

U.S. Department of Justice
Washington, DC 20530

**Exhibit A to Registration Statement
Pursuant to the Foreign Agents Registration Act of
1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by 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 this 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 in print and online at: <http://www.fara.gov>.

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, 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 and Address of Registrant Steptoe & Johnson LLP	2. Registration No. <div style="font-size: 2em; text-align: center;">6077</div>
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3. Name of Foreign Principal Puntland State of Somalia	4. Principal Address of Foreign Principal The Presidency Garowe Somalia
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5. Indicate whether your foreign principal is one of the following:

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 type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input type="checkbox"/> Other (<i>specify</i>) _____

Individual-State nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant
 The Presidency

b) Name and title of official with whom registrant deals
 HE Abdirahman Mohamed Mohamud (Farole), the President of Puntland State of Somalia

7. If the foreign principal is a foreign political party, state:

a) Principal address
 N/A

b) Name and title of official with whom registrant deals N/A

c) Principal aim N/A

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.

N/A

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal Yes No

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 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 must be used.)*

N/A

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.

N/A

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 Exhibit A to the 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.

Date of Exhibit A December 01, 2011	Name and Title Stephen Heifetz, Partner	Signature /s/ Stephen Heifetz eSigned
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U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

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. Compliance is accomplished by filing an electronic Exhibit B form 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 in print and online at: <http://www.fara.gov>.

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, 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 of Registrant Steptoe & Johnson LLP	2. Registration No. 
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3. Name of Foreign Principal

 Puntland State of Somalia

Check Appropriate Box:

4. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. 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 expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

 Interface with the U.S. Government, international organizations, and foreign governments on security matters

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

Interface with the U.S. Government, international organizations, and foreign governments on security matters

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? 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.

Advance collaborative relationship with U.S. government to address piracy and other security matters and enhance the stability of the Puntland region. Letters, emails, and meetings likely will be the means to these ends.

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 Exhibit B to the 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.

Date of Exhibit B	Name and Title	Signature
December 01, 2011	Stephen Heifetz, Partner	/s/ Stephen Heifetz

eSigned

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.

Exhibit B Attachment

DOWLADDA PUNTLAND
EE SOOMAALIYA
MADAXWEYNAHA



ولاية بولت لاند الصومالية
الرئاسية
مكتب الرئيس

PUNTLAND STATE OF SOMALIA
THE PRESIDENT

Ref: MW/DPS/1308/2011

Date: 21 Nov 2011

To: Mr. Stephen R. Heifetz
Steptoe & Johnson Attorneys at Law
1330 Connecticut Avenue NW
Washington, D.C. 20036-1795

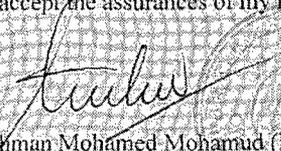
Dear Stephen,

Reference is made to your Electronic Mail (pdf) letter dated 7 November 2011, regarding representation of Puntland State of Somalia with respect to international legal aspects of counter-piracy and other security issues, and the Government of Puntland State of Somalia is pleased to have your esteemed practice represent Puntland.

Our State is committed to advancing the cause of peace, security, justice, democracy, and development.

We acknowledge the terms set forth in your letter of 7 November 2011, including "representation at no cost" to Puntland, and we look forward to future engagement and cooperation in matters of interest.

Please accept the assurances of my highest consideration.


Abdirahman Mohamed Mohamud (Farole)
President

Office: +252 90 - 794312 / 799128 E-mail: plpresidency@hotmail.com

Garowe, Puntland

STEPTOE & JOHNSON^{LLP}
ATTORNEYS AT LAW

Stephen R. Heifetz
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1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
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steptoe.com

7 November 2011

HE Abdirahman Mohamed Mohamud (Farole)
The President of Puntland, State of Somalia
The Presidency
Garowe
Puntland
Somalia

Via Electronic Mail (pdf)

Dear President Farole:

We are very pleased that you have asked Steptoe & Johnson LLP (“S&J”) to represent the Puntland State of Somalia (“Puntland”) with regard to international legal aspects of counter-piracy and other security issues.

