

The question here is the type of work which Willens will do. On first impression it would seem that his work will include more than straight legal representation before a court or the like. Moreover, is the client a "disclosed" foreign principal?

If Willens must or decides to register, there is a recording burden levied. We should check with someone in the firm (possibly Rod Heller or Sam Stern) who has gone through it to find out just how onerous it is, but on first impression it would seem to involve some difficulty. First, a registration statement must be filed which provides a comprehensive statement of the nature of the registrant's business, including a list of registrant's employees and a statement of the work of each (apparently in relation to the foreign principal). There must also be a detailed statement of the money and other things of value spent or disposed of by the registrant in furtherance of his activities for the foreign principal. If the agent distributes material which he intends to be disseminated or circulated among two or more persons, he is required to file with the Attorney General two copies thereof and a statement giving full information of the places, times, and expenses of such transmittal. There are also some regulations regarding use of the mail, and the need to keep books and accounts.