

FOIA MARKER

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Folder Title:

Ireland-Visa/Fundraising Issues [2]

Staff Office-Individual:

European Affairs-Stephens, Kathleen

Original OA/ID Number:

340

Row:	Section:	Shelf:	Position:	Stack:
34	1	6	2	V

Withdrawal/Redaction Sheet

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
001. list	[partial] (1 page)	00/00/1994	b(7)(C), b(7)(F), b(6)
002. cable	re: Visa Applications by Loyalist Leaders, SAO, NIV, Waiver Request. [Belfast 0494] [8 U.S.C. 1202(f)] (1 page)	10/14/1994	P3/b(3)
003. talking points	Points to be Made for Telcon with Attorney General Reno. (2 pages)	00/00/1995	P1/b(1)
004. cable	re: SAO Response - NIV Case. [8 U.S.C. 1202(f)] (2 pages)	03/13/1995	P3/b(3)
005. email	Kathleen Stephens to @UP. Subject: Northern Ireland. (1 page)	03/11/1995	P1/b(1)
006. memo	For Anne-Marie Gatons from Kenneth C. Brill. Subject: Recommendation of a Waiver of Visa Ineligibility....[8 U.S.C. 1202(f)] (1 page)	00/00/1995	P3/b(3)
007. cable	re: Visas Two and Four:....[State 322100] [partial] (1 page)	12/22/1994	b(7)(C), b(6)

COLLECTION:

Clinton Presidential Records
National Security Council
European Affairs (Stephens, Kathleen)
OA/Box Number: 340

FOLDER TITLE:

Ireland - Visa / Fundraising Issues [2]

2021-0172-F

vz6378

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
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C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
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→ FARA. →

4-3-95

Int'l Scruggs -

Regularize process -

protocol - : - State initiates process
- FBI has agreed to provide information - responds to

Scruggs' office - monitor - Nick

{
INS
FBI
Justice-Crim. Div.
State
Scruggs.
}

if all agree -
Scruggs w/ great warning

{ if a dispute (inc. w/ State) - or object -
decision memo for A-G. }

- can get uncontested things in a few days -
-

→ Cahill

→ Adams - raised probs in 1-94 -
"indications"

Justice - FARA - tel. to Robert Harg -
need additional

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<u>Names</u>	<u>Agency</u>	<u>Tel</u>	<u>Fax</u>
Kathleen Stephens	NSC	456-9151	456-9150
Dominic Pastor	OTR	514 5602	514 7858
Kenneth Shivers	STATE	663-1196	663-1553
Lawrence Yontz	CA/VO	663-1198	663-1553
(b)(6), (b)(7)c, (b)(7)f	State CA/VO		
	FBI		
	FBI		
	S/CT		
Doug Dobson	STATE EUR	647-8941	647-0221
PAUL VAW SON		647-6585	



United States Department of State

Washington, D.C. 20520

FAX COVER SHEET

Date:

5/19/94

TO:

NANCY SODERBERG / JULIEN LEBOURGEOIS

OF:

NSC

PAGES (including this cover):

2

FAX#:

395-1180

FROM:

John F. Tefft

Director, Office of Northern European Affairs
EUR/NE, Room 4513, U.S. Department of State

Sender's FAX: (202) 647-3463

Sender's Tel: (202) 647-5687

SUBJECT:

NORAIID

MESSAGE:

NANCY: WE FOLLOWED UP ON YOUR
QUESTION TO ME AT THE McCARTER LUNCH
ABOUT NORAIID FOREIGN AGENT REGISTRATION.
THE ATTACHED PAPER SUMMARIZES WHAT HAS
HAPPENED AND THE CURRENT VIEW AT
JUSTICE.

JFT

CC JULIEN

SENE 5112

PHOTOCOPY PRESERVATION

NORAIID FILING BACKGROUND

NORAIID first registered under the Foreign Agents Act in 1975. Following their registration they filed required reports regularly although not on time. In 1981 the New York Circuit Court (South East District) ruled that NORAIID's registration needed to be amended to identify them specifically as an agent of the IRA (the term "Provisional" was not included in the ruling).

NORAIID filed its last statement in 1992 for the year 1991. The following year the Department of Justice sent a notice of deficiency to NORAIID to which they have not yet responded.

Although NORAIID has not filed since 1991, the Department of Justice has elected not to pursue the matter at this time. Justice reasoned that given the diminished activity of NORAIID over the last ten years, further pursuit might draw attention to and support for their cause resulting in greater NORAIID activity.

Department of Justice attorney Brian Ahern litigated the case on behalf of the U.S. Government and filed the notice of deficiency in 1992.

*Proof of value
agency releasing*

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Stephens, Kathleen D.

From: Stephens, Kathleen D.
To: Darby, M. Brooke; Hawkins, Ardenia R.; @UP - APNSA Special Assistants
Cc: /R, Record at A1; Vershbow, Alexander R.; Kreczko, Alan J.; Maxfield, Nancy H.
Subject: Northern Ireland ~~[CONFIDENTIAL]~~
Date: Tuesday, March 07, 1995 5:29PM

Please pass to Nancy:

Nancy, as you requested, I am faxing you some of the background on the visa waiver problem and some information on Northern Ireland and Ireland political parties.

Of note:

-- State received a signed memo from Richard Scruggs at Justice dated January 27, 1995 advising that "the Department of Justice, including the FBI, agree the individuals listed in the draft Memorandum" (which State proposed sending formally to Justice) "should be granted non-immigrant visas on the same terms as the visas granted to Sinn Fein leader Gerry Adams. . . ."

-- On the basis of that memo, State sent the memo to Justice in final on February 16, listing 12 individuals, including Dennis Donaldson.

-- The three additional people who've since applied for visas and need waivers (but weren't on the State list) are Patrick McGeown, Seamus Finucane, and James Drumm.

DECLASSIFIED
E.O. 13526
White House Guidelines, May 16, 2017
By vr NARA, Date 5/29/2024
2024-0172-F

3 Dec 9/0

SINN FEIN APPLICATIONS FOR VISASMARTIN Mc GUINNESSNEEDS WAIVER
NEEDS WAIVERJOE Cahill

TED Howell ✓

OK

CLLr JOE AUSTIN ✓ OK

CLLr MARY NELLIS ✓ OK

CLLr FRANKIE MOLLOY ✓ OK

STOSHAN O'HANLON

JENNIFER Mc RANN ✓ OK

CHRISIE MC AULEY ✓ OK

CLLr MARIE MOORE ✓ OK

BRIEGE CURRAN ✓ OK

BARRY McILLRUFF ✓ OK

RITA O'HARE ✓ OK

MARTIN FERRIS ✓ OK

J.B. O'HAGEN ✓ OK

ADDED

DENNIS DonaldsonNEEDS
WAIVERTom HartleyNEEDS
WAIVER



Office of Intelligence Policy and Review

Washington, D.C. 20530

January 27, 1995

TO: Paul B. van Son
Office of Northern European Affairs
U.S. Department of State

FROM: *WRS* Richard Scruggs
Counsel for Intelligence Policy
Office of Intelligence Policy and Review

RE: Visa Waivers for Sinn Fein and
Loyalist Party Leaders

This memorandum is to advise you that the Department of Justice, including the FBI, agree the individuals listed in the draft Memorandum to Terry Samuels, Director of Executive Secretariat, Department of Justice from Kenneth C. Brill (copy attached), should be granted non-immigrant visas on the same terms as the visas granted to Sinn Fein leader, Gerry Adams. This agreement is expressly conditioned upon the parties' adherence to the peace process in Northern Ireland.

PHOTOCOPY PRESERVATION



United States Department of State

Washington, D.C. 20520

Date: 3-20TO: Kathy StephensOF: NSCPAGES (Including this cover): 5FAX#: 456-9150

FROM: Paul B. van Son
Desk Officer for Ireland/Northern Ireland
Office of Northern European Affairs
Department of State, Washington, D.C. 20520

FAX: (202) 647-3463

TEL: (202) 647-6585

SUBJECT: De Commissioning & Verification on
Fund Raising

FYI

16 March 1995

Paul:

Following are some ideas Val and I have been tossing around about how we and Sinn Fein can ensure that its fundraising activities in the U.S. are fully transparent, accountable, and guarded against diversion. The fact that no contract has as yet been signed is going to be a problem -- we understand the N.Y. Times is onto the story -- but may actually give the USG a bit of leverage in telling SF what would be acceptable.

Here are the proposals:

- SF to give an undertaking to conduct financial affairs in the U.S. in a transparent and accountable way, comply with U.S. laws and regulations (including registration under FARA), and not use funds to buy arms (we have this from Adams to Lake, but it might be useful to get it in a somewhat more formal and public way).
- Cairde Sinn Fein to receive and handle all funds on behalf of Sinn Fein in the U.S. (as we understand it, this is also Adams' idea).
- CSF to pay all funds into a nominated bank account (or accounts) in its own name in the U.S.
- CSF annual accounts audited by independent accounting firm (e.g., Price Waterhouse or comparable).
- Quarterly CSF statements itemizing any receipts or expenditures of over \$1000.
- Transfer of funds from the U.S. only by CSF, direct to a nominated bank account in Ireland through regular banking channels.
- CSF annual accounts to contain a detailed statement on disbursement of funds outside the U.S. (to whom, how much, date and purpose).

