

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

Form OBD-68
(Rev 10-14-76)
Formerly DJ-307
for

OMB No. 43-R226 Expires Oct. 31, 1981
RECEIVED
CRIMINAL DIVISION
JAN 8 5 03 PM '82
INTERNAL SECURITY SECTION
REGISTRATION UNIT

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents
Registration Act of 1938, as amended.

1. Name of Registrant MUDGE ROSE GUTHRIE & ALEXANDER	2. Registration No. 3200
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- To correct a deficiency in
 - Initial Statement
 - Supplemental Statement for August 18, 1981
- To give notice of change in an exhibit previously filed.
- To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
- Other purpose (specify) _____

4. If this amendment requires the filing of a document or documents, please list -

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

See Attached Exhibits.

Exhibit A - Addendum to Question 11 and 12.

Exhibit B - Question 15(a).

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Subscribed and sworn to before me at _____

this _____ day of _____, 19 _____ (Notary or other officer)

My commission expires _____

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January 8, 1982
Registration No. 3200

INTERNATIONAL SUPPLEMENTAL STATEMENT
AMENDMENT TO
SECTION
REGISTRATION UNIT Exhibit A

Addendum to Questions 11 and 12

Registrant, in filing its Supplemental Statement believed, and continues to believe, that its activities in connection with its legal representation of Creusot-Loire, S.A. are exempt from registration under exemption (g), but registered as a precaution in the event that it might engage in non-exempt activities. It has not. Its representation of Creusot-Loire, S.A. was disclosed to all participating agencies and all government officials with whom Registrant's attorneys discussed this matter. All contacts with government officials were directly related to the proceedings initiated by the Office of Foreign Assets Control of the Department of Treasury, and did not include non-exempt "political activities."

In response to the request of the Department of Justice in its letter of December 9, 1981, however, Registrant voluntarily sets forth hereunder a list of all 1981 meetings shown in Registrant's records with government officials in connection with the issues raised in the Federal Register notice of November 17, 1980, 45 FR 75834. Mr. William Walker participated in all meetings on behalf of Registrant; Messrs. David Vaughan, William Laino, and Marc Miller participated in some of the meetings on behalf of the Registrant.

<u>DATE</u>	<u>NAME</u>	<u>TITLE</u>
1/9/81	Thomas A. Enders	U.S. Ambassador to the Commission of the EC

1/21/81	Myer Rashish	Under Secretary of State for Economic Affairs-designate
2/5-6/81	Ambassador Robert D. Hormats	Deputy U.S. Trade Representative
	Myer Rashish	see above
	Dennis O'Connell	Director, Office of Foreign Assets Control
	William E. Brock	U.S. Trade Representative
	Frank C. Carlucci	Deputy Secretary of Defense
2/27/81	Richard Davis	Assistant Secretary of the Treasury
	Dennis O'Connell	see above
	Susan Swinehart	Director of Licensing, Office of Foreign Assets Control
3/1/81	Dennis O'Connell	see above
3/21/81	John Walker	Assistant Secretary of the Treasury
3/21/81	Dennis O'Connell	see above
	Robert D. Hormats	Assistant Secretary of State for Economic and Business Affairs- designate
4/17/81	Mark Leland	Assistant Secretary of the Treasury
	Robert D. Hormats	see above

Each such meeting took place in the direct context of an effort to secure removal of the exclusion order issued against nickel-bearing stainless steel from Creusot-Loire, and were undertaken in the course of agency proceedings.

This proceeding was initiated in furtherance of enforcement of the Cuban Assets Control Regulation, 31 C.F.R. § 515, which

excludes products of Cuban origin from entering U.S. commerce, a policy which was not then, and is not now, in question. In the course of these proceedings and the meetings listed above, no attempts were made to influence or persuade officials with reference to formulating, adopting, or changing the domestic or foreign policies of the United States concerning the policy of excluding products of Cuban origin from the United States, or with reference to the political or public interests, policies or relations of the government of a foreign country or a foreign political party concerning entry of materials of Cuban origin to U.S. commerce. Among the issues discussed in the meetings listed above was a certificate of origin procedure to permit the entry into the U.S. of nickel-bearing stainless steel from Creusot-Loire which does not contain nickel of Cuban origin.

The last phrase in response to Question 11 should be amended to read "and participation in meetings with officials of OFAC, USTR, and the Departments of Treasury, State, and Defense."

January 8, 1982
Registration No. 3200

AMENDMENT TO SUPPLEMENTAL STATEMENT

Exhibit B

Question 15(a)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
12/1/80- 8/31/81	Park Avenue Travel Eastern Airlines	Air Fares	\$ 9,908.00
	XYZ Cab Co. Local Transportation Hertz - Car Rental	Local Transportation	5,468.74
	Archer Air Courier Network Air Courier Federal Express	Delivery Services	1,331.15
	Western Union International C&P Telephone New York Telephone ITT World Communications Western Union RCA Global Communications	Communications	4,585.63
	Stenographic overtime, and meals during stenog- raphic overtime; attorney meals while working on matter	overtime and over- time meals	2,568.64
	Office Expenses: Document reproduction services, postage, filing fees, Lexis (Research), Word Processing	office expenses	16,183.62
	Expense (exclusive of air fares) for four trips for lawyers from New York to Paris, France and return, nine trips for lawyers from New York to Washington, D.C. and return (Wm. N. Walker and Wm. P. Laino)	travel	<u>6,130.89</u>
	Total 12/1/80 - 8/31/81		<u>\$46,176.67</u>

JUDGE ROSE GUTHRIE & ALEXANDER

1701 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D. C. 20006

202-298-5970

January 18, 1982

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DAVID A. VAUGHAN
RESIDENT PARTNERS

CABLE ADDRESS
BALUCHINS-WASHINGTON

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WILLIAM A. MADISON
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JAMES P. MARLIN
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J. ROGER MENTZ
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WILLIAM N. WALKER
DONALD J. ZOELLER

Mr. Joseph E. Clarkson
U.S. Department of Justice
Chief Registration Unit
Internal Security Section
Criminal Division
315 9th Street, N.W.
Room 100
Washington, D.C.


RANDOLPH H. GUTHRIE
MILTON C. ROSE
H. RIDGELY BULLOCK
COUNSEL

Re: Registration No. 3200

Dear Mr. Clarkson:

Enclosed herewith are two executed originals of the Amendment to Registration Statement of this firm which you requested in your letter of December 9, 1981, and which we provided to you in its final but unexecuted form on January 8, 1982.

If you have any questions about this Amendment, please call me.

Sincerely,

Marc E. Miller

Enclosure

HAND DELIVERY

RECEIVED
CRIMINAL DIVISION
JAN 18 10 24 AM '82
INTERNAL SECURITY
SECTION
REGISTRATION UNIT