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.

## V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>  
 Yes  No

If Yes, go to Item 17.

- (b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?  
 Yes  No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

The Government of Cameroon

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 informational materials? 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 informational materials include the use of any of the following:

- Radio or TV broadcasts     Magazine or newspaper     Motion picture films     Letters or telegrams  
 Advertising campaigns     Press releases     Pamphlets or other publications     Lectures or speeches  
 Other (specify) \_\_\_\_\_

**Electronic Communications**

- Email  
 Website URL(s): \_\_\_\_\_  
 Social media websites URL(s): \_\_\_\_\_  
 Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials 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 the informational materials:

- English     Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes  No

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

- Yes  No

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI - 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 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>13</sup>)

January 30, 2016

Edward J. Newberry

<sup>13</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.

**FARA REPORTING PERIOD: JULY 1 – DECEMBER 31, 2015**

**Attachment A**

**Section I, 4(a): Names of persons that have ceased acting as partners**

<b>Partner Name</b>	<b>Date Terminated</b>	<b>Position</b>
Mullens, Jeffrey	December 31, 2015	Partner
Clancy, Sean	December 15, 2015	Partner
O'Neill, Kevin	November 30, 2015	Partner
Blackwood, Kristine	November 30, 2015	Partner
Dziewit, Halina	October 26, 2015	Partner
Creedon, Shawn	September 18, 2015	Partner
DuVall, Jason D.	September 4, 2015	Partner
Murphy, Lewis F.	July 21, 2015	Partner
Donley, Charles	July 10, 2015	Partner

**FARA Reporting Period July 1 – December 31, 2015****Attachment B - Schedule A****Section I, 5(d): Short Form Registrant Terminations**

<b>Name</b>	<b>Position or Connection</b>	<b>Foreign Principal</b>	<b>Date Foreign Principal Terminated</b>	<b>Date Short Form Registration Terminated</b>
Gregory Louer	Associate	<b>Government of the Gabonese Republic</b>	N/A	December 11, 2015
David Hoppe	Senior Policy Advisor	<b>Government of Kosovo</b>	N/A	October 28, 2015
Robert Kapla	Partner	<b>Government of Turkey</b>	August 28, 2015	August 28, 2015
Bret Boyles	Public Policy Advisor	Government of Turkey	August 28, 2015	August 28, 2015
Trent Lott	Senior Counsel	Government of Turkey	August 28, 2015	August 28, 2015
John Breaux	Senior Counsel	Government of Turkey	August 28, 2015	August 28, 2015

Frank Samolis	Partner	<b>Confederation of Garment Exporters of the Philippines (CONGEP)</b>	December 31, 2015	December 31, 2015
Ludmilla Savelieff	Associate	Confederation of Garment Exporters of the Philippines (CONGEP)	December 31, 2015	December 31, 2015
Stacy Swanson	Public Policy Advisor	Confederation of Garment Exporters of the Philippines (CONGEP)	December 31, 2015	December 31, 2015
David Hoppe	Senior Policy Advisor	Confederation of Garment Exporters of the Philippines (CONGEP)	December 31, 2015	October 28, 2015

FARA Reporting Period: July 1 – December 31, 2015

Attachment C – Section III, #11

**1. Government of the Republic of Cameroon**

During the reporting period, Registrant counseled the foreign principal on the African Growth and Opportunity Act (“AGOA”) and submitted AGOA-related public comments to the Office of the U.S. Trade Representative on behalf of the foreign principal. Moreover, Registrant counseled the foreign principal on matters affiliated with the U.S. Department of State’s Human Rights and Trafficking in Persons Reports. More broadly, Registrant monitored and advised the foreign principal of various U.S. policy developments, and facilitated Congressional meetings to brief policymakers on developments in Cameroon including those affiliated with regional security. This included monitoring the House and Senate National Defense Authorization Acts for Fiscal Year 2016 (H.R. 1735, S. 1376, S. 1356) and foreign principal-related provisions and amendments thereto including those related to Boko Haram.

**2. Embassy of the People’s Republic of China**

During the reporting period, Registrant counseled the foreign principal on U.S. Congressional matters. This included monitoring, compiling information, and analyzing the potential legal and political ramifications of legislation regarding matters of interest to the foreign principal. Such legislation included the House and Senate National Defense Authorization Acts for Fiscal Year 2016 (H.R. 1735, S. 1376, S. 1356) and foreign principal-related provisions and amendments thereto including U.S. relations with Taiwan and Hong Kong, cybersecurity, and arms sales to Taiwan. Moreover, Registrant advised the foreign principal on background and developments concerning other subjects including FY 2016 appropriations (including H.R. 2029, H.R. 2772, and S. 1725), South China Sea, currency, immigration, Tibet, and trade. More generally, Registrant monitored and informed the foreign principal of Congressional hearings and other developments regarding matters of interest to the foreign principal.

**3. Republic of Croatia**

During the reporting period, Registrant counseled the foreign principal on matters affiliated with regional energy security. More broadly, Registrant monitored and advised the foreign principal of various U.S. policy developments.

**4. The Government of the Gabonese Republic**

During the reporting period, Registrant counseled the Foreign Principal on its relations with the United States Government and advised it on enhancing its image.

**5. The Government of the Dominican Republic**

During the reporting period, Registrant provided legal counsel and advice to the foreign principal with respect to the development and implementation of public diplomacy programs

**6. The Palestinian Authority**

There was no reportable activity performed on behalf of the Palestinian Authority during this reporting period.

**7. Government of the State of Qatar**

During the reporting period, Registrant advised the Government of the State of Qatar in regard to its bilateral relationship with the United States, its trade and commerce activities, and legal matters involving the Embassy and other diplomatic missions of the State of Qatar, contractors and Qatari nationals. Squire Patton Boggs also rendered advice to the Embassy concerning its charitable activities in the United States; the exercise of diplomatic functions; interpretation of obligations established by treaty; dispositions of Embassy real estate in the United States; issues of diplomatic immunity; and vendor contracts with the Embassy.

**8. Temasek Holdings**

During the reporting period, Registrant advised the foreign principal regarding the Trans Pacific Partnership (TPP) negotiations, particularly with respect to the chapter covering State-Owned Enterprises (SOEs), including monitoring progress of negotiations and tracking proposed language submitted by any TPP Member Country, and communications with TPP Member Country embassies in Washington, DC.

**9. Confederation of Garment Exporters of the Philippines (CONGEP)**

During this reporting period, Registrant advised the foreign principal with respect to its trade priorities, including advocating for the establishment of a preferential trade treatment framework between the United States and the Republic of the Philippines.

**10. The Government of Turkey (through the Gephardt Group)**

During the reporting period, Registrant advised the foreign principal on U.S.-Government of Turkey bilateral relations.

**11. The Government of Kosovo**

During the reporting period, Registrant continued to represent the foreign principal on multiple aspects of its relations with the U.S. Government. As part of this representation, Registrant counseled the foreign principal on U.S. Congressional and regulatory matters. To facilitate such counsel, Registrant conducted outreach to Congressional and agency officials. Registrant discussed ways to enhance U.S.-Kosovo bilateral relations, promote U.S. investment in Kosovo, and support the Government of Kosovo's efforts to garner diplomatic recognition by other nations and international organizations. Registrant also monitored and advised the foreign principal on various U.S. policy developments and their potential impact on the bilateral relationship, and assisted the foreign principal in sharing information with U.S. policymakers about its own initiatives.

**FARA Reporting Period: July 1 – December 31, 2015**  
**Attachment D – Section III, #12**

**1. Government of Cameroon**

During the reporting period, Registrant counseled the foreign principal on the African Growth and Opportunity Act ("AGOA") and submitted AGOA-related public comments to the Office of the U.S. Trade Representative on behalf of the foreign principal. Moreover, Registrant counseled the foreign principal on matters affiliated with the U.S. Department of State's Human Rights and Trafficking in Persons Reports. More broadly, Registrant monitored and advised the foreign principal of various U.S. policy developments, and facilitated Congressional meetings to brief policymakers on developments in Cameroon including those affiliated with regional security. This included monitoring the House and Senate National Defense Authorization Acts for Fiscal Year 2016 (H.R. 1735, S. 1376, S. 1356) and foreign principal-related provisions and amendments thereto including those related to Boko Haram. The below reportable political contacts were made on behalf of the foreign principal.

<b>Date</b>	<b>Type of Meeting</b>	<b>Office of</b>	<b>Met/Discussed with</b>	<b>Issue</b>
8/25/2015	Email	State Department	Ben Mossberg, Desk Officer	U.S.-Cameroon bilateral relations
8/25/2015	Phone call	State Department	Ben Mossberg, Desk Officer	U.S.-Cameroon bilateral relations
9/16/2015	Email	State Department	Ben Mossberg, Desk Officer	U.S.-Cameroon bilateral relations
9/16/2015	Phone call	State Department	Ben Mossberg, Desk Officer	U.S.-Cameroon bilateral relations
11/4/2015	Email	State Department	Karen Bel, Regional Environment Officer for West and Central Africa	U.S.-Cameroon bilateral relations
11/4/2015	Phone call	State Department	Karen Bel, Regional Environment Officer for West and Central Africa	U.S.-Cameroon bilateral relations

**FARA Reporting Period: July 1 – December 31, 2015**  
**Attachment D – Section III, #12**

11/5/2015	Email	State Department	Karen Bel, Regional Environment Officer for West and Central Africa	U.S.-Cameroon bilateral relations
11/6/2015	Email	State Department	Karen Bel, Regional Environment Officer for West and Central Africa	U.S.-Cameroon bilateral relations
12/10/2015	Email	Sen. Joni Ernst (R-IA)	Jabari White, National Security Policy Advisor	U.S.-Cameroon bilateral relations
12/10/2015	Email	Sen. Joni Ernst (R-IA)	Jabari White, National Security Policy Advisor	U.S.-Cameroon bilateral relations
12/11/2015	Meeting	Rep. Joe Wilson (R-SC)	Matt Blackwell, Legislative Advisor	U.S.-Cameroon bilateral relations
12/11/2015	Meeting	Sen. James Inhofe (R-OK)	Col. Anthony Lazarski, Sr. Advisor and Adrienne Jackson, Legislative Correspondent	U.S.-Cameroon bilateral relations
12/11/2015	Email	Sen. Jeff Flake (R-AZ)	Colleen Donnelly, Legislative Assistant	U.S.-Cameroon bilateral relations
12/16/2015	Email	Rep. Mac Thornberry (R-TX)	Scott Rein, Air Force Fellow	U.S.-Cameroon bilateral relations
12/31/2015	Email	State Department	Ben Mossberg, Desk Officer	U.S.-Cameroon bilateral relations
12/31/2015	Phone call	State Department	Ben Mossberg, Desk Officer	U.S.-Cameroon bilateral relations

**FARA Reporting Period: July 1 – December 31, 2015**  
**Attachment D – Section III, #12**

**2. Embassy of the People's Republic of China**

During the reporting period, Registrant counseled the foreign principal on U.S. Congressional matters. This included monitoring, compiling information, and analyzing the potential legal and political ramifications of legislation regarding matters of interest to the foreign principal. Such legislation included the House and Senate National Defense Authorization Acts for Fiscal Year 2016 (H.R. 1735, S. 1376, S. 1356) and foreign principal-related provisions and amendments thereto including U.S. relations with Taiwan and Hong Kong, cybersecurity, and arms sales to Taiwan. Moreover, Registrant advised the foreign principal on background and developments concerning other subjects including FY 2016 appropriations (including H.R. 2029, H.R. 2772, and S. 1725), South China Sea, currency, immigration, Tibet, and trade. More generally, Registrant monitored and informed the foreign principal of Congressional hearings and other developments regarding matters of interest to the foreign principal. The below reportable political contacts were made on behalf of the foreign principal.

