U.S. Department of Justice
Washington, DC 20530

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

OMB NO. 1105-0004

Privacy Act Statement. 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, D.C. 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. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average 1.5 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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration No.
Arnold & Porter	1750

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☐ To correct a deficiency in

☐ Initial Statement

☐ Supplemental Statement for the period ending _____

☐ Other purpose *(specify)* _____

☒ To give a 10-day notice of change in information as required by Section 2(b) of the Act.

☐ To give notice of change in an exhibit previously filed.

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4. If this amendment requires the filing of a document or documents, please list-

Exhibits A and B.

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. *(If space is insufficient, a full insert page must be used.)*

This Amendment to Registrant's Registration Statement is to give notice of a new foreign principal, Cambodian People's Party, and to file the necessary Exhibits A and B.

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 the 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 signature[1])
April 22, 1998	William D. Rogers

1 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.

U.S. Department of Justice
Washington, DC 20530

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

OMB NO. 1105-0003

Privacy Act Statement. 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, D.C. 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. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 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
Arnold & Porter
555 Twelfth Street, N.W.
Washington, D.C. 20004-1202

2. Registration No.
1750

3. Name of foreign principal
Cambodian People's Party

4. Principal address of foreign principal
Norodom Boulevard
Khan Charkarmon
Phnom Penh, Cambodia

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:
- ☐ Partnership
- ☐ Corporation
- ☐ Association
- ☐ Committee
- ☐ Voluntary group
- ☐ Other *(specify)* _____

☐ Individual-State nationality _____

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

a) Branch or agency represented by the registrant. Not Applicable.

b) Name and title of official with whom registrant deals.

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

a) Principal address. Norodom Boulevard, Khan Charkarmon, Phnom Penh, Cambodia

b) Name and title of official with whom registrant deals. H.E. Ith Sam Heng, Chief of Cabinet, Cambodian People's Party Central Committee

c) Principal aim to represent the interests of the people of Cambodia.

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

Not Applicable.

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.)*

Not Applicable.

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.

Not Applicable.

Date of Exhibit A	Name and Title	Signature
April 22, 1998	William D. Rogers, Partner	

U.S. Department of Justice
Washington, DC 20530

Exhibit B
To Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, an amended

OMB No. 1105-0007

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. One original and two legible photocopies of this form shall be filed 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, 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, D.C. 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. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration No.
Arnold & Porter	1750

3. Name of Foreign Principal
Cambodian People's Party (CPP)

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Check Appropriate Boxes:

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.
The Registrant will provide legal counsel on matters of interest to the Cambodian People's Party. The fee for such representation is set forth in the attached agreement.

Formerly OBD-65

FORM CRM-155
SEP. 1996

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

The Registrant will provide legal counsel on matters of interest to the Cambodian People's Party.

9. Will the activities on behalf of he 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.

From time to time, the registrant may engage in political activities on behalf of the foreign principal as described in the footnote below.

Date of Exhibit B	Name and Title	Signature
April 22, 1998	William D. Rogers, Partner	

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 interests, policies, or relations of a government of a foreign country or a foreign political party.

ARNOLD & PORTER
555 TWELFTH STREET, N.W.
WASHINGTON, D.C. 20004-1206
(202) 942-5000
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WILLIAM D. ROGERS
(202) 942-5915

April 13, 1998

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REGISTRATION UNIT

Mr. James C. Stearns
Porter, Wright, Morris & Arthur
1667 K Street, N.W.
Suite 1100
Washington, DC 20006-1605

Dear Mr. Stearns:

We are pleased that you have engaged Arnold & Porter (the "Firm") to support your provision of legal and advisory services to the Cambodian People Party ("CCP"). The purpose of this letter is to set forth our mutual understanding as to the basis on which our fees and related expenses will be charged with respect to this matter.

1. Fee Calculation. The Firm will charge for professional services at our usual and customary rates for such matters. These charges will be based primarily on our standard hourly rates for services in effect at the time the work is performed. You should be aware that our rates are reviewed at least annually and may be modified to reflect changes in our cost structure.

