FORM OBD - 67
JAN 1977

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

OMB No. 43-R0216
Approval expires Oct. 31, 1981

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REGISTRATION UNIT
CRIMINAL DIVISION

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

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

Patton, Boggs & Blow
2550 M Street, N.W. Washington, D.C. 20037

2. Registration No.

2165

3. Name of foreign principal

DFS Group, Ltd.

4. Principal address of foreign principal

119 Connaught Center
Connaught Road Central, Hong Kong

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 ☐ Committee

☒ Corporation ☐ Voluntary group

☐ Association ☐ 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 the 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

Retail sales; primarily sales of duty-free goods.

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.)

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.

The foreign principal is a privately-held corporation organized under the laws of Hong Kong, with over one million shares of stock outstanding. Its control is exercised by a board of directors elected annually.

Date of Exhibit A	Name and Title	Signature
February 4, 1981	James R. Patton, Jr. Managing Partner	

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Form OBD-65
Rev. 4-27-77
(Formerly DJ-[illegible])

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Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT
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 duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Patton, Boggs & Blow	DFS Group, Ltd.

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 two 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 two 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 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 foreign principal has requested our assistance in various legal and administrative matters concerning the acquisition and retention of customs warehouse bonds, government regulation of duty-free retail operations, concession contracts, and related matters. The period of the agreement is indefinite, with the principal to pay for services performed at normal hourly rates, and to reimburse the firm for expenses incurred in connection with such services.

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

Registrant may engage in the performance of legal and related services on behalf of the foreign principal. Such services may include formal or informal advocacy of the principal's interests before United States and State government officials. Such services may also include advice and counsel with respect to domestic and foreign trading policies of the United States.

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

Formal or informal advocacy before United States government agencies, especially the United States Customs Service, and State 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 [X] 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 activities outlined under item 5 above will be primarily legal but may also comprise political activities such as contacts with policy-makers responsible for regulating foreign commerce. Such activities may be carried out through various means of advocacy, including prepared extemporaneous testimony, written memoranda, and other efforts to persuade, including informal meetings to present the principal's position; all of such efforts being intended to promote the adoption of appropriate government regulation of duty-free retail sales, and similar purposes.

Date of Exhibit B	Name and Title	Signature
February 4, 1981	James R. Patton, Jr. Managing Partner	

[1/] Political 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.