

31 JAN 1993

For Six Month Period Ending \_\_\_\_\_

(Insert date)

Name of Registrant **BAYH, CONNAUGHTON,  
FENSTERHEIM & MALONE, P.C.** Registration No. **4606**

Business Address of Registrant **1575 Eye Street, N.W., Suite 1025  
Washington, D.C. 20005**

**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 <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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

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

**Branch office opened on January 1, 1993.**

**1300 Dove Street  
Suite 200  
Newport Beach, California 92660**

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

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:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
Philip Sbarbaro	9936 Courthouse Woods Ct.	U.S.A.	Principal	1/1/93
Gibson Pratt	2209 Clove St, SD CA.	U.S.A.	Principal	1/1/93

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>

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>

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

Date of Termination

ICN-Galenika

6/1/92

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes  No

If yes, furnish following information:

Name and address of foreign principal

Date acquired

Milan Panic  
Belgrade, Yugoslavia

10/1/92

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

NONE

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:

Milan Panic

Registrant provided advice and counsel regarding compliance with U.S. sanctions against Yugoslavia and regarding compliance with U.N. resolutions regarding Yugoslavia. Registrant also provided assistance in dealing with representatives of the U.S. Government and the media.

<sup>1</sup>The 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 activity<sup>2</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.

**Registrant monitored events, provided advice and contacted U.S. Government representatives regarding Mr. Panic's activities in Yugoslavia and U.S. policy towards Yugoslavia. Registrant did not actively support or oppose any specific piece of legislation, but rather attempted to provide information to promote a full understanding of Mr. Panic's activities and events in Yugoslavia. It should be noted that several pieces of legislation were pending calling for additional sanctions against the Republic of Serbia, including S.1737, S.1793, S. Res. 213, S. Res. 224, H.R. 3518, H.R. 4052 and H. Res. 296. (See attached Exhibit 1 for details of activities).**

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.

<sup>2</sup>The 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.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
11/18/92	SPI Pharmaceuticals, Inc. on behalf of Milan Panic	Payment for Services and Expenses	\$119,377.05
			<u>\$119,377.05</u>
			Total

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> 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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<sup>3</sup>A 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).

<sup>4</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 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>
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**See Exhibit 2**

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Total

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> 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 value<sup>5</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:

<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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**The Corporation has made no such contributions, although individual shareholders and employees have contributed to candidates and political action committees. (See Exhibit 3 for contributions of short-form registrants).**

## 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.

<sup>5</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.

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) \_\_\_\_\_

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

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 A<sup>6</sup>      Yes       No   
Exhibit B<sup>7</sup>      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.

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

<sup>7</sup>The Exhibit B, which is filed on Form 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 C<sup>8</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.

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.

N/A

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.

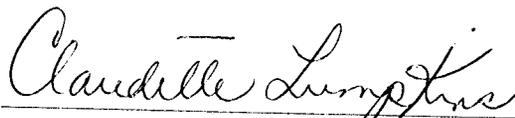
(Type or print name under each signature)

(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.)

  
Thomas A. Connaughton

Subscribed and sworn to before me at District of Columbia

this 26th day of February, 19 93

  
(Signature of notary or other officer)

Commission expires 1/31/97

<sup>8</sup>The 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.)

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530

**NOTICE**

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form CRM-154, formerly Form OBD-64-- Supplemental Statement):

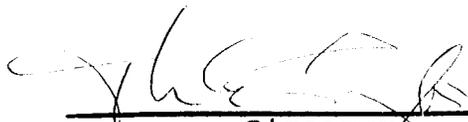
Yes \_\_\_\_\_ or No \_\_\_\_\_ X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes \_\_\_\_\_ or No \_\_\_\_\_ X

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

  
\_\_\_\_\_  
Signature

February 26, 1993  
\_\_\_\_\_  
Date

Thomas A. Connaughton  
\_\_\_\_\_  
Please type or print name of signatory on the line above