This is not an ideal arrangement, from our perspective or that of HMG; better would be a contract for a major accounting firm to track the funds independently from solicitation to disbursement, at least through spot checks. That, however, would be extremely expensive, and our primary goal is to guard against diversion to weapons acquisition rather than to enrich the accountants at SF expense. These proposals provide a more reasonable and affordable minimum level of transparency.

- 2 -

We should make it clear to Adams, Mairead Keane and others that failure to comply with these provisions, or any attempt to evade them or find loopholes in them, would be regarded as indicative of intent to divert, and could lead to immediate reimposition of fundraising restrictions and possible legal action. In practice, I'm sure the RUC, FBI et al would be only too happy to uncover evidence of foul play. It is in our interests as well as those of SF that there be no evidence to uncover.

Finally, it is our understanding that NORaid will continue in business alongside CSF, with its contributions targetted to "widows and orphans" and other "social programs" rather than political purposes. We would have a lot more credibility all round if we were to enforce on NORaid the FARA regulations it has been evading for the past 4-5 years, and even more credibility if we were to put NORaid under the same controls as CSF.

Please share these thoughts with colleagues at FBI and DOJ as well as State and NSC, to see what they think of them.

Larry

**PRESS LINE: PRIME MINISTER'S TELEPHONE CONVERSATION
WITH PRESIDENT CLINTON, SUNDAY 19 MARCH**6C
LR

The Prime Minister and the President had a business-like and thorough conversation about Northern Ireland, the Middle East, Bosnia and Croatia, and the Prime Minister's visit to Washington in early April. The call lasted for 25 minutes.

On Northern Ireland, the Prime Minister stressed the importance of a commitment by Sinn Fein to serious and constructive discussion, designed to lead to concrete steps in the decommissioning of arms. The Government had sent Sinn Fein an agenda for discussion of this and other subjects. But Sinn Fein had not yet made the necessary commitment, and the exploratory dialogue would not be raised to Ministerial level until they did so. We awaited Sinn Fein's response to our agenda.

President Clinton acknowledged the importance of decommissioning of weapons. The US Government had made clear to Sinn Fein that serious discussion of decommissioning should begin, and begin soon. The Prime Minister made clear that there would have to be substantial progress in the decommissioning of weapons before Sinn Fein's entry into inclusive talks on a political settlement, on the same basis as the constitutional parties, could be considered.

The Prime Minister expressed concern about fundraising by Sinn Fein and the purposes to which these funds might be put. He said that there was a long history of funds raised in the United States being used to support the IRA's activities, and that it was vital that money should not be used to restock the IRA's arsenal. The President said that the US Government wanted to see strict

accounting for funds raised by Sinn Féin in the United States.
Minister urged that this should be put in place without delay.

The Prime Minister also gave the President a general account of the political situation in Northern Ireland, the complexities of the negotiations, and the state of the peace process.

Middle East

The Prime Minister described his Middle East tour. He said it was important that we should help to ensure that elections took place in the Palestinian autonomy later this year, and he hoped that the European Union would meet Chairman Arafat's request for EU observers. He welcomed the progress achieved by Secretary Christopher on the Syria track.

The Prime Minister and the President agreed to have a more detailed discussion about the Middle East, including their joint concerns about Iraq's behaviour, when they met in Washington on 4 April.

Croatia and Bosnia

The Prime Minister and the President welcomed the recent progress made in Croatia, but were concerned at the continuing impasse in Bosnia. They will discuss these subjects, too, in greater depth during the April visit.

*OSinFein***GILROY DOWNES HOROWITZ & GOLDSTEIN***Attorneys-at-Law*

15 Park Row

New York, New York 10038-2301

Lawrence C. Downes
James Gilroy
Michael Goldstein
Michael M. Horowitz

Telephone (212) 406-0110
Facsimile (212) 406-0420

Thomas Dillon

March 13, 1995

BY FAX - (202) 456-9151

Ms. Cathy Stevens
National Security Counsel

Dear Ms. Stevens:

As per our telephone conversation, Friends of Sinn Fein, Inc. is a New York Not-for-Profit Corporation. Our directors include myself, my brother Sean Downes, who is an attorney in New York, and Thomas Devlin, a contractor in New York. Our attorney is Richard Harvey, Esq. of Stevens, Hines & White, P.C. 116 West 111th Street, New York, NY 10026, (212) 864-4445. We are in the process of complying with the rules and regulations as they apply to us. We intend to cooperate in every way. We have opened a bank account at Country Bank, 4349 Katonah Avenue, Bronx, NY 10470. We have signed a lease for office space at 1350 Connecticut Avenue, Suite 307, Washington, D.C. The office will be staffed full time. It is intended that Mairead Keane will be the Executive Director of this office, as soon as the proper paper work is cleared.

We expect that on Mr. Adams' current tour we will net no more than \$50,000. This amount will not fund even the Washington office for a year.

We intend to retain a reputable certified public accounting firm to audit the funds received by our organization. We will comply with all reasonable requests to assure that the funds are properly accounted for.

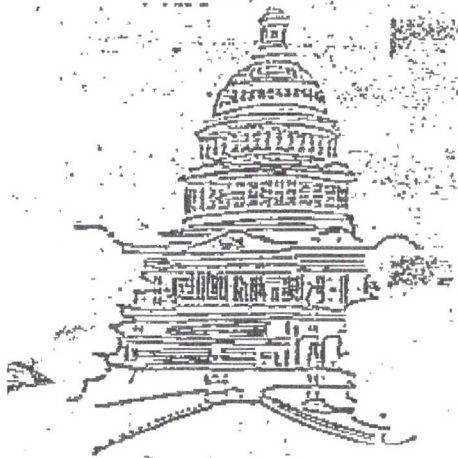
If you have any questions please feel free to contact
myself or Richard Harvey.

Very truly yours,

GILROY DOWNES HOROWITZ & GOLDSTEIN


Lawrence C. Downes

LCD:jg



Edward M. Kennedy

U.S. Senator for Massachusetts

**315 Russell Senate Office Building
Washington, D.C. 20510
202/224-4543
202/224-2417 FAX**

*TO KATH'S
FBI
ms*

FAX TRANSMISSION

DATE/TIME: _____

TO: *Nancy* _____

RECEIVING FAX: _____

FROM: *Trina Vargo. / Foreign Policy 224-2638* _____

**NUMBER OF PAGES
INCLUDING COVER:** _____

COMMENTS:

456-9460

MARCH 23, 1995

MEMORANDUM

TO: SENATOR
FR: TRINA
RE: SINN FEIN FUNDRAISING

I spoke with the lawyers for Sinn Fein today. They informed me that Friends of Sinn Fein (US-based fundraising organization heretofore referred to as Sinn Fein) has retained Richard A. Eisner & Co., the 9th largest accounting firm in New York City. The partner in charge of auditing Sinn Fein's account is D. Edward Martin. Eisner & Co. will establish record-keeping procedures and work with Sinn Fein bookkeepers to assure Eisner & Co. will be able to do an audit when Adams' three month visa expires (June 30).

Larry Downes, the President of Friends of Sinn Fein, is in the process of registering as a foreign agent with DoJ and the group is also applying for 501(c)4 status.

The following are numbers provided by Downes. He informs me he has provided the same information to the NSC.

Sinn Fein began with a \$15,000.00 donation from Chuck Feeney (billionaire businessman who is part of the O'Dowd/Flynn group). From that, \$1,870.00 went to the first month's rent for the Washington office, \$5,610.00 was required as a security deposit on the office, \$500.00 to Bell Atlantic and \$2,270.00 to McCaw Enterprises for the phone system, \$4,155.97 to W.D. Campbell (furniture company), and \$305.00 to DoJ as registration fee for foreign agent status. That leaves less than \$250.00 from that \$15,000 contribution.

Adams attended three fundraisers. In Queens, the gross was \$13,052.00; in Philadelphia, the gross was \$9,695.00; and the New York/Essex House lunch has grossed \$55,000 to date (may get another \$5,000 in contributions). The total gross, assuming the additional \$5,000.00 comes through, is \$82,747.00. Sinn Fein hasn't yet received the bill from the Essex House but they expect it will be \$25,000.00. The band that played in Philadelphia is charging \$1,500.00. The accountants will charge \$15,000 through June 30, and travel and hotel costs for Adams and his entourage are expected to be up to \$15,000.00. When these costs are deducted from the gross, that leaves a profit of \$26,247.00.

After expenses are paid, Sinn Fein intends to look at upgrading their communications system between Dublin, Belfast and the US (i.e. phones and fax machines). There will also be the cost of the salaries of the two people working in the Sinn Fein office.

cc: Carey, Amb. Smith, Nancy, Niall

Richard A. Eisner & Company
Accountants and Consultant



March 22, 1995

Lawrence C. Downes, Esq.
Gilroy Downes Horowitz & Goldstein
15 Park Row, 7th Floor
New York, NY 10038

Re: Friends of Sinn Fein, Inc.

Dear Mr. Downes:

We are pleased to confirm our understanding of the services we are to provide for the Friends of Sinn Fein, Inc. (the Organization) for the fiscal year ended June 30, 1995.

Among the various services to be provided (as detailed on page 2 of this letter) will be an audit of the Organization's balance sheet as of June 30, 1995, and the related statements of support and revenue, expenses and changes in fund balances and of cash flows for the partial year then ended. Our audit will be conducted in accordance with generally accepted auditing standards and will include such tests of the Organization's accounting records and other procedures as we consider necessary to enable us to express an unqualified opinion that the financial statements are fairly presented, in all material respects, in conformity with generally accepted accounting principles.