<b>Date</b>	<b>Type of Meeting</b>	<b>Office of</b>	<b>Met/Discussed with</b>	<b>Issue</b>
9/8/15	Meeting	House Foreign Affairs Committee	Shelley Su	US-PRC bilateral relations
9/8/15	Meeting	House Foreign Affairs Committee	Amy Chang	US-PRC bilateral relations
9/9/15	Meeting	Senate Foreign Relations Committee	Michael Schiffer	US-PRC bilateral relations
9/9/15	Meeting	Senate Foreign Relations Committee	Carolyn Leddy	US-PRC bilateral relations
12/17/15	Meeting	Office of the Speaker	Dave Hoppe and Jonathan Burks	US-PRC bilateral relation

**FARA Reporting Period: July 1 – December 31, 2015**  
**Attachment D – Section III, #12**

**3. Government of the State of Qatar**

During the reporting period, Registrant advised the Government of the State of Qatar in regard to its bilateral relationship with the United States, its trade and commerce activities, and legal matters involving the Embassy and other diplomatic missions of the State of Qatar, contractors and Qatari nationals. Registrant also rendered advice to the Embassy concerning its charitable activities in the United States; the exercise of diplomatic functions; interpretation of obligations established by treaty; dispositions of Embassy real estate in the United States; issues of diplomatic immunity; and vendor contracts with the Embassy. The below reportable political contacts were made on behalf of the foreign principal.

Date	Type of Meeting	Office of	Met/Discussed with	Issue
9/16/2015	Phone Call	State Department	Benjamin Lowenberg, Qatar Desk Officer	Visa requirements for domestic workers of foreign diplomats
9/16/2015	Email	State Department	Benjamin Lowenberg, Qatar Desk Officer	Visa requirements for domestic workers of foreign diplomats
12/3/2015	Phone Call	State Department	Benjamin Lowenberg, Qatar Desk Officer	Bilateral work agreements applicable to spouses of diplomats
12/4/2015	Email	State Department	Benjamin Lowenberg, Qatar Desk Officer	Bilateral work agreements applicable to spouses of diplomats

**4. The Government of Turkey**

During the reporting period, Registrant advised the foreign principal on U.S.-Government of Turkey bilateral relations. The below reportable political contacts were made on behalf of the foreign principal.

Date	Mtg Type	Met with – Office of	Met With – Individual	Issue Discussed
8/13/15	Meeting	Rep. Mike Bost	Mark Ratto and Christian LaBella	US-Turkey bilateral relations

**FARA Reporting Period: July 1 – December 31, 2015**  
**Attachment D – Section III, #12**

**5. The Government of Kosovo**

During the reporting period, Registrant continued to represent the foreign principal on multiple aspects of its relations with the U.S. Government. As part of this representation, Registrant counseled the foreign principal on U.S. Congressional and regulatory matters. To facilitate such counsel, Registrant conducted outreach to Congressional and agency officials. Registrant discussed ways to enhance U.S.-Kosovo bilateral relations, promote U.S. investment in Kosovo, and support the Government of Kosovo's efforts to garner diplomatic recognition by other nations and international organizations. Registrant also monitored and advised the foreign principal on various U.S. policy developments and their potential impact on the bilateral relationship, and assisted the foreign principal in sharing information with U.S. policymakers about its own initiatives. The below reportable political contacts were made on behalf of the foreign principal.

<b>Date</b>	<b>Type of Meeting</b>	<b>Office of</b>	<b>Met/Discussed with</b>	<b>Issue</b>
7/14/2015	Email	Rep. Mike Turner	Morley Greene	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Senate Foreign Relations Committee	Caleb McCarry	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Senate Foreign Relations Committee	John Rader	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Rep. Dana Rohrabacher	Scott Cullinane	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Rep. Paul Cook	Claire Cozad	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Rep. Dave Trott	Mena Hanna	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Rep. Gregory Meeks	Philip Bednarczyk	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Rep. Lois Frankel	Joshua Cohen	U.S. - Government of Kosovo Bilateral Relations
7/14/2015	Email	Rep. Mark Meadows	Martha Van Lieshout	U.S. - Government of Kosovo Bilateral Relations

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**Attachment D – Section III, #12**

7/14/2015	Email	Rep. George Holding	Kris Denzel	U.S. - Government of Kosovo Bilateral Relations
7/21/2015	Meeting	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
7/21/2015	Correspondence	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
7/30/2015	Phone Call	Senator Ernst	Matt Sexton, Regional Director	U.S. - Government of Kosovo Bilateral Relations
7/31/2015	Phone Call	Senator Ernst	Matt Sexton, Regional Director	U.S. - Government of Kosovo Bilateral Relations
8/3/2015	Correspondence	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
8/11/2015	Correspondence	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
8/12/2015	Correspondence	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
8/12/2015	Phone Call	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
8/20/2015	Phone Call	House Foreign Affairs Committee	Janice Kaguyutan	U.S. - Government of Kosovo Bilateral Relations
8/28/2015	Phone Call	Congressman Roskam	Michelle Schimpp	U.S. - Government of Kosovo Bilateral Relations
8/28/2015	Email	Congressman Roskam	Michelle Schimpp	U.S. - Government of Kosovo Bilateral Relations
9/4/2015	Email	Rep. Peter Roskam	Jeff Billman	U.S. - Government of Kosovo Bilateral Relations
9/8/2015	Phone Call	House Foreign Affairs Committee	Janice Kaguyutan	U.S. - Government of Kosovo Bilateral Relations
9/8/2015	Email	Rep. Peter Roskam	Jeff Billman	U.S. - Government of Kosovo Bilateral Relations
9/9/2015	Correspondence	Sen. Ernst	Taryn Frideres	U.S. - Government of Kosovo Bilateral Relations
9/9/2015	Phone Call	Sen. Ernst	Taryn Frideres	U.S. - Government of Kosovo

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				Bilateral Relations
9/10/2015	Correspondence	Sen. Ernst	Taryn Frideres	U.S. - Government of Kosovo Bilateral Relations
9/15/2015	Email	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
9/15/2015	Phone Call	House Foreign Affairs Committee	Janice Kaguyutan	U.S. - Government of Kosovo Bilateral Relations
9/16/2015	Email	USAID	Lisa Magno	U.S. - Government of Kosovo Bilateral Relations
9/16/2015	Email	House Democracy Partnership	Michele Schimpp	U.S. - Government of Kosovo Bilateral Relations
9/22/2015	Phone Call	Sen. Ernst	Taryn Frideres	U.S. - Government of Kosovo Bilateral Relations
9/23/2015	Phone Call	Rep. Rohrabacher	Scott Cullinane	U.S. - Government of Kosovo Bilateral Relations
9/23/2015	Email	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
9/25/2015	Email	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
9/29/2015	Email	House Foreign Affairs Committee	Jason Steinbaum	U.S. - Government of Kosovo Bilateral Relations
10/14/2015	Email	Rep. Dana Rohrabacher	Scott Cullinane	U.S. - Government of Kosovo Bilateral Relations
10/19/2015	Email	Rep. Dana Rohrabacher	Scott Cullinane	U.S. - Government of Kosovo Bilateral Relations
10/29/2015	Email	Rep. Dana Rohrabacher	Justin Ahn	U.S. - Government of Kosovo Bilateral Relations
10/30/2015	Email	State Department	Ilan Goodman	U.S. - Government of Kosovo Bilateral Relations
11/3/2015	Phone Call	State Department	Anne Morrison	U.S. - Government of Kosovo Bilateral Relations

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**6. Confederation of Garment Exporters of the Philippines (CONGEP)**

Registrant advised the foreign principal with respect to its trade priorities, including advocating for the establishment of a preferential trade treatment framework between the United States and the Republic of the Philippines. The below reportable political contacts were made on behalf of the foreign principal.

Date	Type of Meeting	Office of	Met/Discussed with	Issue
7/7/2015	Meeting	Rep. Darryl Issa	Matthew Goulding	US-Philippines trade issues
7/15/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/16/2015	Phone call	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/16/2015	Meeting	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/17/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/20/2015	Email	Rep. Trent Franks	Chelsea Patterson	US-Philippines trade issues
7/20/2015	Phone Call	Sen. Dianne Feinstein	Shaeda Ahmadi	US-Philippines trade issues
7/20/2015	Email	Rep. Scott Rigell	Beth Kaczmarek	US-Philippines trade issues
7/20/2015	Phone call	Rep. Dave Reichert	Natalie Kamphaus	US-Philippines trade issues
7/20/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/22/2015	Email	Rep. Trent Franks	Chelsea Patterson	US-Philippines trade issues
7/22/2015	Meeting	Rep. Scott Rigell	Rep. Scott Rigell	US-Philippines trade issues
7/23/2015	Meeting	Rep. Dave Reichert	Rep. Dave Reichert, Natalie Kamphaus	US-Philippines trade issues
7/27/2015	Email	Rep. Bobby Scott	Randi Petty	US-Philippines trade issues
7/27/2015	Email	Rep. Tulsi Gabbard	Anthony Ching	US-Philippines trade issues
7/27/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/27/2015	Email	Rep. Charles Boustany	Rebecca Hobbs	US-Philippines trade issues

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7/27/2015	Meeting	Rep. Darryl Issa	Rep. Darryl Issa, Matthew Goulding	US-Philippines trade issues
7/28/2015	Meeting	Rep. Bobby Scott	Rep. Bobby Scott	US-Philippines trade issues
7/29/2015	Email	Rep. Tulsi Gabbard	Anthony Ching	US-Philippines trade issues
7/30/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
7/30/2015	Phone call	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
8/3/2015	Meeting	Rep. Tulsi Gabbard	Anthony Ching	US-Philippines trade issues
8/20/2015	Email	Rep. Charles Boustany	Jonathan LeMaire	US-Philippines trade issues
8/20/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
8/24/2015	Email	Rep. Charles Boustany	Jonathan LeMaire	US-Philippines trade issues
8/28/2015	Email	Rep. Charles Boustany	Jonathan LeMaire	US-Philippines trade issues
9/4/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
9/9/2015	Email	Rep. Charles Boustany	Jonathan LeMaire	US-Philippines trade issues
9/15/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
9/16/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
9/16/2015	Meeting	Sen. Lisa Murkowski	Allison Nyholm	US-Philippines trade issues
9/16/2015	Meeting	Sen. Dan Sullivan	Liz Banicki	US-Philippines trade issues
9/17/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
9/18/2015	Email	Rep. Dave Reichert	Natalie Kamphaus	US-Philippines trade issues
9/18/2015	Email	Senate Finance Committee	Rebecca Eubank	US-Philippines trade issues
9/18/2015	Email	Senate Finance Committee	Rebecca Eubank	US-Philippines trade issues
9/18/2015	Email	Rep. Darryl Issa	Matthew Goulding	US-Philippines trade issues
9/18/2015	Email	Rep. Trent Franks	Ari Zimmerman	US-Philippines trade issues
9/18/2015	Phone call	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
9/21/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
9/21/2015	Email	Senate Finance Committee	Rebecca Eubank	US-Philippines trade issues
9/25/2015	Email	Senate Finance Committee	Rebecca Eubank	US-Philippines trade issues
9/27/2015	Email	Senate Finance Committee	Rebecca Eubank	US-Philippines trade issues
9/29/2015	Email	Rep. Tulsi Gabbard	Anthony Ching	US-Philippines trade issues

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9/29/2015	Phone Call	Rep. Tulsi Gabbard	Anthony Ching	US-Philippines trade issues
10/4/2015	Email	Rep. Tulsi Gabbard	Ryan Trapani	US-Philippines trade issues
10/4/2015	Email	Rep. Tulsi Gabbard	Ryan Trapani	US-Philippines trade issues
10/16/2015	Email	Rep. Matt Salmon	Amy Chang	US-Philippines trade issues
10/16/2015	Phone call	Rep. Dave Reichert	Natalie Kamphaus	US-Philippines trade issues
10/20/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
10/22/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
10/22/2015	Phone call	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
11/8/2015	Email	Rep. Tulsi Gabbard	Ryan Trapani	US-Philippines trade issues
11/10/2015	Email	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
11/10/2015	Email	Rep. Tulsi Gabbard	Ryan Trapani	US-Philippines trade issues
11/12/2015	Phone call	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
11/12/2015	Phone call	Senator Brian Schatz	Mika Morse	US-Philippines trade issues
11/30/2015	Email	Rep. Tulsi Gabbard	Ryan Trapani	US-Philippines trade issues

**7. Government of the Gabonese Republic**

During the reporting period, Registrant counseled the Foreign Principal on its relations with the United States Government and advised it on enhancing its image. The below reportable political contacts were made on behalf of the foreign principal:

Date	Type of Meeting	Office of	Met/Discussed with	Issue
11/9/2015	Meeting	State Department (Bel) + US Embassy Accra (Tuolienuo)	Karen Bel, Regional Environment Officer for West and Central Africa + Isaiah Tuolienuo, Contractor	U.S.-Government of Gabon bilateral relations

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**Attachment D – Section III, #12**

**8. Government of the Dominican Republic**

During the reporting period, Registrant provided legal counsel and advice to the foreign principal with respect to the development and implementation of public diplomacy programs. The below reportable political contacts were made on behalf of the foreign principal.

