

FEB 28 2003

For Six Month Period Ending _____
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration No.
Bruce Zagaris, Esq. 5299

(c) Business Address(es) of Registrant
1101 Seventeenth St., N.W.
Suite 1100
Washington, D.C. 20036

2. 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

(c) Explain fully all changes, if any, indicated in items (a) and (b) above.
none

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C¹, 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.

none

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¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws 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. (a) 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:

n/a
Name Position Date Connection Ended

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

If yes, furnish the following information:

n/a
Name Residence Address Citizenship Position Date Assumed

5. (a) Has any person named in item 4(b) rendered services directly in furtherance of the interests of any foreign principal? Yes No

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

n/a

(b) Have any employee or individuals, 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:

n/a
Name Position or connection Date terminated

(c) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

If yes, furnish the following information:

n/a
Name Residence Address Citizenship Position Date Assumed

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes No

n/a

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

II - FOREIGN PRINCIPAL

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

If yes, furnish the following information:

n/a

Name of foreign principal

Date of termination

8. Have you acquired any new foreign principal² during this 6 month reporting period?
Yes No

If yes, furnish following information:

n/a

Name and address of foreign principal

Date acquired

Government of Barbados
Ministry of Economic Development
Upton, Saint Michael
Barbados

September 9, 2003

9. In addition to those named in Items 7 and 8, if any, list foreign principals² whom you continued to represent during the 6 month reporting period.

Polygon Co., Ltd.
Government of Antigua and Barbuda
Government of Barbados

10. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A³ Yes No
Exhibit B⁴ 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.

n/a

² The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual 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 principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)
³ 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.
⁴ 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.

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 7, 8, and 9 of this statement? Yes No

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

For the Government of Antigua and Barbuda, Mr. Zagaris had communications concerning a potential trip to the U.S. by the Antigua and Barbuda High Commissioner in London.

For Polygon Co., Ltd., Mr. Zagaris worked on communications with the Inter-American Commission on Human Rights in connection with a petition brought by Mssrs. Alikhani and Christoforu, both of Polygon. The case of Mr. Christoforu has now been dismissed. Mr. Zagaris also monitored U.S. legislation and cases on awards to victims of terrorism (See Insert 1)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ 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.

On September 5, 2002 Mr. Zagaris had a phone conversation with Jimmy Gurule, Undersecretary of Treasury Enforcement, to try to arrange a meeting with Ron Sanders, the High Commissioner of Antigua and Barbuda in London.

For the Government of Barbados, Mr. Zagaris participated in discussions on the U.S.-Barbados income tax treaty on September 16-17, 2002, and monitored developments in the U.S. executive and legislative branches affecting the income tax treaty and trade and investment between the U.S. and Barbados. Insofar as Mr. Zagaris participated in discussions on behalf of the Government of Barbados with the U.S., his representations may be considered as "political activity."

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.

Mr. Zagaris participated in meetings of the OFAC Practitioners Forum that may be beneficial to Polygon Co., Ltd.

Mr. Zagaris participated in meetings of the International Tax and Finance Forum and the International Tax Discussion Group Luncheon. He served as chair of the International Enforcement Subcommittee, Committee on Civil and Criminal Penalties, Tax Section, American Bar Association. He participated in discussions with Manchester Trade Inc. with respect to a contract with the U.S. Agency for International Development on the Caribbean Trade and Competitiveness Project.

⁵ The term "political activities" means any activity that the person engaging in believes will, or that the person intends to, in any 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 political or public interests, policies, or relations of a government, 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 7, 8, and 9 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 [X] No []

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies⁶

Table with 4 columns: Date, From Whom, Purpose, Amount. Rows include entries from Government of Antigua and Barbuda and Barbados for Professional Services, with amounts ranging from \$264.00 to \$8,156.06. A Total row is at the bottom.

(See Insert 2)

(b) RECEIPTS - FUND RASING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fund raising campaign⁷, any money on behalf of any foreign principal named in items 7, 8, and 9 of this statement? Yes [] No [X]

If yes, have you filed an Exhibit D to your registration? Yes [] No []

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes [] No [X]

If yes, furnish the following information:

Table with 4 columns: Name of foreign principal, Date received, Description of thing of value, Purpose.

6, 7 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).) 8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal. 9 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 7, 8, and 9 of this statement? Yes No

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

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

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.