Our audit procedures will include a variety of tests of documentary evidence supporting the transactions recorded in the accounts. We will request written representations from the Organization's attorneys as part of the engagement, and, at the conclusion of our audit, we will also request certain written representations from its management about the financial statements and related matters.

An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements; therefore, our audit will involve judgment about the number of transactions to be examined and the areas to be tested. In addition, we will plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. However, because of the concept of reasonable assurance and because we will not perform a detailed examination of all transactions, there is a risk that material errors, irregularities or illegal acts, including fraud or defalcations, may exist and not be detected by us. We will of course inform the Organization's management and governing board of any matters of that nature that came to our attention, unless they are clearly inconsequential. Our responsibility as auditors is limited to the period covered by our audit and does not extend to any later periods.

375 Madison Avenue, New York, N.Y. 10022-2597 Telephone: (212) 355-1700, Fax: (212) 355-2414

Member of Summit International Associates, Inc.

New York, NY • Melville, NY • Cambridge, MA • Florham Park, NJ



Page 3

An entity's management frequently needs to ask questions of its independent accountants, or to use them as a "sounding board" for any of a number of issues or concerns that may arise in the course of day-to-day operations. We appreciate the importance of interchange with our clients and provide for it in our fee quotations. Accordingly, we will not "start the meter running" when the Organization's representatives need to consult with us on routine matters, either by phone or in person, and the Organization can always depend on a prompt response to its needs.

We appreciate the opportunity to be of service to the Friends of Sinn Fein, Inc. and believe this letter accurately summarizes the significant elements of our engagement. If you agree with the terms as described above, please sign the enclosed copy of this letter and return it to us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "D. Edward Martin", is written over a horizontal line.

D. Edward Martin
Partner

This letter correctly sets forth the understanding of the Friends of Sinn Fein, Inc. with regard to the services to be performed by Richard A. Eisner & Company, LLP, for the fiscal year ended June 30, 1995.

Signature:

A handwritten signature in dark ink, appearing to read "Lawrence Jones", is written over a horizontal line.

Title:

A handwritten signature in dark ink, appearing to read "President", is written over a horizontal line.

Date:

A handwritten signature in dark ink, appearing to read "March 22, 1995", is written over a horizontal line.



Page 2

We understand that the Organization's staff will provide us with the basic information required for our audit and that management is responsible for the accuracy and completeness of that information. We will advise the Organization about appropriate accounting principles and procedures and their application and will assist in the preparation of its financial statements, but the responsibility for the financial statements remains with its management. This responsibility includes the maintenance of adequate records and the related internal control structure, the selection and application of accounting principles, and the safeguarding of assets.

Our audit is not specifically designed and cannot be relied on to disclose reportable conditions, that is, significant deficiencies in the design or operation of the internal control structure. However, during the audit, if we become aware of such reportable conditions or ways in which we believe management practices can be improved, we will communicate them in a separate letter.

Our estimated fees for this engagement are summarized as follows:

<u>Services</u>	<u>Estimated Fees*</u>
Initial establishment of record-keeping systems and procedures	\$ 4,000
Audit of financial statements for the partial fiscal year ended June 30, 1995	7,000
Preparation of federal Form 990 and related state filings	3,000
Preparation of management comments letter	1,000
Special observations procedures (e.g., cash received at dinners, etc.)	To be determined
Special periodic reports on cash utilization (approximately \$3,000 - \$4,000 per report)	To be determined
* We will also be reimbursed for out-of-pocket expenses, such as for travel to out-of-town locations.	

ACCOUNTING

New York's largest accounting firms

ranked by the number of area professionals

Rank	Firm	Managing partner(s)	Number of professionals in N.Y. area					1994 firm revenue (in millions)	N.Y. 20% comp*	Other offices in N.Y. area
			1994†	1993†	A.A.P.†	Total	MAA†			
1	Dubille & Tishler Two World Financial Center Marlborough 10051	William G. Perret (212) 632-2300	3,898	2,880	1,495	949	930	\$2,201.0	1	Jericho, L.I.
2	Arthur Andersen & Co. 1045 Sixth Ave. Manhattan 10019	Scott P. Robinson Felix H. Hagan (212) 708-4000	3,088	2,416	1,084	875	1,788	\$6,788.4	7	Midvale, L.I.; Roseland, N.J.
3	Ernst & Young 757 Broadway Ave. Manhattan 10019	Dennis Puckett (212) 773-8000	2,340	2,178	1,180	458	910	\$7,300.0	1	Staten, L.I.; White Plains; Hackensack, N.J.
4	KPMG Peat Marwick 343 Park Ave. Manhattan 10017	Steve Butler (212) 758-0700	2,208	2,363	1,417	834	816	\$8,501.8	3	Jericho, L.I.; Garden City, L.I.; Short Hills, N.J.; Monticello, N.Y.; Yonkers, N.Y.
5	Campbell & Lybrand 1555 Third Ave. Manhattan 10017	Sam G. Pomeroy (212) 659-1000	1,708	1,447	850	238	815	\$1,800.0	2	Manhasset, L.I.
6	Price Waterhouse 1177 Sixth Ave. Manhattan 10019	James J. Sabin (212) 506-7800	1,828	1,737	742	360	489	\$1,670.0	0	Jericho, L.I.; Hackensack, N.J.
7	GLD Sullivan 320 Madison Ave. Manhattan 10017	Frederick H. Sullivan Edna H. Sullivan Robert H. Sullivan (212) 686-1000	800	101	280	140	88	\$401.8	2	White Plains; Rockledge, L.I.; Woodbridge, N.J.
8	Grant Thornton 808 Third Ave. Manhattan 10017	Donald A. Chabot (212) 509-6100	388	345	250	100	50	\$220.8	0	Staten, L.I.; Roseland, N.J.
9	Wolfe A. Singer & Company, LLP 573 Madison Ave. Manhattan 10017	Richard A. Singer Joseph M. Singer Thomas A. Singer (212) 686-1700	328	301	170	53	107	\$48.7	1	Manhasset, L.I.; Syosset Park, N.Y.
10	Goldstein & Haskin & Co. 1180 Sixth Ave. Manhattan 10019	Samuel H. Goldstein (212) 372-1000	301	201	134	79	72	\$38.2	2	Manhasset, L.I.
11	David W. Brown & Co. 415 Madison Ave. Manhattan 10017	Stanley H. Brown (212) 682-0400	187	188	128	47	13	\$21.0	1	None
12	M.R. Winkler & Co. 133 W. 50th St. Manhattan 10019	Stanley H. Winkler (212) 681-0200	178	149	143	29	7	\$88.8	1	None
13	J.H. Cohen & Co. 400 Park Ave. Manhattan 10022	Lawrence J. Cohen (212) 343-4000	167	158	123	32	12	n/a	1	Roseland, N.J.
14	Stetson & Cohen & Co. 111 W. 42nd St. Manhattan 10018	Mark D. Cohen (212) 480-8000	155	155	89	31	3	\$14.6	1	None
15	Margolis Winer & Weiss 400 Garden City Plaza Garden City, L.I. 11530	Paul Weiss (516) 747-2000	130	143	96	18	79	\$15.0	0	None
16	Archin & Archin 1333 Broadway Manhattan 10018	Ed Archin John Archin (212) 640-6400	128	128	92	28	7	\$30.0	1	None
17	Horowitz & Horowitz & Co. 1211 Sixth Ave. Manhattan 10019	Samuel H. Horowitz (212) 686-0000	128	119	78	18	38	\$129.0	1	None
18	Shuchman & Poffen 505 Park Ave. Manhattan 10017	Robert J. Shuchman Dennis J. Poffen Gerald A. Shuchman (212) 687-0000	126	128	87	20	12	n/a	1	Jericho, L.I.
19	Edward J. Brown & Co. 280 Madison Ave. Manhattan 10017	Ed J. Brown (212) 687-8000	120	106	87	27	6	\$14.1	1	White Plains
20	Stetson & Cohen & Co. 301 Madison Ave. Manhattan 10017	Samuel H. Stetson Joseph J. Cohen (212) 686-2200	114	918	77	24	10	\$400.0	3	Garden City, L.I.
21	Robert J. Brown & Co. 152 Third Ave. Manhattan 10017	Robert J. Brown Paul Brown (212) 505-1000	108	104	88	17	4	n/a	1	Garden City, L.I.
22	Loewy, Schuchman & Co. 70 E. Service Highway Valhalla, N.Y. 11582	Paul Loewy (914) 672-3000	108	100	78	22	8	n/a	None	
23	Patricia E. Kohn & Co. 28 LIVINGSTON Ave. Roseland, N.J. 07068	Patricia E. Kohn (201) 984-8800	108	108	88	18	2	\$13.0	1	None
24	Mark W. Brown & Co. 111 Great Neck Road Great Neck, L.I. 11021	Mark W. Brown (516) 466-5500	98	98	88	18	n/a	0	None	
25	Stetson & Cohen & Co. One Battery Park Plaza Manhattan 10006	Samuel H. Stetson Mary H. Cohen (212) 708-1000	95	95	78	28	n/a	\$22.0	1	None

Notes: * Most firms use various New York City, Suffolk, and Westchester counties in their reports; and Bergen, Essex, Hudson and Union counties in New Jersey. Firms were contacted twice on this basis in 1994. † Accounting Report of 1994 and Accounting Today. ‡ Not available. In case of ties, firms are listed alphabetically. 1- As of Jan. 1 of that year. 2- Audit and accounting. 3- Management advisory services. 4- Five boroughs. 5- Information obtained from annual report submitted to the SEC by fiscal year ending December 1993. Research: Jennifer Felsel

Reprinted with permission from Crain's New York Business, January 23, 1995.



