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
BENEDICT, MILLS COUNSELLORS INTERNATIONAL, LTD.
461 PARK AVENUE S. - 12TH FLOOR
NEW YORK, NY 10016

2. Registration No.
4777

3. Name of foreign principal
Spanish Embassy

4. Principal address of foreign principal
405 Lexington Ave. 44th flr. NY, NY 10174

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. Branch

b) Name and title of official with whom registrant deals. Luis de Velasco
Trade Commissioner

2001 DEC 11 12:00

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.)*

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
11/7/01	JOAN AMATO, CONTROLLER	

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. 461 PARK AVENUE S. - 12TH FLOOR NEW YORK, NY 10016	Spanish Embassy

Check Appropriate Box:

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.

A proposed investment attraction program.

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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.

Provide company profiles, prospect research and appointment settings.

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.

Date of Exhibit B	Name and Title	Signature
11/7/01	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.

sent to various companies in April - September 2001

(*Trade Commission Letterhead*)

October 24, 2001

«Contact»
«Title»
«Company»
«Address1»
«City», «State» «Zip»

Dear «Salutation»:

We've followed with interest your company's rapid revenue growth as well as the success of your current operations in Spain. In the month ahead, we'd like to explore how «Company» might profit from specific business expansion opportunities taking place in our country.

By way of a brief update, Spain offers some of the highest return on investment (according to the *OECD Economic Outlook* report), is among Europe's most competitive labor costs (according to the US Bureau of Labor Statistics) and offers the most favorable research and development incentives in Europe (according to UNICE Benchmarking Report 2000).

Rather than going into deeper detail here, I have asked my associate, Carl Schnedeker, to call you in the next 10 days to arrange a personal meeting at your office during the week commencing September 17th or later. In the interim, let me suggest that you use the enclosed fax-back form to signal your availability or than of an appropriate colleague.

I believe you may be surprised to see how your company's future might profitably include one of the world's most stable, fast-growing economies - for its domestic consumption *and* its export potential.

Sincerely,

Vicente I. Orts
Director, Investment Department

cc: Mr. Schnedeker

P.S. One other point – as the attached form indicates, we'll also be pleased to immediately share with you a list of <Industry Sector> companies planning expansion in Spain.



Embassy of Spain
Trade Commission
Investment Department

Fax-Back Number: 212-725-2254
Attention: Carl Schnedeker

From: «Contact»
«Title»
«Company»

To: Carl Schnedeker: Fax: 212/725-2254
Phone: 212/725-0707
E-mail: cs@dc-intl.com

____ Please call me about arranging an appointment at my office to discuss specific current opportunities for my company in Spain.

My phone number: _____

____ Please call my associate as noted below:

Name: _____

Title: _____

Phone Number: _____

____ Please fax me the list of<Industry Sector>companies planning expansion in Spain and recent investments by foreign companies.

sent to various companies
in April – September 2001

October 24, 2001

«Contact»
«Title»
«Company»
«Address1»
«City», «State» «Zip»

Dear «Salutation»:

We've been impressed with your company's rapid revenue growth and believe you might profit from specific business expansion opportunities taking place in Spain.

By way of brief background, Spain offers some of the highest return on investment (ROI) (according to the *OECD Economic Outlook* report), the second-greatest percentage of students with higher-education (source: *Eurostat Yearbook*), and has some of the most competitive labor costs (according to the US Bureau of Labor Statistics) in the European Union.

Rather than going into deeper detail here, I have asked my associate, Carl Schnedeker, to call you in the next 10 days to arrange a personal meeting at your office during the week commencing October 29th or later. In the interim, let me suggest that you use the following fax-back form to signal your availability or that of an appropriate colleague.

I believe you may be surprised to see how your company's future might profitably include one of the world's most stable, fast-growing economies - for its domestic consumption *and* its export potential.

Sincerely,

Vicente I. Orts
Director, Investment Department

cc: Mr. Schnedeker

P.S. One other point -- as the attached form indicates, we'll also be pleased to immediately share with you a list of «Country» companies presently operating in Spain (as well as recent expansions).



Embassy of Spain
Trade Commission
Investment Department

Fax-Back Number: 212-725-2254
Attention: Carl Schnedeker

From: «Contact»
«Title»
«Company»

To: Carl Schnedeker Fax: 212/725-2254
Phone: 212/725-0707
E-mail: cs@dc-intl.com

____ Please call me about arranging an appointment at my office to discuss specific current opportunities for my company in Spain.

My phone number: _____

____ Please call my associate as noted below:

Name: _____

Title: _____

Phone Number: _____

____ Please fax me the list of «Country» companies presently operating in Spain and recent investments by foreign companies. My fax line is: _____