

For Six Month Period Ending 24 DEC : 1983
(Insert date)

Name of Registrant
Akin, Gump, Strauss, Hauer & Feld

Registration No. 3492

Business Address of Registrant
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036

I--REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

- (1) Residence address Yes No
- (2) Citizenship Yes No
- (3) Occupation Yes No

(b) If an organization:

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

RECEIVED
CRIMINAL DIVISION
JAN 25 4 50 PM '84
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

2. Explain fully all changes, if any, indicated in item 1.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position	Date Connection Ended
Robert Milbank, Jr.	Partner/Dallas	September 30, 1983

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

If yes, furnish the following information: (see attached for additional information)

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
James E. Rogers	5912 Wiltshire Dr. Bethesda, Md. 20814	USA	Partner	April 1983

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

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
James L. Bayless	1437 McLean Mews Court McLean, Va. 22101	Associate	August 1983

II-FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name of foreign principal: West Indies Rum & Spirits Producers Association
Date of Termination: September 7, 1983

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

If yes, furnish following information:

Name and address of foreign principal: Intelsat, 490 L'Enfant Plaza East, S.W. 7th Floor, Washington, D.C. 20024
Date acquired: July 1983

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

III-ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes No

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

INTELSAT

Provide counsel and advice to client regarding international telecommunications policy and actual representation and/or consultation with Executive Branch officials and members of Congress and/or their staffs regarding the development of such policy.

WEST INDIES RUM & SPIRITS PRODUCERS ASSOCIATION

Provided counsel and advice to client regarding rum and spirits imports and actual representation with Executive Branch officials and members of Congress and/or their staffs.

1The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).
A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
 Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

INTELSAT

Contact with members of Congress and their staffs and Executive Branch officials to inform them of INTELSAT programs, plans and future activities and to discuss the development of U.S. international telecommunications policy.

WEST INDIES RUM & SPIRITS PRODUCERS ASSOCIATION

Representation on legislative matters before the U.S. Congress and Executive Branch officials, particularly with respect to S. 554, the Carribean Basin Economic Recovery Act.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes No

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
8/18/83	West Indies Rum	Payment for Legal Services Rendered	\$ 10,000.00
9/9/83	"	"	10,000.00
9/12/83	"	"	15,000.00
12/30/83	"	"	7,500.00
9/2/83	Intelsat	Payment for Legal Services Rendered	9,339.95
11/28/83	"	"	62,987.50
Total			\$ 114,827.45

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes No

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).
⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS—MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes No

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

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
<u>West Indies Rum & Spirits Producers Association</u>			
June 1983	Firm	Taxis	\$ 181.35
	"	Telephone & telegram	109.30
	"	Postage	5.00
	"	Courier	344.00
	"	Meals	113.25
	"	Duplication	221.71
	"	Poster	274.90
July 1983	Firm	Word Processing	\$ 30.00
	"	Duplication	361.40
	"	Meals	1,285.81
	"	Courier	378.00
	"	Telegrams	24.64
	"	Telephone	89.00
	"	Postage	27.00
	"	Taxis	5.00
	"	Supplies, etc.	93.23
<u>INTELSAT</u>			
July 1983	Firm	Courier	\$ 19.00
	"	Taxis	24.45
	"	Duplication	11.00
August 1983	Firm	Meals	\$ 63.05
	"	Taxis	49.00
	"	Staff Services	246.89
	"	Duplication	372.67
	"	Postage and messenger	57.00
	"	Telephone	42.00

(See Attachment 1 for September, October, November and December Disbursements)

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes No

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

See Attached

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Intelsat

West Indies Rum & Spirits Producers Association

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

Radio or TV broadcasts Magazine or newspaper articles Motion picture films Letters or telegrams
 Advertising campaigns Press releases Pamphlets or other publications Lectures or speeches

Other (specify) Briefing Papers and Fact Sheets

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

Public Officials Newspapers Libraries
 Legislators Editors Educational institutions
 Government agencies Civic groups or associations Nationality groups
 Other (specify) _____

21. What language was used in this political propaganda:

English Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act?
 Yes No The materials disseminated were printed on INTELSAT stationary, thereby clearly revealing the identity and existence of the (continued)

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes No

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes No
 Exhibit B⁷ Yes No

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you 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.

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

⁷The Exhibit B, which is filed on CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C.