<b>Date</b>	<b>Type of Meeting</b>	<b>Office of</b>	<b>Met/Discussed with</b>	<b>Issue</b>
09/15/2015	Meeting	State Department	Joseph Bagga-Taves, the new Desk Officer for the Dominican Republic	U.S.-Dominican Republic bilateral relations

**9. The Palestinian Authority**

No reportable contacts were made on behalf of the Palestinian Authority during this reporting period.

**10. Temasek Holdings**

No reportable contacts were made on behalf of the Temasek Holdings during this reporting period.

**11. The Government of Croatia**

No reportable contacts were made on behalf of the Government of Croatia during this reporting period.

**FARA REPORTING PERIOD: JULY 1 – DECEMBER 31, 2015****ATTACHMENT E: SECTION IV, 14(A)****1. Government of the Republic of Cameroon - Payments Received**

07/20/2015	Government of the Republic of Cameroon	\$100,000.00
10/26/2015	Government of the Republic of Cameroon	\$100,000.00
	<b>TOTAL</b>	<b>\$200,000.00</b>

**2. The Government of Croatia \***

07/2/2015	The Government of Croatia	\$364,000.00
08/3/2015	The Government of Croatia	\$364,000.00
09/2/2015	The Government of Croatia	\$364,000.00
10/5/2015	The Government of Croatia	\$363,966.20
11/2/2015	The Government of Croatia	\$364,033.80
12/2/2015	The Government of Croatia	\$364,000.00
	<b>TOTAL</b>	<b>\$2,184,000.00</b>

**3. The Government of the Gabonese Republic - Payments Received**

08/31/2015	The Government of the Gabonese Republic	\$250,000.00
12/7/2015	The Government of the Gabonese Republic	\$100,000.00
	<b>TOTAL</b>	<b>\$350,000.00</b>

**\*Amounts reported include total receipts from the foreign principal. In some cases, all or some of the moneys received relate to non-FARA work.**

**4. The Office of the National Security Advisor (ONSA) - Payments Received**

09/15/2015	The Office of the National Security Advisor (ONSA) – Government of Nigeria	\$11,568.16
	<b>TOTAL</b>	<b>\$11,568.16</b>

**5. Government of Kosova - Payments Received**

07/21/2015	Government of Kosova	\$98,297.78
09/3/2015	Government of Kosova	\$151,702.22
	<b>TOTAL</b>	<b>\$250,000.00</b>

**6. Government of the State of Qatar - Payments Received**

07/31/2015	Government of the State of Qatar	\$102,055.54
10/5/2015	Government of the State of Qatar	\$60,305.00
12/8/2015	Government of the State of Qatar	\$30,067.63
	<b>TOTAL</b>	<b>\$192,428.17</b>

**7. Confederation of Garment Exporters of the Philippines (CONGEP) - Payments Received**

07/10/2015	CONGEP	\$17,480.00
09/18/2015	CONGEP	\$35,000.00
09/23/2015	CONGEP	\$35,000.00
	<b>TOTAL</b>	<b>\$87,480.00</b>

**8. Temasek Holdings - Payments Received**

12/22/2015	Temasek Holdings	\$91,833.19
	<b>TOTAL</b>	<b>\$91,833.19</b>

**9. The People's Republic of China - Payments Received**

07/9/2015	The People's republic of China	\$105,000.00
10/18/2015	The People's Republic of China	\$105,000.00
12/14/2015	The People's Republic of China	\$105,000.00
	<b>TOTAL</b>	<b>\$315,000.00</b>

**No monies were received during this reporting period for:**

- A. The Government of Turkey \*\*
- B. The Palestinian Authority \*\*

**\*\* No fees were received from or on behalf of the foreign principal in relation to FARA registrable activities**

**FARA Reporting Period: July 1 – December 31, 2015****Attachment F – Section 15(a)\*****1. The Government of the Republic of Cameroon – Disbursements**

Local Transportation	\$21.04
Cell phone	\$1.22
Meals	\$15.00
FARA Filing Fee	\$305.00
<b>TOTAL</b>	<b>\$342.26</b>

**2. The Embassy of the People's Republic of China – Disbursements**

Local Transportation	\$268.02
Miscellaneous	\$117.50
FARA Filing Fee	\$305.00
<b>TOTAL</b>	<b>\$690.52</b>

**3. Office of the National Security Advisor (ONSA) - Nigeria – Disbursements**

Airfare through Travel Service	\$138.00
Cell or Mobile Phone	\$450.00
Delivery Services	\$30.02
Local Transportation	\$83.11
Meals	\$301.93
Miscellaneous	\$728.63
Telephone	\$245.15
Travel	\$555.00
FARA filing fee	\$305.00
<b>TOTAL</b>	<b>\$2,836.84</b>

**4. Temasek Holdings – Disbursements**

FARA Filing Fee	\$305.00
Miscellaneous	\$28.00
<b>TOTAL</b>	<b>\$333.00</b>

**5. Confederation of Garment Exporters of the Philippines – Disbursements**

FARA Filing Fee	\$305.00
Local Transportation	\$235.13
<b>TOTAL</b>	<b>\$540.13</b>

**6. The Government of Croatia - Disbursements**

Airfare through Travel Service	\$32,207.20
Binding Charges - Binding Paper	\$6.00
Cell or Mobile Phone	\$70.64
Cellular Phone	\$70.52
Color Imaging	\$1,285.50
Court Costs	\$11,134.06
Delivery Services	\$1,309.78
Entertainment	\$39.29
Express Mail - Fedex	\$686.81
Express Mail - Other	\$1,254.18
Express Mail - UPS	\$1,317.10
FARA filing fee	\$305.00
Hotel	\$4,247.70
Local Transportation	\$1,422.05
Meals	\$9,609.68
Miscellaneous	\$5,034.46
Notary Charges	\$52.07
Note & Bond Charge	\$16.23
Online services - Lexis/Nexis	\$12,739.28
Online services - Other	\$31.83
Outside Consultants	\$85,368.27
Postage	\$725.56
Printing/Duplicating - Outside	\$3,749.33
Printing/duplicating-in-house	\$571.86
Secretary Overtime	\$2,611.25
Stenographic Reporting/Video Duplication/Transcript	\$1,516.94
Supplies	\$1,283.29
Telephone	\$703.70
Translating Charge	\$17,724.65
Translators	\$1,012.50
Travel	\$101,890.88
<b>TOTAL</b>	<b>\$299,997.61</b>

**7. The Government of the State of Qatar - Disbursements**

FARA Filing Fee	\$305.00
Telephone	68.23
<b>TOTAL</b>	<b>\$373.23</b>

**8. The Government of the Gabonese Republic – Disbursements**

Airfare through Travel Service	\$495.00
Cell or Mobile Phone	\$697.41
Court Filing / Process Service	\$201.00
FARA filing fee	\$305.00
Delivery Services	\$51.88
Local Transportation	\$264.18
Meals	\$281.56
Miscellaneous	\$13.90
Public Notices	\$60.00
Travel	\$31,098.41
<b>TOTAL</b>	<b>\$33,468.34</b>

**9. The Government of Kosova – Disbursements**

Airfare through Travel Service	\$836.36
Local Transportation	\$321.73
Meals	\$9,509.69
Telephone	\$2.39
FARA filing fee	\$305.00
Travel	\$10,078.46
<b>TOTAL</b>	<b>\$21,053.63</b>

**10. The Government of the Dominican Republic – Disbursements**

FARA Filing Fee	\$305.00
Air fare through travel service	\$386.00
Binding Charges - Binding Paper	\$110.00
Cell or Mobile Phone	\$536.81
Local Transportation	\$767.38
Meals	\$289.75
Miscellaneous	\$50.00
Online services - other	\$28.20
Outside Consultants	\$27,000.00
Registration Fees	\$73.60
Telephone	\$139.78
Travel	\$6,613.43
<b>TOTAL</b>	<b>\$36,299.95</b>

**11. The Palestinian Authority\* – Disbursements**

FARA filing fee	\$305.00
<b>TOTAL</b>	<b>\$305.00</b>

**12. The Government of Turkey (through the Gephardt Group) – Disbursements**

FARA Filing Fee	\$305.00
<b>TOTAL</b>	<b>\$305.00</b>

**\*Note:** All disbursements related to travel and subsistence consist of travel and hotel costs for related members of the Firm while in travel status, for travel performed incident to representing the foreign interests of the foreign principal. In the case of some clients, *e.g.*, Croatia, disbursements shown were incurred for work that is not FARA-registrable such as arbitration.