D. EDWARD MARTIN, MBA, CPA

Ed Martin is an audit partner whose background encompasses a broad cross-section of professional activities and industries. He currently heads Richard A. Eisner & Company, LLP's not-for-profit services group, and his experience includes museums, trade associations, religious entities, educational institutions, voluntary health and welfare organizations, youth organizations, and private foundations.

Prior to coming to New York, Ed spent two years in a special tour-of-duty with a "Big 6" accounting firm's nonprofit industry group in Washington, D.C. and participated in the development of two major additions to authoritative literature in the nonprofit arena:

- the American Institute of CPAs' Statement of Position No. 78-10, "Accounting Principles and Reporting Practices of Certain Nonprofit Organizations," and
- the *Museum Accounting Handbook* for the American Association of Museums.

A graduate of the University of Texas at El Paso and the College of William and Mary (MBA), Ed is an adjunct professor at Pace University and Baruch College-CUNY. He is also a former member of the Auditing Standards Board, the accounting profession's senior technical committee for auditing matters in the United States, and is currently serving on committees of both the American Institute of CPAs and New York State Society of CPAs.

Ed has authored a variety of business publications, including a survey of nonprofit accounting and financial reporting practices in the *Philanthropy Monthly* and a chapter on not-for-profit topics in the *Handbook of Cost Accounting*. In addition, his recent book published by Matthew Bender, the *Attorney's Handbook of Accounting, Auditing and Financial Reporting*, contains a comprehensive chapter on nonprofit organizations, including the application of FASB Statements Nos. 116 and 117.

Ed frequently addresses groups on business subjects, most recently directing seminars on non-for-profit accounting and reporting for the Office of the Not-for-Profit Sector of the City of New York, the United Jewish Appeal, the Fund for the City of New York, and the law firm of Patterson, Belknap, Webb & Tyler. He has also served on the governing boards of not-for-profit entities in New York City.

RM

JULIE L. FLOCH, CPA

Julie Floch is a manager in Richard A. Eisner & Company, LLP's Small Business Services Department and has a background in a number of industries, including not-for-profit organizations and a variety of service enterprises, as well as in personal financial planning. She frequently serves in a management advisory role for smaller companies, as well as oversees the audits and reviews of larger entities' financial statements. Julie is also experienced in the application of government auditing standards and the requirements of federal regulations relating to clients who receive government funding.

A graduate of the State University of New York at Binghamton, Julie is a member of the American Institute of CPAs and the New York State Society of CPAs (currently serving on the Exempt Organizations Committee) and serves on the board of directors of the American Women's Society of CPAs. She frequently addresses groups on accounting topics, most recently participating in seminars at Columbia University, Pace University, the Fund for the City of New York, and the law firm of Reid & Priest.



Not-For-Profit Clients

While Richard A. Hisner & Company, LLP's client base is composed largely of owner-managed corporations and partnerships and our industry specialization is far-ranging, the partners and staff of Richard A. Hisner & Company, LLP have made a commitment to the not-for-profit sector. In this important sector, a selected listing of our clients and other relationships include:

AS OF FEBRUARY 20, 1995

A View From The Torch Foundation
 The Aaron Diamond Foundation
 The Aaron Diamond AIDS Research
 Center for the City of New York
 Abbott House
 The American Council on Education
 (GED Testing Service)
 American Trust for Oxford University
 Bache Foundation
 Beate Klarsfeld Foundation
 The Berkeley Carroll School
 The Brearley School
 Catholic Charities
 Children's Express Foundation, Inc.
 Citizen's Committee
 Columbia University Community Services
 Cunningham Dance Foundation, Inc.
 Ethical Culture Schools
 Ethical Fieldston Fund
 The Excel Foundation
 First Presbyterian Church of Springfield
 The Flynn Theatre
 Gladys and Roland Harriman Foundation
 Mary W. Harriman Foundation
 W. Averell and Pamela C. Harriman
 Foundation
 Historic Speedwell
 "I Have a Dream" Foundation
 The Jaqua Foundation
 Leonard C. Yaseem Foundation

Lewis Brothers Foundation
 Local Initiatives Support Corporation
 A. L. Mailman Family Foundation
 Middlesex County Economic Opportunities
 Corporation
 National Development and Research
 Institute, Inc.
 National Horse Show Association of
 America, Ltd.
 National Horse Show Foundation
 National Jewish Commission on Law
 New Eyes for the Needy, Inc.
 New Jersey Historical Society
 The New York Botanical Garden
 New York Eye & Ear Infirmary
 New York Financial Writers' Association
 Inc.
 New York Women's Foundation, Inc.
 New York Youth at Risk, Inc.
 Pembroke College Foundation
 Reformed Church in America
 Robert Steel Foundation for Pediatric
 Cancer
 Mary A. H. Ramsey Foundation
 St. Bernard's School, Inc.
 Saint Thomas Church
 Sawyer Foundation
 The Seamen's Church Institute of
 New York and New Jersey
 The Sister Fund

NFFC205

RM**Not-For-Profit Clients****AS OF FEBRUARY 20, 1995 (cont.)**

**Society for Seamen's Children
Tisch Foundation, Inc.
Town Creek Foundation
The Town School, Inc.
United Social Services
United States Equestrian Team
Uris Brothers Foundation
Westchester Community Opportunity
Program
Whitehead Charitable Trust
Youth Action Program**

NFP0200

UNCLASSIFIED

United States Department of State

Washington, D.C. 20520

URGENT

TRANSMISSION RECORD

TO:

Kathy Stephens

FROM: Lawrence C. Yontz

ADDRESS:

NSC

UNIT: Coordination Division

Visa Services

Department of State

PHONE:

456-9151

PHONE: 202-663-1198

FAX:

456-9150

FAX: 202-663-1553

DATE:

3/13/95

NUMBER OF PAGES:

4

(Not including cover sheet)

COMMENT/MESSAGE:

visas two/low for
Mc Gowan, the subject of the
March 10, 95 Reno/Christopher
letter.

I'll be going home as near to 5pm
as possible. Haven't heard from you yet
on Drumm. Thanks.

Larry**URGENT**UNCLASSIFIED

activity.

- (1) the individual is not to solicit or accept funds;
- (2) the individual is not to attend or participate in any function for which admission is charged, if the charge for admission exceeds the actual costs of the function;
- (3) the individual may not attend, or otherwise participate in, any function at which there is to be fundraising;

MAR 13 '95 04:55PM
03/13/95 11:35 202 847 3483
03/10/95 FRI 20:18 FAX 202 436 9150
MAR 10 '95 07:52PM EONS

EUR/NE
EUROPEAN DIR

P.3

001
001

647-3463

P.2



Office of the Attorney General
Washington, D. C. 20530

March 10, 1995

The Honorable Warren Christopher
Secretary of State
Washington, D.C. 20520

Dear Mr. Secretary:

This is to advise you that in light of discussions with the Department of State and NSC representatives over the past several days, and in order to support the peace process and ceasefire in Northern Ireland, I have decided to grant a waiver of ineligibility for Richard McAuley, Patrick McGeown and David Ervine, so that all three may be issued non-immigrant visas.

The waiver for Messrs. McAuley and McGeown is subject to the following conditions:

- * Each waiver application shall be presented to the INS at the Headquarters level using the currently established waiver procedures and channels;
- * Restrictions, such as geographic travel limitations, length of stay, etc., shall be as INS prescribes; however, each of the named individuals is subject to the following restrictions with respect to fundraising activity:
 - (1) the individual is not to solicit or accept funds;
 - (2) the individual is not to attend or participate in any function for which admission is charged, if the charge for admission exceeds the actual costs of the function;
 - (3) the individual may not attend, or otherwise participate in, any function at which there is to be fundraising;

MAR 13 '95 04:55PM
03/13/95 11:36 202 647 3483
03/10/95 FRI 20:16 FAX 202 456 9150
MAR 10 '95 07:51PM EONS

EUR/NE
EUROPEAN DIR

P.2

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P.3

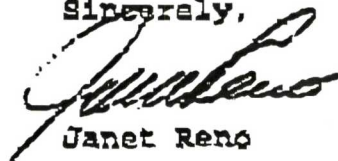
- 2 -

(4) the only exception to the foregoing restrictions is that the individual may be present at functions where Gerry Adams engages in fundraising, and may assist in that fundraising activity during that period of time that Adams is physically present at the function.

- * Deviations from, or violations of, any imposed restrictions shall be grounds for cancellation of the current visa and a return to a more restrictive Department of Justice-level approval process.

As noted above, I have also agreed to an ineligibility waiver for David Ervine, whom I am informed is a leader of the Loyalist Party. In light of the fact that Gerry Adams has now been granted a waiver that is free of restrictions on fundraising, considerations of equity prompt me to agree to identical terms for Mr. Ervine. I wish to make clear, however, that this action should not be taken as an indication of willingness to grant similar treatment to any other person.

