U.S. Department of Justice
Washington, DC 20530

Exhibit A
To Registration Statement
Pursant to 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, 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 Registration Unit in Washington, D.C. 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. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 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	2. Registration No.
Oliver A. Dulle, Jr. & Company Inc. 7777 Bonhomme Avenue, Suite 1740 St. Louis, MO 63105	#4739

3. Name of foreign principal	4. Principal address of foreign principal
Luxembourg Board of Economic Development	17 Beekman Place New York, NY 10022

5. Indicate whether your foreign principal is one of the following:

- ■ Foreign government
- ☐ 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 _____

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6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant. Luxembourg Board of Economic Development

b) Name and title of official with whom registrant deals. John Graff, Director

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

a) Principal address.

b) Name and title of official with whom registrant deals.

c) Principal aim

Formerly OBD-67

FORM CRM-157
SEP. 1996

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

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 ☐

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must 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
	OLIVER A. Dulle, Jr. President	

U.S. Department of Justice
Washington, DC 20530

Exhibit B
To Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, an 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. One original and two legible photocopies of this form shall be filed 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, 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 Registration Unit in Washington, D.C. 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. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

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, 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 No.
Oliver A. Dulle, Jr. & Company, Inc.	#4739

3. Name of Foreign Principal

Luxembourg Board of Economic Development

Check Appropriate Boxes:

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.

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

Formerly OBD-65

FORM CRM-155
SEP. 1996

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

Development of marketing materials, initiation of controls regarding establishment of business activity in Luxembourg, responding to requests for information.

9. Will the activities on behalf of he above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? 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
	Oliver A. Duke se President	

Footnote: 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 interests, policies, or relations of a government of a foreign country or a foreign political party.

4739

MARS

Economic Development

Marketing, Assistance, Research and Support Program

Luxembourg Consulate General

CONTRACT OF SERVICES
DECEMBER 20, 2000

2001 JUL -6 PM 4: 13

St. Louis
Chicago
Washington, DC
Manchester, ENGLAND
Hanover, GERMANY

Dulle & Co
INTERNATIONAL

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OUTSOURCED INTELLIGENCE AND BACK OFFICE SUPPORT FOR ECONOMIC DEVELOPMENT

MARS: **Economic Development Marketing, Assistance, Research and Support Program**

Dulle&Co International was formed in 1979 and provides information-based marketing solutions for economic development agencies, electric utilities, industry groups and other organizations. We have developed a program to systematically deliver prospective inward investor opportunities and to support pursuit of these projects. We provide the "back office" support to the staff by conducting research, profiling prospects, qualifying leads, arranging company visits and otherwise supporting the research and information requirements of the staff.

MARSDatabase

As required to support our survey program or to assist with competitor or potential customer/distributor research, we generate or source databases to meet specific project objectives. Our primary database has been drawn from a number of sources. The database includes companies in the manufacturing, distribution and high-tech industries and applicable service industries. The database also includes companies that have been included based on our other activities including growth industry research, acquisitions, NewScan and specialty sector research. Our database is updated virtually daily as we identify new prospects or add companies from specific new sectors. Several of our data sources provide for quarterly or annual updates of their data.

In addition to our general economic development database, we also maintain a separate, smaller database of prospect and qualified leads, along with those leads that have been disqualified and the reason for disqualification. If requested, we can also transfer qualified leads electronically to be directly imported into other formats.

MARSSurvey

Regular surveys of US company expansion plans are sent to manufacturers, distributors and selected service companies as well as to companies in segments that have been identified as growth or emerging sectors from our database as described above. The surveys are generally sent in January, April and September. The cost of the survey is included in the overall cost of our program. There is no additional cost for data, postage, printing and fulfillment for this activity.

MARSGrowth

Ongoing analysis and research is conducted to identify segments which are predicted to grow or emerge or for which shortages or scarcity or lack of capacity are predicted. These analyses drive special surveys or identification of specific candidate companies in "growth sectors".

MARSM&A

US and overseas mergers and acquisitions are monitored daily as research indicates that nearly 50 percent of acquisitions are followed by expanded facilities within eighteen months. This process is also used to approach acquiring companies that are planning consolidation to encourage them to consider the service area as one of the major consolidation sites.

MARSAware

Weekly, electronic scans (NewScan) of over 6,000 worldwide publications from major industry, financial and general news sources to obscure trade and specialty journals include review of over 60,000 article abstracts annually. This process creates awareness of trends and potential expansion plans as indicated by our proprietary search syntax and analysis and has produced many of our best prospects. We generally find that companies identified by our NewScan process have large projects and have not been contact by any other agency about their expansion plans.

MARSProfile

All leads that are identified are then profiled to provide information about corporate parameters (sales, employees, segment, etc.), operations, news, sector and competition where available, and additional information sources. Leads are profiled as soon as a survey response is received or when a NewScan opportunity is identified.

MARSResearch

As requested, we provide quick-response, detailed research from a variety of authoritative sources to support leads generated inhouse or other research required to support strategic initiatives.