## Squire Patton Boggs (US) LLP

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## Attachment G – Section 15(c)

## Squire Patton Boggs (US) LLP – PAC Contributions

<u>Date</u>	<u>Candidate</u>	<u>Campaign Committee</u>	<u>\$ Amount</u>
7/9/2015	Kevin Malecek	Friends of Kevin Malecek	600.00
7/9/2015	Jared Huffman	Huffman for Congress 2014	1,000.00
7/9/2015	Kelly Ayotte	Friends of Kelly Ayotte Inc.	2,000.00
7/10/2015	Charles Grassley	Grassley Committee Inc.	2,500.00
7/10/2015	Rick Pfeiffer	Friends of Rick Pfeiffer Committee	250.00
7/20/2015	Carlos Gimenez	Miami Dade Residents First	2,000.00
7/24/2015	John Boehner	Boehner for Speaker	2,700.00
8/3/2015	Frank Jackson	Frank Jackson for a Better Cleveland	2,000.00
8/18/2015	Dave Yost	Dave Yost for Ohio	1,000.00
8/18/2015	Judy Moran	Friends of Judy Moran	400.00
8/18/2015	FCRP	Franklin County Republican Party	1,750.00
8/18/2015	Brad Wenstrup	Wenstrup for Congress	1,000.00
8/27/2015	John Rogers	Friends of Rogers	150.00
8/28/2015		Council Leadership Fund	2,500.00
8/27/2015	Charles Schumer	Friends of Schumer	5,000.00
9/24/2015	Daniel Troy	Citizens for Troy	600.00

9/24/2015	Matt Trafis	Trafis for Council Committee	100.00
9/24/2015	Michael Barth	Barth for Council Committee	100.00
9/23/2015	Willoughby-Eastlake Levy Campaign	Willoughby-Eastlake Levy Campaign	1,000.00
9/24/2015	Building our Future Together	Building our Future Together	750.00
9/24/2015	Citizens for Poland Schools	Citizens for Poland Schools	750.00
9/24/2015	Save Our Schools Firelands Levy Committee	Save Our Schools Firelands Levy Committee	500.00
9/24/2015	Citizens for Massillon Schools	Citizens for Massillon Schools	250.00
9/24/2015	Youth Education Supporters (Y.E.S. Committee)	Youth Education Supporters (Y.E.S. Committee)	250.00
9/24/2015	Sandy Valley Schools Campaign Fund	Sandy Valley Schools Campaign Fund	250.00
9/24/2015	Buckeye Citizens for Quality Education	Buckeye Citizens for Quality Education	250.00
9/24/2015	Canfield Schools Citizens Committee	Canfield Schools Citizens Committee	250.00
9/24/2015	Friends of Nordonia Schools	Friends of Nordonia Schools	300.00
9/24/2015	Citizens for the Continuation of OCE&R	Citizens for the Continuation of OCE&R	400.00
9/30/2015	Citizens for a Safe Community	Citizens for a Safe Community	500.00
9/30/2015	Woodridge Levy Committee	Woodridge Levy Committee	500.00
9/30/2015	Supporters of Cardinal Local Schools	Supporters of Cardinal Local Schools	250.00

9/30/2015	Citizens for Schools	Citizens for Schools	250.00
9/30/2015	Revere Levy Committee	Revere Levy Committee	250.00
9/30/2015	Citizens for Wickliffe Schools	Citizens for Wickliffe Schools	250.00
9/30/2015	Champion Schools Tax Levy Fund	Champion Schools Tax Levy Fund	500.00
9/30/2015	Chippewa Levy Committee	Chippewa Levy Committee	500.00
9/30/2015	Citizens for Better Schools	Citizens for Better Schools	500.00
9/30/2015	Friends of Boardman Schools	Friends of Boardman Schools	250.00
9/30/2015	Citizens for Lorain Schools	Citizens for Lorain Schools	500.00
9/30/2015	Citizens for Quality Career Technical Education	Citizens for Quality Career Technical Education	750.00
9/30/2015	Citizens for Cleveland Heights' Future	Citizens for Cleveland Heights' Future	1,000.00
9/30/2015	Citizens for Lakeland	Citizens for Lakeland	750.00
10/27/2015	Rick Larsen	Citizens to Elect Rick Larson	1,000.00
10/29/2015	Marsha Blackburn	Marsha Blackburn for Congress, Inc	2,500.00
10/1/2015	Dave Joyce	Friends of Dave Joyce	1,000.00
10/15/2015	BHRL Campaign	Broadview Heights Recreation Levy Campaign	500.00
10/1/2015	Gayle Manning	Committee to Elect Manning	750.00
10/27/2015	Kyrsten Sinema	Kyrsten Sinema for Congress	1,000.00
10/1/2015	Richard Dell'Aquila	Friends of Richard Dell'Aquila	100.00
10/1/2015	Sam Alai	Friends of Sam Alai	150.00

10/5/2015	Brian Schatz	Schatz for Senate	500.00
10/6/2015	Carrie Glaeden	Glaeden for Judge	500.00
10/6/2015	Richard Pignatiello	Friends of Richard A. Pignatiello	100.00
10/16/2015	CCDP	Cuyahoga County Democratic Party	1,000.00
10/29/2015	Andrew Ginther	Friends of Ginther	4,500.00
10/29/2015	Nathan Manning	Manning for Ohio	200.00
10/29/2015	Tom Patton	Friends of Tom Patton	1,000.00
10/29/2015	John Carter	John Carter for Congress	2,000.00
10/29/2015	Rob Portman	Portman for Senate Committee	5,000.00
11/18/2015	Martin Heinrich	Martin Heinrich for Senate	1,000.00
11/13/2015	Carlos Curbelo	Calos Curbelo for Congress	1,000.00
11/12/2015	GCP	Greater Cleveland Partnership	5,000.00
11/12/2015	Dave Yost	Yost for Ohio	1,500.00
11/18/2015	Glenn Grothman	Glenn Grothman for Congress	1,000.00
11/18/2015	Mario Diaz-Balart	Mario Diaz-Balart for Congress	5,000.00
11/18/2015	Patrick Tiberi	Tiberi for Congress	1,300.00
11/30/2015	Patrick Leahy	Leahy Green Mountain Committee	2,500.00
11/18/2015	Jon Tester	Montanans for Tester	2,500.00
12/3/2015	Lizabeth Benquisto	Lizabeth Benquisto Campaign	1,000.00
12/3/2015	Tom Lee	Tom Lee Campaign	1,000.00
12/3/2015	Richard Burr	Burr for Senate	5,000.00
12/3/2015	Patty Murray	People for Patty Murray	1,000.00
12/3/2015	Ileana Ros-Lehtinen	Ros-Lehtinen for Congress	5,000.00
12/3/2015	Bill Shuster	Shuster for Congress	5,000.00

12/4/2015	<b>OHROC</b>	<b>OHROC (Ohio House Republican Organizational Committee)</b>	<b>5,000.00</b>
12/4/2015	<b>CAC</b>	<b>County Action Committee</b>	<b>2,500.00</b>
12/4/2015	<b>Pat DeWine</b>	<b>DeWine for Judge</b>	<b>1,000.00</b>
12/4/2015	<b>Maureen O'Connor</b>	<b>O'Connor for Supreme Court</b>	<b>1,000.00</b>
12/4/2015	<b>Armond Budish</b>	<b>Friends of Armond Budish</b>	<b>2,500.00</b>
12/4/2015	<b>Pat Fischer</b>	<b>Friends of Pat Fischer</b>	<b>1,000.00</b>
12/17/2015	<b>Nan Whaley</b>	<b>Friends of Nan Whaley</b>	<b>500.00</b>
12/17/2015	<b>John Husted</b>	<b>Husted for Ohio</b>	<b>2,500.00</b>
12/17/2015	<b>Mike DeWine</b>	<b>Mike DeWine for Ohio</b>	<b>2,500.00</b>
12/17/2015	<b>Joe Russell</b>	<b>Friends of Joe Russell</b>	<b>500.00</b>
12/18/2015	<b>Bill Nelson</b>	<b>Bill Nelson for U.S. Senate</b>	<b>2,500.00</b>
12/18/2015	<b>Jeff Duncan</b>	<b>Duncan for Congress</b>	<b>2,500.00</b>
12/18/2015	<b>Ed Royce</b>	<b>Royce Campaign Committee</b>	<b>2,500.00</b>
12/18/2015	<b>Ted Deutch</b>	<b>Ted Deutch Campaign Committee</b>	<b>1,000.00</b>
12/18/2015	<b>Tom Rooney</b>	<b>Tom Rooney for Congress</b>	<b>1,000.00</b>
12/18/2015	<b>Vern Buchanan</b>	<b>Vern Buchanan for Congress</b>	<b>1,000.00</b>

**Robert Kapla – Political Contributions**

<u>Date</u>	<u>\$ Amount</u>	<u>Candidate</u>	<u>Political Organization</u>
11/24/2015	\$250	Katie McGinty	Katie McGinty, Democrat for Senate

**Ludmilla Savelieff – Political contributions**

<u>Date</u>	<u>\$ Amount</u>	<u>Candidate</u>	<u>Political Organization</u>
10/21/2015	\$250	Rob Portman	Rob Portman for US Senate
9/27/2015	\$50	Chrys Kefalas	Chrys for Maryland
9/15/2015	\$100	Jeb Bush	Jeb 2016



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September 16, 2015

Ms. Constance Hamilton  
Deputy Assistant U.S. Trade Representative for Africa  
Office of the U.S. Trade Representative  
600 17<sup>th</sup> St. N.W., Room F516  
Washington, D.C. 20508

**Re: Request for Public Comments on Annual Review of Country Eligibility for Benefits under the African Growth and Opportunity Act in Calendar Year 2016: Recertification of Eligibility for Cameroon**

Dear Ms. Hamilton:

The global law firm of Squire Patton Boggs (US) LLP represents the Government of the Republic of Cameroon (GOC or Government) and is pleased to submit, on behalf of the Government, the following comments regarding the re-certification of Cameroon as a beneficiary country under the African Growth and Opportunity Act (AGOA).<sup>1</sup> This submission is in response to the August 14, 2015 notice in the Federal Register posted by the Office of the U.S. Trade Representative (USTR).<sup>2</sup>

This year, the importance of and further enthusiasm for AGOA is clearer than ever, as the U.S. Congress, on a bipartisan basis, renewed AGOA for a 10 year period. Upon this renewal, USTR Michael Froman confirmed that AGOA "has been the cornerstone of [the US] trade relationship with Africa for 15 years," and noted that AGOA's renewal was for "the longest ever in the program's history."<sup>3</sup> Additionally, he stated that AGOA "will incentivize good governance and pro-growth, pro-development policies, including on labor and human rights, while providing much-needed certainty for African producers, U.S. buyers, and investors."<sup>4</sup> Along the same lines, President Obama recently praised AGOA's potential to "boost the trade

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<sup>1</sup> This letter is prepared by Squire Patton Boggs (US) LLP on behalf of the Republic of Cameroon. Additional information is available at the FARA Registration Unit of the U.S. Department of Justice in Washington, D.C.

<sup>2</sup> 80 Fed. Reg. 48,951 (Aug. 14, 2015).

<sup>3</sup> Office of the USTR, *Statement by Ambassador Michael Froman on Congressional Passage of TPA, AGOA, and Preference Package* (June 2015), available at <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2015/june/statement-ambassador-michael-froman>.

<sup>4</sup> *Id.*

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and investment that supports hundreds of thousands of jobs both in Africa and the United States, creating opportunities for all of us.”<sup>5</sup>

The GOC shares this enthusiasm for AGOA and is committed to the continued improvement and expansion of AGOA in order to open Africa’s markets, increase African regional and global trade, and diversify U.S.-Africa two-way trade and investment. Cameroon’s geographic location is essential to the region’s economic growth – Cameroon serves as a gateway to landlocked Chad and the Central African Republic, which collectively represent a potential market of some 250 million consumers.<sup>6</sup> Moreover, Cameroon is the engine of regional trade in Central Africa, exporting primarily crude oil and petroleum products, lumber, cocoa beans, aluminum, coffee, and cotton.<sup>7</sup> Cameroon is also a founding member of the African Union, the Economic Community of Central African States (ECCAS), and the Economic and Monetary Community of Central Africa (CEMAC).

The GOC firmly believes that Cameroon demonstrates AGOA’s success and reflects AGOA’s promise for the future of the global trading system by generating trade and investment opportunities for Cameroon, the United States and the broader Central Africa region. Thus, we respectfully request that Cameroon remain eligible for benefits under AGOA.

In support of our request to maintain Cameroon as an AGOA eligible country and in accordance with the AGOA eligibility requirements, the following comments elaborate on the GOC’s progress toward establishing: (1) a market-based economy; (2) the elimination of barriers to U.S. trade and investment; (3) the rule of law; (4) a system to combat corruption; (5) economic policies to reduce poverty; and (6) protection of internationally recognized worker rights.<sup>8</sup> These comments also provide a brief overview of Cameroon’s efforts to “enhance” AGOA going forward.

