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OMB No. 1124-0006; Expires July 31, 2023

U.S. Department of Justice
Washington, DC 20530

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

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at https://www.fara.gov.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational 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 FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: https://www.fara.gov. One copy of every such document, other than informational 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 in print and online at: https://www.fara.gov.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .22 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, FARA Unit, Counterintelligence and Export Control Section, National Security 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
The Raben Group, LLC

2. Registration Number
7140

3. Primary Address of Registrant
1341 G St. NW, 5th Flr, Washington, DC 20005

4. Name of Foreign Principal
Melia Hotels International

5. Address of Foreign Principal
Calle Gremi de Boters, 24
Palma de Mallorca
SPAIN 07009

6. Country/Region Represented
SPAIN

7. Indicate whether the foreign principal is one of the following:

- ☐ Government of a foreign country [1]
- ☐ Foreign political party
- ☒ Foreign or domestic organization: If either, check one of the following:
  - ☐ Partnership
  - ☒ Corporation
  - ☐ Association
  - ☐ Committee
  - ☐ Voluntary group
  - ☐ Other *(specify)* _____
- ☐ Individual-State nationality _____

8. 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 engages

1 "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

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9. If the foreign principal is a foreign political party, state:

a) Name and title of official with whom registrant engages

b) Aim, mission or objective of foreign political party

10. 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.

Hospitality/Hotels

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 in part by a foreign government, foreign political party, or other foreign principal	Yes ☐ No ☒

11. Explain fully all items answered "Yes" in Item 10(b).

12. 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.

N/A

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EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature
07/15/2022	Robert Raben	/s/Robert Raben

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EXECUTION

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Date	Printed Name	Signature
7/15/2022	Robert Raben	

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U.S. Department of Justice

Washington, DC 20530

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

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. Compliance is accomplished by filing an electronic Exhibit B form at https://www.fara.gov.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational 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 FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: https://www.fara.gov. One copy of every such document, other than informational 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 in print and online at: https://www.fara.gov .

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .32 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, FARA Unit, Counterintelligence and Export Control Section, National Security 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 Number
The Raben Group, LLC	7140

3. Name of Foreign Principal
Melia Hotels International

Check Appropriate Box:

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. What is the date of the contract or agreement with the foreign principal? 05/16/2022

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

For almost 20 years the Raben Group has provided research and legislative monitoring and analysis for its clients in order to best guide their policy goals and priorities. Working with Congress, the Administration, academics, civil rights and advocacy leaders, the Raben Group has provided legislative strategy, messaging, and direct lobbying in service of its clients.

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

Over the course of the service agreement, the Raben Group will conduct a series of interviews with experts, academics and policy makers with the objective of drafting a report on the status of US policy toward Cuba as it impacts foreign companies doing business in Cuba. The engagements will be strictly focused on understanding the current, and possible future, posture of Congress and the Biden Administration toward Cuba.

10. 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. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

See Appendix for Response

11. Prior to the date of registration[2] for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?

Yes ☒ No ☐

If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's activities, including political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Date	Contact	Method	Purpose
			No Political Activity Contacts to Report

12. During the period beginning 60 days prior to the obligation to register[3] for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes ☐ No ☒

If yes, set forth below in the required detail an account of such monies or things of value.

Date Received	From Whom	Purpose	Amount/Thing of Value

13. During the period beginning 60 days prior to the obligation to register[4] for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal?

Yes ☐ No ☒

If yes, set forth below in the required detail and separately an account of such monies, including monies transmitted, if any.

Date	Recipient	Purpose	Amount

1 "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 or public interests, policies, or relations of a government of a foreign country or a foreign political party.

2,3,4 Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

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EXECUTION

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Date	Printed Name	Signature
07/15/2022	Robert Raben	/s/Robert Raben

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EXECUTION

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Date	Printed Name	Signature
7/15/2022	Robert Raben	

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Appendix
Response to Item 10

Item 10: Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act. 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 response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

The registrant will be meeting with policymakers with responsibility in shaping US - Cuba policy. Specifically, the registrant will be looking into any changes to US / Cuba policy with direct impact on foreign companies doing business in Cuba. With that in mind, we will be discussing the impact of the Helms Burton Act, related sanctions under Title IV and the consideration of future changes. We expect to pursue an educational and data collection effort with policymakers at first and then based on the information gathered move into a more direct lobbying stage requesting changes to US / Cuba policy and, specifically, changes to the implementation of the Helms Burton Act.

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Appendix
Response to Item 11-Description

The registrant has begun conducting a handful of meetings with key policymakers and agency personnel to gather information on US / Cuba policy and begin to share the circumstances surrounding the representation. The meetings were strictly informational and did not request any changes to US / Cuba policy.

