U.S. Department of Justice
Washington, DC 20530

Exhibit A
To Registration Statement
Pursuant to 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, copy of information materials 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 of every such documents, other than information materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 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

Piper Rudnick LLP
1200 19th Street, NW
Washington, D.C. 20036-2412

2. Registration No. 3712

FEDERAL BUREAU OF INVESTIGATION
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CRM/ARS UNIT

3. Name of foreign principal

Government of Spain

4. Principal address of foreign principal

Embassy of Spain
2375 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

5. Indicate whether your foreign principal is one of the following:

☒ 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 nationality

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant. Government of Spain

b) Name and title of official with whom registrant deals. Ambassador Javier Rupérez and Deputy Chief of Mission, Minister Félix Valdés

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

8. If the foreign principal is not a foreign government or a foreign political party,

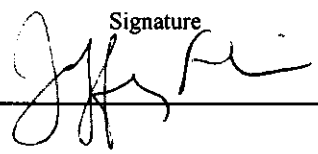
a) State the nature of the business or activity of this foreign principal

b) Is this foreign principal

Supervised by a foreign government, foreign political party, or other foreign principal	Yes ☐	No ☐
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 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 must 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.

Date of Exhibit A	Name and Title	Signature
1/16/03	Jeffrey F. Liss, Chief Operating Officer	

U.S. Department of Justice
Washington, DC 20530

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

OMB NO. 1105-0007

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. One original and two legible photocopies of this form shall be filed 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, copy of information materials 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 of every such documents, other than information materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration No. 3712
Piper Rudnick LLP	

3. Name of foreign principal

Government of Spain

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CRIMINAL DIVISION

Check Appropriate Boxes

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.

5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.

6. ☐ 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 expenses, if any, to be received.

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

Please see the attached correspondence.

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

Please see the attached correspondence.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? 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.

The Registrant will provide strategic advice and counsel to the foreign principal. The Registrant's activities may also include inquiries on behalf of the foreign principal with members of the Legislative and Executive Branch. The Registrant will not speak on behalf of the foreign principal to the executive and legislative branches of the United States Government except with the foreign principal's authorization.

Date of Exhibit B	Name and Title	Signature
1/16/03	Jeffrey F. Liss, Chief Operating Officer	

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any 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 interest, policies, or relations of a government of a foreign country or a foreign political party.

Piper Rudnick

LLOYD HAND
lloyd.hand@piperrudnick.com
direct 202.371.6050

December 30, 2003

His Excellency
Javier Rupérez
The Ambassador of Spain
2375 Pennsylvania Avenue N.W.
Washington D.C., 20037

My dear Mr. Ambassador:

The purpose of this letter is to propose retention of Piper Rudnick LLP (the "Firm") by the Government of Spain. The terms and conditions of our retention are described below.

The Firm will provide counsel, advice and other services on a wide range of political, economic and other matters as identified and described by the Government of Spain. Our Firm will be available to assist the Government of Spain in all matters with respect to which we do not have pre-existing conflicts at the time a specific assignment is given. The purpose of this retainer arrangement is to assist the Government of Spain in promoting closer relations with the United States. In this respect, the firm will advise the Government of Spain in all matters related to public diplomacy, strategic communication with the media, evaluation of events programmed by the Embassy of Spain and will assist and counsel the Government of Spain in strengthening its relations with the White House, the State Department and other Executive Departments and Agencies, and the U.S. Congress, undertaking all appropriate actions and activities. All work done on behalf of the Spanish Government will be closely coordinated with its embassy in Washington. Each individual assignment will be the matter of agreement between the Firm and the Government of Spain.

This agreement is effective commencing December 30, 2003. Spain agrees to pay the firm a retainer of two (2) million dollars ($2,000,000) in twenty (20) equal monthly installments of one hundred thousand dollars ($100,000). This amount is to be paid for professional services including reasonable expenses for a period of twenty (20) months at the end of which period we will mutually evaluate our relationship. An initial payment of 35 percent of the total retainer, seven hundred thousand dollars ($700,000), to be made at the time of the execution of the agreement, shall be held by the firm in an interest-bearing escrow account for the benefit of the Government of Spain. Each monthly installment in the amount of one hundred thousand dollars ($100,000) will be debited against this escrow account. Method of payment will be in U.S. dollars transmitted by wire to the Firm's account (see attached wiring information). Our billing statements shall be rendered on a monthly basis and are due and payable upon receipt.

All of our lawyers, consultants and legal assistants are bound by and strictly adhere to the District of Columbia Court of Appeals Rules of Professional conduct and laws and regulations governing lawyers, lobbyists and foreign agents applicable to activities on behalf of clients vis-à-vis in the Executive Branch, U.S. House of Representatives and U.S. Senate.

We require all lawyers, consultants, and legal assistants to maintain time records regarding their work for each of our clients. The time records are reviewed carefully before bills are sent to our clients. All attorneys, consultants and legal assistants have hourly billing rates, which are reflected on our monthly time records. The amount of our billing statement for professional services will be at the fair value of our services, taking into account the time records for the matter, the types of services we have been asked to perform, any special level of expertise required, the size and scope of the matter, the results obtained, and other relevant circumstances. Our usual practice is to bill at standard hourly rates plus expenses. The hourly rates for partners in the firm are $225-$595, associates bill at $190-$300, and paralegals bill at $25-$170. My hourly rate for this type of work is $575.

This agreement may be terminated by either party by providing the other thirty (30) days advance written notice of termination, in which case any unpaid fees due to Piper Rudnick will be paid by the Government of Spain on a pro-rata basis through to the date of termination. In the event that some extraordinary occurrence affecting this agreement should take place or the Government of Spain should require extraordinary services, e.g. legal or litigation services not contemplated by this agreement, the Firm and the Government of Spain agree to enter upon a separate agreement.

We look forward to working with you. If this letter meets with the approval of the Government of Spain, please countersign and date below and return.

Sincerely,

Lloyd N. Hand
Partner
PIPER RUDNICK LLP

Accepted and approved:

Government of Spain

By: _____

Date: 31.12.03