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June 22, 1983

Mr. Joseph E. Clarkson
Chief, Registration Unit
Department of Justice
315 9th Street, N.W.
Washington, D.C. 20530

Re: Application for Waiver

RECEIVED
CRIMINAL DIVISION
JUN 27 4 44 PM '83
INTERNATIONAL SECURITY
SECTION
REGISTRATION UNIT

Dear Mr. Clarkson:

Pursuant to Rule 201(d) of the Foreign Agents Registration Act of 1938, Registrant hereby requests a waiver of the requirements to file a copy of the Registrant's General Partnership Agreement (Exhibit C) for the reasons set forth below.

The primary business of the foreign principal is the exportation of rum to the United States markets. Our services, as shown in the Registration Statement, are primarily those of representing the interests of the foreign principal concerning the importation of rum before the U.S. Congress. The Registrant's General Partnership Agreement is a strictly internal document governing the operation of the partnership in the general practice of law. As such, the document contains no information which would be relevant to the disclosure requirements of the Foreign Agents Registration Act of 1938. Further, no information contained in the document refers to or has any bearing on the conduct of our representation of the foreign principal or the business activity of that principal. No activities which we would perform on behalf of the foreign principal will be influenced by or have any relationship to the General Partnership Agreement under which the firm conducts business.

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Mr. Joseph E. Clarkson

June 2 , 1983

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For these reasons we urge approval of this Application for Waiver. If additional information is required, please so advise us and we will be happy to provide it.

Sincerely,

AKIN, GUMP, STRAUSS, HAUER & FELD

By:


Daniel L. Spiegel

DLS:bas