Activities -
Date - June 6, 2022
Contact - Meeting with Mara Tekach, Coordinator/Director Office of Cuban Affairs, State Department
Method - Information meeting
Purpose - To understand the current status of US/Cuba policy and, specifically, the Helms Burton Act

Date - June 16, 2022
Contact - Meeting with Ricardo Zuniga, Principal, Deputy Secretary, Bureau of Western Hemisphere Affairs, State Department
Method - Informational Meeting
Purpose - To understand the current status of US/Cuba policy and, specifically, the Helms Burton Act

Date - July 1, 2022
Contact - Meeting with Daniel "Danny" Meza, Senior Advisor, Undersecretary for Economic Growth, Energy and the Environment, State Department
Method - Informational Meeting
Purpose - To understand the current status of US/Cuba policy and, specifically, the Helms Burton Act

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THERABENGROUP

AGREEMENT BETWEEN MELIÁ HOTELS INTERNATIONAL, S.A.
AND
THE RABEN GROUP, LLC

This Agreement between Meliá Hotels International, S.A. (MHI),
(Address) Calle Gremi Boters, 24, and The Raben Group, LLC (Raben),
1341 G St NW, 5th Floor, Washington DC, 20005, Tax ID # 52-2296319, sets forth as follows:

1. MHI hereby retains Raben for government affairs services.

2. Raben Principal & Co-Founder Estuardo Rodriguez will lead the Raben team and report to D. Juan Ignacio Pardo.

3. The term of this Agreement will be for an initial period from May 16, 2022 – August 15, 2022. This Agreement may be extended upon mutual agreement. This Agreement may also be terminated in accordance with the provisions of Section 10 of the Agreement

4. Raben will provide to MHI the services reflected in the attached Appendix A and Appendix B.

5. In consideration for these services, MHI shall pay Raben a fixed monthly fee of $35,000 per month for each month of work performed, prorated for any partial month (fees will be prorated daily on the basis of a thirty (30) day month). MHI shall also reimburse Raben for any additional pre-approved incurred expenses, at actual cost. MHI understands and agrees that all Raben invoices are payable immediately upon receipt, including, when applicable, receipts and invoices for approved expenses, such as travel, printing, venue costs or catering. In the event of a disputed invoice, MHI shall promptly pay all non-disputed amounts, and the disputed amounts shall be resolved in accordance with this Agreement.

6. Raben shall indemnify and hold harmless MHI, its officers and employees, against all losses, claims, liabilities, damages and expenses of any nature, directly or indirectly arising out of, or as a result of, any act or omission by Raben, its employees, agents or subcontractors in the performance of this Agreement. Likewise, MHI shall indemnify and hold harmless Raben, its employees, agents, or subcontractors, against all losses, claims, liabilities, damages, and expenses of any nature, directly or indirectly arising out of, or as a result of, any act or omission by MHI, its officers and employees in the performance of this Agreement.

7. Raben and its employees, agents and subcontractors agree to maintain confidentiality with respect to proprietary and confidential information they obtain during the course of their work under this Agreement. Confidentiality shall survive the termination of the agreement.

8. The parties understand and agree that these services include activities that are considered lobbying under the United States Internal Revenue Code, the Lobbying Disclosure Act

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(LDA), and/or the Foreign Agent Registration Act (FARA). Raben is responsible for preparing and submitting all required FARA and LDA filings for work related to the services provided under this Agreement, including any and all costs associated with such filings.

9. MHI agrees that during the period this agreement is in force, including any extensions or modifications thereto, and for an additional 12 months following this period, MHI will not solicit for employment, hire, or contract with any Raben employee. MHI agrees to pay Raben the sum of $15,000 as liquidated damages for the breach or attempted breach of this provision.

10. This Agreement, and any disputes arising out of or related to this contract, shall be governed by, and construed in accordance with, the laws of the District of Columbia.

11. This Agreement represents the totality of the understanding between the parties and may be modified, or any provision herein may be waived, only by a writing signed by both parties. MHI is contracting hereunder for the services of Estuardo Rodriguez and other Raben staff as appropriate.

12. Either party may terminate this Agreement with or without cause with fifteen (15) days written notice; if such notice is proffered, each party will fulfill its obligations to the point of actual termination.

13. The parties agree to retain a sense of humor.

In Witness Whereof, the parties have signed or caused their duly authorized representatives to sign this Agreement on the dates stated below.

Meliá Hotels International, S.A.

By: _____

Name: Juan Ignacio Pardo

Title: Chief Legal & Compliance officer

Date: 17.05.2022

The Raben Group, LLC

By: _____

Joanne Irby

COO

Date: 5/17/22

Billing Contact Name:

Juan Ignacio Pardo

Billing Contact Mailing Address (If different from above):

juan.ignacio.pardo@melia.com

Billing Contact Email & Phone:

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Appendix A: Scope of Work

1. Establish a better understanding by U.S. policymakers and the Administration of Melia Hotels International's global footprint and, in particular, its work in Cuba
2. Gain a clear understanding of the imposition of sanctions under Title IV of the Helms Burton Act
3. Identify a clear process to challenge any existing sanctions
4. Developing a strategy to identify and activate key supporters of Melia Hotels International

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Appendix B: Terms of Understanding

1. The strategy and the defined steps for this work with Melia Hotels International will be executed in preparation for a potential new Congressional landscape, post the 2022 midterm elections.
2. While Raben will conduct due diligence to understand under what circumstances policymakers and officials would be supportive of the goals of Melia Hotels International, at no point will payment or financial support of candidates be offered or paid in return for such support.
3. Both parties understand and agree that moving forward with this work will require compliance with the Foreign Agents Registration Act (FARA) under the US Department of Justice.

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