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Clerk of the House of Representatives	Secretary of the Senate
Legislative Resource Center	Office of Public Records
B-106 Cannon Building	232 Hart Building
Washington, DC 20515	Washington, DC 20510

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05 FEB 15 PM 11:00

LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - **All Filers Are Required to Complete This Page**

1. Registrant Name

APCO Worldwide Inc.

2. Address ☐ Check if different than previously reported

1615 L Street, NW, Suite 900, Washington, DC 20036

3. Principal Place of Business (if different from line 2)

N/A

City: State/zip (or Country)

4. Contact Name	Telephone	E-mail (optional)	5. Senate ID #
Lynley A. Ogilvie	(202) 778-1042		4117-975

7. Client Name ☐ Self

SPI Spirits (Cyprus) Limited

6. House ID # 30920074

TYPE OF REPORT

8. Year 2004 Midyear (January 1-June 30) ☐ **OR** Year End (July 1-Dec

9. Check if this filing amends a previously filed version of this report ☐

10. Check if this is a Termination Report ☐ ➪ Termination Date _____ 11. No Lobbyin

INCOME OR EXPENSES - Complete Either Line 12 **OR** Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than $10,000 ☐

$10,000 or more ☑ ➪ $ $20,000.00
Income (nearest $20,000)

Provide a good faith estimate, rounded to the nearest $20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).

13. Organizations

EXPENSES relating to lobbying activities for this repor period were:

Less than $10,000 ☐

$10,000 or more ☐ ➪ $ _____
Expenses (nearest $20,00(

14. REPORTING METHOD. Check box to indicate e accounting method. See instructions for description of o

☐ **Method A.** Reporting amounts using LDA definiti

☐ **Method B.** Reporting amounts under section 603 Internal Revenue Code

☐ **Method C.** Reporting amounts under section 162(Internal Revenue Code

Signature _____ Date _____

Printed Name and Title _____

Registrant Name APCO Worldwide Inc. Client Name SPI Spirits (Cyprus) Limited

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which th engaged in lobbying on behalf of the client during the reporting period. **Using a separate page for each co** information as requested. Attach additional page(s) as needed.

15. General issue area code FOR (one per page)

16. Specific lobbying issues

United States/Russian relations

17. House(s) of Congress and Federal agencies contacted ☐ Check if None

United States House of Representatives
United States Senate
United States Department of State

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Barry Schumacher	
Jonathan Gregory	
Tim Warner	
Don Bonker	

19. Interest of each foreign entity in the specific issues listed on line 16 above ☐ Check if None

Client is owned 70% by SPI Worldwide Trade Ltd. and 30% by SPI N.V.

Signature Judith Sapir Date 2/14/05

Judith Sapir, Senior Vice President, General Counsel & Secretary