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
Approval Expires Oct. 31, 1986

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
Development Counsellors International LTD
461 Park Ave South 9th Floor

2. Registration No.
4777

3. Name of foreign principal
St. Lucia National Development Corporation

4. Principal address of foreign principal
27 Brazil Street P.O. Box
Castries, St. Lucia W.I.

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

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.)*

Promote investments in the St. Lucia

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
11/15/99	JOAN AMATO Controller	Joan Amato

U.S. GOVERNMENT PRINTING OFFICE : 1984 O - 434-349

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
Approval Expires Nov. 30, 1986

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
Development Counsellors International LTD	St. Lucia National Development Corporation

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.

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

Economic development + U.S. media strategy action plan

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

see # 4

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 # 4

Date of Exhibit B	Name and Title	Signature
11/15/99	JOAN AMATO CONTROLLER	Joan Amato

[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.

Development Counsellors International 461 Park Avenue South, New York, NY 10016
Phone (212) 725-0707 Fax (212) 725-2254 E-mail econdev@dc-intl.com / Website: www.dc-intl.com

March 19, 1999

Ms. Jacqueline Albertine
General Manager
St. Lucia National Development Corporation
Brazil Street, P.O. Box 495
Castries, St. Lucia, West Indies

Re: DCI Marketing Program/Workplan for the St. Lucia National Development Corporation (February 23-1999 Through February 28, 2000)

Dear Jacqueline:

Based upon our recent site visit to St. Lucia, a careful appraisal of existing materials and information provided during the course of this visit, as well as subsequent meetings with Mr. Carl Pilgrim, the NDC's New York-based executive, and Mr. John Arrindell, Executive Director of the Eastern Caribbean Investment Promotion Service (ECIPS), Development Counsellors International is pleased to present the following marketing program/workplan.

These recommendations emerge from the firm's 39 years of uniquely specialized experience in economic development marketing.

I. THE OBJECTIVES

Simply put, this workplan seeks to help the NDC create quality jobs on the island of St. Lucia. In particular, we will seek to:

- Establish an improved image for St. Lucia among prospective investors and their advisors;
- Broaden the scope of outreach of investment promotion activities.
- Increase both the quality and quantity of the NDC's direct contact with prospective investors and their advisors;

Because of budget limitations, we have developed a highly focused and results-oriented program. We have found that such an approach often encourages more immediate results and can be built upon more successfully with a proven favorable return-on-investment. The plan that we propose would focus primarily on prospecting – directly reaching and encouraging prospective investors in the United States and Canada to make direct investment or participate in joint ventures in St. Lucia.

A secondary element of the program would be public relations, placing favorable articles about St. Lucia and its business opportunities within key trade press. These articles can help generate additional prospect activity as well as improve the climate for sales contact.

Through this end, we have developed the folowing program elements:

II. THE PROGRAM

The following key activities would be the major elements of DCI's proposed marketing program for St. Lucia:

A. Getting Started: Defining The Right Target Companies

The three investment targets identified by both NDC and ECIPS as priorities are information services, agro-processing and tourism facilities/services. All three sectors make sense in terms of both local and international competitiveness.

An immediate priority will be the development of a "smart list" database of prospective investors. This database will be compiled from a number of key sources including:

- Major business databases (such as Dunn & Bradstreet) utilizing SIC codes of St. Lucia's target companies.
- Companies/business executives who already have existing ties to St. Lucia and/or the Caribbean (the list of US citizens who own property or timeshares in St. Lucia is a prime example of this).
- Companies that have previously indicated interest in the Eastern Caribbean (via both the NDC and ECIPS).
- The growing number of location advisors/site selection consultants who frequently manage key location searches for both large and midsize corporations.

The smart list that we develop will be the driving force behind the next section which is the direct mail campaign.

Objective: Create a "smart list" database one overall smart list that will have at least 1,500 contacts in the desired SIC codes.

B. Direct Mail Outreach Program

With a "smart list" database assembled, we will commence a comprehensive direct mail campaign covering both the United States and Canada. Three separate mailings (tentatively timed to be dropped in May, September and November) will be developed by DCI. The Prime Minister, Dr. Kenny Anthony, would be the ideal individual to sign such a letter for the initial mailing. Where possible, private sector endorsements from US companies with investments in St. Lucia would be utilized.