Sincerely,



Janet Reno

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
004. cable	re: SAO Response - NIV Case. [8 U.S.C. 1202(f)] (2 pages)	03/13/1995	P3/b(3)

COLLECTION:

Clinton Presidential Records
National Security Council
European Affairs (Stephens, Kathleen)
OA/Box Number: 340

FOLDER TITLE:

Ireland - Visa / Fundraising Issues [2]

2021-0172-F
vz6378

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

P1 National Security Classified Information [(a)(1) of the PRA]
P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
P3 Release would violate a Federal statute [(a)(3) of the PRA]
P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

b(1) National security classified information [(b)(1) of the FOIA]
b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
005. email	Kathleen Stephens to @UP. Subject: Northern Ireland. (1 page)	03/11/1995	P1/b(1)

COLLECTION:

Clinton Presidential Records
National Security Council
European Affairs (Stephens, Kathleen)
OA/Box Number: 340

FOLDER TITLE:

Ireland - Visa / Fundraising Issues [2]

2021-0172-F
vz6378

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GILROY DOWNES HOROWITZ & GOLDSTEIN*Attorneys-at-Law*

15 Park Row

New York, New York 10038-2301

Lawrence C. Downes
James Gilroy
Michael Goldstein
Michael M. Horowitz

Telephone (212) 406-0110
Facsimile (212) 406-0420

Thomas Dillon

March 13, 1995

BY FAX - (202) 456-9151

Ms. Cathy Stevens
National Security Counsel

Dear Ms. Stevens:

As per our telephone conversation, Friends of Sinn Fein, Inc. is a New York Not-for-Profit Corporation. Our directors include myself, my brother Sean Downes, who is an attorney in New York, and Thomas Devlin, a contractor in New York. Our attorney is Richard Harvey, Esq. of Stevens, Hines & White, P.C. 116 West 111th Street, New York, NY 10026, (212) 864-4445. We are in the process of complying with the rules and regulations as they apply to us. We intend to cooperate in every way. We have opened a bank account at Country Bank, 4349 Katonah Avenue, Bronx, NY 10470. We have signed a lease for office space at 1350 Connecticut Avenue, Suite 307, Washington, D.C. The office will be staffed full time. It is intended that Mairead Keane will be the Executive Director of this office, as soon as the proper paper work is cleared.

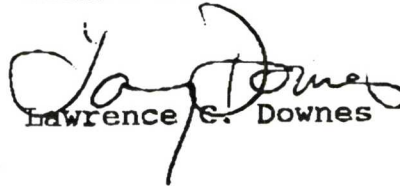
We expect that on Mr. Adams' current tour we will net no more than \$50,000. This amount will not fund even the Washington office for a year.

We intend to retain a reputable certified public accounting firm to audit the funds received by our organization. We will comply with all reasonable requests to assure that the funds are properly accounted for.

If you have any questions please feel free to contact
myself or Richard Harvey.

Very truly yours,

GILROY DOWNES HOROWITZ & GOLDSTEIN



Lawrence C. Downes

LCD:jg

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
006. memo	For Anne-Marie Gatons from Kenneth C. Brill. Subject: Recommendation of a Waiver of Visa Ineligibility....[8 U.S.C. 1202(f)] (1 page)	00/00/1995	P3/b(3)

COLLECTION:

Clinton Presidential Records
National Security Council
European Affairs (Stephens, Kathleen)
OA/Box Number: 340

FOLDER TITLE:

Ireland - Visa / Fundraising Issues [2]

2021-0172-F
vz6378

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b(8) Release would disclose information concerning the regulation of
financial institutions [(b)(8) of the FOIA]
b(9) Release would disclose geological or geophysical information
concerning wells [(b)(9) of the FOIA]



U.S. Department of Justice

Office of Intelligence Policy and Review

Washington, D.C. 20530

January 27, 1995

TO: Paul B. van Son
Office of Northern European Affairs
U.S. Department of State

FROM: *WPS* Richard Scruggs
Counsel for Intelligence Policy
Office of Intelligence Policy and Review

RE: Visa Waivers for Sinn Fein and
Loyalist Party Leaders

This memorandum is to advise you that the Department of Justice, including the FBI, agree the individuals listed in the draft Memorandum to Terry Samuels, Director of Executive Secretariat, Department of Justice from Kenneth C. Brill (copy attached), should be granted non-immigrant visas on the same terms as the visas granted to Sinn Fein leader, Gerry Adams. This agreement is expressly conditioned upon the parties' adherence to the peace process in Northern Ireland.



United States Department of State

Washington, D.C. 20520

Date: 3-30

TO: Kathy Stephens

OF: NSC

PAGES (Including this cover): _____

FAX#: _____

FROM: Paul B. van Son
Desk Officer for Ireland/Northern Ireland
Office of Northern European Affairs
Department of State, Washington, D.C. 20520

FAX: (202) 647-3463

TEL: (202) 647-6585

SUBJECT: Terrorist Visa Waivers

I got this from ~~DO~~ CA/VO.

Tells you what Steinberg is up to.

Does not look like rapid turn arounds are going to be likely nor "blanket waves"



United States Department of State

Washington, D.C. 20520

MAR. 27 1995

To : Mark R. Steinberg
Associate Deputy Attorney General
Director of Executive Office for
National Security
Department of Justice

From: CA/VO/L - Cornelius D. Scully III

Subj: Department of Justice Protocol for Visa Ineligibility
Waivers in Cases Involving Individuals Excludable under
Section 212(a)(3)(B) of the INA

Ref : Your FAX of March 24, 1995, and previous correspondence and
conversations

The documents which you sent to me by FAX on March 24 include not merely what appears to be the final version of the draft Protocol but also a copy of your memorandum of transmittal to the Attorney General. I am concerned that you have represented to the Attorney General that the Department of State, through me, has concurred in the proposed new procedures set forth in the Protocol. I desire to make it a matter of record that (1) I did not, and do not as of this date, have the authority to speak for the Department of State in this matter; and (2) I never represented to you that I did have such authority.

I attended the meeting on March 22 and otherwise participated in this exercise in my capacity as a long-time employee of the Department having both detailed knowledge of the subject matter and a degree of responsibility for the processing within the Department of State of cases within the purview of the Protocol. In that capacity, I tried both to explain how the system for handling such cases has worked up to now and what I perceived to be potential problems to which the proposed new system might give rise. Throughout the process, I was acutely aware that the Protocol addresses itself to internal Department of Justice procedures, and I remain so.

Throughout our discussions, both at the meeting itself and in subsequent telephone conversations, you gave me repeated assurances that there is no intention on the part of the Department of Justice to materially affect the operation of the system in the sense of imposing delays or changing the outcome of individual cases which might create policy issues. You have additionally assured me that, if there should be evidence of any such delays, it should be brought directly to your attention and that you would undertake to eliminate them. As you will recall, I pointed out certain situations in which there are certainly policy implications.

-2-

You did, in fact, make a number of changes in the text of the Protocol which were intended to respond to concerns I had raised. As a result of that and of the assurances you gave me, I concluded (notwithstanding serious misgivings) that I could not properly pursue the matter further and was constrained to accept the new procedures as a fait accompli. That is the most that you are entitled to assume from our conversations.

It is highly improbable that the Attorney General's decision in this matter will be influenced one way or another by comments from an anonymous career functionary of the Department of State. Nonetheless, I do think it to be appropriate to bring to her attention that the Department of State, as an institution, has neither concurred in the Protocol nor declined to do so.

cc: DOJ/OIPR-RScruggs
DOJ/CRIM-DBiehl
FBI-JPO'Neill
INS/HQ/INS-DKBarnes

Drafted: CA/VO/L:CDScullyIII:cds
3/27/95 WD#4020D x31184

MAR 29 '95 04:54PM

P. 4

ROUTING AND TRANSMITTAL SLIP		DATE	March 24, 1995
TO: (Name, Office symbol, room number, Agency/Post)		Initials	Done
1. C.D. SCULLY			
2. STEPHEN PATTISON			
3. LARRY YONTZ			
4.			
5.			
REMARKS: FYI - THE ATTACHED PACKAGE WAS SENT TODAY TO THE DEPUTY ATTORNEY GENERAL FOR APPROVAL AND FORWARDING TO THE ATTORNEY GENERAL. WE WILL INFORM YOU WHEN IT HAS BEEN SIGNED BY THE AG.			
DO NOT use this form as a substitute for appropriate, separate documents, and similar records.			
FROM: (Name, Title, Agency/Post)		Room No. - Bldg.	
MARK R. STEINBERG, Associate Deputy Attorney General Director of the Executive Office for National Security		4127 - MAIN	
		Room No. 307-3667	

MAR 29 '95 04:54PM

P.5



U. S. Department of Justice

Office of the Deputy Attorney General

Executive Office for National Security

Director

Washington, D.C. 20530

March 24, 1995

MEMORANDUM FOR THE ATTORNEY GENERAL

THROUGH: THE DEPUTY ATTORNEY GENERAL

FROM: Mark R. Steinberg *Mark*
Director, Executive Office for National Security

SUBJECT: Protocol for Handling Visa Waiver Ineligibility Requests

PURPOSE: To approve a regime for the receipt, processing and notification of the results of requests for waivers of ineligibility in cases involving individuals otherwise excludable as terrorists or potential terrorists.

BACKGROUND: In light of an increase in the number of requests for waivers of visa ineligibility for individuals otherwise excludable, the Attorney General asked EONS to coordinate the development of a protocol for handling such requests. After discussions involving representatives of the FBI, the Criminal Division, INS, OIPR, and the State Department, the protocol appended hereto at Tab "A" was approved.