If you have previously filed an Exhibit C³, state whether any changes therein have occurred during this 6 month reporting period. Yes No N/A

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

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes No

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

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

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)

Akin, Gump, Strauss, Hauer & Feld
By: Daniel Z. Spiegel, Power of Attorney

Akin, Gump, Strauss, Hauer & Feld

By: Daniel L. Spiegel, Power of Attorney

Subscribed and sworn to before me at Washington, DC

this 24th day of January, 1984

Sheila K. Iversen
(Signature of notary or other officer)

My Commission Expires April 30, 1984

³The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

4

Dean Gandy 3310 Fairmont # 6D
Dallas, Texas 75201

USA

Partner

June 15, 1983

Van Oliver 3429 Southwestern
Dallas, Texas 75225

USA

Partner

July, 1983

INTELSAT (con't)

15.(a)

September 1983

Firm	Duplication	\$	198.10
"	Staff services		127.34
"	Telephone		98.00
"	Postage/Courier		148.00
"	Taxi		128.20

October 1983

Firm	Courier	\$	151.00
"	Duplication		497.80
"	Lexis		134.57
"	Meals		116.90
"	Telephone		47.00
"	Transportation		112.75
"	Staff Services		232.19

November 1983

Firm	Duplication	\$	211.80
"	Courier Service		94.00
"	Word Processing		37.50
"	Telephone		114.00
"	Taxis		33.50
"	Meals		131.39
"	Staff Services		31.80

December 1983

Firm	Duplication	\$	102.95
"	Taxis		108.50
"	Staff Services		255.08
"	Courier		123.00
"	Telephone		46.00
"	Meals		40.61

	TOTAL	\$	7,750.63
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AGSH&F POLITICAL ACTION COMMITTEEPOLITICAL CONTRIBUTIONS

<u>Date</u>	<u>Amount</u>	<u>Party or Candidate</u>	<u>Location</u>
6/8/83	\$ 210.00	North Carolina Campaign Fund	North Carolina
6/9/83	500.00	Committee to Re-elect Thomas P. O'Neill	Massachusetts
6/14/83	250.00	Eckart for Congress	Ohio
6/14/83	500.00	Florio Campaign Fund	New Jersey
6/14/83	500.00	William Lehman Campaign Fund	Florida
6/14/83	1,000.00	Friends of Albert Gore	Tennessee
6/14/83	250.00	Friends of George Miller	California
6/14/83	500.00	Hall for Congress	Texas
6/14/83	500.00	Alexander Campaign Committee	Arkansas
6/20/83	2,500.00	The Chairman's Council (Fundraising group of the Democratic Congressional Committee)	
6/20/83	500.00	The Tower Senate Club (John Tower for U.S. Senator)	Texas
6/27/83	1,000.00	Re-Elect Exon for Senate Cte.	Nebraska
6/28/83	500.00	Friends of Phil Sharp	Indiana
7/11/83	350.00	Friends of Sikorski	Minnesota
7/19/83	500.00	Kent Hance Committee	Texas
7/20/83	10,000.00	The Democratic Congressional Dinner Committee	

<u>Date</u>	<u>Amount</u>	<u>Party or Candidate</u>	<u>Location</u>
7/25/83	\$ 750.00	Congressional Victory Fund	
7/25/83	250.00	Ortiz for Congress Cte.	Texas
7/28/83	1,000.00	Campaign to Re-elect Senator Huddleston	Kentucky
8/1/83	500.00	Murtha for Re-election Committee	Pennsylvania
8/4/83	300.00	People for Mrazek	New York
8/5/83	46.38	The Catering Company (fundraising breakfast for Geraldine A. Ferraro)	New York
8/31/83	2,000.00	Jim Richards Committee	Dallas
9/8/83	1,000.00	Friends of Senator Carl Levin	Michigan
9/12/83	1,000.00	Friends of Howell Heflin	Alabama
9/13/83	250.00	Hollings for President Cte.	South Carolina
9/13/83	500.00	Friends of Hightower	Texas
9/16/83	250.00	Dixon for Congress Committee	California
9/20/83	500.00	Fazio for Congress Committee	California
9/23/83	1,000.00	Republican Majority Fund Candidate Account	
9/26/83	250.00	Friends of Bob Carr	Michigan
10/3/83	500.00	Binqaman for U.S. Senate	New Mexico
10/3/83	500.00	The Waxman Committee	California
10/3/83	500.00	Friends of Albert Gore	Tennessee
10/3/83	250.00	Congressman Fazio Campaign Committee	California
10/3/83	500.00	The Wilson Committee	Texas

<u>Date</u>	<u>Amount</u>	<u>Party or Candidate</u>	<u>Location</u>
10/3/83	\$ 1,000.00	Friends of Gillis Long Cte.	Louisians
10/3/83	250.00	Hoyer for Congress Committee	Maryland
10/4/83	250.00	Citizens for Cardiss Collins	Illinois
10/4/83	250.00	Berman for Congress Committee	California
10/27/83	250.00	Oscar H. Mauzy B-day Party	Texas
11/27/83	250.00	Charles Gandy Re-Election Campaign	Texas
11/22/83	1,000.00	Simpson Senate Committee	Wyoming

23 continued..

foreign principal, which is exempt from FARA pursuant to the
Int'l Organizations Immunities Act and Executive Order No. 11,966.