Telephone follow-up with interested companies would be immediate. DCI would seek to "qualify" the prospect and seek out next steps to explore investment in St. Lucia.

Objective: Generate three separate mailings to reach targeted investors.

C. Taking St. Lucia On The Road: Prospecting Missions

Responses to the mail campaign will drive a prospecting travel schedule for Carl Pilgrim. Geographic regions that record the greatest quantity and quality of responses will merit individual missions with appointments arranged by DCI (in addition to ongoing prospecting efforts in the New York tri-state area).

Objective: Arrange and carry out 2-3 prospecting missions in the U.S. (and possibly Canada) that consist of 1-2 days of meetings with qualified investors and site selection consultants; carry out ongoing prospecting program in New York tri-state area.

D. Beyond Prospecting Missions: Trade Show Support

Throughout the year, the NDC will be participating in various tradeshows in the U.S. and Canada. In order to maximize the efficacy of these tradeshows, DCI proposes to arrange meetings for the NDC with trade show attendees.

An advance letter would be mailed to appropriate attendees requesting a meeting to discuss the benefits of doing business in St. Lucia. DCI would conduct telemarketing follow-up to arrange such meetings.

Objective: Arrange 1-2 days worth of appointments with qualified prospects at two designated tradeshows.

E. Special Hotel Development Initiative: Encouraging Investors to Attend November Seminar in St. Lucia

From our meeting with John Arrindell of ECIPS, we discovered the organization was planning a Fall meeting in St. Lucia to attract hotel and related investment to the Eastern Caribbean.

This is a golden opportunity for St. Lucia to show what it has to offer hotel investors (essentially offering the island a "home court advantage").

DCI would assist in encouraging attendance at the event as well as arranging one-on-one meetings for the NDC with prospective investors in attendance.

Objective: Organize one-on-one meetings with key hotel developers before, during and after the main event. DCI will also assist ECIPS in augmenting the invitation list.

F. Preparing St. Lucia for Meetings with Prospective Investors

As we discussed during the course of our recent visit to St. Lucia (and evidenced in this workplan), DCI's primary role is "to bring the horses to water." It is essentially the NDC's job "to get the horses to drink."

We do believe, however, that we can be of assistance in preparing the NDC's designated marketers for this task via a special one-on-one "coaching" session with DCI's Chairman, Ted Levine as well as ongoing telephone consultation.

Objective: Hold special "coaching" session on meetings with prospective investors; Offer ongoing counsel and advice in presentation preparation.

G. Public Relations: Telling St. Lucia's Story to the Media

A secondary component within this marketing effort for St. Lucia is to get the word out about the positive business opportunities via editorial placement. In addition to responding to appropriate media leads, we would recommend arranging 2 individual journalists' visits. These would be reporters or freelance writers from business publications that are read by the people that St. Lucia hopes to attract as investors. The main goal of this media campaign is to start to generate a media buzz about the favorable business climate and to use the end product - the articles - in the direct mail program as third party endorsements.

Objective: Arrange individual press visits to St. Lucia for 2 business journalists; Penetrate appropriate stories that might include St. Lucia.

H. Ad Hoc Consulting

This type of counseling could fall under several categories:

- Giving advice where needed. This could include anything from giving advice on the best ways of creating follow-up letters, to the presentation of materials, to best presenting techniques, etc.
- Arranging for media appointments and/or speaking engagements for Prime Minister Anthony during the course of an already scheduled visit to the United States or Canada.
- Assisting your organization in translating the success of this marketing program into telling NDC's own success story on the island.

Simply put, we do everything we can to help our clients achieve their objectives as quickly and as economically as possible.

III. THE BUDGET

Staying within the preliminary budget of $108,000 (outlined in the original proposal), the following line item budget would be established:

St. Lucia National Development Corporation/DCI
Investment Attraction Program

PROGRAM BUDGET
(February 23, 1999-February 28, 2000)

I.	Professional Fees		
	-- DCI Time Costs for Program Design and Execution ($6,750/month x 12 months)		$ 81,000
II.	On-going Program Expenses		
	-- Ongoing Communication Expenses telephone, faxes, copying services, overnight delivery/messenger, local transportation, etc. ($250/month x 12 months)	$ 3,000	
	-- Database development; list purchase/input	$ 1,250	
	-- Direct Mail Program ($1.75/letter x 2,500 letters(max) x 3 mailings)	$ 13,125	
	-- DCI/Journalist Travel to St. Lucia air, lodging and ground transportation ($1,500/trip x 3 trips)	$ 4,500	
	-- DCI Travel within the United States; trade show/prospecting mission support ($750/trip x 2 trips)	$ 1,500	
	-- Contingency for special opportunities	$ 3,625	
	Program Expense Subtotal:		$ 27,000
	PROGRAM TOTAL		**$ 108,000**

IV. THE NEXT STEP

Jacqueline, we look forward to discussing this workplan with you and/or Mr. Pilgrim at your earliest convenience. We'd like to suggest a conference call on sometime in the upcoming week to get your reaction to this document.