Partner  
\_\_\_\_\_  
Title

93 FEB 26 11 23:33

EXHIBIT #1  
Details regarding Question #12

With Respect to Milan Panic

<u>Date</u>	<u>Activity</u>	<u>Purpose</u>
Birch E. Bayh, Jr.		
10/1/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss developments in Yugoslavia
10/8/92	Telephone conference with Andy Semmel (Senator Lugar) and Congressman Moody	To discuss upcoming elections in Yugoslavia
10/14/92	Telephone conference with Richard Newcomb (Department of Treasury)	To discuss licensing issues
10/14/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss events in Yugoslavia
10/15/92	Letter to Mr. Thomas Niles (Department of State)	To present information regarding current situation in Yugoslavia
10/26/92	Telephone conference with M. Baretta (Senator Dole)	To discuss events in Yugoslavia and upcoming elections
10/26/92	Letter to Senator Robert Dole	To present information regarding current situation in Yugoslavia
10/27/92	Meeting with Richard Newcomb (Department of Treasury)	To discuss licensing issues
11/4/92	Telephone conference with Richard Newcomb (Department of Treasury)	To discuss licensing issue

11/5/92	Meeting with William Montgomery (Department of State) and telephone conference with Congressman Lee Hamilton	To discuss developments in Yugoslavia
11/11/92	Telephone conference with Senator Dennis DeConcini	To discuss developments in Yugoslavia and upcoming elections
11/13/92	Meeting with Andy Semmel (Senator Lugar)	To discuss monitoring of upcoming elections in Yugoslavia
11/16/92	Telephone conference with Andy Semmel	To discuss upcoming elections in Yugoslavia
11/19/92	Telephone conference with Richard Newcomb (Department of Treasury)	To discuss licensing matters
11/24/92	Telephone conference with Richard Newcomb (Department of Treasury)	To discuss licensing matters
11/25/92	Telephone conference with Congresswoman Helen Bentley and Andy Semmel (Senator Lugar)	To discuss developments in Yugoslavia
11/30/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss upcoming election in Yugoslavia
12/30/92	Telephone conference with Richard Newcomb (Department of Treasury)	To discuss licensing issues
1/5/93	Telephone conference with Congresswoman Helen Bentley	To discuss developments in Yugoslavia
1/7/93	Telephone conference with Congresswoman Helen Bentley	To discuss developments in Yugoslavia
1/19/93	Meeting with Congressman Lee Hamilton	To discuss developments in Yugoslavia

1/20/93	Meeting with Thomas Niles (Department of State), J. Smith (Department of Defense)	To discuss developments in Yugoslavia
1/27/93	Meeting with Steve Oxman (Department of State)	To discuss developments in Yugoslavia
1/29/93	Telephone conference w/M. Habib (Department of State)	To discuss the detention of Milan Panic at the Yugoslavian border
<b>Thomas A. Connaughton</b>		
10/15/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss upcoming elections in Yugoslavia
10/21/92	Telephone conferences with Richard Newcomb (Department of Treasury)	To discuss licensing issues
10/26/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss monitoring upcoming elections in Yugoslavia
10/27/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss developments in Yugoslavia
10/28/92	Telephone conference with John Roth (Department of Treasury)	To discuss licensing issues
10/29/92	Telephone conferences with Andy Semmel (Senator Lugar)	To discuss developments in Yugoslavia
11/11/92	Letter to Richard Newcomb (Department of Treasury)	To present information regarding licensing issues
11/18/92	Two telephone conferences with John Roth (Department of Treasury)	To discuss licensing issues

11/30/92	Telephone conference with John Roth (Department of Treasury)	To discuss licensing issues
12/2/92	Telephone conferences with Andy Semmel (Senator Lugar), Michael Van Dusen (Foreign Affairs Committee) and Congresswoman Helen Bentley	To discuss upcoming elections in Yugoslavia
12/8/92	Telephone conference with John Roth (Department of Treasury)	To discuss licensing issues
1/7/93	Meeting with Congress Lee Hamilton and James Reuben (Foreign Relations Committee)	To discuss developments in Yugoslavia
1/29/93	Telephone conference with Andy Semmel (Senator Lugar)	To discuss developments in Yugoslavia
<b>Kevin O. Faley</b>		
10/14/92	Meeting with Andy Semmel (Senator Lugar)	To discuss developments in Yugoslavia
11/16/92	Telephone conference with Andy Semmel (Senator Lugar)	To discuss monitoring elections in Yugoslavia
<b>Sheldon J. Harris</b>		
11/2/92	Telephone conference with Martin Sletzing (Foreign Affairs Committee)	To discuss developments in Yugoslavia
11/6/92	Telephone conference with Martin Sletzing (Foreign Affairs Committee)	To discuss developments in Yugoslavia