The protocol focuses exclusively upon those waiver requests that: (1) arise by virtue of the applicants' excludability as terrorists or potential terrorists under Section 212(a)(3)(B) of the Immigration and Nationality Act; and (2) are the subjects of State Department recommendation for waiver at the "seat-of-government," i.e. Main Justice, level. This focus was recommended by all interested components on the basis that these requests represent virtually the entire universe of the requests having the potential to require other than routine attention.

The protocol describes a process in which agreement by all interested Department of Justice components that a waiver should be granted results

in issuance of a visa without the need for involvement of the Attorney General. In those cases in which the interested components are either in dispute over whether a waiver should be granted, or agree that a waiver should be denied, the matter will be escalated for final determination by the Attorney General.

These procedures will apply in all relevant cases except those involving waiver requests for individuals who are or may be foreign intelligence officers. As to that category of applicant, procedures previously agreed to in writing among the intelligence community, the FBI, and the State Department, will continue to apply.

DISCUSSION: N/A

CONCLUSION: N/A

RECOMMENDATION: That you approve the protocol attached at Tab. "A"; sign the memorandum at Tab "B," notifying the pertinent components that the protocol is to take immediate effect; and authorize EONS to notify other interested agencies of these actions.

-0-

Action re: Protocol at Tab "A" and authorization of EONS to notify other agencies.

APPROVE _____

DISAPPROVE _____

OTHER _____

List of Concurring Components:
OIPR (Scruggs)
INS (Neighbors)
FBI (Fischer)
CRM (Biehl)

State Dept., per C.D. Scully,
also concurs

1710 P.T.T

**Protocol for
Visa Ineligibility Waivers
in Cases Involving Individuals Excludable
under Section 212(a)(3)(B) of the INA**

Explanatory note:

This protocol addresses the handling of requests for waivers of ineligibility in cases where the applicant is excludable for having engaged in terrorist activities or for the likelihood that he/she will engage in such activities, and the Department of State has recommended waiver to the Department of Justice at the "seat-of-government" level. In short, it describes the procedure for handling such waiver cases that have been directed to Main Justice and associated components for determination.

The protocol describes a process in which concurrence by all interested DOJ components that a waiver of excludability should be granted results in granting of the waiver without the involvement of the Attorney General. Only in those cases in which the interested DOJ components are in dispute over whether a waiver should be granted, or agree that a waiver should be denied, is the matter escalated to the Attorney General for final action.

-0-

Proposed Protocol

1. This protocol sets forth the procedures to be followed when the Department of State formally requests or recommends to the Department of Justice, at the "seat-of-government" level, that a waiver of excludability be granted to an individual otherwise excludable under Section 212(a)(3)(B) of the Immigration and Nationality Act (hereinafter referred to as a "terrorist waiver request"). It is intended only to set forth the process by which such formal requests are to be received and acted upon by the Department of Justice.
2. The only proper source of a terrorist waiver request is the State Department, and the only proper initial recipient of such request is OIPR. Terrorist waiver requests received from sources other than the State Department will not be acted upon.
3. Under normal circumstances, all terrorist waiver requests shall be made in writing by the State Department to OIPR. The request shall include any proposed conditions to be placed upon the applicant's visa if the waiver is granted. In circumstances

that require immediate action on the terrorist waiver request, Department of Justice activity necessary to respond to the request may begin upon OIPR's receipt of an oral request from the State Department. If necessary, the Department of Justice may also communicate its decision on the request orally to the State Department. Whenever a terrorist waiver request and/or a decision on a request is orally communicated, the State Department shall immediately thereafter reduce the oral exchange to writing and transmit that writing to OIPR.

4. The normal response time for a terrorist waiver request, i.e. the elapsed time from receipt of a written request by OIPR to delivery to the State Department of a written response, is ten (10) working days.

5. OIPR shall be the central mechanism for processing terrorist waiver requests, with EONS assisting in coordinating the response. For purposes of this protocol, "processing" shall include receipt and dissemination of a request to the FBI, Criminal Division, INS and EONS (the "interested components"); polling of those components, as described below; and, as appropriate, either preparing a written action recommendation for the Attorney General or notifying the INS of the fact that all interested components concur that a waiver should be granted.

6. Upon receipt from the State department of a terrorist waiver request, OIPR shall immediately disseminate same to the interested components. If any interested component receives such a request directly, it shall redirect the request to OIPR.

7. OIPR and every other component to which the terrorist waiver request is disseminated shall maintain in its files the request and all documents pertinent to action upon it.

8. As soon as practicable after disseminating the terrorist waiver request to the interested components, OIPR shall solicit from each such component, excepting EONS, information pertinent to the request and a recommendation concerning whether the request should be granted. The polling may be handled telephonically or through in-person meeting.

9. As part of its response to OIPR, INS shall have responsibility for determining and reporting whether the applicant has previously been granted a waiver and, if so, whether objections were raised to the granting of the prior waiver. If a visa was issued, INS shall also determine the substance of any conditions attached to the visa and whether the applicant entered the United States.

10. Under normal circumstances, each component receiving a terrorist waiver request shall provide responsive information and a recommendation for action within five (5) working days of receiving the request. Any component failing to respond within that period shall be deemed not to have objected to granting the

waiver.

11. OIPR shall maintain within its files notes that reflect the times at which requests or recommendations for terrorist waiver requests were disseminated to interested components, the time(s) at which the components were contacted for information and/or recommendations, and the substance of the information and recommendation received from each interested component.

12. Each interested component that provides information and/or a recommendation concerning a terrorist waiver request shall maintain in its files copies or summaries of all information supplied and a memorandum or note memorializing the recommendation given.

13. Under normal circumstances, i.e. when all components have provided timely information and recommendations, OIPR can be expected to accomplish the following within seven days of receiving a terrorist waiver request from the State Department:

- (a) In those cases in which the interested components recommend against granting a waiver or are in disagreement over whether a waiver should be granted, OIPR shall generate and send to the Attorney General, through DAG/EONS, a memorandum recommending whether the request should be granted or denied. The memorandum will summarize or attach the pertinent information and recommendations of each interested component and, where there is conflict among the components, explain the basis for OIPR's recommendation.
- (b) In those cases in which all interested components concur that a waiver should be granted, OIPR shall notify INS of that fact in writing, thereby authorizing INS, without further internal review or deliberation, to issue the ineligibility waiver. In cases requiring immediate attention, the notification may be given orally, followed immediately thereafter by a written confirmation.

14. If the Attorney General seeks oral consultation with the representative of any interested component before acting on a visa waiver request, representatives of OIPR and EONS will, whenever possible, be present for the discussion. It shall be the responsibility of OIPR to document the substance of each such consultation and to disseminate to all interested components, and to EONS, a copy of that documentation.

15. When the Attorney General has taken final action on a terrorist waiver request, either a signed decision by the

MAR 29 '95 04:57PM

P.10

Attorney General will be transmitted to the State Department or OIPR will send a written memorandum of the decision to the State Department. OIPR will immediately distribute copies of the Attorney General's decision or the written memorandum of decision to all interested components, including EONS, and will maintain a copy of such writings in its permanent files.

16. When INS has granted a terrorist waiver request pursuant to the foregoing procedures, it shall generate and distribute to OIPR and the interested components, a written document stating that fact.

17. In addition to any of the foregoing responsibilities that may affect it, OIPR shall develop and maintain in its files a form that records, as to each terrorist visa waiver request, the date of receipt of the request, the identities of the components polled and their recommendations, and the final disposition (and date of disposition) of the request by the Department of Justice.

TAB B



Office of the Attorney General
Washington, D. C. 20530

MEMORANDUM FOR LOUIS FREEH
DORIS MEISSNER
JOANN HARRIS

FROM: THE ATTORNEY GENERAL

SUBJECT: Protocol For VISA Ineligibility Waivers

I have today approved the attached protocol for the handling of requests for waivers of visa ineligibility in cases where the applicant is excludable under Section 212(a)(3)(B) of the Immigration and Nationality Act and the Department of State has requested waiver by the Department of Justice at the "seat-of-government" level. I ask that you make appropriate distribution of the protocol within your component and that you take whatever additional steps you deem necessary to insure that it is promptly implemented.

cc: EONS
OIPR



0 Ireland

United States Department of State

Washington, D.C. 20520

Date:

3-21

TO:

Kathy Supers

OF:

NSC

PAGES (Including this cover):

FAX#:

FROM:

Paul B. van Son

Desk Officer for Ireland/Northern Ireland

Office of Northern European Affairs

Department of State, Washington, D.C. 20520

FAX: (202) 647-3463

TEL: (202) 647-6585

SUBJECT:

Visas for IRA/Foyahists

*Kathy - what do we have to do? Let
a list from the Foyahists? Sinn Fein
and then give it to the Pres?*

Right now only Adams can raise funds.

*I don't think for English? Gary W. Michael
want to raise funds in the presence
of Adams.*

9-505031



Office of the Attorney General
Washington, D. C. 20530

March 16, 1995

The Honorable Warren Christopher
Secretary of State
Washington, D.C. 20520

Dear Mr. Secretary:

I am writing in further response to Deputy Secretary Talbott's letter of December 8, 1994, seeking my concurrence in a decision to designate Ireland as a probationary participant the Visa Waiver Pilot Program (VWPP).

I am willing to join with you in designating Ireland for inclusion in the VWPP on probationary status. However, as the peace process in Ireland is still at an early and fragile stage, I want to take this occasion to confirm certain arrangements to which we have previously agreed concerning efforts by Sinn Fein and IRA members to travel to this country.

