

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 Davis & Harman 1455 Pennsylvania Avenue, N.W., Suite 1200 Washington, D.C. 20004	2. Registration No. 4018
3. Name of foreign principal A.C.E. Insurance Company (Bermuda) Ltd.	4. Principal address of foreign principal The ACE Building 30 Woodbourne Avenue Hamilton, HM 08 Bermuda

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:

<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee
<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input type="checkbox"/> 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: N/A

a) Principal address

b) Name and title of official with whom registrant deals.

c) Principal aim

RECEIVED
DEPT. OF JUSTICE
SEP 11 1988

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

Bermuda Insurance Company

b) Is this foreign principal

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

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

ACE is owned by ACE Limited, a Cayman Islands corporation, which is publicly owned.

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

Date of Exhibit A

6/8/93

Name and Title

Thomas A. Davis
Partner

Signature



U.S. Department of Justice
Washington, DC 20530

Exhibit B
To Registration Statement
Under the Foreign Agents Registration Act of 1938, as amended

OMB No. 105-0017
Approval Expires Nov. 30, 1993

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.

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

Name of Registrant DAVIS & HARMAN	Name of Foreign Principal A.C.E. INSURANCE COMPANY (BERMUDA) LTD.
---	---

Check Appropriate Boxes:

- 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.
- 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.
- The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

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

Present a proposed clarification of tax issues involving executive compensation insurance to Members of Congress and their staffs and officials of the Treasury Department.

RECEIVED
FEB 10 1988
REGISTRATION
UNIT
CRIMINAL
DIVISION
U.S. DEPT. OF JUSTICE

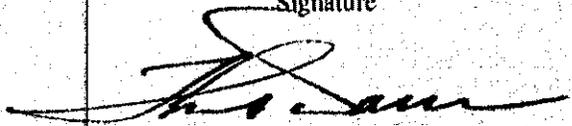
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

We will be preparing briefing materials and meeting with Members of Congress and their staff, and Treasury officials to discuss the proposed tax clarification.

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

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

On behalf of A.C.E. Insurance Company, we will be seeking clarification of tax issues in connection with unfunded executive compensation benefits. In this regard, we will be preparing briefing materials on this issue for Members of Congress and their staffs and Treasury Department officials and meeting with such individuals.

Date of Exhibit B	Name and Title	Signature
6/8/93	Thomas A. Davis Partner	

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



I N S U R A N C E M A N A G E M E N T L I M I T E D

VIA TELECOPIER

June 3, 1993

Thomas A. Davis, Esq.
DAVIS & HARMAN
The Willard
1455 Pennsylvania Avenue, N.W.
Suite 1200
Washington, D.C. 20004

Dear Mr. Davis,

Thank you for your letter of April 23, 1993. The terms of your engagement are satisfactory to ACE. Please keep us advised as this matter progresses.

Sincerely,

BRADFORD W. RICH
Executive Vice President
and General Counsel

BWR/ys

cc: T. Gallagher - Gallagher & Blitz
R. Skillman - Caplan & Drysdale

93 JUN -9 13:34

RECEIVED
DEPT OF JUSTICE
COMMUNICATIONS SECTION

LAW OFFICES OF
DAVIS & HARMAN
THE WILLARD
1455 PENNSYLVANIA AVENUE, N.W.
SUITE 1200
WASHINGTON, D.C. 20004
—
TEL (202) 347-2230
FAX (202) 393-3310

April 23, 1993

Brad W. Rich, Esq.
Senior Vice President and General Counsel
A.C.E. Insurance Company (Bermuda) Ltd.
P. O. Box HM 1015
30 Woodburne Avenue
Hamilton, Bermuda HM DX

Dear Mr. Rich:

Richard Skillman has talked with our firm regarding your interest in seeking legislation to clarify the tax issues arising from insurance policies written to insure nonqualified deferred compensation plans. As I understand it, the primary goal would be to amend the tax code to make it clear that a third party guarantee or executive compensation insurance supporting the deferred benefits does not cause any of those benefits to be taxed currently under Section 83 of the tax code.

Our firm would be pleased to represent A.C.E., Inc., in conjunction with your other Washington counsel, on this legislative issue. We would suggest a fee of \$5,000 per month for a period of six months, commencing May 1, 1993 (which could be paid quarterly if you would prefer), plus expenses directly related to your matter as such expenses are incurred. Those expenses could include costs for photocopying, telephone, delivery services, facsimiles, postage, in-town travel, out-of-town travel (if pre-approved), electronic research and reasonable costs for business meals with members of Congress and staff.

Brad W. Rich, Esq.
April 23, 1993
Page 2

At the end of six months, if the matter has not been resolved to your satisfaction, we will review the situation with you to determine whether or not we should continue to pursue the issue and, if so, what would be an appropriate fee arrangement. For example, it might be appropriate to switch to an hourly charge at that time since I think a great deal of the basic work will probably come during the first six months.

I have discussed this proposal with Richard Skillman who thinks it is appropriate. I hope it meets with your approval.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Davis", written in black ink.

Thomas A. Davis

Enclosure

cc: Richard Skillman