

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Pillsbury, Madison & Sutro 1667 K St., NW, Suite 1100 Washington, D.C. 20006	2. Registration No. 4212
3. Name of foreign principal Interbank (Uluslararası Endüstri ve Ticaret Bankası)	4. Principal address of foreign principal Buyukdere Caddesi 108/C Esentepe 80496 Istanbul, Turkey

5. Indicate whether your foreign principal is one of the following type:

- Foreign government
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
 - Partnership
 - Corporation
 - Association
 - Individual—State his nationality _____

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

- a) Branch or agency represented by the registrant.
- b) Name and title of official with whom registrant deals.

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

- a) Principal address
- b) Name and title of official with whom registrant deals.
- c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

Commercial Bank

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal Yes No

Directed by a foreign government, foreign political party, or other foreign principal..... Yes No

Controlled by a foreign government, foreign political party, or other foreign principal Yes No

Financed by a foreign government, foreign political party, or other foreign principal..... Yes No

Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes No

Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes No

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

Interbank's parent is the Cukurova Group.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

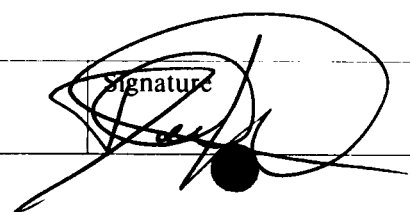
Date of Exhibit A

2/25/91

Name and Title

Donald E. deKieffer
Partner

Signature



Under the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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Name of Registrant	Name of Foreign Principal
Pillsbury, Madison & Sutro	Interbank (Uluslararası İndüstri ve Ticaret Bankası)

Check Appropriate Boxes:

- 1. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
- 2. There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 3. The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

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4. Describe fully the nature and method of performance of the above indicated agreement or understanding.
 Assist client in obtaining specific licenses from OFAC permitting client to be reimbursed under J/Cs covering merchandise shipped to Iraq prior to the U.S. embargo on trade with Iraq.

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

Provide legal advice regarding administration of OFAC Iraqi sanctions and represent client before relevant government agencies.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

N/A

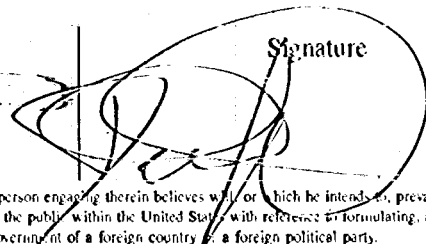
Date of Exhibit B

2/25/91

Name and Title

Donald F. deKieffer
Partner

Signature



¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

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WRITER'S DIRECT DIAL NUMBER

202/463-2368

November 13, 1990

Professional Services

Mr. Kemal Koprulu
Vice President
Interbank
Buyukdere Cad. 108, Esentepe
Istanbul, Turkey

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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Dear Mr. Koprulu:

Based on the results of our preliminary conflict check and your discussions with Kevin Horgan of this firm, Pillsbury, Madison & Sutro will be pleased to represent Interbank in connection with applications to the United States Office of Foreign Assets Control for licenses permitting the payment by the Bank of New York with respect to letters of credit numbers 262/10315; 262/10316; 262/10317; 262/10318; 262/11684; 276/8/89; 170/8/89; and 158/121/89/31198. When you have signed and returned to us a copy of this letter, this will constitute our agreement to perform services for Interbank.

Fees for our services will be calculated based on our normally hourly rates which vary depending on the training and experience of the person performing the service. We are enclosing a list of attorneys and legal assistants who we anticipate may work on Interbank matters together with the hourly rates applicable to each. Other persons may work on Interbank matters from time to time if the need arises. As we indicated in our discussions, most of the work on this matter will be performed by Kevin Horgan.

Our services will be billed to you on a monthly basis; statements are generally prepared during the third week of the month following the month when the services are performed. In addition, we will prepare and submit to you, on a monthly basis, a statement of any disbursements incurred for your account. Disbursements generally include

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costs such as long distance telephone calls, postage, duplicating charges, filing fees and the like. We will not incur any major disbursement expenses, such as travel, without your prior approval.

In our discussions, Kevin Horgan has disclosed to you that Pillsbury, Madison & Sutro presently represents Diler Foreign Trade, Inc. and Bank of New York in various matters. Your signature below will indicate that you have been informed of the nature of our representation of these clients and waive any objection to our concurrent representation of Diler and Bank of New York.

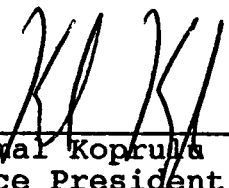
Please do not hesitate to contact me or Kevin Horgan (202/463-2368) with any questions you might have about our representation of Interbank. If you agree that we may proceed to provide services on the terms set forth above, please sign and return this letter along with a retainer of \$5,000. The \$5,000 retainer will be applied to the first \$5,000 in fees and disbursements incurred in connection with our representation of Interbank. If our fees and disbursements for the aforementioned services are less than \$5,000, the excess will be returned to Interbank.

Very truly yours,


Donald E. deKieffer

I agree to the foregoing.

11/12/90
Date


Kemal Koprulu
Vice President
Interbank

PILLSBURY MADISON & SUTRO
INTERNATIONAL TRADE PERSONNEL

Donald E. deKieffer (Partner)	\$265/hr
J. Kevin Horgan (Associate)	\$205/hr
Thomas B. Trimble (Associate)	\$170/hr
Damon E. Xenopoulos (Associate)	\$155/hr
J. Christopher Stevens (Assoc.)	\$128/hr
Kim A. Claudfelter (Leg. Ass't)	\$65/hr
Sangme L. Coghlan (Leg. Ass't)	\$65/hr