#### **I. Market-Based Economy**

Pursuant to the eligibility requirements under the AGOA program, the GOC continues to implement policies that further the capitalization of its market-based economy. In May 2015, the State Department acknowledged the investment climate in Cameroon is improving, especially as Cameroon “begins to experience the higher-grade technology being offered by U.S. firms, as well as the application of corporate social responsibility norms and international best business

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<sup>5</sup> Afrika Reporter, *Obama touts AGOA, Africa’s opportunity as he leaves for Kenya, Ethiopia* (July 23, 2015), available at <http://www.afrikareporter.com/obama-touts-agoa-africas-opportunity-as-he-leaves-for-kenya-ethiopia/>.

<sup>6</sup> U.S. Department of State, *2014 Investment Climate Statement* (June 2014), available at <http://www.state.gov/e/eb/rls/othr/ics/2014/226931.htm>.

<sup>7</sup> CIA World FactBook, available at <https://www.cia.gov/library/publications/the-world-factbook/geos/cm.html>.

<sup>8</sup> Trade and Development Act of 2000, 19 U.S.C. § 3703 (2000).

practices.”<sup>9</sup> As a result, U.S. investment in Cameroon has grown and “the country maintains a long-stated goal to be an emerging market economy by 2035.”<sup>10</sup>

Foreign investors in Cameroon face no policies that deliberately discriminate against foreign investors by prohibiting, limiting, or conditioning foreign investment in a sector of the economy.<sup>11</sup> In 2014, Cameroon’s Prime Minister Philemon Yang repeated the Government’s commitment to attracting foreign direct investments during his budget speech.<sup>12</sup> Figures from the United Nations Conference on Trade and Development (UNCTAD) show that in 2014, Cameroon received FDI inflows of USD 501 million, which represents a net increase of 53 percent from the previous year.<sup>13</sup>

The GOC’s progress toward solidifying a market-based economy is enhanced by AGOA. As such, Cameroon continues to increase its AGOA utilization rate, with a 2014 report by the U.S. International Trade Commission (USITC) acknowledging Cameroon’s utilization rate as 13.3 for all AGOA products. Of note, Cameroon’s utilization rate is not dependent on crude petroleum exports.<sup>14</sup>

Moreover, because market access for U.S. investors remains a high priority for Cameroon, the GOC continues to host events and partner with professionals to promote investment and receive input on how to better facilitate business in Cameroon. For example, in March 2015, Cameroon held its sixth session of the Cameroon Business Forum (CBF)<sup>15</sup> in Douala.<sup>16</sup> As the chair of the CBF, Prime Minister Philemon Yang convenes the Forum, which provides the business community an opportunity to participate in investment reforms, ultimately increasing transparency between the public and private sector.

Awareness of corporate social responsibility (CSR) is gaining ground in Cameroon, with many U.S. corporations taking the lead as examples. The GOC requires domestic and foreign companies to carry out an Environmental and Social Impact Assessment (ESIA) study for major projects, with the Ministry of Labor ensuring the enforcement of laws in this field. Moreover, the CBF consults business stakeholders and has made over 38 recommendations to the GOC in

<sup>9</sup> U.S. Department of State, *2015 Investment Climate Statement* (May 2015), available at <http://www.state.gov/e/eb/rls/othr/ics/2015/241509.htm>.

<sup>10</sup> Ventures Africa, *A Look at Investment Opportunities in Cameroon* (Oct. 28, 2013).

<sup>11</sup> U.S. Department of State, *2015 Investment Climate Statement* (May 2015), available at <http://www.state.gov/e/eb/rls/othr/ics/2015/241509.htm>.

<sup>12</sup> *Id.*

<sup>13</sup> UNCTAD, *Country Fact Sheets* (June 24, 2015), available at <http://unctad.org/en/Pages/DIAE/World%20Investment%20Report/Country-Fact-Sheets.aspx>.

<sup>14</sup> USITC, *AGOA: Trade and Investment Performance Overview* (Apr. 2014).

<sup>15</sup> The Cameroon Business Forum CBF was created with the support of the World Bank in 2006. It is a five-year intervention that became operational in 2009 and serves as a public-private platform aimed at improving the business climate in Cameroon. The World Bank, *Africa Program Factsheets*, available at [https://www.wbginvestmentclimate.org/publications/upload/Cameroon\\_FINAL\\_A4.pdf](https://www.wbginvestmentclimate.org/publications/upload/Cameroon_FINAL_A4.pdf).

<sup>16</sup> Cameroon Radio Television (CRTV), *Cameroon Business Forum: 6th session begins* (Mar. 9, 2015), available at <http://crtv.cm/fr/latest-news/journal-national-1/-cameroon-business-forum-6th-session-begins-14198.htm>.

the past five years; these recommendations align with OECD and World Bank "Doing Business" requirements CSR guidelines. In Cameroon's private sector, the Groupement inter-patronal du Cameroun (GICAM) advocates for CSR as well.<sup>17</sup>

Cameroon is also working to attract foreign investors by promoting infrastructure development and modernizing financing instruments within the country. Since 2008, for example, foreign investors such as the European Investment Bank, the World Bank, and the French Development Agency, among others, have contributed funds to improve water supplies for Cameroon. In 2012, the U.S. Export-Import Bank (Ex-Im) and Cameroon signed a loan agreement that allowed Hoffman International, a New Jersey-based construction equipment company, to use the financing from Ex-Im to sell the GOC \$47 million worth of cranes, excavators, and other construction machinery.<sup>18</sup> Former U.S. Ambassador Robert Jackson noted that the "equipment will enable the Cameroon to upgrade its infrastructure" and "exemplifies the trend of expanding U.S.-Cameroon bilateral trade and investments."<sup>19</sup>

Ex-Im also approved a \$100 million loan guarantee with Société Générale Bank to help build bridges in Cameroon. Further, at the World Bank Annual Fall Meeting in Washington, D.C., the Islamic Development Bank signed four financing agreements worth \$248 million with Cameroon, Côte d'Ivoire, and Senegal. The two agreements signed with Cameroon included: (1) \$170 million for the Olama-Kribi road in Cameroon to enhance transportation facilities from the Kribi port and further regional integration with Equatorial Guinea, Chad, and the Central African Republic; and (2) \$33 million to reduce poverty by providing electricity to rural areas in the country.<sup>20</sup>

Other infrastructure projects providing investment opportunities include road construction projects such as the 657 kilometer road linking Sangmelima in Cameroon to Ouesso in the Republic of Congo, and projects to accommodate the shipping industry's largest vessels at the Kribi Deepwater Port in Cameroon.<sup>21</sup> In addition, the GOC recently awarded a consortium led by French company Necotrans with a contract for operation and maintenance of the multipurpose terminal at Kribi port, which is the only deepwater port in the Central Africa region. The multipurpose terminal is expected to handle around 1.4m tonnes of cargo per annum two years

<sup>17</sup> U.S. Department of State, *2015 Investment Climate Statement* (May 2015), available at <http://www.state.gov/e/eb/rls/othr/ics/2015/241509.htm>.

<sup>18</sup> U.S. Export-Import Bank, *Ex-Im Bank Approves Record \$1.5 Billion in Financing of U.S. Exports to Sub-Saharan Africa in First Three Quarters of FY 2012* (Aug. 2012), available at <http://www.exim.gov/newsandevents/releases/2012/ex-im-bank-approves-record-1-point-5-billion-in-financing-of-us-exports-to-sub-saharan-africa-in-first-three-quarters-of-fy-2012.cfm>.

<sup>19</sup> U.S. Embassy Yaoundé, Remarks by U.S. Ambassador Robert P. Jackson (July 2012), available at [http://yaounde.usembassy.gov/sp\\_07162012.html](http://yaounde.usembassy.gov/sp_07162012.html).

<sup>20</sup> Reuters, *Cote d'Ivoire, Cameroon and Senegal Sign US\$248 Million Worth of Financing Agreements with IDB at World Bank Annual Meeting* (Oct. 12, 2014), available at <http://www.zawya.com/story/Cote-dIvoire-Cameroon-and-Senegal-Sign-US-248-Million-Worth-of-Financing-Agreements-with-IDB-at-World-Bank-Annual-Meeting-ZAWYA20141012152544/>.

<sup>21</sup> Africa Review, *Saudis to Give \$10m for Cameroon to Congo Road* (Feb. 2012), available at <http://www.africareview.com/Business-Finance/Saudis-to-finance-Cameroon-to-Congo-road/-/979184/1318562/-/o9bt5oz/-/index.html>.

after its completion. Phase two of the terminal's construction will lead to the handling of over 3m tpa of cargo. The new terminal is expected to employ over 250 people to handle wood, cotton, minerals and equipment for Cameroon's oil and gas industry. Additionally, next to the Kribi port, an industrial zone and power plant are also planned for construction.<sup>22</sup> Collectively, these infrastructure improvements facilitate trade beyond Cameroon and broaden export options for Central African neighbors, such as Chad, Central African Republic, the Republic of Congo, Gabon, and Equatorial Guinea. In addition, the GOC has three major road projects underway that will further facilitate regional trade: (1) the Wouri Bridge project; (2) the Nigeria-Cameroon highway project; and (3) the Yaoundé-Douala highway project.<sup>23</sup>

As a potential net-exporter of agricultural products to the Central African region and beyond, Cameroon is also investing in and collaborating with investors in its agricultural sector. On September 4, 2015, the GOC and the United Nation's Food and Agriculture Organization (FAO) signed two agreements: (1) creating a \$20 million, five-year Partnership Programme aimed at promoting agricultural development in the Central African nation, with the GOC dedicating the funding; and (2) establishing an expanded FAO Partnership and Liaison office in Cameroon's capitol city of Yaoundé. The agreements were signed by Cameroon's Minister of External Relations Pierre Moukoko Mbonjo and Minister for Agriculture and Rural Development Essimi Menye and FAO Director-General José Graziano da Silva. The Programme's priorities include implementing national strategies to boost rural growth, promoting agricultural jobs for youth and women, and developing and implementing policies and strategies to build the resilience of rural populations to disasters and crises. Cameroon has been member of FAO since 1960 and the FAO has maintained an Office in Yaoundé since 1978.<sup>24</sup>

Finally, we note that the AGOA renewal bill amended the eligibility requirements to specify that countries should be making progress toward establishing a market-based economy that protects private property rights for men *and* women. Here we note that, recently, two, small-medium sized businesses run by women in Cameroon secured contracts that will allow one Cameroonian company to design uniforms that will be sent to the United States (US\$ 4 million) and another Cameroonian company to supply a U.S.-based company with nutritional supplements (US\$ 10 million) via the AGOA program.

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<sup>22</sup> Splash 247, *Cameroon awards concession for new multipurpose port terminal* (Sept. 2, 2015), available at <http://splash247.com/cameroon-awards-concession-for-new-multipurpose-port-terminal/>.

<sup>23</sup> The Wouri Bridge project will ease congestion and facilitate farmers' ability to get products to the Port of Douala for export. The Nigeria-Cameroon highway project began in June 2010 and is nearing completion. It will enhance trade between the two countries, giving Nigerian exporters better access to the Port of Douala and providing economic integration between ECCAS and the Economic Community of West African States. Finally, the Yaoundé-Douala highway project improvements will help to boost trade to the Port of Douala.

<sup>24</sup> U.N. FAO, *Cameroon dedicates \$20 million to support national agricultural development* (Sept. 4, 2015), available at <http://www.fao.org/news/story/en/item/327398/code/>.

## II. Elimination of Barriers to U.S. Trade and Investment

As highlighted by the U.S. Department of State, the United States is a large investor in Cameroon, and Cameroon has many opportunities for economic investment in agriculture, mineral extraction (mining, oil, and gas), forestry, electricity, transportation (roads, rails, and ports), utilities, tourism, telecommunications, and housing. Further, since the enactment of the Investment Promotion Incentives Law in April 2013, Cameroon has increased incentives that offer foreign investors opportunities to “bring in needed capital to boost the economy.”<sup>25</sup> In 2012, the Government of Cameroon devised a National Strategy for Implementation of AGOA to better maximize the trade benefits accorded by AGOA. The Government also established a National Commission in charge of implementing the National Strategy.

