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: Holland & Knight
888 - 17th Street, N.W., Suite 900
Washington, D.C. 20006

2. Registration No.: 3718

3. Name of foreign principal: Florida International Bankers Association

4. Principal address of foreign principal: World Trade Center
80 S.W. 8th St., Suite 1800
Miami, Florida 33130

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.

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

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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

The Florida International Bankers Association is a Florida not-for-profit corporation. It was established for the purpose of promoting and fostering international banking and commerce, providing a medium for the exchange of ideas, discussing common member problems, developing new procedures to enhance international banking in Florida, and developing better banking relationships and comprehension.

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.)*

See Attachment 9A.

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
December 18, 1991	David H. Baker, Partner	

ATTACHMENT 9A

Florida International Bankers Association ("FIBA"), Inc. is a non-profit Florida corporation. Its membership includes both foreign banking institutions that do business in Florida and U.S. institutions. All members pay dues which are the primary source of FIBA's funding. Due to the changing composition of its membership, FIBA may from time to time be predominantly financed by foreign principals.

Foreign FIBA members may be elected to FIBA's Board of Directors or as officers. Therefore, FIBA may be directed and controlled by foreign principals depending on the composition of FIBA's Board of Directors and officers.

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U.S. Department of Justice
Washington, DC 20530

Exhibit B
To Registration Statement
Under 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. 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
Holland & Knight	Florida International Bankers Association

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.

See Attachment 3B.

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

See Attachment 5B.

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

See Attachment 5B.

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.

See Attachment 5B.

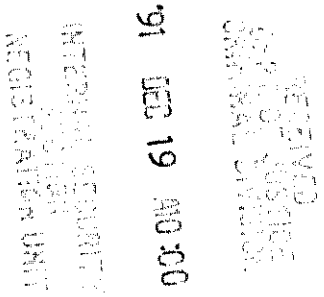
Date of Exhibit B	Name and Title	Signature
December 18, 1991	David H. Baker Partner	

[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.

ATTACHMENT 3B

Registrant previously represented FIBA in matters for which no registration under the Foreign Agents Registration Act was required. Florida International Bankers Association retained registrant on or about July 1991 to lobby respecting S. 1019, S. 543 and H.R. 6, (later H.R. 3768), regarding the Foreign Bank Supervision provisions. Charges for these services will be at registrant's normal hourly rates. All billing will include reimbursements for all expenses incurred on behalf of FIBA. Duration of registrant's services is unknown.

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ATTACHMENT 5B

On or about July 1991, registrant began lobbying Congress and the Federal Reserve System on behalf of the Florida International Bankers Association ("FIBA"), Inc., with respect to S. 1019, S. 543 and H.R. 6 (later H.R. 3768), regarding the Foreign Bank Supervision provisions. The representation included writing to, and personally contacting legislative members and their staff and officers at the Federal Reserve. The following attorneys were actively involved in the lobbying efforts: Janet R. Studley of registrant's Washington office; Carlos Mendez-Peñate and Amelia R. Maguire of registrant's Miami office.

The following is a list of all personal contacts between registrant and legislative members or staff and Federal Reserve System officials in the six month period ending August 7, 1991:

Date	Activity
07/19/91	Telephone conference with staff of Senator Mack.
07/22/91	Telephone conference with Leslie Woolley, Legislative Director, Office of Senator Graham.
07/24/91	Telephone conference with Buz Gorman, Legislative Assistant, Office of Senator Mack.
07/26/91	Meetings with Senators Graham and Mack and their staffs; with staff members of the Senate Banking Committee; and with the Federal Reserve Board staff.
07/27/91	Telephone conferences with L. Woolley and T. Cline, Office of Senator Graham.
07/28/91	Telephone conference with L. Woolley.
07/30/91	Telephone conference with L. Woolley.
08/01/91	Telephone conference with L. Woolley (Senator Graham) and Kathleen O'Day, staff member of Federal Reserve System.
08/02/91	Telephone conferences with T. Cline and Congressman Sam Gibbons.
08/05/91	Telephone conference with L. Woolley.
08/06/91	Telephone conference with T. Cline.
08/07/91	Telephone conferences with L. Woolley and T. Cline.