12/3/92	Telephone conference with Martin Sletzinger (Foreign Affairs Committee)	To discuss upcoming elections in Yugoslavia
12/15/92	Telephone conference with Martin Sletzinger (Foreign Affairs Committee)	To discuss upcoming elections in Yugoslavia
1/29/93	Telephone conference with Martin Sletzinger (Foreign Affairs Committee)	To discuss developments in Yugoslavia

EXHIBIT #2

<u>DATE</u>	<u>TO WHOM</u>	<u>PURPOSE</u>	<u>AMOUNT</u>
8/92-1/93	BCF&M	Photocopy	\$ 424.60
8/92-1/93	BCF&M	Telecopier	863.00
8/92-1/93	Washington Express	Messenger	146.46
8/92-1/93	AT&T	Telephone	1,357.97
8/92-1/93	BCF&M	Meals/Enter- tainment	2,336.82
8/92-1/93	Cab Company	Taxi	583.67
8/92-1/93	BCF&M	Postage	.58
8/92-1/93	Corsair Travel	Airfare	7,577.90
8/92-1/93	American Express	Hotel	<u>2,879.92</u>
		<b>TOTAL</b>	<b>\$16,170.92</b>

EXHIBIT #3

<u>DATE</u>	<u>AMOUNT OR THING OF VALUE</u>	<u>NAME OF POLITICAL ORGANIZATION</u>	<u>NAME OF CANDIDATE</u>
Birch E. Bayh, Jr.			
8/5/92	\$ 250	Friends of Phil Sharp	Phil Sharp
8/12/92	\$ 500	Moody for Senate	Jim Moody
9/3/92	\$ 500	Friends of Jim Moody	Jim Moody
9/8/92	\$ 500	Friend of Dorothy Bradley	Dorothy Bradley
9/22/92	\$ 500	Hoosiers for Tim Roemer	Tim Roemer
9/30/92	\$ 500	Oakar for Congress	Mary Rose Oakar
10/6/92	\$1,000	Citizens for Downey	Tom Downey
10/9/92	\$ 500	Mikulski for Senate	Barbara Mikulski
10/27/92	\$1,000	Glenn for Senate Committee	John Glenn
<b>Thomas A. Connaughton</b>			
8/5/92	\$ 500	Shea for Governor	Pat Shea
8/5/92	\$ 250	Friends of Phil Sharp	Phil Sharp
8/12/92	\$ 500	Moody for Senate	Jim Moody
9/17	\$ 100	Hoosiers for Jill Long	Jill Long
10/19	\$ 250	Bentley for Congress	Helen Bentley

**Kevin O. Faley**

9/1/92	\$ 50	McCloskey for Congress	Frank McClosky
9/1/92	\$ 50	Hoosiers for Hogsett	Joe Hogsett
9/1/92	\$ 50	Bayh for Governor	Evan Bayh
9/3/92	\$ 100	Moody for Senate	Jim Moody
9/18/92	\$ 100	McCloskey for Congress	Frank McCloskey
9/29/92	\$ 100	Clinton for President	Bill Clinton
10/7/92	\$ 50	Hoosiers for Jill Long	Jill Long
10/9/92	\$ 20	McCloskey for Congress	Frank McCloskey
10/22/92	\$ 250	Bentley for Congress	Helen Bentley

**Sheldon J. Harris**

8/3/92	\$ 500	Martin Frost for Congress	Martin Frost
8/3/92	\$ 500	David Bonior for Congress Committee	David Bonior
8/10/92	\$ 200	Eric Fingerhut for Congress Committee	Eric Fingerhut
9/1/92	\$ 500	Mary Rose Oakar for Congress	Mary Rose Oakar
10/22/92	\$ 250	Committee to Re-elect Bentley	Helen Bentley
10/25/92	\$ 500	Bob Carr for Congress	Bob Carr
12/12/92	\$ 250	Larry LaRocco for Congress	Larry LaRocco