

U.S. Department of Justice  
Washington, DC 20530

**Registration Statement**  
**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

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**I--REGISTRANT**

1. Name of Registrant

Miles Partnership, LLLP

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2. Registration Number (To be assigned by the FARA Unit)

7382

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3. Primary Business Address

6751 Professional Pkwy, Suite 200, Sarasota, FL 34240

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4. If the registrant is an individual, furnish the following information:

- (a) Residence address(es)
  
  
  
  
  
- (b) Nationality
- (c) Year of birth
- (d) Present citizenship
- (e) If present citizenship not acquired by birth, state when, where and how acquired
- (f) Occupation

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5. If the registrant is not an individual, furnish the following information:

- (a) Type of organization: Committee  Association  Partnership  Voluntary group   
Corporation  Other (*specify*) \_\_\_\_\_
- (b) Date and place of organization 11/29/2005, Sarasota, FL
  
  
- (c) Name of responsible individual David Burgess  
(e.g., officer, director or partner)
  
- (d) Other business address(es), if any, including 13952 Denver West Parkway, Suite 200, Lakewood, CO 80401  
locations of branch or local offices
  
  
- (e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
David Burgess	Provided to DOJ Under Separate Cover	UNITED STATES	President & CEO
Dianne Gates	Provided to DOJ Under Separate Cover	UNITED STATES	Chief Financial Officer
Laura Libby	Provided to DOJ Under Separate Cover	UNITED STATES	President - Destination Management
Randi Rogers	Provided to DOJ Under Separate Cover	UNITED STATES	Chief Operating Officer
Jay Salyers	Provided to DOJ Under Separate Cover	UNITED STATES	Senior Vice President
Roger Miles	Provided to DOJ Under Separate Cover	UNITED STATES	Chairman

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
See Appendix for Response		

(h) Describe the nature of the registrant's regular business or activity.

Miles Partnership is a strategic marketing consultancy focused exclusively on travel and tourism.

(i) Give a complete description of the ownership and control structure of the registrant.

Miles Partnership, LLLP is a partnership and is owned by Miles Partnership, LLC. There are three partners who hold more than 10% ownership that are private US citizens.

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6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
See Appendix for Response			

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal Foreign Principal Address  
 See Appendix for Response

**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes  No

If yes, describe fully.

Foreign Principal Activities/Services

**IV--FINANCIAL INFORMATION**

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>2</sup> under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes  No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
See Appendix for Response					

\$ 4,749,530.17

**Total**

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.  
<sup>2</sup> An agent must register within 10 days of becoming an agent, and before acting as such.  
<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>4</sup> under FARA, has the registrant received anything of value<sup>5</sup> other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes  No

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
See Appendix for Response				

**10. (a) DISBURSEMENTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>6</sup> under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes  No

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					

\$5,759,528.02

Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>7</sup> under FARA, has the registrant disposed of any thing of value<sup>8</sup> other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes  No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
See Appendix for Response				

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>9</sup> under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes  No

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
01/30/2024	Jay Salyers	Team Stand for America	Cash	\$ 2,500.00

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Prior to the time of filing this statement,<sup>11</sup> has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes  No

If yes, identify each foreign principal and file the informational materials.

Foreign Principal	Type of Informational Materials
IFEMA MADRID Tahiti Tourisme Los Cabos Tourism Trust Bermuda Tourism Authority	Advertising campaigns; Website URL(s)  Advertising campaigns

12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes  No

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

Bermuda Tourism Authority; Los Cabos Tourism Trust; IFEMA MADRID; Tahiti Tourisme

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes  No

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount

14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes  No

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
360viewPR	530 S Hewitt St., Unit 322 Los Angeles, CA 90013	Tahiti Tourisme

15. Activities in preparing or disseminating informational materials will include the use of the following:

- Magazine or newspaper     
 Advertising campaigns     
 Press releases     
 Pamphlets or other publications  
 Lectures or speeches     
 Radio or TV broadcasts     
 Motion picture films     
 Letters or telegrams  
 Email  
 Website URL(s): https://onlyinmadrid.com/  
 Social Media website URL(s): \_\_\_\_\_  
 Other (*specify*): \_\_\_\_\_

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

<sup>11</sup> See Footnote 2, on page 3.