Date	To Whom	Purpose	Amount
09/30/02	Government of Barbados	Office Expenses	\$2076.39
09/30/02	Polygon Co., Ltd.	Office Expenses	\$9.32
10/31/01	Government of Barbados	Office Expenses	\$625.12
11/30/02	Government of Barbados	Office Expenses	\$10.94
11/30/02	Polygon Co., Ltd.	Office Expenses	\$4.38
12/31/02	Government of Barbados	Office Expenses	\$1.08
12/31/02	Polygon Co., Ltd.	Office Expenses	\$3.16
01/31/03	Government of Barbados	Office Expenses	\$5.63
02/28/03	Government of Barbados	Office Expenses	\$4.43
02/28/03	Polygon Co., Ltd.	Office Expenses	\$0.11

\$2,740.56

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, and 9 of this statement?

Yes No

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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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 value¹¹ 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:

Date	Amount or thing of value	Name of political organization	Name of candidate
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^{10, 11} 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.

V - INFORMATIONAL MATERIALS

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials¹²?
 Yes No

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

17. Identify each such foreign principal.

Polygon Co., Ltd.

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 informational materials? 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 informational materials include the use of any of the following:

- | | | | |
|---|--|--|---|
| <input type="checkbox"/> Radio or TV broadcasts | <input checked="" type="checkbox"/> Magazine or newspaper articles | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications | <input type="checkbox"/> Lectures or speeches |
| <input type="checkbox"/> Other (specify) _____ | | | |

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

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Public Officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input checked="" type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input checked="" type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

21. What language was used in the informational materials:

- English Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes No

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI-EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Type or print name under each signature¹³)

March 20, 2003

Bruce Zaorlis
BRUCE ZAORLIS

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¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

THIS FORM IS TO BE AN OFFICIAL ATTACHMENT TO YOUR CURRENT
SUPPLEMENTAL STATEMENT - PLEASE EXECUTE IN TRIPLICATE

SHORT-FORM REGISTRATION INFORMATION SHEET

SECTION A

The Department records list active short-form registration statements for the following persons of your organization filed on the date indicated by each name. If a person is not still functioning in the same capacity directly on behalf of the foreign principal, please show the date of termination.

Short Form List For Registrant: **Berliner Corcoran & Rowe, LLP**

Last Name	First Name and Other Names	Registration Date	Termination Date	Role
Zagaris	Bruce	2/2/99		

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SECTION B

In addition to those persons listed in Section A, list below all current employees rendering services directly on behalf of the foreign principal(s) who have not as yet filed short-form registration statements. (Do not list clerks, secretaries, typists or employees in a similar or related capacity. If there is some question as to whether an employee has an obligation to file a short-form, please address a letter to us describing the activities and connection with the foreign principal.)

Name	Function	Date Hired

Signature: _____

Date: _____

Title: _____

Insert 1

11. During this six month period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement?

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For Polygon Co., Ltd., Mr. Zagaris worked on communications with the Inter-American Commission on Human Rights in connection with a petition brought by Mssrs. Alikhani and Christoforu, both of Polygon. The case of Mr. Christoforu has now been dismissed. Mr. Zagaris also monitored U.S. legislation and cases on awards to victims of terrorism in cases brought against foreign sovereigns, such as the Terrorism Risk Insurance Act. Mr. Zagaris also responded to media inquiries about *Case No.: 179/3/80, Judgment Dated January 20, 2003* in the Tehran Public Court, Third Branch, in the case of Mr. Hossein Alikhani et al v. United States Government for tort and human rights violations. Mr. Zagaris sent to Peter Choharis, Piper Rudnick, materials on the Alikhani Iran judgment.

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14. (a) Receipts-Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, and 9 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)

If no, explain why.

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

Date	From Whom	Purpose	Amount
10/11/02	Government of Antigua and Barbuda	Professional Services	\$264.00
10/29/02	Government of Barbados	Professional Services	\$5420.88
10/31/02	Government of Antigua and Barbuda	Professional Services	\$602.00
11/26/02	Government of Barbados	Professional Services	\$12,427.89
01/07/03	Government of Barbados	Professional Services	\$8,156.06
02/11/03	Polygon Co., Ltd.	Professional Services	\$8,569.57
03/10/03	Government of Barbados	Professional Services	\$2,031.21
			<u>\$37,471.61</u>
			Total

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