

U.S. Department of Justice  
Washington, DC 20530

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

For 6 Month Period Ending 04/30/2021  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant  
Covington & Burling LLP
- (b) Registration Number  
6876
- (c) Primary Business Address  
800 10th Street, Washington, DC 20001

2. Has there been a change in the information previously furnished in connection with the following?

- (a) If an individual:
- (1) Residence address(es)      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.  
From time to time, partners not associated with the foreign principals join or leave the partnership.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.**

3. If the registrant previously filed an Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.    Yes       No
- If yes, has the registrant filed an updated Exhibit C?      Yes       No
- If no, please file the updated Exhibit C.

<sup>1</sup> 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, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response				

(b) 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:

Name	Position	Date Ceased
Catherine Dargan	Member of the Management Committee	01/01/2021
Louise Nash	Member of the Management Committee	01/01/2021

5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes  No

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services

(b) During this 6 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

Name	Residence Address	Citizenship	Position	Date Assumed

(c) Have any employees 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:

Name	Position or Connection	Date Terminated

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes  No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes  No

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

**II - FOREIGN PRINCIPAL**

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

OCP S.A.

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes  No  N/A

Exhibit B<sup>4</sup> Yes  No  N/A

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes  No

If yes, has the registrant filed an amendment to these exhibits? Yes  No

If no, please file the required amendment.

<sup>2</sup> 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.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, 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, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes  No

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

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity<sup>5</sup> as defined below? Yes  No

If yes, identify each 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, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

OCP S.A.: See response to item 11.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
OCP S.A.	11/18/2020	Mary Kate Carter and Andrew Brandt, Senate Finance Committee staff	Teleconference	Provide information on current posture of Phosphate Fertilizer CVD proceeding and potential impact of Phosphate Fertilizer tariff on US agricultural producers.

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes  No

If yes, describe fully.

Foreign Principal	Activities/Services

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, 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 of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 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  No

If no, please explain why no monies were received.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Foreign Principal See Appendix for Response	Date Received	From Whom	Purpose	Amount	Subtotal
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\$ 8,093,174.70

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes  No

If yes, has the registrant previously filed an Exhibit D<sup>8</sup> to its registration? Yes  No

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

If no, please file the required Exhibit D.

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes  No

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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<sup>6, 7</sup> A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</sup> 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, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal?      Yes       No

If no, explain why no disbursements were made.

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.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
OCP S.A.	11/11/2020	Employee reimbursement	FARA filing fees.	\$ 610.00	
OCP S.A.	04/30/2021	None	As indicated in item 11, Covington also provides various, non-registerable legal services for OCP S.A., and made disbursements related to those activities during the period.	\$ .01	
OCP S.A.	-----	-----	-----	----->	\$ 610.01

\$ 610.01  
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Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes  No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> 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	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
11/02/2020	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	\$ 250.00
12/01/2020	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	\$ 250.00
01/01/2021	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	\$ 250.00
02/01/2021	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	\$ 250.00
03/01/2021	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	\$ 250.00
04/01/2021	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	\$ 250.00
12/26/2020	Bruce Wilson	Fair Fight	Online	\$ 500.00

<sup>10, 11</sup> 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. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?<sup>12</sup> Yes  No

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes  No

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- Magazine or newspaper       Advertising campaigns       Press releases       Pamphlets or other publications  
 Lectures or speeches       Radio or TV broadcasts       Motion picture films       Letters or telegrams  
 Email  
 Website URL(s): \_\_\_\_\_  
 Social media websites URL(s): \_\_\_\_\_  
 Other (*specify*) \_\_\_\_\_

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- Public officials       Newspapers       Libraries  
 Legislators       Editors       Educational institutions  
 Government agencies       Civic groups or associations       Nationality groups  
 Other (*specify*) \_\_\_\_\_

20. Indicate the language used in the informational materials:

- English       Other (*specify*) \_\_\_\_\_

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes  No

If no, please please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes  No

<sup>12</sup> 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.



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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, 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	Printed Name	Signature <sup>13</sup>
05/30/2021	Bruce Wilson	/s/Bruce Wilson
_____	_____	_____
_____	_____	_____
_____	_____	_____

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<sup>13</sup> 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.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, 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.

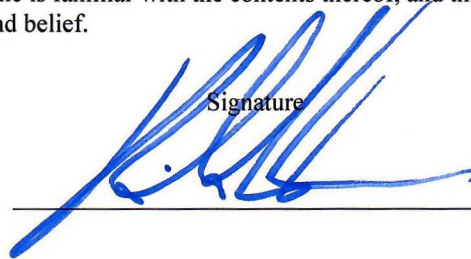
Date

Printed Name

Signature

5/30/2021

Bruce S. Wilson



**Appendix**  
**Response to Item 4(a)**

**Item 4(a): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? If yes, furnish the following information:**

<b>Name</b>	<b>Residence Address</b>	<b>Citizenship</b>	<b>Position</b>	<b>Date Assumed</b>
Phyllis Jones	Provided to DOJ	UNITED STATES	Member of the Management Committee	01/01/2021
Lisa Peets	Provided to DOJ	UNITED STATES	Member of the Management Committee	01/01/2021

## Appendix

### Response to Item 11

**Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:**

Foreign Principal(s)	Activities/Services
OCP S.A.	<p>Registrant assisted in a public relations campaign regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports, including (1) developing engagement strategy with customers of OCP N.A., trade groups, and other third parties regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (2) U.S. government lobbying regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (3) consultation regarding media relations regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (4) assisting in preparation of OCP N.A. internal talking points and messaging materials regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (5) assisting in preparation of press release to promote awareness and action in response to U.S. duties on imports of phosphate fertilizers; (6) consulting on design and content of the <a href="http://www.StandwithUSFarmers.com">www.StandwithUSFarmers.com</a> website; and (7) consulting with other subcontractors for the public relations campaign. Covington &amp; Burling LLP is also outside counsel to OCP S.A. and provides various, non-registerable legal services for OCP S.A., including representation of OCP S.A. in the pending injury proceeding at the International Trade Commission, Inv. No. 701-TA-CEO-651, and the countervailing duty investigation at the Department of Commerce.</p>

## Appendix

### Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
OCP S.A.	10/27/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	\$ 2,449.73	
OCP S.A.	11/04/2020	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$1,116,661.12	
OCP S.A.	11/04/2020	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$1,136,591.00	
OCP S.A.	11/12/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	\$ 2,501.14	
OCP S.A.	11/12/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	\$ 7,672.44	
OCP S.A.	11/12/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	\$16,603.90	
OCP S.A.	11/12/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	\$77,766.92	
OCP S.A.	12/16/2020	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$1,972,319.38	
OCP S.A.	03/02/2021	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$1,108,494.50	
OCP S.A.	03/05/2021	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$ 84.19	
OCP S.A.	03/05/2021	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$970,479.69	
OCP S.A.	04/06/2021	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$750,411.50	
OCP S.A.	04/16/2021	OCP S.A.	Legal fees in connection with FARA activity and non-registerable legal services.	\$931,139.19	
OCP S.A.	-----	-----	-----	----->	\$8,093,174.70