We will undertake this representation at no cost to you. Either you or S&J may terminate this representation at any time by providing written notice of such termination; any such termination by S&J must comply with the applicable Rules of Professional Conduct. The receipt of a written termination notice by either party will terminate the engagement.

Pursuant to U.S. law, specifically the Foreign Agents Registration Act (“FARA”), we will register our representation of Puntland with the United States Department of Justice. This engagement letter is a required piece of the registration material to be filed with the Department of Justice, and it will become publicly available; further, we will report periodically to the Department of Justice about our activities on your behalf and otherwise comply with FARA.

We are undertaking in this engagement to establish an attorney-client relationship only with Puntland, and will apply the ethics rules relating to conflicts of interest only with respect to Puntland. It is our understanding that the firm is not being asked to provide advice to, or establish an attorney-client relationship with any other entity. We cannot undertake to treat additional entities as clients unless we are able to evaluate the conflicts issues that might be presented were we to do so, and agree to treat such additional entities as clients.

HE Abdirahman Mohamed Mohamud (Farole)

7 November 2011

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S&J is a national and international law firm that represents a diverse array of clients and these clients may have matters in conflict with Puntland. We are undertaking to represent Puntland in connection with this matter on the basis that this representation or any future representations that are initiated without a new or amended engagement letter will not be deemed to preclude S&J from representing other clients, including any current or future S&J clients adverse to Puntland. We recognize that the waiver with respect to potential future adverse representations is broad in scope; however, given the nature of our practice, we are simply not able to identify future potential conflicts with any greater specificity.

Despite the generality of the foregoing waiver, S&J will not, under any circumstances, represent any client adverse to Puntland in a matter that is substantially related to the subject of this representation. Please note, however, that we currently represent Sterling Corporate Services ("SCS") regarding counter-piracy issues; to the extent that your interests become adverse to SCS's interests, we will have to terminate this engagement to continue our SCS representation.

Our ethical obligations as lawyers impose upon us quite stringent rules about protecting the confidentiality of client information, including not only privileged material but other material we obtain during our representation of your company that is of a confidential nature or that the company would not want to see disclosed other than with its approval. The conflicts waiver discussed above in no way relieves us of our obligation to protect such information.

The occasion might arise for us to consult (at our expense) regarding this engagement with our own counsel – our General Counsel or other firm lawyers working with our General Counsel who do not perform work for you – or with our own outside counsel, on the subject matter of this engagement. To the extent that we are addressing our own rights or responsibilities, a conflict of interest might be deemed to exist between you and S&J as to such consultation or resulting communications, particularly if a dispute were to arise between you and S&J regarding the subject matter of this engagement. A condition of this engagement is that, in such circumstances, you hereby consent to such consultation occurring, and waive any claim of conflict of interest based on such consultation or resulting communications that could otherwise disqualify us from continuing to represent you or from acting in our own behalf, even if doing so might be deemed adverse to your interests. You acknowledge that such communications are protected by our own attorney-client privilege from disclosure to you.

When we complete a particular matter you have assigned to us, we will keep the essential records relating to our work for you for five years thereafter. There are portions of our records that are viewed as client records and you may ask at any time to receive copies of these records. In referring to records, we include electronic and "hard copy" records.

I am transmitting this letter to you by email as an electronic document, which I have signed and dated. In order to confirm Puntland's engagement of S&J and its agreement with the

HE Abdirahman Mohamed Mohamud (Farole)
7 November 2011
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terms set forth above, I ask that you sign, date and return a copy to me. If you are not authorized to sign on behalf of Puntland, please let me know.

If you have any questions concerning the matters set forth above, please let me know. We are very much looking forward to working with you and your government.

Sincerely yours,



Stephen Heifetz

AGREED AND ACCEPTED BY PUNTLAND STATE OF SOMALIA

Date: _____