16. Informational materials will be disseminated among the following groups:

- Public officials
- Legislators
- Government agencies
- Newspapers
- Editors
- Civic groups or associations
- Libraries
- Educational groups
- Nationality groups
- Other (*specify*) See Appendix for Response

17. Indicate the language to be used in the informational materials:

- English
- Other (*specify*) \_\_\_\_\_

**VI--EXHIBITS AND ATTACHMENTS**

18. (a) The following described exhibits shall be filed with a Registration Statement:

*Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

*Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

**VII--EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature <sup>12</sup>
<u>03/11/2024</u>	<u>David Burgess</u>	<u>/s/David Burgess</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

<sup>12</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

02/12/2024

DAVID BURGESS



## Appendix

### Response to Item 5(g)

**Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?**

<b>Person</b>	<b>Foreign Principal(s)</b>	<b>Services</b>
David Burgess	IFEMA MADRID	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
	Tahiti Tourisme	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
	Los Cabos Tourism Trust	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
	Bermuda Tourism Authority	Strategic direction with respect to marketing campaigns for tourism purposes.
Jay Salyers	IFEMA MADRID	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
	Tahiti Tourisme	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
	Los Cabos Tourism Trust	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
	Bermuda Tourism Authority	Strategic direction with respect to marketing campaigns for clients for tourism purposes.

## Appendix

### Response to Item 6

**Item 6: List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.**

<b>Name</b>	<b>Residence Address</b>	<b>Foreign Principal(s)</b>	<b>Nature of Services</b>
Kristin Carlson	Provided to DOJ Under Separate Cover	Tahiti Tourisme	Strategic direction with respect to marketing campaigns for the client for tourism purposes.
Gray Lawry	Provided to DOJ Under Separate Cover	IFEMA MADRID	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
Gray Lawry	Provided to DOJ Under Separate Cover	Tahiti Tourisme	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
Gray Lawry	Provided to DOJ Under Separate Cover	Los Cabos Tourism Trust	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
Gray Lawry	Provided to DOJ Under Separate Cover	Bermuda Tourism Authority	Strategic direction with respect to marketing campaigns for clients for tourism purposes.
Melissa Bartalos	Provided to DOJ Under Separate Cover	Bermuda Tourism Authority	Strategic content direction with respect to marketing campaigns for clients for tourism purposes.
Allison Jones	Provided to DOJ Under Separate Cover	Los Cabos Tourism Trust	Account management with respect to marketing campaigns for clients for tourism purposes.
Duane Uyeda	Provided to DOJ Under Separate Cover	Tahiti Tourisme	Account management with respect to marketing campaigns for clients for tourism purposes.
Samantha Sommers	Provided to DOJ Under Separate Cover	IFEMA MADRID	Account management with respect to marketing campaigns for clients for tourism purposes.
Elizabeth Mabe	Provided to DOJ Under Separate Cover	IFEMA MADRID	Account management with respect to marketing campaigns for clients for tourism purposes.
Mattes Hall	Provided to DOJ Under Separate Cover	Tahiti Tourisme	Account management with respect to marketing campaigns for clients for tourism purposes.
Mattes Hall	Provided to DOJ Under Separate Cover	Los Cabos Tourism Trust	Account management with respect to marketing campaigns for clients for tourism purposes.
Mattes Hall	Provided to DOJ Under Separate Cover	Bermuda Tourism Authority	Account management with respect to marketing campaigns for clients for tourism purposes.
Justin Gibbs	Provided to DOJ Under Separate Cover	IFEMA MADRID	Strategic SEO direction with respect to marketing campaigns for clients for tourism purposes.
Justin Gibbs	Provided to DOJ Under Separate Cover	Tahiti Tourisme	Strategic SEO direction with respect to marketing campaigns for clients for tourism purposes.
Justin Gibbs	Provided to DOJ Under Separate Cover	Los Cabos Tourism Trust	Strategic SEO direction with respect to marketing campaigns for clients for tourism purposes.
Justin Gibbs	Provided to DOJ Under Separate Cover	Bermuda Tourism Authority	Strategic SEO direction with respect to marketing campaigns for clients for tourism purposes.
Jamie Fiedler	Provided to DOJ Under Separate Cover	IFEMA MADRID	Strategic digital/web direction and execution with respect to marketing campaigns for clients for tourism purposes.

<b>Name</b>	<b>Residence Address</b>	<b>Foreign Principal(s)</b>	<b>Nature of Services</b>
Kayla Coe	Provided to DOJ Under Separate Cover	Los Cabos Tourism Trust	Strategic media direction with respect to marketing campaigns for clients for tourism purposes.
Kayla Coe	Provided to DOJ Under Separate Cover	Bermuda Tourism Authority	Strategic media direction with respect to marketing campaigns for clients for tourism purposes.

