

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 Winthrop, Stimson, Putnam & Roberts - Washington Office 1133 Connecticut Avenue, N.W., Washington, D.C. 20036	2. Registration No. 4735
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3. Name of foreign principal Caribbean Banana Exporters Association ("CBEA")	4. Principal address of foreign principal Woodlands, Newgents Park Hatch End, Pinner Middlesex HA5 4ZA, England
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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
 - Committee
 - Voluntary group
 - Other (specify) _____
- Individual—State his nationality _____

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

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

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

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

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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

Caribbean Banana Exporters Association is an association representing the interests of its members, growers and exporters of bananas produced in the Caribbean countries of Jamaica, Dominica, St. Lucia, St. Vincent and the Grenadines, Grenada, Belize and Suriname.

b) Is this foreign principal

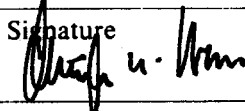
- Owned by a foreign government, foreign political party, or other foreign principal Yes No
- Directed by a foreign government, foreign political party, or other foreign principal..... Yes No
- Controlled by a foreign government, foreign political party, or other foreign principal Yes No
- Financed by 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.)

CBEA is controlled and financed by its members, the growers and exporters of bananas produced in the Caribbean countries listed at 8(a), above. These companies included Fyffes plc, Geest plc, and Jamaican Producers.

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 3/3/95	Name and Title Christopher R. Wall Partner	Signature 
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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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Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 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.

Name of Registrant	Name of Foreign Principal
Winthrop, Stimson, Putnam & Roberts Washington, DC Office	Caribbean Banana Exporters Association ("CBEA")

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.

The agreement is an oral understanding that Winthrop, Stimson will provide CBEA the services described below on the basis of normal hourly billing rates, but not to exceed a cap of \$45,000 per month beginning in February 1995, plus out-of-pocket expenses for as long as the services are required.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The registrant has agreed to act as legal counsel for the principal in connection with an investigation of matters concerning the principal currently being conducted by the Office of the United States Trade Representative (USTR). In addition to legal advice, it is reasonable to expect that the registrant will advise the principal with respect to certain political aspects of this investigation. The precise nature of assignments to be undertaken by the registrant are described more fully in response to question 5 below. The individuals actually performing this service will be lawyers, although some nonlawyer professionals will assist.

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

The primary activities of the registrant will be in the nature of legal services relating to the investigation of matters concerning the principal currently being conducted by the Office of the USTR. To that extent, the registrant will advise the principal on the legal aspects of this investigation, actively represent the principal before USTR officials and, if and where appropriate, negotiate with USTR officials on behalf of the principal.

To a lesser extent, the registrant will represent the principal before other Executive Branch officials who, although not part of the office of the USTR, may still be relevant to the Administration's policy decisions concerning this investigation.

In some instances the registrant will advocate the interest of the principal before interested members of Congress and/or their staff.

Finally, the registrant will provide the principal with legal advice in connection with the foregoing, including but not limited to assistance in drafting legal and other documents.

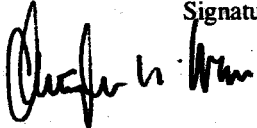
6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹

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.

The primary "political activity" to be conducted by the registrant will relate to the assistance in the preparation of certain documents to be employed by the principal. The primary purpose of these documents will be to advocate the termination of the USTR investigation addressed at the European Union (EU) banana import regime. These documents will explain reasons why terminating this investigation would be consistent with U.S. domestic and foreign policy interests.

As stated above, the primary responsibility of the registrant will be to assist in preparing these documents and especially advising with regard to legal aspects thereof. The registrant will assist in furnishing some of these documents to USTR and other relevant Executive Branch officials. In some instances, the registrant will furnish these documents to members of Congress and/or their staff.

Date of Exhibit B	Name and Title	Signature
3/3/95	Christopher R. Wall Partner	

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.