U.S. Department of Justice
Washington, DC 20530

Exhibit A
To Registration Statement
Under the Foreign Agents Registration Act of 1938, as amended

OMB No. 1105-0003

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 Genreral 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

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

2. Registration No.

2165

3. Name of foreign principal

Scheidt & Bachmann GmBH

4. Principal address of foreign principal

Breite Strasse 132
4050 Moenchen - Gladbach
Germany

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: N/A

a) Branch or agency represented by the registrant.

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

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

a) Principal address

b) Name and title of official with whom 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

Manufacture, sale, and distribution of automatic ticket vending machines.

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.)*

N/A

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.

Privately owned by Mr. Gert Miller and family.

Date of Exhibit A	Name and Title	Signature
6/27/93	Timothy J. May Managing Partner	

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Washington, DC 20530

Exhibit B
To Registration Statement
Under the Foreign Agents Registration Act of 1938, as amended

OMB No. 1105-0007
Approval Expires Nov. 30, 1993

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 Genreral 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	Name of Foreign Principal
Patton, Boggs & Blow	Scheidt & Bachmann GmbH

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.

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

Registrant will provide legal and consulting services, billing on an hourly basis, plus disbursements.

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

To provide legal and consulting advice and representation to the principal before Congress at the Executive branch wil respect to the Federal Transit Administration (FTA) Buy America requirements.

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.

Some of the activity will include briefing members of the Executive and Congressional branches on the application of FTA Buy America requirements to the principal and other manufacturers.

Date of Exhibit B	Name and Title	Signature
6/27/93	Timothy J. May 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.

☆ U.S. GOVERNMENT PRINTING OFFICE: 1990 - 282-068/25017

LAW OFFICES OF
STEPHEN M. WATERS & ASSOCIATES
SUITE 1717 • 150 NORTH WACKER DRIVE • CHICAGO, ILLINOIS 60606
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June 14, 1993

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

RE: Automatic Fare Collection Equipment
BART Contract Number 93UG-210
Buy America Act Waiver/Cubic Objection
Our Reference: 492-47

Dear Mr. Davis:

This office is general counsel for Agent Systems, Inc. of Dallas, Texas. This letter confirms our telephone conversation that you will represent Scheidt & Bachmann GmbH and Agent Systems, Inc. with regard to the dispute noted above.

It is our understanding that you will arrange for the appropriate meetings and FTA conferences and responses as you think appropriate relative to this matter. Your fees will be paid by Agent Systems and Scheidt & Bachmann, and will not exceed $10,000.00. A meeting has already been arranged for the morning of June 16, 1993 which will be attended by you, Brian Waters and Curt Silberman.

Please contact me if you have any questions. Thank you for your courtesy and assistance.

Very truly yours,

Stephen M. Waters
SMW/mj
cc: Agent Systems, Inc.
cc: Each of the above via Facsimile

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TELEPHONE (201) 822-2222

ARNOLD R. KENT
ASSOCIATE COUNSEL

June 11, 1993
My File No. 12711-9

Advance Copy via Telefax
1-202-457-6315

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

Re: Scheidt & Bachmann GmbH / BART

Dear Mr. Davis:

This letter will confirm your telephone conversation with Arnold R. Kent, Esq., pertaining to the above matter. The undersigned Curt C. Silberman and Arnold R. Kent are U.S. Counsel to Scheidt & Bachmann GmbH.

In accordance with this conversation, this letter will authorize you to represent Scheidt & Bachmann before the Federal Transportation Agency and other governmental agencies or divisions thereof, as you deem appropriate, for purposes of asserting Scheidt & Bachmann's position relative to the Buy America Statute and the ramifications of the current situation involving BART and the Cubic Corp.

It is understood that the fee structure for this representation will be a maximum of $10,000.00 in which Mr. Brian Waters of Agent Systems, Inc. will participate.

I further understand from Mr. Kent that you anticipate an initial meeting with government officials on Wednesday, June 16, 1993, which meeting I will attend, and I would appreciate your telephone call on Monday, June 14, to confirm the appointment and to advise time and location.

Very truly yours,

Curt C. Silberman

CCS/gb