## Appendix

### Response to Item 7

**Item 7: List every foreign principal for whom the registrant is acting or has agreed to act.**

<b>Foreign Principal</b>	<b>Foreign Principal Address</b>
IFEMA MADRID	Avenida del Partenón, 5 Madrid SPAIN 28042
Tahiti Tourisme	2eme etage du Quai des Ferrys de la gare maritime Papeete, Tahiti - French Polynesia FRENCH POLYNESIA BP 65-98 713
Los Cabos Tourism Trust	Carretera Transpeninsular Km. 4.3 Plaza Providenci, NO. 209 El Tezal, Cabo San Lucas, BCS, CP, Mexico MEXICO 23454
Bermuda Tourism Authority	22 Church Street, 5th Floor Hamilton, Bermuda BERMUDA HM11

## Appendix

### Response to Item 9(a)

**Item 9(a): RECEIPTS-MONIES:** During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise? If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
IFEMA MADRID	10/23/2023	IFEMA MADRID	Payments for services rendered	\$ 675,486.16	
IFEMA MADRID	-----	-----	-----	----->	\$ 675,486.16
Tahiti Tourisme				None	
Los Cabos Tourism Trust				None	
Bermuda Tourism Authority	02/27/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 14,900.00	
Bermuda Tourism Authority	03/15/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 10,000.00	
Bermuda Tourism Authority	04/14/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 18,635.00	
Bermuda Tourism Authority	05/15/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 5,000.00	
Bermuda Tourism Authority	06/16/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 5,000.00	
Bermuda Tourism Authority	08/30/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 102,200.00	
Bermuda Tourism Authority	08/31/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 967,651.00	
Bermuda Tourism Authority	11/20/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 73,650.00	
Bermuda Tourism Authority	11/30/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 984,078.73	
Bermuda Tourism Authority	12/22/2023	Bermuda Tourism Authority	Payments for services rendered	\$ 132,725.36	
Bermuda Tourism Authority	01/17/2024	Bermuda Tourism Authority	Payments for services rendered	\$ 1,760,203.92	
Bermuda Tourism Authority	-----	-----	-----	----->	\$ 4,074,044.01

## Appendix

### Response to Item 9(b)

**Item 9(b): RECEIPTS-THINGS OF VALUE:** During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant received anything of value other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal? If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
IFEMA MADRID				None
Tahiti Tourisme				None
Los Cabos Tourism Trust				None
Bermuda Tourism Authority				None

## Appendix

### Response to Item 10(a)

**Item 10(a): DISBURSEMENTS-MONIES:** During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal? If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	To Whom	Purpose	Amount	Subtotal
IFEMA MADRID	08/30/2023	various marketing companies	media asset production fees	\$ 6,984.00	
IFEMA MADRID	09/30/2023	various marketing companies	media asset production fees	\$ 39,158.76	
IFEMA MADRID	10/30/2023	various marketing companies	media asset production fees	\$ 103,724.20	
IFEMA MADRID	11/30/2023	various marketing companies	media asset production fees	\$ 972.60	
IFEMA MADRID	12/30/2023	various marketing companies	media asset production fees	\$ 412,768.77	
IFEMA MADRID	01/30/2024	various marketing companies	media asset production fees	\$ 602,034.23	
IFEMA MADRID	-----	-----	-----	----->	\$1,165,642.56
Tahiti Tourisme				None	
Los Cabos Tourism Trust				None	
Bermuda Tourism Authority	06/30/2023	Carefree Communication LLC	digital marketing services	\$ 350.00	
Bermuda Tourism Authority	06/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 246,470.44	
Bermuda Tourism Authority	07/30/2023	Carefree Communication LLC	digital marketing services	\$ 500.00	
Bermuda Tourism Authority	07/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 174,143.22	
Bermuda Tourism Authority	08/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 187,114.63	
Bermuda Tourism Authority	09/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 382,104.78	
Bermuda Tourism Authority	10/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 545,708.67	
Bermuda Tourism Authority	11/30/2023	Carefree Communication LLC	digital marketing services	\$ 900.00	
Bermuda Tourism Authority	11/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 622,820.77	

<b>Foreign Principal</b>	<b>Date</b>	<b>To Whom</b>	<b>Purpose</b>	<b>Amount</b>	<b>Subtotal</b>
Bermuda Tourism Authority	12/30/2023	Carefree Communication LLC	digital marketing services	\$ 900.00	
Bermuda Tourism Authority	12/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$ 596,010.24	
Bermuda Tourism Authority	12/30/2023	Carefree Communication LLC	digital marketing services	\$ 2,200.00	
Bermuda Tourism Authority	12/30/2023	Various advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	media buys to advertising companies (ie, Google, Trip Advisor, Meta, TravelZoo, etc.)	\$1,834,662.71	
Bermuda Tourism Authority	-----	-----	-----	----->	\$4,593,885.46

**Appendix**  
**Response to Item 10(b)**

**Item 10(b): DISBURSEMENTS-THINGS OF VALUE:** During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant disposed of any thing of value other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? If yes, furnish the following information:

<b>Foreign Principal</b>	<b>Date</b>	<b>Recipient</b>	<b>Purpose</b>	<b>Thing of Value</b>
IFEMA MADRID				None
Tahiti Tourisme				None
Los Cabos Tourism Trust				None
Bermuda Tourism Authority				None

**Appendix**  
**Response to Item 16(Other)**

general public; general public; general public; general public