AGOA has helped the GOC expand and diversify its exports, affording Cameroon duty-free access to the U.S. market for more than 6,000 products. Of note, African countries access only 65 products out of those 6,000 available products. Cameroon’s total goods exports to the United States in 2013 totaled \$367 million, a 19.1% increase from 2012. U.S. exports to Cameroon totaled \$331 million, up 31% from 2012.<sup>26</sup>

Under AGOA and the Generalized System of Preferences (GSP), Cameroon’s exports include petroleum; manufactured products such as machinery, pharmaceutical products, vehicles, optic and medical instruments, and plastic; and agriculture-related products such as cocoa, coffee, rubber, and spices (totaling \$50 million in 2013).<sup>27</sup> Cameroon is also eligible for AGOA textile and apparel benefits. Given Cameroon’s continued interest in exports to the United States of these products, the GOC requests that USTR also continue to recommend that Cameroon receive these AGOA benefits.

The positive levels of trade between Cameroon and the United States demonstrate a commitment to trade without barriers. This commitment is reflected in Cameroon’s Vision 2035, which notes as specific objectives “an increase in the quantity of manufactured products in exports and the concurrent reduction of oil products and agricultural produce” and “[a] focus on the establishment of a single and integrated economic space through the elimination of all barriers to intra-regional exchange.”<sup>28</sup>

Moreover, Cameroon promotes investment through its Bilateral Investment Treaty with the United States which imposes certain standards and requirements and protects U.S. investors operating in Cameroon. Indeed, the U.S. Department of State reports that “foreign and domestic investors receive legal guarantees that substantially comply with international norms, including full and prior compensation in the event of expropriation on the basis of public

<sup>25</sup> U.S. Department of State, *2014 Investment Climate Statement – Cameroon* (June 2014), available at <http://www.state.gov/e/eb/ris/othr/ics/2014/226931.htm>.

<sup>26</sup> USTR, *Cameroon Profile*, available at <http://www.ustr.gov/countries-regions/africa/cameroon>.

<sup>27</sup> *Id.*

<sup>28</sup> Government of Cameroon, *Vision 2035* (June 2009).

interest.”<sup>29</sup> The U.S. Department of State also reports that Cameroon has established an Investment Promotion Agency, which, “in addition to promoting the country’s brand both domestically and abroad,” is charged with coordinating “the activities of a multitude of ministries and agencies responsible for the promotion of specific economic sectors.”<sup>30</sup>

Cameroon is a member of the Organization for the Harmonization of Business Law in Africa (OHADA), a system of business laws and implementing institutions adopted by 17 West and Central African countries to establish a uniform legal framework governing commerce and investment. The membership is open to any African Union country.<sup>31</sup>

### III. Rule of Law

The GOC recognizes the importance of the rule of law in promoting democracy and stability in the Cameroon and the Central Africa region. More broadly, on August 25, 2015, Cameroon became the 29<sup>th</sup> African Union (AU) Member State<sup>32</sup> to ratify the Protocol on the establishment of the African Court on Human and Peoples’ Rights.<sup>33</sup> The African Court on Human and Peoples’ Rights is a continental court established by AU to enhance the protection of human and peoples’ rights in Africa and allows individuals and NGOs to bring cases directly before the Court.

Cameroon has collaborated with the United States “to build civil society and a shared vision of civic responsibility, volunteerism, and public service.”<sup>34</sup> With U.S. assistance, civil society groups in Cameroon “are strengthening ties among NGOs” and “Cameroonian civil society is building democratic traditions and citizen confidence.”<sup>35</sup> Cameroon’s commitment to the rule of law was also reflected in recent elections. As highlighted in the 2014 Human Rights

<sup>29</sup> U.S. Department of State, *2014 Investment Climate Statement – Cameroon* (June 2014), available at <http://www.state.gov/e/eb/rls/othr/ics/2014/226931.htm>.

<sup>30</sup> *Id.* The Department of State has also highlighted various investment initiatives by Cameroon in previous years, including: (1) a reduction in the tax burden on certain sectors, such as pharmaceuticals and renewable energy, by eliminating the Value Added Tax for products in those sectors; (2) a “One-Stop-Shop” program in Yaoundé, which aims to simplify the process for registering a business; (3) new procedures for registering with the Registre du Commerce et du Crédit Mobilier; (4) a new tax center for small companies; (5) the digitalization of the judicial system; (6) a virtual platform to speed up customs procedures (see note on Kribi Port, above); and (7) the creation of commercial chambers in courts to facilitate the settling of trade disputes (Law 2011/027 of Dec. 14, 2011).

<sup>31</sup> OHADA now includes 17 African countries: Benin, Burkina Faso, Cameroon, Comoros, Congo, Côte d’Ivoire, Gabon, Guinea Bissau, Guinea, Equatorial Guinea, Mali, Niger, Central African Republic, Democratic Republic of Congo, Senegal, Chad, and Togo, available at <http://www.ohada.com/accueil.html>.

<sup>32</sup> The African Union is comprised of 54 Member states.

<sup>33</sup> African Union, *Cameroon becomes 29th AU Member State to ratify Protocol on establishment of African Court on Human and Peoples’ Rights* (August 25, 2015), available at <http://www.au.int/en/content/cameroon-becomes-29th-au-member-state-ratify-protocol-establishment-african-court-human-and->

<sup>34</sup> Remarks for the Independence Day Reception by U.S. Ambassador to Cameroon Robert Jackson (June 13, 2013), available at [http://yaounde.usembassy.gov/sp\\_061313.html](http://yaounde.usembassy.gov/sp_061313.html).

<sup>35</sup> *Id.*

Report, "the high voter turnout (70 percent) and ELECAM's administration of the election were viewed as major improvements over previous elections."<sup>36</sup> ELECAM's work has continued and the GOC signed a contract in 2014 with a German technology company to maintain ELECAM's biometric systems and technology.<sup>37</sup> Further, ELECAM has recently registered around 240,000 new voters, well above its initial target of 200,000 voters.<sup>38</sup> While a date has yet to be confirmed, Cameroon is expected to next hold a presidential and National Assembly election in 2018.<sup>39</sup>

At a broader level and given its strategic location, Cameroon also plays an important role in promoting security and the rule of law in the Central Africa region. In July 2014, for example, U.N. Secretary-General Ban Ki-moon appointed Cameroonian Major General Martin Chomu Tumenta, who led the AU peacekeeping mission, to continue leading the now U.N. peacekeeping force (MINUSCA) in the Central African Republic (CAR).<sup>40</sup> Cameroon also provides an estimated 1,300 troops to MINUSCA. MINUSCA's primary mission is to protect CAR civilians but also includes: providing support for the transition process, facilitating humanitarian assistance, promoting and protecting human rights; supporting rule of law, and assisting with the disarming, demobilization, reintegration and repatriation processes.<sup>41</sup>

With continued regional instability, Cameroon also provides safe haven for the thousands of refugees – estimated at nearly 231,610 – that are fleeing extremist violence in neighboring countries.<sup>42</sup> Cameroon maintains an open-border policy for asylum-seekers. In addition to being a signatory to the 1951 Refugee Convention and the 1969 OAU Refugee Convention, Cameroon adopted a law defining the legal framework for refugee protection, which took force in November 2011.<sup>43</sup>

Cameroon is also closely collaborating with Nigeria, Chad, and Niger in efforts to combat the spread of extremism, specifically the U.S.-designated foreign terrorist organization, Boko Haram. Cameroon – along with Nigeria, Chad, Niger and Benin – participated in the French-hosted Summit in Paris, with all African leaders pledging to share intelligence and coordinate

<sup>36</sup> U.S. Department of State, *2013 Country Reports on Human Rights Practices* (2014), available at <http://www.state.gov/documents/organization/236550.pdf>.

<sup>37</sup> Elections Cameroon signs a contract covering the maintenance of biometric hardware and transfer of technology (Sept. 19, 2014), available at <http://www.elecaml.com/en/news/news/article/partenariat-gieseckeunddevrient-elecaml.html>.

<sup>38</sup> Cameroon Concord, *Cameroon updates voters register as the Republic of Niger prepares to organize presidential elections* (Aug. 27, 2015), available at <http://cameroon-concord.com/news/item/3911-cameroon-updates-voters-register-as-the-republic-of-niger-prepares-to-organize-presidential-elections#sthash.ix4P8fCe.dpuf>.

<sup>39</sup> IFES Election Guide, available at <http://www.electionguide.org/elections/upcoming/>.

<sup>40</sup> U.N. New Centre, Ban Appoints Cameroonian General to lead U.N. Peacekeeping Force (Jul. 30, 2014), available at <http://www.un.org/apps/news/story.asp?NewsID=48378#.VDqchfidVBk>.

<sup>41</sup> United Nations, MINUSCA home page, available at <http://www.un.org/en/peacekeeping/missions/minusca/>.

<sup>42</sup> U.N. High Commissioner for Refugees, *2015 Country Operations Profile – Cameroon*, available at <http://www.unhcr.org/pages/4a03e1926.html>.

<sup>43</sup> *Id.*

action against Boko Haram.<sup>44</sup> Moreover, after the shocking abduction of over 200 Nigerian schoolgirls, the Embassy of Cameroon in Washington issued a statement in 2014 strongly condemning Boko Haram's actions. Cameroon's Special Forces were deployed to the large land border with Nigeria to help search for the missing girls and to ensure Cameroon's territory is not being used by Boko Haram.<sup>45</sup> These forces remain deployed, with additional Cameroonian military forces and resources as Boko Haram continues its incursions into northern Cameroon and has kidnapped Cameroonians, including children. Reports indicate that Cameroonian police arrested 104 Boko Haram members in 2014.<sup>46</sup>

The Government remains deeply committed to strengthening regional security and combatting Boko Haram. In December 2014, Cameroon's National Assembly adopted legislation that criminalized terrorism, which had not previously been explicitly criminalized.<sup>47</sup> Cameroon President Paul Biya continues to prioritize the effort to combat Boko Haram, saying the GOC "will ceaselessly continue to fight Boko Haram until it's totally wiped out." In its efforts to combat Boko Haram, the GOC has also partnered with the United States. Assistant Secretary of State for African Affairs Linda Thomas-Greenfield visited Cameroon in September 2014 to discuss strategies on this issue, after co-chairing a regional Ministerial meeting on Boko Haram in Nigeria.<sup>48</sup> U.S. assistance to the GOC to combat Boko Haram has also included \$40 million to the Global Security Contingency Fund for Cameroon, Chad, Niger, and Nigeria to counter the terrorist organization. The program provides technical expertise, training, and equipment to the four countries to develop institutional and tactical capabilities to enhance their respective efforts to counter Boko Haram, and to lay the groundwork for increased cross-border cooperation to counter Boko Haram.<sup>49</sup>

More broadly, the Cameroonian Armed Forces have been a core partner to the U.S. military for many years. Since 2007, the Cameroonian Navy has partnered with the U.S. Navy's Africa Partnership Station maritime engagement program and has sent numerous officers and sailors to training courses. Further, Cameroon has hosted several U.S. military exercises on areas of mutual interest like maritime and border security and combating piracy and terrorism. In

<sup>44</sup> The United States, United Kingdom and the EU also participate in the Summit. At the conclusion, a statement was released and posted to the French Presidency's website. See Elysee Presidency de la Republique, *Paris Summit for Security in Nigeria – Conclusions* (May 17, 2014), available at <http://www.elysee.fr/declarations/article/paris-summit-for-security-in-nigeria-conclusions/>; See also, BBC, *Africa leaders declare 'war' on Nigeria Boko Haram* (May 17, 2014), available at <http://www.bbc.com/news/world-africa-27451966>.

