

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Mudge Rose Guthrie Alexander & Ferdon 2121 K Street, N.W., Suite 700 Washington, D.C. 20037		2. Registration No. 3200
3. Name of foreign principal Footwear Open Trading Coalition ("FOTC")	4. Principal address of foreign principal 1319 F Street, N.W. Washington, D.C. 20004	

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

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

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

- a) Branch or agency represented by the registrant.
- b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

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

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 N/A

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The Footwear Open Trading Coalition, Inc. ("FOTC") is a non-profit corporation that has been created to fund lobbying, legal and economic projects designed to maintain open trading on footwear to the United States. Its non-member contributors include domestic and foreign corporations in the business of manufacturing, distributing and selling footwear. A list of the foreign corporations that have thus far contributed to FOTC is set forth in response to question 9.

b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes No
- Directed by a foreign government, foreign political party, or other foreign principal Yes No
- Controlled by a foreign government, foreign political party, or other foreign principal Yes No
- Financed by a foreign government, foreign political party, or other foreign principal Yes No
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes No
- Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes No

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

FOTC is financed and subsidized in part by foreign principals to the extent that it has received contributions from foreign corporations. FOTC has received contributions from the following foreign corporations:

a.) Kingsway Toy Co., Ltd.
Suite 705-8 Albion Plaza
2-6 Granville Road
Tsimshatsui, Hong Kong

e.) Elegant Slippers Mfg. Co., Ltd.
373 Tokwawan Rd., 11th Floor, Block A
Kowloon, Hong Kong

b.) Summa Leathers, Ltd.
803 Chai Wan Industrial City
Phase 2, 70 Wing Tai Road
Chai Wan, Hong Kong

f.) King Fung Industries Company
373 Tokwawan Rd., 11th Floor, Block A
Kowloon, Hong Kong

c.) Shine Foundation, Ltd.
12/F, Lockhart Centre
301-307 Lockhard Road
Wanchai, Hong Kong

In addition, FOTC has received a contribution from:

Woolworth Overseas Corporation
New York, New York 10279-0099

d.) Dong Chen Shoe Factory Co.
373 Tokwawan Rd., 11th Fl.,
Block A
Kowloon, Hong Kong

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

FOTC is a non-profit, non-member corporation controlled by its directors, who are all U.S. citizens residing in the United States.

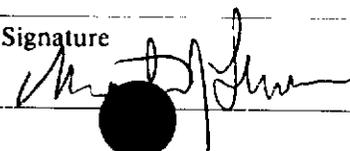
Date of Exhibit A

5/16/91

Name and Title

Martin J. Lewin
Partner

Signature



INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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Name of Registrant	Name of Foreign Principal
Mudge Rose Guthrie Alexander & Ferdon	Footwear Open Trading Coalition ("FOTC")

Check Appropriate Boxes:

- 1. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
- 2. There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 3. The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

Registrant will be paid a professional fee based on the standard hourly rates of the individuals working on the matter and will be reimbursed for expenses. The agreement will continue until terminated by FOTC.

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

Registrant will advise FOTC on a wide range of legislative matters that involve free trade concerns, including most favored nation status for China; footwear quotas/auctioning legislation; and efforts to reduce U.S. tariffs on shoes. Registrant may engage in lobbying, meet with governmental officials, or engage in other activities on behalf of FOTC concerning the above-mentioned and other free trade issues.

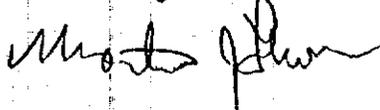
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Registrant will perform some or all the following activities in connection with the issues discussed in response to question 4: a.) prepare and disseminate written materials; b.) meet with private sector groups and governmental officials; and c) advise FOTC with respect to positions to be taken.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Registrant intends to meet with appropriate government officials in order to advocate FOTC's free trade position regarding trade issues that affect foreign suppliers and U.S. importers and sellers of footwear. Registrant may also disseminate written materials covering various free trade matters to private groups and government officials.

Date of Exhibit B	Name and Title	Signature
5/16/91	Martin J. Lewin Partner	

¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.