All of us at DCI look forward to working with you and your team on this important program.

Sincerely,

Andrew T. Levine
President

E. Parce Ainsworth
Account Supervisor

Development Counsellors International 461 Park Avenue South, New York, NY 10016
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St. Lucia Nat'l Dev.Corp.
Brazil St. P.O. Box 495
Castries, St. Lucia
West Indies,
ATTN: Jacqueline Albertine G.M.

Invoice-# : 005300
Date : 04/30/98
Job Number : 279-2
Terms : Net 10 Days
P.O. Number :
Page-# : 1

Job title .

DESCRIPTION	AMOUNT
Messenger/Delivery	32.00
Communication: Telephone, Fax Photostats, Postage	33.88
--- INVOICE TOTAL ---	$ 65.88

Interest charge of 1½% will be added to all past due invoices.

White—Client Copy/Yellow—Remittance Copy/Pink—File Copy/Goldenrod—Client File Copy

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St. Lucia Nat'l Dev.Corp.
Brazil St. P.O. Box 495
Castries, St. Lucia
West Indies,
ATTN: Jacqueline Albertine G.M.

Invoice-# : 005399
Date : 05/31/99
Job Number : 279-2
Terms : Net 10 Days
P.O. Number :
Page-# : 1

Job title :

DESCRIPTION	AMOUNT
Communication: Telephone, Fax Photostats, Postage	20.84
--- INVOICE TOTAL ---	$ 20.84

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St. Lucia Nat'l Dev.Corp.
Brazil St. P.O. Box 495
Castries, St. Lucia
West Indies,
ATTN: Jacqueline Albertine G.M.

Invoice-# : 005571
Date : 07/31/99
Job Number : 279-2
Terms : Net 10 Days
P.O. Number :
Page-# : 1

Job title :

DESCRIPTION	AMOUNT
Travel, Cabs & Tolls	
Communication: Telephone, Fax Photostats, Postage	26.75
Contracted Services	1,044.02
--- INVOICE TOTAL ---	$ 1,070.77

Interest charge of 1½% will be added to all past due invoices.

White—Client Copy/Yellow—Remittance Copy/Pink—File Copy/Goldenrod—Client File Copy

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St. Lucia Nat'l Dev.Corp.
Brazil St. P.O. Box 495
Castries, St. Lucia
West Indies,
ATTN: Jacqueline Albertine G.M.

Invoice-# : 005666
Date : 08/31/99
Job Number : 279-2
Terms : Net 10 Days
P.O. Number :
Page-# : 1

Job title :

DESCRIPTION	AMOUNT
Travel, Cabs & Tolls 30 688.40	2,138.90
Messenger/Delivery	13.50
Communication: Telephone, Fax Photostats, Postage	61.44
--- INVOICE TOTAL ---	$ 2,213.84

-2065.2

148.64

Interest charge of 1½% will be added to all past due invoices.

White—Client Copy/Yellow—Remittance Copy/Pink—File Copy/Goldenrod—Client File Copy

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St. Lucia Nat'l Dev.Corp.
Brazil St. P.O. Box 495
Castries, St. Lucia
West Indies,
ATTN: Jacqueline Albertine G.M.

Invoice-# : 005766
Date : 09/30/99
Job Number : 279-2
Terms : Net 10 Days
P.O. Number :
Page-# : 1

Job title :

DESCRIPTION	AMOUNT
Travel, Cabs & Tolls	309.88
Messenger/Delivery	7.00
Communication: Telephone, Fax Photostats, Postage	33.52
--- INVOICE TOTAL ---	$ 350.40

Interest charge of 1½% will be added to all past due invoices.

White—Client Copy/Yellow—Remittance Copy/Pink—File Copy/Goldenrod—Client File Copy