<sup>45</sup> Reuters, *Cameroon Sends Troops to Nigeria Border to Tackle Boko Haram* (May 27, 2014), available at <http://www.reuters.com/article/2014/05/27/us-cameroon-boko-haram-military-idUSKBN0E71T120140527>.

<sup>46</sup> U.S. Department of State, *Country Reports on Terrorism 2014* (June 2015), available at <http://www.state.gov/documents/organization/239631.pdf>.

<sup>47</sup> *Id.*

<sup>48</sup> U.S. Department of State, *Assistant Secretary Linda Thomas-Greenfield's Travel to Nigeria, Cameroon, and England* (Sept. 2, 2014), available at <http://www.state.gov/r/pa/prs/ps/2014/09/231229.htm>.

<sup>49</sup> White House, *U.S. Efforts to Assist the Nigerian Government in its Fight against Boko Haram* (Oct. 14, 2014), available at <http://www.whitehouse.gov/the-press-office/2014/10/14/fact-sheet-us-efforts-assist-nigerian-government-its-fight-against-boko->

early 2014, Cameroon joined the U.S.-led Trans-Sahara Counterterrorism Partnership program to prevent the spread of extremism in Africa.<sup>50</sup> Further, in April 2014, senior military officers from the Economic Community of West African States, the Economic Community of Central African States, and the Gulf of Guinea commission met with the U.S. Africa Command and agreed to "create a regional coordination center for maritime safety and also to arm it to face growing insecurity on the Gulf of Guinea."<sup>51</sup>

#### IV. A System to Combat Corruption

As required by the AGOA program, the GOC supports, promotes, and advances the rule of law, anti-corruption measures, and increased transparency. Corruption is a criminal offense in Cameroon, and carries jail time (five years to life) and a fine (\$400 to \$4,000). Further, Cameroon has ratified the United Nations Convention against Corruption and has established an independent National Anti-Corruption Commission (CONAC).<sup>52</sup>

The National Financial Investigation Agency (ANIF), created in 2005, plays a role in combating money laundering and conducting financial investigations. In March 2014, ANIF reported it had received 250 reports of suspicious banking transactions. ANIF investigated and brought nearly 90 cases to the Attorney General.<sup>53</sup> In addition, in 2011, the GOC established a "Special Criminal Court" to specifically address high-profile financial crimes. The special tribunal is empowered to try perpetrators that are involved in embezzlement or corruption-related crimes of at least 50 million FCFA (US\$ 104,290). The Special Criminal Court can also review cases involving current or former government officials.

The GOC has sanctioned government employees for corruption, embezzlement and mismanagement. Moreover, in 2014, the Special Criminal Court opened hearings on the embezzlement case against businessman Patrice Tsimi Enyegue and his three codefendants. Enyegue, the principal defendant and representative of a service provider at the Douala port, has been accused of fraudulently obtaining or retaining the sum of US\$ 93,000 from the Port of Douala.<sup>54</sup> In August 2014, the Special Criminal Court also opened hearings on the embezzlement case against Iya Mohamed, the former president of the Cameroon Football Federation and general manager of the Cameroon Cotton Development Corporation. Iya and his codefendants, Henri Clavier, Minlend Jerome, Fotso Lucien, Pierre

<sup>50</sup> U.S. Department of State, *Country Reports on Terrorism 2014* (June 2015), available at <http://www.state.gov/documents/organization/239631.pdf>.

<sup>51</sup> Voice of America, *US, African Countries Team Up to Tackle Piracy in Gulf of Guinea* (Apr. 23, 2014), available at <http://www.voanews.com/content/us-african-countries-team-up-to-tackle-piracy-in-gulf-of-guinea-/1899510.html>.

<sup>52</sup> CONAC, available at [http://www.conac-cameroun.net/en/index\\_en.php](http://www.conac-cameroun.net/en/index_en.php).

<sup>53</sup> Business in Cameroon, *ANIF Received 250 Reports of Suspected Money Laundering in 2013* (Mar. 21, 2014), available at <http://www.businessincameroon.com/finance/2103-4729-cameroon-anif-received-250-reports-of-suspected-money-laundering-in-2013>.

<sup>54</sup> U.S. Department of State, *2014 Country Reports on Human Rights Practices* (June 2015), available at <http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm#wrapper>.

Kaptene, Mahamat Karagama, and Christophe Mbaïougam, are being prosecuted for diversion of an estimated US\$ 21 million in public funds.<sup>55</sup>

Cameroon remains committed to increasing transparency and promoting a democratic system in Cameroon and the Central Africa region. Cameroon's Superior Control of the State (CONSUPE) traveled in 2014 to South Africa, Switzerland, France, and the United States to meet with government officials and discuss best practices used in those respective countries for combatting the abuse or misuse of public funds (a follow up CONSUPE visit to Washington is expected in the near future).<sup>56</sup> On October 9, 2014, the National Agency of Information and Communication Technologies and CONSUPE signed a partnership agreement to help Cameroon improve the management of the GOC's information systems.<sup>57</sup>

At the regional level, the GOC has joined 24 other countries in increasing its fiscal transparency through the Extractive Industries Transparency Initiative (EITI) process. On October 17, 2013, the EITI Board congratulated Cameroon for successfully completing the EITI validation process and earning the designation of "EITI Compliant."<sup>58</sup> Cameroon is the third Central African country to hold this status. While most of the revenue in the extractive field has been oil-related, in February 2015, EITI observed<sup>59</sup> Cameroon is also reforming its mining sector, including providing a better framework for artisanal mining. The World Bank is providing support to strengthen local and regional integration of mining activities.

#### V. Economic Policies to Reduce Poverty

Poverty reduction continues to be on the forefront of Cameroon's economic policy agenda. Indeed, in its "Vision 2035," the GOC established its long-term strategy that includes objectives to develop infrastructure, reduce poverty to less than 10 percent, and consolidate democracy and national security.<sup>60</sup> The GOC has also released a "Growth and Employment Strategy Paper (GESP) Reference Framework for Government Action over the Period 2010-2020." The GESP was prepared in consultation with the International Monetary Fund and the World Bank, and it outlines strategies for reducing poverty.<sup>61</sup>

<sup>55</sup> *Id.*

<sup>56</sup> Cameroon's Embassy in Washington facilitated a Washington visit for the CONSUPE delegation in February 2014.

<sup>57</sup> Cameroon Web, *ANTIC, CONSUPE Focus on Control of Public Finances* (Oct. 9, 2014), available at <http://www.cameroonweb.com/CameroonHomePage/NewsArchive/artikel.php?ID=312530>.

<sup>58</sup> Extractive Industries Transparency Initiative, *Cameroon Accepted as 'EITI Compliant'* (Oct. 17, 2013), available at <http://eiti.org/news/cameroon-accepted-eiti-compliant>.

<sup>59</sup> EITI, *Cameroon Mining Sector is Evolving* (Feb. 2, 2015), available at <https://eiti.org/news/cameroon-mining-sector-evolving>.

<sup>60</sup> The World Bank, *Time For The Lion To Wake Up? An Economic Update On Cameroon* (Jan. 26, 2011), available at

[http://siteresources.worldbank.org/INTAFRICA/Resources/CMR\\_Economic\\_update.Jan.26.11.pdf](http://siteresources.worldbank.org/INTAFRICA/Resources/CMR_Economic_update.Jan.26.11.pdf).

<sup>61</sup> GESP Reference Framework for Government Action 2010/2020 (Aug. 2009), available at <http://www.imf.org/external/pubs/ft/scr/2010/cr10257.pdf>.

The GOC also has continued to implement programs aimed at reducing the issues associated with poverty. For example, the GOC recognizes that education is essential in combating poverty. As such, primary and secondary education at public schools is free in Cameroon. Approximately 79 percent of children ages 5 to 15 years attend school in Cameroon, with a primary completion rate of 73 percent.<sup>62</sup> With regard to combating HIV/AIDS, the GOC has worked with the United States to implement the Emergency Plan for AIDS Relief (PEPFAR), which brings American medical experts to assist Cameroonians in combating AIDS and HIV.<sup>63</sup> As highlighted by the U.S. Embassy in Cameroon, "all PEPFAR investments are aligned with Cameroon's National HIV/AIDS Strategic Plan and work to strengthen the capacity of Cameroon's government, non-governmental and private sectors, and civil society to respond to the HIV/AIDS epidemic."<sup>64</sup>

The 2014 *Ibrahim Index of African Governance* recognizes Cameroon's improvements in its Human Development category, which contains subcategories on education, health and welfare.<sup>65</sup> Further, as noted in the 2013 Human Rights Report, Cameroon has "continued its program to improve school access by creating new schools, building new classrooms, and recruiting new teachers. [...] The Association to Combat Violence against Women (ALVF) established committees to counter violence against girls in and out of school and to encourage girls to remain in school. During the year some committees were upgraded and officially registered as civil society organizations."<sup>66</sup>

#### **VI. Protection of Internationally Recognized Worker Rights**

Consistent with AGOA's requirement to protect worker rights, the GOC has ratified the eight core International Labor Organization (ILO) conventions. Protecting human rights is a priority for Cameroon, and the country is a participant in the regional ILO International Programme on the Elimination of Child Labour program to combat child trafficking. Slavery is illegal in Cameroon, and the law provides punishment of 10 to 20 years' imprisonment for persons accused of slavery or trafficking in persons for the purposes of forced labor.<sup>67</sup>

<sup>62</sup> Department of Labor, *2013 Findings on the Worst Forms of Child Labor*, available at <http://www.dol.gov/ilab/reports/child-labor/cameroon.htm>.

<sup>63</sup> Remarks During the Independence Day Reception by U.S. Ambassador Jackson (June 13, 2013), available at [http://yaounde.usembassy.gov/sp\\_061313.html](http://yaounde.usembassy.gov/sp_061313.html).

<sup>64</sup> U.S. Embassy in Cameroon, President's Emergency Plan for AIDS Relief, available at <http://yaounde.usembassy.gov/pepfar.html>.

<sup>65</sup> 2014 Ibrahim Index of African Governance (2014), available at <http://www.moibrahimfoundation.org/interact/>.

<sup>66</sup> U.S. Department of State, *2013 Country Reports on Human Rights Practices* (2013), available at <http://www.state.gov/documents/organization/220302.pdf>.

<sup>67</sup> U.S. Department of State, *2015 Trafficking in Persons Report* (2015), available at <http://www.state.gov/documents/organization/243558.pdf>.

In 2011, the GOC extended its anti-trafficking provisions to all persons regardless of age or gender.<sup>68</sup> To date, the GOC continues making progress to reduce trafficking. According to the Department of State's most recent Trafficking in Persons Report:

The government demonstrated continued progress in preventing child trafficking. The government increased the number of multidisciplinary regional taskforces from one to three during the reporting period. The taskforces in the Northwest, Southwest, and Littoral regions, comprised of representatives of social welfare, police, gendarmerie, magistrates, and NGOs, coordinated the response to trafficking cases and conducted grass roots awareness campaigns on the radio and through community watch groups . . . . Officials continued efforts to implement the plan by identifying and reintegrating street children, publishing a new manual that tightened procedures for adoption of children, and, in collaboration with an international organization, conducting a national awareness campaign against forced labor and sex trafficking of children. MINAS continued to address the phenomenon of street children, a population vulnerable to trafficking, and identified 240 new cases of street children in Yaounde and Douala; it reunited 77 children with their families and offered healthcare, education, and psychosocial services to the others during the reporting period. At ports of entry, trained customs and border security officers interrogated adults accompanying children and checked their travel documents to verify their parentage, and volunteer committees in some rural communities were trained to recognize and monitor vulnerable children.<sup>69</sup>

The GOC also supports efforts to eliminate child labor by developing initiatives such as the National Action Plan on the Worst Forms of Child Labor. Indeed, the U.S. Department of Labor (DOL) acknowledges in its annual report that Cameroon has made "moderate advancement" in efforts to eliminate the worst forms of child labor.<sup>70</sup> Further, in February 2013, the GOC ratified the Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict, and the government continues to work with U.S.-based Vital Voices<sup>71</sup> for implementation of its new comprehensive anti-trafficking law.

