

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 The Fratelli Group 1300 Connecticut Ave., N.W. Suite 600 Wash.DC 20036		2. Registration No. 5004
3. Name of foreign principal Caribbean Banana Exporters' Association	4. Principal address of foreign principal Woodlands, Nugents Park Hatch End Middlesex, England HA5 4RA	

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.
b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:
a) Principal address
b) Name and title of official with whom registrant deals.
c) Principal aim

RECEIVED
REGISTRATION UNIT
SEP 19 9 31 AM '88
ATTORNEY GENERAL
DEPARTMENT OF JUSTICE

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 include 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

I declare under penalty of perjury that the foregoing is true and correct. Executed on 3/9/95

Date of Exhibit A MARCH 13, 1995	Name and Title FRANCIS O'BRIEN - PRESIDENT	Signature FRANCIS O'BRIEN
-------------------------------------	---	------------------------------

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.

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 .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 The Fratelli Group	Name of Foreign Principal <i>5004</i> Caribbean Banana Exporters Association
--	---

Check Appropriate Boxes:

- 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.
- 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.
- 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.

RECEIVED
REGISTRATION UNIT
C-113
DIVISION

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

The Fratelli Group has been contracted by CBEA to provide communications consulting services. Fratelli will work with CBEA, its members and agents to develop communications strategies and materials for use with the media and public officials.

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

Drafting, editing and distribution of press kits, to include press releases and fact sheets.

Consultation with CBEA on appropriate communications strategies.

Coordination of press conferences and other potential events.

Coordination of interviews with media for CBEA spokespeople.

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.

CBEA is attempting to convince the U.S. government to reverse a decision by the United States Trade Representative to pursue a Section 301 Investigation of the European Union Banana Regime. The Fratelli Group has been retained by CBEA to manage communications with the media and to consult on overall strategy. Fratelli will produce public communications documents to be circulated in the media and among public officials. Fratelli will also coordinate press events on behalf of CBEA.

I declare under penalty of perjury that the foregoing is true and correct. Executed on MARCH 13, 1995.

Date of Exhibit B	Name and Title	Signature
MARCH 13, 1995	FRANCIS O'BRIEN - PRESIDENT	FRANCIS O'BRIEN

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.



January 31, 1995

Mr. Gordon Myers, CMG.
Caribbean Banana Exporters Association
Woodlands, Nugents Park
Hatch End
Middx., HA5 4RA
England

Dear Mr. Myers:

It was a pleasure meeting with you and discussing how The Fratelli Group could assist the Caribbean Banana Exporters Association (CBEA) in its U.S. effort.

As we discussed in our recent meeting, the CBEA seeks assistance to defend traditional trade relationships between the Caribbean nations and members of the European Community. To successfully accomplish this goal, The Fratelli Group will work with CBEA to develop a coordinated and effective communications strategy to supplement and enhance the Association's lobbying initiatives.

The key to success will depend on the ability of the CBEA team to fashion and communicate a compelling case that will resonate with U.S. regulators, legislators, and the media.

Because the case carries international implications, media awareness will be heightened. This creates the need for an aggressive, knowledgeable and well-connected communications team. The Fratelli Group is experienced, successful, and uniquely capable of meeting this communications challenge by helping CBEA mount a sophisticated, winning trade campaign.

The staff of The Fratelli Group has extensive experience in international trade issues, and has developed a strong record of success in the design and execution of trade-related public policy initiatives.

As part of our service, we will devise and execute an appropriate communications strategy that will include:

T H E F R A T E L L I G R O U P

1300 Connecticut Avenue, NW • Suite 600 • Washington, DC 20036 • 202.822.9491 • Fax 202.223.0358

page 2

- Research
- Message development
- Key audience identification
- Communications planning and execution
- Specialized media contacts (U.S.)
- Comprehensive writing services

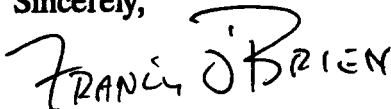
Because the 301 case has been brought by a U.S. firm, a bias against the CBEA position will be inherent among U.S. regulators and legislators. It will be critical for us to address this bias from the beginning with a strong and well constructed communications plan.

As the debate evolves, our efforts will be coordinated to achieve maximum benefit. To achieve these goals, Fratelli will regularly consult with CBEA and its team on the most appropriate methods and avenues in which to focus our efforts to ensure that the communications plan is closely integrated with lobbying efforts.

For the above mentioned communications services, The Fratelli Group will charge a \$10,000 monthly fee to be paid in advance, with out-of-pocket expenses to be billed. The initial agreement would include February, March and April, 1995. After three months, this agreement may be suspended upon 30 days written notice by either party.

We look forward to working with you. Your case presents an exciting challenge that we would be eager to pursue. I have enclosed a Fratelli brochure for your information. I will call you shortly to discuss formalizing an agreement.

Sincerely,

A handwritten signature in black ink that reads "FRANCIS O'BRIEN". The signature is written in a cursive style with some capital letters.

Francis O'Brien

enclosure

10,000

486-8686

CARIBBEAN BANANA EXPORTERS ASSOCIATION

Woodlands,

Nugents Park,

Hatch End,

Middx JA5 4R

Phone: 081-428 6773

44 Fax: 081-428 2009

From G. E. Myers, CMG.

Francis O'Brien,
The Fratelli Group,
1300 Connecticut Avenue,
Suite 600,
Washington DC 20036

Fax : 010 1 202 223 0358

7 February 1995

Dear Francis,

Section 301 Petition

I am writing to confirm that CBEA would like Fratelli to act for them in organising a PR campaign in relation to this petition, in co-ordination with the operations of Winthrop Stimson and Bennett Marsh.

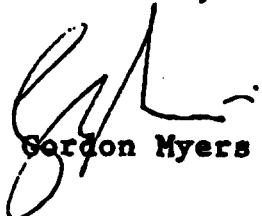
As agreed on the 'phone, the campaign would be undertaken for two months only and would seek to obtain maximum impact in that period. I hope to receive as soon as possible a detailed strategy and programme, with estimated fees and costs. The former should certainly not exceed the upper limit discussed of \$ 15,000 per month.

An essential part of the programme will be the deployment at the optimum moment of one, or preferably several, Prime Ministers from the CBEA countries. We must rely on co-operation of the Washington embassies to secure this. This should be secured through the Working Group, which we agreed to set up, chaired by Bennett Marsh, and bringing together yourselves, Winthrop Stimson, and the embassies, notably Jamaica and St Lucia, both of whose ambassadors will be Group members.

You asked for payment monthly in advance. Would you kindly let me have details of your bank account for this purpose. Invoices should be addressed to CBEA, c/o Fyffes Group Ltd.

I look forward to working with you on this.

Best wishes,


(Gordon Myers)