MARSAdQualify

As leads are received from your trade publication advertising, our staff will immediately research and eliminate leads from residences, non-existent and small businesses. We will profile and enter the balance of the leads into our MARS database and will then make contact with these leads to verify their ad responses regarding plans, timetable, etc. prior to turning them over for followup. This process will further allow field staff to focus their efforts on the pursuit of legitimate advertising leads, avoid wasteful calls to worthless leads, maximize the value of advertising and avoid missing the real opportunities because of time constraints for followup.

MARSCalls

Our staff pursues survey respondents, NewScan leads and other opportunities with repetitive calls (up to 6 calls per company) to qualify their survey responses and project requirements prior to disposition or forwarding for further action in the field. Each contact or attempted contact is accompanied by written communication or email to followup, summarize the conversation or solicit project information, providing for up to 12 contacts per company as part of the process. Calls are made over a three to four month period after a lead is identified or over a longer period if requested by the prospect or dictated by the nature and timing of the project.

During these calls, we position the agency as a resource for companies seriously considering services areas and as providing support, assistance and incentives for the consideration of expansion into the area.

When the conversation indicates a serious interest in considering the area and/or when specific information relative to sites, costs, power rates, incentives or other particular data are required, we then shift the prospect over to field personnel and suggest a visit. We then encourage and document further followup by field personnel to help insure that the project moves forward. Each month, a report of those projects that have been forwarded, indicating the appropriate account manager, is forwarded to both serve as a convenient reminder of outstanding contacts required and to provide a convenient format to record any new project developments. This process is vital to insure that timely followup is maintained with qualified prospects. It also documents the recruitment process and demonstrates the involvement of field personnel on a project. Finally, it keeps qualified prospects from "falling through the cracks".

MARSAfterCare

As aftercare is a vital part of a continuing economic development strategy, we will provide assistance in profiling US companies that have investments in the area so that staff can maintain an ongoing program of communications and visits. This type of process helps to insure that the region obtains consideration for future investments or for consolidations.

MARSVisits

On a semi-annual basis, or as needed, top prospects are contacted about their availability and interest in arranging a meeting with field representatives to initiate a relationship with the company, provide information and solicit further requirements and to secure an inward site visit commitment. These personal visits are an integral component of the relationship development and recruitment program. Visits can occur within three months of identifying a prospect or more than a year after the project is identified as required by the project timing.

MARSReports

On a monthly basis, we will provide a summary report to the staff regarding the results of our activities. This will include a 2-3 page analysis of leads by source and a 3-4 page summary of the status of each lead that we are pursuing. We have also found that we can often produce periodic reports for clients that help them to meet their internal reporting requirements providing both speed and convenience while relieving client personnel from the task of preparing these reports.

Each month we will also forward a call summary which will include each lead that has been turned over to the staff for a visit or other required contact so that we can receive an update of any new developments or further conversations with the companies (ie. site visits, project timetable changes, etc.). We are able to deliver all of these reports electronically and we will shortly be able to provide for electronic updates by the staff via the Internet.

MARSStrategyReview

Also on a quarterly basis, visits are made to meet with management to review the status and requirements of specific projects, to evaluate the results of various initiatives, to maintain program focus and to review and amend strategies as needed. We will help to evaluate the success of specific initiatives and of ongoing operations. Measurement of objectives includes such indicators as the number of prospects identified, leads qualified, company and site visits. We feel that the best measure of our success is the number of leads that we forward that represent actual projects, regardless of where the project is finally located. Our objective is to identify investment projects and to obtain serious consideration of the area for the location of those projects. We will forward those projects to the business recruitment team to manage and attempt to secure the project for the area.

Timing:

The services included herewith will be provided for a period of three months from the date of commencement.

Fees:

The services outlined herein, with the exception of the **MARS**AdQualify will be provided for a total cost, including expenses (except travel and special research reports and databases that must be acquired by specific request), of $2,500 per month for three months from the effective date of this agreement.

Intellectual Property:

It should be understood that Dulle & Co. will retain ownership to all information, data, strategies and procedures, copy, service marks and related intellectual property developed or generated in connection with this engagement. Dulle & Co. will be considered to be the author of any reports, documents, brochures, presentations or other documents or bodies of work used or generated in connection with this engagement. The client will not utilize any copyrighted properties, information, data or other materials in any way contrary to existing licenses, copyright laws and conventions or other applicable statutes, agreements or regulations.

Conclusion:

We feel very strongly that we have developed a well-designed, very systematic process for identifying, qualifying and managing leads for business recruitment. Our staff are focused on their specific tasks and they perform them on a timely basis. We use available data sources and technology effectively to generate information that is vital to identifying prospects. Our system operates on a very consistent basis and produces results in a consistent manner. We are very focused on our process and on the regular performance of those tasks that are required for this process to operate. We also feel that our entire system of support (which is also provided on a "cost-included basis) provides necessary services to our clients on an outsourced basis at a cost that is much lower, and with a much more consistent operation and results, than can be provided inhouse.

We look forward to working with you on this project and to helping you achieve your economic development objectives.

Very truly yours,

Oliver A. Dulle, Jr.
President
Dulle&Co International

ACCEPTED:

I hereby accept your proposal for the services described herein above as indicated below:

..... December 10, 2000
Name **Date**

Consul General, Consulate General of Luxembourg New York
Company