

ALCALDE & FAY

GOVERNMENT & PUBLIC AFFAIRS CONSULTANTS

January 28, 2019

John C. Demers
Assistant Attorney General for National Security
Department of Justice
FARA Registration Unit
175 N Street, NE
Constitution Square, Building 3
Washington, DC 20002

Dear Assistant Attorney Demers:

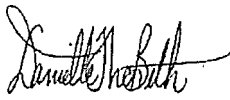
Please find attached, correspondence dated July 10, 2018 from the Government of Saint Lucia to the Departments of State and Defense. Although the original correspondence was disseminated from the Government of Saint Lucia directly to those departments, we now understand that any subsequent dissemination by Alcalde & Fay would qualify as "informational material" and subject to the disclaimer and 48-hour filing requirement provided under § 614.

Our filing contains a table of communication with the federal government on behalf of the Government of Saint Lucia, including the date of dissemination of this letter to two Congressional offices.

In addition, we provided the attached map of the Caribbean and the June 5, 2018 voting record for the Organization of American States, during two meetings with Congressional offices, which we now also understand would qualify as "informational material" and subject to the disclaimer and 48-hour filing requirement provided under § 614.

We sincerely appreciate the clarification provided during preparation of our first Six-Month Supplemental FARA Statement and will ensure that future communication with the federal government that includes "informational materials" as defined by FARA will include the disclaimer and will be timely filed.

Sincerely,



Danielle McBeth
Partner



Maurice Kurland
Partner