Our charges will include the time of attorneys and, where applicable, other professionals and paraprofessionals. These charges will also include the time recorded on this engagement by secretaries and word processing personnel. While some firms have elected to recover such elements of overhead through their basic charges for legal services, we believe it is more appropriate to charge our clients for such services only to the extent they are used in a particular engagement. We will be pleased to indicate to you, if you wish, our current standard hourly rates for attorneys and others at various levels of seniority.

You agree to make a preliminary retainer payment to our account in the amount of $25,000, as a revolving prepayment against future invoices returnable to you at the end of our services.

You have advised me that you anticipate our total fees for this service to be not less than $100,000.

2. Reimbursement for Expenses. In performing this engagement, we will inevitably make disbursements and incur other internal charges on your behalf. These are likely to include such items as travel and transportation expenses (including subsistence expenses while on travel); charges for long distance telephone calls; express delivery and postage charges; duplicating charges; expenses associated with overtime work; and any special computer, data processing, or similar expenses that are beyond the capacity of the Firm's existing system. We will bill you at cost for charges paid to third parties, and charges for internal services will be billed at the Firm's usual and customary rates for such services.]

If, in the course of the engagement it is necessary for the Firm to arrange for the services of other outside counsel, experts, or consultants, or to incur other major expenses on your behalf, we will arrange to have the charges for such services or items billed directly, unless other arrangements are agreed to between us.

3. Statements for Fees and Expenses. On a regular basis, generally every month, the Firm will send you a statement covering our fee charges and expenses, providing all such reasonable detail as you may require. All such statements are due and payable within 30 days following your receipt of them. We understand that internal accounts payable processing may occasionally cause delays in the payment of our statements, and I am sure that you understand that undue delays in the payment of our statements increase our costs in providing legal services to all of our clients. For this reason, and in order to avoid burdening clients who pay our statements promptly with the costs we incur when others are late, the Firm reserves the right to impose an additional charge of 1 percent per month from the statement date if statements are not paid in a timely manner.

4. Waiver. Arnold & Porter is a large firm, with offices in four United States cities and in foreign countries. Our practice is broadly based and covers many areas of both domestic and international law. The very size of the firm has created situations where work for one client in a narrow area has barred other lawyers from pursuing major matters, unrelated to the first matter.

In order to avoid the potential for this kind of restriction on our practice, we request an advance agreement that Arnold & Porter will not be disqualified from representing interests adverse to you or CPP in matters that are not substantially related to the matters on which Arnold & Porter has been retained by you or CPP.

This waiver is not intended to, and would not, permit Arnold & Porter to represent interests directly adverse to you or CPP in matters that are substantially related to the work done for you or CPP. Nor is it intended that there be, and there would not be, any waiver of your right not to have confidences or secrets that you transmit to Arnold &

Porter disclosed to any third party or used against you. We would, of course, hold such information that you provide to us in strict confidence.

Accordingly, we request your agreement on your behalf and CPP's that it will not raise any objection to Arnold & Porter's representation of other clients on the basis of you or CPP's retention of Arnold & Porter with respect to matters on which our advice has been or will be sought, and you consent to and waive any objection to Arnold & Porter's representation of other clients, unless the other representation involved Arnold & Porter in representing an interest directly adverse to that of you or CPP on matters that are substantially related to those on which Arnold & Porter represents you or CPP.

If you have any questions about understandings as described above, please let us know.

* * * *

If the terms of the engagement are acceptable to you, I would appreciate it if you would sign and return to me the enclosed copy of this letter, evidencing your agreement to these terms.

Once again, let me say how pleased we are that you have engaged Arnold & Porter in this matter.

Sincerely yours,

ARNOLD & PORTER

William D. Rogers

ACCEPTED AND AGREED TO:

PORTER, WRIGHT, MORRIS & ARTHUR