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<sup>68</sup> U.S. Department of State, *2014 Country Reports on Human Rights Practices* (2014), available at <http://www.state.gov/documents/organization/226845.pdf>.

<sup>69</sup> U.S. Department of State, *2015 Trafficking in Persons Report* (2015), available at <http://www.state.gov/documents/organization/243558.pdf>.

<sup>70</sup> U.S. Department of Labor, *2013 Findings on the Worst Forms of Child Labor* (2013), available at <http://www.dol.gov/ilab/reports/child-labor/cameroon.htm>.

<sup>71</sup> Vital Voices, available at <http://www.vitalvoices.org/what-we-do/issues/human-rights/cameroon-initiative-combat-human-trafficking>.

**VII. Cameroon's Efforts Toward an "Enhanced" AGOA**

The GOC actively supported and welcomed the renewal of the AGOA program and continues to offer its views on important aspects for the long-term development and growth of Africa, including: (1) focus on Central Africa; (2) sustainable development; and (3) other improvements to AGOA.

**A. *Focus on Central Africa***

In July 2013, the Obama Administration announced the launch of *Trade Africa*, a partnership between the United States and Sub-Saharan Africa to increase internal and regional trade within Africa and expand economic ties between Africa, the United States, and other markets worldwide. One of the initiatives promoted by *Trade Africa* includes transforming U.S. Africa Trade Hubs "into U.S. Trade and Investment Centers to provide information, advisory services, and risk mitigation and financing to encourage linkages between U.S. and East African investors and exporters."<sup>72</sup>

The GOC agrees with this initiative promoted under *Trade Africa* and encourages bilateral efforts to increase U.S. technical assistance and advice related to the AGOA program in the Central Africa region. The GOC joins CEMAC in its commitment to regional economic integration and the member states' efforts to break down barriers to regional trade.<sup>73</sup> Cameroon is proud to host an AGOA Trade Resource Center. However, as a regional leader and an economic engine for Central Africa, the GOC feels that a more expansive AGOA center (such as a Trade Hub) could better service the region. As such, it has engaged in a high-level dialogue with its regional partners and U.S. government to build support and financing for a Central Africa AGOA Trade Hub that could be based in Douala. The GOC certainly welcomed the United States' offer "to combine U.S. technical assistance with CEMAC member states' financial resources to create a Central Africa Trade Hub, aimed at helping businesses in the Central African countries develop and expand regional value-chains in key non-oil sectors."<sup>74</sup> The GOC believes efforts to improve U.S. technical assistance are not only key to expanding AGOA's success in Central Africa and improving the region's capacity to effectively access and benefit from global markets, but they are essential in advancing U.S. policy toward the region, as announced by the Obama Administration under *Trade Africa*.

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<sup>72</sup> White House, *Fact Sheet: Trade Africa* (July 1, 2013), available at <http://www.whitehouse.gov/the-press-office/2013/07/01/fact-sheet-trade-africa>.

<sup>73</sup> The CEMAC is comprised of Chad, Central African Republic, Gabon, Equatorial Guinea and the Republic of Congo (Brazzaville), forming a customs union and free trading area between the member states. Cameroon is also a member of the African Union's ECCAS, the economic community of the African Union for promotion of regional economic cooperation in Central Africa. ECCAS member states include: Cameroon, Chad, Central African Republic, Gabon, Equatorial Guinea, the Republic of Congo (Brazzaville), the Democratic Republic of the Congo (Kinshasa), Angola, Sao Tome and Principe, and Burundi.

<sup>74</sup> Statement by Deputy Permanent Representative to the WTO David Shark, *WTO Trade Policy Review of the Central African Economic and Monetary Community* (July 29-31, 2013).

## **B. Sustainable Development**

For Cameroon, trade development and growth also means responsible trade. That is why Cameroon joined the Kimberley Process on diamond certification in 2012.<sup>75</sup> It is also why, in 2013, Cameroon published a guide outlining initiatives to protect the country's rich rainforests and reduce emissions from deforestation.<sup>76</sup>

Of note, the Ministry of Forestry and Wildlife reports that Cameroon's forests are the second largest in Africa, covering more than 17 million hectares (42 million acres) or about 42 percent of the country.<sup>77</sup> They account for more than 6 percent of the nation's GDP, the highest percentage of all countries in the Congo Basin, providing services and sustenance both directly and indirectly to local communities and city dwellers alike.<sup>78</sup> Approximately 3% of Cameroon's forests are managed by local and indigenous communities and 46% are designated as protected areas – one of the highest percentages in the world.<sup>79</sup> The forests are estimated to contain 600 flora and fauna species, of which 300 are salable as timber.<sup>80</sup> As such, the GOC is at the forefront of initiatives to combat illegal logging, working with World Resources Institute's (WRI) Global Forest Watch Team and using an interactive forestry atlas to ensure wood products leaving Cameroon are harvested legally. Because of its continued efforts, a 2011 assessment by Chatham House notes that illegal logging in Cameroon had fallen by 50 percent since 1999.<sup>81</sup>

<sup>75</sup> The Kimberley process was established to ensure that diamond purchases do not finance violence by rebel movements and their allies seeking to undermine legitimate governments. Through the Kimberley Process, Cameroon has joined over 70 countries that help prevent conflict diamonds from entering the legitimate trade. See Kimberly Process, *KP Participants and Observers*, available at <http://www.kimberleyprocess.com/web/kimberley-process/kp-participants-and-observers>.

<sup>76</sup> Cameroon Ministry of Forests and Wildlife, *Guide d'informations des operateurs du secteur forestier pour l'obtention du certificat de legalite* (Nov. 2013), available at <http://www.minfof.cm/doc/Guide-Certificat-de-Legalite-siteWeb.pdf>. The guide, put together in collaboration with the World Wildlife Fund, the German Development Agency (GIZ), and the Cameroon Center for Environment and Development, informs the design of programs under the U.N.-backed scheme known as "Reducing Emissions from Deforestation and Forest Degradation" (REDD). The guide also provides for consent of impacted indigenous people and local communities for REDD+ projects. See Thomas Reuters Foundation, *Cameroon Guidelines Seek to Avert Conflict Over Forest Carbon Scheme* (Apr. 16, 2014).

<sup>77</sup> Cameroon Ministry of Forests and Wildlife, *Étude de l'importance économique et sociale du secteur forestier et faunique au Cameroun* (Nov. 2013), available at [http://www.minfof.cm/doc/Etude\\_MINFOF\\_2013.pdf](http://www.minfof.cm/doc/Etude_MINFOF_2013.pdf).

<sup>78</sup> Thomson Reuters Foundation, *Cameroon Guidelines Seek to Avert Conflict over Forest Carbon Scheme* (Apr. 16, 2014), available at <http://www.trust.org/item/20140415132429-cl30h/>.

<sup>79</sup> Chatham House, *Illegal Logging Portal – Cameroon*, available at <http://www.illegal-logging.info/regions/cameroon>.

<sup>80</sup> Cameroon Ministry of Forests and Wildlife, *Étude de l'importance économique et sociale du secteur forestier et faunique au Cameroun* (Nov. 2013), available at [http://www.minfof.cm/doc/Etude\\_MINFOF\\_2013.pdf](http://www.minfof.cm/doc/Etude_MINFOF_2013.pdf).

<sup>81</sup> Chatham House, *Illegal Logging Indicators - Country Report Card* (2011), available at <http://ch-indicators.hmd-clients.com/sites/default/files/reports/CHillegalloggingreportcardcameroon.pdf>.

In response to increased threats domestically and internationally, the GOC has also increased its efforts to protect an important driver of trade, tourism, and overall economic growth in Africa: the continent's precious wildlife. In 2012, as a result of illegal poaching activity, President Biya authorized the deployment of Cameroon's Special Forces (the BIR) to its North Region to repel poachers and protect Cameroon's remaining savanna elephants. The WWF recognized that the GOC's response was unprecedented in Africa, noting the deployment sent "a powerful message to the organized syndicates behind the international illegal wildlife trade."<sup>82</sup> This critical issue was highlighted by the U.S. government in its recent National Strategy for Combatting Wildlife Trafficking.<sup>83</sup>

Moreover, U.S. Ambassador to Cameroon, Michael Hoza, recently visited the site of the devastating 2012 savanna elephant poaching in the Bouba N'djida National Park. Ambassador Hoza observed: "Cameroon is in a desperate battle against elephant poachers and ivory traffickers. All partners in the global struggle to protect wildlife must redouble their efforts to partner with the Government and people of Cameroon to achieve a clear understanding of the crisis and the critical steps necessary to end the elephant slaughter before Cameroon's treasured elephant population becomes extinct."<sup>84</sup> Cameroon is well aware of the threats to its national treasures and therefore GOC welcomes the United States' continued engagement in advancing a high-level international dialogue on illicit poaching and countering the trafficking of ivory, including a global campaign to reduce demand for illegal ivory. The GOC also welcomes collaborating with the United States to combat further illicit wildlife trade.

### **C. AGOA Fosters Regional Integration**

The GOC applauds the United States' commitment to continue looking at ways to increase the reach of AGOA's benefits in the region. The GOC believes that cooperation between the United States and Cameroon will continue to strengthen with the help of AGOA, as well as foster regional integration. As Secretary of State John Kerry noted during Cameroon's National Day in May 2015, the GOC and the U.S. government are working together "to bolster regional stability . . . to stabilize the Central African Republic . . . [and] to protect endangered species, reduce the impact of climate change, curb wildlife trafficking, and improve maritime

<sup>82</sup> World Wildlife Fund, *WWF Applauds Cameroon's Mobilization of 600 Elite Soldiers to Defend Country from Poachers* (Dec. 19, 2012), available at <http://www.worldwildlife.org/press-releases/wwf-applauds-cameroon-s-mobilization-of-600-elite-soldiers-to-defend-country-from-poachers>. The GOC continues to arrest and prosecute poachers in Cameroon's judicial system. See World Wildlife Fund, *Twenty Wildlife Criminals Arrested in Cameroon* (Apr. 2013), available at <http://wwf.panda.org/who-we-are/wwf-offices/cameroon/news/?208430/Twenty-wildlife-criminals-arrested-in-Cameroon>.

<sup>83</sup> U.S. National Strategy for Combatting Wildlife Trafficking (Feb. 2014), available at <http://www.whitehouse.gov/sites/default/files/docs/nationalstrategywildlifetrafficking.pdf>.

<sup>84</sup> U.S. Embassy Yaoundé, *Protection of Cameroon's Wildlife a National Security Priority* (2015), available at [http://yaounde.usembassy.gov/pr\\_030315.html](http://yaounde.usembassy.gov/pr_030315.html).

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security.”<sup>85</sup> Importantly, Cameroon’s bilateral relationship with the U.S. government in all of these areas is enhanced by AGOA.

\* \* \*

We appreciate this opportunity to submit comments on behalf of the GOC and request that the country remain eligible for benefits under AGOA to further assist Cameroon in realizing its full economic potential.

Sincerely,



Robert S. Kapla  
Partner  
Squire Patton Boggs (US) LLP

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<sup>85</sup> Press Statement by Secretary of State John Kerry, Cameroon National Day (May 20, 2015), available at <http://www.state.gov/secretary/remarks/2015/05/242645.htm>.