

U.S. Department of Justice

Washington, DC 20530

Short Form Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials 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, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .429 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, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name Gerald Masoudi	2. Registration No. 5852
3. Residence Address(es) 7200 Elizabeth Drive McLean VA 22101	4. Business Address(es) 1201 Pennsylvania Ave NW #1200 Washington DC 22101
5. Year of Birth 1968 Nationality USA Present Citizenship USA	6. If present citizenship was not acquired by birth, indicate when, and how acquired.

7. Occupation Attorney

8. What is the name and address of the primary registrant?
Name Covington & Burling LLP
Address 1201 Pennsylvania Ave NW #1200
Washington DC 22101

9. Indicate your connection with the primary registrant:

- partner director employee consultant
 officer associate agent subcontractor
 other (specify) _____

10. List every foreign principal to whom you will render services in support of the primary registrant.
Corporación Colombia Internacional

11. Describe separately and in detail all services which you will render to the foreign principal(s) listed in Item 10 either directly, or through the primary registrant listed in Item 8, and the date(s) of such services. (If space is insufficient, a full insert page must be used.)
See attachment.

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act and in the footnote below?

Yes No

If yes, describe separately and in detail such political activity.

Please see response #11

13. The services described in Items 11 and 12 are to be rendered on a

full time basis part time basis special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

Salary: Amount \$ _____ per _____ Commission at _____ % of _____

Salary: Not based solely on services rendered to the foreign principal(s).

Fee: Amount \$ _____ Other thing of value _____

15. During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contributions of money or other things of value from your own funds or possessions and on your own behalf in connection with any election to political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes No

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
October 2014	\$250	Ed Gillespie for Senate (Virginia)	
September 2014	\$250	Cory Gardner for Senate (Colorado)	

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

November 26, 2014

 (Date of signature)

/s/ Gerald Masoudi
 _____ eSigned
 (Signature)

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which 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 the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Attachment

Response to item #11.

Covington & Burling LLP will review documentation provided by the foreign principal and the Colombian Ministry of Agriculture and consult with relevant United States government agencies to ascertain the current status of the U.S. Department of Agriculture's approval process for the export of Colombian crops to the United States, in light of the obligations the United States may have under the U.S.-Colombia Free Trade Agreement. The crops include hass avocados, peppers, watermelon, melon, mango and beef. Following this analysis, Covington & Burling LLP will propose specific steps that Covington would take, working with the foreign principal, to achieve the foreign principal's market access objectives.