It is my understanding that if the VWPP is extended to include Ireland, individuals who are ineligible for visas, including a number of Sinn Fein and IRA members, will continue to be required, in advance of their departure for the United States, to apply at a U.S. embassy or consulate for a waiver of ineligibility. Absent the granting of the waiver, they will not receive a visa and will not be permitted to enter the United States. To the extent that any Sinn Fein or IRA member requires a waiver of ineligibility, I understand that the following conditions will continue to apply:

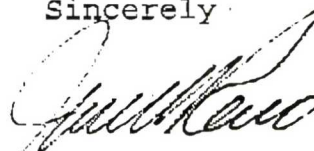
- * The applicant shall present his or her waiver application to the INS at the Headquarters level using the currently established waiver procedures and channels;
- * If the waiver is granted, the applicant shall provide advance notice of intended travel to the United States and a full itinerary of all intended travel within the United States. Other restrictions, such as geographic limitations, length of stay, etc. shall be as the INS prescribes.
- * Each applicant who receives a waiver and visa shall be subject to the following restrictions with respect to fundraising activity:

- (1) the individual is not to solicit or accept funds;
- (2) the individual is not to attend or participate in any function for which admission is charged, if the charge for admission exceeds the actual costs of the function;
- (3) the individual may not attend, or otherwise participate in, any function at which there is to be fundraising;
- (4) the only exception to the foregoing restrictions is that the individual may be present at functions where Gerry Adams engages in fundraising, and may assist in that fundraising activity during that period of time that Adams is physically present at the function.

* Deviations from, or violations of, any imposed restrictions shall be grounds for cancellation of the visa.

I trust that the foregoing is satisfactory to you and that we are in accord on the basis for this decision.

Sincerely



Janet Reno



Office of the Attorney General
Washington, D. C. 20530

March 8, 1995

The Honorable Warren Christopher
Secretary of State
Washington, DC. 20520

Dear Mr. Secretary:

This is in response to the February 16 memorandum from Kenneth C. Brill to Terry Samuels concerning the waiver process for Sinn Fein and Loyalist Party leaders wishing to travel to the United States in furtherance of the peace process. The memorandum included a list of twelve persons and recommended that we agree that appropriate officers of your Department and the Immigration and Naturalization Service (INS) process their waiver applications without the requirement for direct communication between the Secretary of State and the Attorney General. We were subsequently informed that comparable treatment was sought for three additional persons: James N. Drumm, Seamus Finucane and Patrick McGeowan.

After reviewing the matter in detail, the Department of Justice concurs with the recommendation as to only three of the fifteen individuals: James N. Drumm, Joseph English and Tom Hartley. As to the remainder, i.e. Messrs. Joseph Cahill, Patrick Joseph Doherty, Aidan McAteer, Patrick Trainor, David Ervine, William Hutchinson, Augustus Andrew Spence, Dennis Donaldson, Martin McGuinness, Siobhan O'Hanlan, Seamus Finucane, and Patrick McGeowan, we believe that the granting of the requested waiver would be inappropriate at this time.

With respect to Messrs. Drumm, English and Hartley, our concurrence is subject to the following provisions:

- Each waiver application shall be presented to the INS at the Headquarters level using the currently established waiver procedures and channels;
- Restrictions, such as geographic travel limitations, length of stay, etc., shall be as INS prescribes; however, as previously instituted with Gerry Adams and others, no fundraising will be permitted as an express condition to granting the visa; and,

- 2 -

- Deviations from, or violations of, any imposed restrictions shall be grounds for cancellation of the current visa and a return to the more restrictive Department of Justice-level approval process.

Our agreement with respect to Messrs. Drumm, English and Hartley shall continue in effect as long as those three individuals continue to support the peace process and ceasefire in Northern Ireland.

Sincerely,

A handwritten signature in dark ink, appearing to read "Janet Reno", written over a horizontal line.

Janet Reno



United States Department of State

Washington, D.C. 20520

Date:

3-8

TO:

Kathy Stephens

OF:

NSC

PAGES (Including this cover):

FAX#:

456-9150

FROM:

Paul B. van Son
Desk Officer for Ireland/Northern Ireland
Office of Northern European Affairs
Department of State, Washington, D.C. 20520

FAX: (202) 647-3463

TEL: (202) 647-6585

SUBJECT:

VISAS

Evans, Spence, English, Hutchinson
issued visas via a Brill-Samuels in
October 1994

Cahill issued a visa in Nov 94 without a
Brill-Samuels
Cahill & Trainor issued in Aug 94 with Brill
Doherty & McAteer issued in Sept, it appears
without a Brill-Samuels
McAuley ~~appears to~~ issued in Sep on Adams
request via Brill

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
007. cable	re: Visas Two and Four:....[State 322100] [partial] (1 page)	12/22/1994	b(7)(C), b(6)

COLLECTION:

Clinton Presidential Records
National Security Council
European Affairs (Stephens, Kathleen)
OA/Box Number: 340

FOLDER TITLE:

Ireland - Visa / Fundraising Issues [2]

2021-0172-F
vz6378

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

P1 National Security Classified Information [(a)(1) of the PRA]
P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
P3 Release would violate a Federal statute [(a)(3) of the PRA]
P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

b(1) National security classified information [(b)(1) of the FOIA]
b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

IMMEDIATE

UNCLASSIFIED

INCOMING

DEPARTMENT OF STATE
EUROPEAN AFFAIRS

PAGE 01 030630Z 043090 5001/30
INFO: UN (02) F1 (01)

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ACTION VO-06

INFO LOC 00 CIAE-00 OAS-00 EUR-00 FBIE-00 INSE-00 ADS-00
NSAC-00 SSO-00 007W

-----8EE151 030650Z 20
O 022138Z DEC 94
FM SECSTATE WASHDC
TO AMCONSUL BELFAST IMMEDIATE
AMEMBASSY LONDON IMMEDIATE
AMEMBASSY DUBLIN IMMEDIATE

UNCLAS STATE 322100

VISAS

E.O. 12858: N A
TAGS: CVIS, PIER, PREI, PGOV, UI, E1 MCAULEY, RICHARD GERARD
SUBJECT: SAO RESPONSE NIV CASE
REF: A VICTIMS 056850 B BELFAST 555 C BELFAST 563
D STATE 256979

1. VISAS TWO AND FOUR: 212 (A) (2) (A) (3) (1), 212 (A) (2) (B), AND
212 (A) (3) (B) FOR RICHARD GERARD MCAULEY. (b)(6), (b)(7)c
(b)(6), (b)(7)c

2. THE DEPARTMENT HAS NO OBJECTION TO ISSUANCE OF A B-1 B-2
VISA VALID FOR MULTIPLE ENTRIES WITHIN THREE MONTHS. MR.
MCAULEY'S VISA SHOULD BE ANNOTATED TO REFLECT THE 212 (D) (3) (A)
WAIVERS GRANTED BY INS CO. IT SHOULD BE FURTHER ANNOTATED TO
INDICATE THAT APPLICANT MUST NOTIFY THE UNITED STATES GOVERNMENT

OF HIS ITINERARY IN ADVANCE OF ANY TRAVEL AND THAT MR. MCAULEY
IS NOT TO ENGAGE IN DIRECT OR INDIRECT FUNDRAISING.

3. POSTS SHOULD REFER TO REFTEL D FOR GUIDANCE ON THE
DEFINITION OF FUNDRAISING. THE PROHIBITION ON INDIRECT FUNDRAISING

SHOULD BE UNDERSTOOD AS FOLLOWS:

- THE ALIEN IS NOT TO SOLICIT OR ACCEPT FUNDS.
- THE ALIEN IS NOT TO ATTEND OR PARTICIPATE IN ANY FUNCTION FOR
WHICH ADMISSION IS CHARGED, IF THE CHARGE FOR ADMISSION EXCEEDS
THE ACTUAL COSTS OF THE FUNCTION.
- THERE IS TO BE NO FUNDRAISING AT ANY FUNCTION WHICH THE ALIEN
ATTENDS OR IN WHICH THE ALIEN PARTICIPATES, AS A SPEAKER OR
OTHERWISE.

AS STATED IN REFTEL D, THESE CONDITIONS ARE TO BE CONSTRUED
BROADLY.

4. ISSUING POST SHOULD OBTAIN AND INFORM THE DEPARTMENT
IMMEDIATELY OF APPLICANT'S ITINERARY, INCLUDING DATE, TIME AND
FLIGHT NUMBER OF ARRIVAL, AND PROPOSED DATES AND CITIES TO BE
VISITED. PLEASE SLUG TELEGRAM RESPONSE FOR EUR/NE AND CA VO L C
AND INCLUDE DIRGFI WASHDC AS AN ACTION ADDRESSEE. ASSISTANCE
APPRECIATED.
TALBOT

UNCLASSIFIED



United States Department of State

Washington, D.C. 20520 9420246

'94 SEP -3 P1:16

September 3, 1994

UNCLASSIFIED

MEMORANDUM TO:

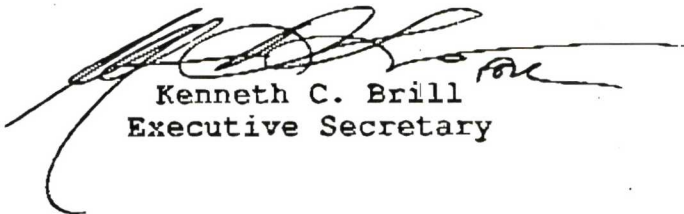
TERRY SAMUELS
Director of the Executive Secretariat
Department of Justice

WILLIAM H. ITOH
Executive Secretary
National Security Council

Subject: Extension of Nonimmigrant Stay for Joseph Cahill and
Patrick Trainor

Waivers of terrorist ineligibility were granted by the Attorney General on August 30, 1994, to permit the subjects to enter the United States with non-immigrant visas. Subjects were admitted to the United States until September 4. The Irish Government has now asked that subjects be allowed to remain in the United States until September 19. In addition, the Irish Government would like the United States to permit subjects to travel to San Francisco, Los Angeles, and San Diego.

