

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 Cameron & Hornbostel, 818 Connecticut Ave., N.W., Ste. 700, Wash., D.C. 20006	2. Registration No. 16514000 4705 <i>gji</i>
---	---

3. Name of foreign principal Polygon Co. Ltd.	4. Principal address of foreign principal P.O. Box 5451, Nicosia, Cyprus
--	---

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
CRIMINAL DIVISION
93 NOV -1 PM 12: 58
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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

Polygon Co. Ltd. is a Cypriot registered offshore company and is trading in oil field equipments and parts.

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.)

Polygon Co. Ltd. is owned by Union Oil Inc., of Nevis. Polygon Co. Ltd., however, is directed, controlled, and financed by Hossein Alikhani and George Christoforou.

The shareholders of Union Oil Inc. are Mr. Ghader Zehtab-Fard and Mrs. Jalleh Faramarzi. Both Mr. Zehtab-Fard and Mrs. Faramarzi are private individuals.

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.

Polygon Co. Ltd. is controlled by Hossein Alikhani and George Christoforou.

Date of Exhibit A

Oct. 26, 1993

Name and Title

Bruce Zagaris, 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.

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	Name of Foreign Principal
Cameron & Hornbostel	Polygon Co. 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.

We will prepare and disseminate to certain interested groups written and possibly audio and/or video information about the subject matter of the agreement attached.

RECEIVED
DEPT. OF JUSTICE
CRIMINAL DIVISION
93 NOV - 1 PM 12: 55
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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

We will advise the client on certain international and U.S. law and policy matters concerning the litigation mentioned in the attached professional services agreement. We will advise and help inform interested persons and groups about the version of Polygon Co. Ltd., the implications and policies that may result from the adjudication of the cases. We will prepare memoranda and press releases and disseminate them to interested persons. We may engage in discussions with officials in the executive and/or legislative branches of the U.S. and other governments concerning the cases and their resolution.

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.

We may hold discussions with officials in the executive and/or legislative branches of the U.S. and other governments concerning the cases and their resolution. In particular, we will focus on: (1) the extraterritorial application of the Libyan sanctions regulations; (2) the use of stings to bring criminal actions against foreign individuals to enforce the Libyan sanctions and related regulations; and (3) the policies of kidnapping and alluring foreign nationals to jurisdictions outside the U.S. for the purpose of arresting them, especially without the consent in advance of these arrangements of the foreign government in whose territory the arrest is made.

Date of Exhibit B	Name and Title	Signature
Oct. 26, 1993	Bruce Zagaris, 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.

CAMERON & HORNBOSTEL
818 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20006

202 293-6890
FAX: (202) 293-1877

PETER A. HORNBOSTEL
DUNCAN H. CAMERON
LARRY W. THOMAS
WILLIAM KITCHELL INDE
HOWARD L. VICKERY
FREDERICK BIRKBECH
BERTRAND J. DELANNEY
BRUCE ZAGARIS
ALEXANDER W. GIERCK

GREGORY J. BENDLIN
MICHELE C. BERGMAN
WADE G. CHANNELL
DAVID W. PHILLIPS

*NOT ADMITTED IN D.C.

NEW YORK OFFICE
250 PARK AVENUE
NEW YORK, N.Y. 10022
(212) 692-6502
FAX: (212) 697-0848

ASSOCIATED MIAMI
OFFICE
TAYLOR, BRIGGS,
BUREY & GREENE
801 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 377-6200
FAX: (305) 371-4570

OF COUNSEL
THOMAS J. SKOLA
RICHARD RUY
CAROLYN W. DAVENPORT

October 14, 1993

By Fax (011) 357-2-451879

Mr. Hossein Alikhani
Polygon Co. Ltd.
P.O. Box 5451
Nicosia, Cyprus

Retainer Agreement for Professional Services

Dear Mr. Alikhani:

It was a pleasure to speak with you today. The purpose of this retainer letter is to describe the terms of our professional services to be rendered to Polygon Co. Ltd.

1. Description of Services. We will advise on certain international and U.S. law and policy matters concerning the cases of George Christofom and Polygon Co. Ltd. and the pending indictment of the U.S. v. George Christofom (U.S. Dist. Ct. S. D. Florida Case No. 93-0909), a related case in the Bahamas, and particularly the extradition, extraterritorial jurisdiction, and potential ways to resolve the cases. In addition, we will advise and help implement a strategy to inform interested persons about your side and perspective of the events that have given rise to the litigation as well as the implications and policies that may result from decisions in the adjudication of the cases. We may assist with explaining the policy aspects of the cases and resolution of the disputes with officials of the United States executive and legislative branches of government.

Because the services contemplated will involve disseminating information about the above-mentioned cases and may influence public opinion and/or members of the legislative and executive branches, U.S. law requires that we register as an agent for a foreign principal. U.S. law also will require the preparation of reports that are filed with the U.S. Government and available for inspection by the public. In addition, we will have to label the information that we prepare and disseminate, so it reflects that we have prepared such material in our capacity as agents for a foreign principal.

RECEIVED
DEPT. OF JUSTICE
CRIMINAL DIVISION
93 NOV - 1 PM 12: 58
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

2. Professional Fees. Our fees for these professional services will be charged as follows: \$240.00 on an hourly basis rendered by the undersigned; and regular rates when performed by attorneys, law clerks, and paralegals.

3. Reimbursable Expenses. Reimbursement will be required for our out of pocket expenses incurred in connection with our services, including the expense of any long distance telephone calls, filing fees, special postage, photocopies, computer research, transportation, transcripts or other expenses incurred on your behalf.

4. Initial Retainer. The firm normally requires an advance against the initial fees. We have agreed on an initial advance of U.S. \$50,000.00. Once this amount is exhausted, further representation will be contingent on replenishment of an additional advance sufficient to cover the services you request.

5. Monthly Statements. All fees for professional services and reimbursable expense will be billed monthly and are payable upon receipt of the statement.

6. Managing Attorney. The undersigned attorney shall be the managing attorney responsible for supervising the professional services to be rendered.

If the foregoing meets with your approval, please sign the fax copy of this Agreement and return it to me by facsimile. If you have any questions concerning this matter, please contact me.

Sincerely,

CAMERON & HORNBOSTEL

By: 

Bruce Zagar

AGREED AND ACCEPTED:

POLYGON CO. LTD.

By: 

Hossein Alikhani

Dated: Oct. 15. 93

#1b\polylob.ret