The Department of State concurs in this request and asks that the Attorney General take appropriate steps to modify the duration of the waivers and the geographic restrictions, as requested by the Irish Government. No other conditions attached to the waivers should be modified, and the subjects should be informed that all other conditions remain in effect.


Kenneth C. Brill
Executive Secretary

UNCLASSIFIED

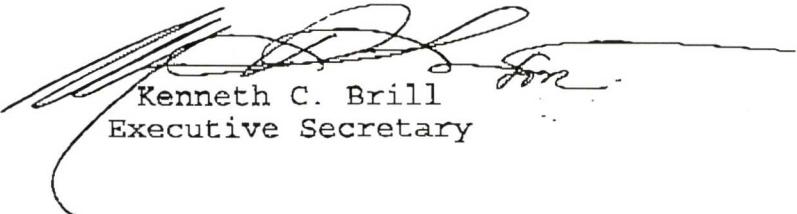


United States Department of State

Washington, D.C. 20520

UNCLASSIFIEDMEMORANDUM FOR TERRY SAMUELS
DIRECTOR OF THE EXECUTIVE SECRETARIAT
DEPARTMENT OF JUSTICESubject: Recommendation of a Waiver of Visa Ineligibility
Gerard "Gerry" Adams

Gerard "Gerry" Adams, President of the Sinn Fein party has applied for a non-immigrant visa, but is excludable under Section 212(a)(3)(B) of the Immigration and Nationality Act (terrorist activity.) Pursuant to Section 212(d)(3) of the Immigration and Nationality Act, the Secretary of State recommends to the Attorney General that a waiver of ineligibility be granted in order that Mr. Adams may travel to the United States during the period September 24 to October 8. A waiver is also recommended for Richard McCauley who will be travelling to the United States with Mr. Adams. The Secretary further recommends that the waiver be issued subject to the condition that neither Mr. Adams nor Mr. McCauley engage in direct or indirect fundraising.


Kenneth C. Brill
Executive SecretaryUNCLASSIFIED

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United States Department of State

Washington, D.C. 20520

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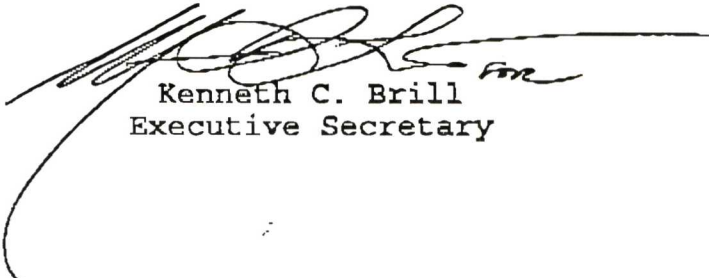
November 22, 1994

UNCLASSIFIED

MEMORANDUM FOR TERRY SAMUELS
DIRECTOR OF THE EXECUTIVE SECRETARIAT
DEPARTMENT OF JUSTICE

Subject: Recommendation of a Waiver of Visa Ineligibility
Gerard "Gerry" Adams

Gerard "Gerry" Adams, President of the Sinn Fein party, has again applied for a non-immigrant visa. He remains excludable under Section 212(a)(3)(B) of the Immigration and Nationality Act (terrorist activity). Pursuant to Section 212(d)(3) of the Immigration and Nationality Act, the Secretary of State recommends to the Attorney General that a waiver of ineligibility be granted for a three month multiple-entry visa in order that Mr. Adams may travel to the United States during the period December 7 to 13. The Secretary further recommends that the waiver be issued subject to the condition that he notify the United States government of his itinerary in advance of any travel and that Mr. Adams not engage in direct or indirect fundraising.



Kenneth C. Brill
Executive Secretary

UNCLASSIFIED

UNCLASSIFIED

United States Department of State

Washington, D.C. 20520

TRANSMISSION RECORD

TO:

NSC

FROM: Lawrence C. Yontz

ADDRESS:

Kathy Stephens

UNIT: Coordination Division

Visa Services

Department of State

PHONE:

456-9151

PHONE: 202-663-1198

FAX:

456-9150

FAX: 202-663-1553

DATE:

4-20.95

NUMBER OF PAGES:

one

(Not including cover sheet)

COMMENT/MESSAGE:

Copy of the visa authorization
cable to Dublin for Joseph Cahill.
Per our conversation.

RandyUNCLASSIFIED

UNCLASSIFIED

Department of State

TELEGRAM

PAGE 01 STATE 096239 192146Z
ORIGIN VO-06

SHC8028

STATE 096239 192146Z

SHC8028

INFO LOG-00 CIAE-00 SMEC-00 OAS-00 DODE-00 DS-00 EUR-00
FBIE-00 TEDE-00 INR-00 INSE-00 JUSE-00 L-00 ADS-00
NSAE-00 NSCE-00 SIR-00 SCT-00 DSCC-00 DRL-00 /017R

IMMEDIATELY OF APPLICANT'S ITINERARY, INCLUDING DATE, TIME AND FLIGHT NUMBER OF ARRIVAL, AND PROPOSED DATES AND CITIES TO BE VISITED. PLEASE SLUG TELEGRAM RESPONSE FOR EUR/UBI AND CA/VO/L/C AND INCLUDE DIRFBI WASHDC AS AN ACTION ADDRESSEE. ASSISTANCE APPRECIATED. CHRISTOPHER

DRAFTED BY: CA/VO/L/C:LCYONTZ:0541C:LCY

APPROVED BY: CA/VO:DDILLARD

CA/VO/L:CDSCULLY, III

EUR/UBI:PVANSON

S/CT:DDOBSON (INFO)

INS/CO:RNEIGHBORS (INFO)

DESIRED DISTRIBUTION:

FBI, INS, NSC, JUSTICE

-----BD42AF 192146Z /38

O R 192126Z APR 95

FM SECSTATE WASHDC

TO AMEMBASSY DUBLIN IMMEDIATE

INFO AMEMBASSY LONDON

AMCONSUL BELFAST

UNCLAS STATE 096239

VISAS -

E.O. 12356: N/A

TAGS: CUIS, PTER, PREL, PGOV, EI, UK (CAHILL, JOSEPH)

SUBJECT: SAO RESPONSE - NIV CASE

REF: A) VICTARS 062875 B) DUBLIN 1479 C) 94 STATE

256979

1. VISAS TWO AND FOUR: 212 (A) (2) (A) (1) (1), 212 (A) (2) (B), 212 (A) (3) (B), AND 212 (A) (6) (C) FOR JOSEPH CAHILL, DPOB: MAY 19, 1920 BELFAST, NORTHERN IRELAND.

2. THE ATTORNEY GENERAL HAS GRANTED WAIVERS OF MR. CAHILL'S FOUR VISA INELIGIBILITIES. ACCORDINGLY, THE DEPARTMENT HAS NO OBJECTION TO ISSUANCE OF A B-1/B-2

VISA VALID FOR MULTIPLE ENTRIES WITHIN THREE MONTHS TO MR. CAHILL. MR. CAHILL'S VISA SHOULD BE ANNOTATED TO REFLECT THE FOUR WAIVERS OF VISA INELIGIBILITY GRANTED UNDER SECTION 212 (D) (3) (A) OF THE INA BY THE ATTORNEY GENERAL AND INS/CO. IT SHOULD ALSO BE ANNOTATED THAT APPLICANT IS NOT TO ENGAGE IN ANY DIRECT OR INDIRECT FUNDRAISING WHILE IN THE UNITED STATES. LASTLY, THE VISA SHOULD BE ANNOTATED TO REFLECT THAT APPLICANT MUST PROVIDE A U.S. CONSULAR OFFICER WITH A FULL AND DETAILED ITINERARY PRIOR TO ANY TRAVEL TO THE UNITED STATES.

3. POST SHOULD REFER TO REFTEL C) FOR GUIDANCE ON THE DEFINITION OF FUNDRAISING. THE PROHIBITION ON DIRECT OR INDIRECT FUNDRAISING SHOULD BE UNDERSTOOD AS FOLLOWS:

- THE ALIEN IS NOT TO SOLICIT OR ACCEPT FUNDS.

- THE ALIEN IS NOT TO ATTEND OR PARTICIPATE IN ANY FUNCTION FOR WHICH ADMISSION IS CHARGED, IF THE CHARGE FOR ADMISSION EXCEEDS THE ACTUAL COSTS OF THE FUNCTION.

- THERE IS TO BE NO FUNDRAISING AT ANY FUNCTION WHICH THE ALIEN ATTENDS OR IN WHICH THE ALIEN PARTICIPATES, AS A SPEAKER OR OTHERWISE.

AS STATED IN REFTEL C), THESE CONDITIONS ARE TO BE CONSTRUED BROADLY.

4. POST SHOULD OBTAIN AND INFORM THE DEPARTMENT