U.S. Department of Justice
Washington, DC 20530

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

OMB No. 1105-0004
Approval Expires Oct. 31, 1983

1. Name of Registrant	2. Registration No.
Arnold & Porter	1750

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☐ To correct a deficiency in

☐ Initial Statement

☐ Supplemental Statement for _____

☒ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.

☐ Other purpose *(specify)* _____

☐ To give notice of change in an exhibit previously filed.

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

Exhibits A and B

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.

This amendment to registrant's registration statement is to give notice of a new foreign principal of the registrant, Dalmine Siderca, and to file the necessary Exhibits A and B.

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.

Robert Herzstein

(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 District of Columbia

this 21st day of May, 1984

Marshall Vaccaro Court
(Notary or other officer)

My Commission Expires October 31, 1988

My commission expires _____

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Exhibit A
To Registration Statement
Under the Foreign Agents Registration Act of 1938, as amended

OMB No. 1105-0003
Approval Expires Oct. 31, 1983

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
ARNOLD & PORTER

2. Registration No.
1750

3. Name of foreign principal
Dalmine Siderca

4. Principal address of foreign principal
L.N. Alem 1067
Buenos Aires, Argentina

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

☐ Foreign government

☐ Foreign political party

XX Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership
XX Corporation
☐ Association
☐ Committee
☐ Voluntary group
☐ Other (specify) _____

☐ Individual—State his nationality _____

6. 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 deals.

N/A

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

N/A

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

Production and sale of steel products.

TERMINATED
DATE 3-31-85

Formerly OBD-67

FORM CRM-157
AUG. 82

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.)*

We understand that the foreign principal is owned and controlled by other foreign entities: 87% of the stock of the foreign principal is privately held by other private companies and 13% of the stock is held by public stockholders (through the Buenos Aires stock exchange).

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.

N/A

Date of Exhibit A	Name and Title	Signature
May 21, 1984	Robert Herzstein, Partner	

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 Oct. 31, 1983

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
ARNOLD & PORTER	Dalmine Siderca

Check Appropriate Boxes:

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. XX 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.

CRIMINAL DIVISION
INTERNAL SECURITY
REGISTRATION UNIT

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

The Registrant will represent the foreign principal, as a member of the Centro de Industriales Siderurgicos, in the Escape Clause (Section 201) proceedings on steel products that resulted from the January 24, 1984 filing of a petition with the International Trade Commission and will render advice on U.S. laws, regulations and policies that may affect or relate to the activities of the foreign principal, as described in the attached letter dated April 26, 1984. The fee for such representation is to be determined as set forth in the attached letter dated April 26, 1984.

TERMINATED
DATE 3-31-85

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

The Registrant has rendered and will render legal advice to the foreign principal in connection with representation of the foreign principal, as a member of the Centro de Industriales Siderurgicos, in the Escape Clause (Section 201) proceedings on steel products that resulted from the January 24, 1984 filing of a petition with the International Trade Commission. The Registrant has also rendered and will render legal advice to the foreign principal with respect to U.S. laws, regulations and policies that may affect or relate to the activities of the foreign principal and will engage in other activities as required in legal representation of the principal, as set forth in the attached letter dated April 26, 1984.

The Registrant engages and will engage in activities on behalf of the foreign principal that do not require registration under the Act. The Registrant is registering because some of its activities may require such registration.

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 ☒X 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 Registrant may engage in political activities on behalf of the foreign principal. The Registrant's activities may on occasion include communications on behalf of the foreign principal with Executive Branch officials, officials of government agencies, and with members of the U.S. Senate and House of Representatives and their staffs relating to legislation and actions of the Executive Branch and government agencies that may affect or relate to the foreign principal.

Date of Exhibit B	Name and Title	Signature
May 21, 1984	Robert Herzstein, Partner	

[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 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.

ARNOLD & PORTER

1200 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 872-6700

1700 LINCOLN STREET
DENVER, COLORADO 80203
(303) 863-1000

CABLE: "ARFOPO"
TELECOPIER: (202) 872-6720
TELEX: 89-2733

WILLIAM D. ROGERS
DIRECT LINE: (202) 872-6915

April 26, 1984

RECEIVED
MAY 15 1984

Dalmine Siderca
L.N. Alem 1067
Piso 29
Buenos Aires, Argentina

Attention: Carlos D. Tramutola
Executive Vice President

Dear Mr. Tramutola:

This will confirm the basis upon which Dalmine Siderca has retained our firm.

As we have discussed, our work will fall principally into three categories. First, we will monitor and analyze events and attitudes in the United States that might affect your interests. Second, we will advise you concerning possible courses of action to head off, or defend against, efforts to erect import barriers against your products.

Third, we will represent Dalmine Siderca, as a member of the Centro de Industriales Siderurgicos ("CIS"), in the Escape Clause (Section 201) proceedings that have resulted from the January 24, 1984 filing with the International Trade Commission of a petition by Bethlehem Steel Corporation and the United Steelworkers of America. This will include representation during both the injury and remedy phases before the International Trade Commission and in connection with review by the President. This representation will include, as appropriate, preparation on behalf of CIS of a pre-hearing brief on injury for submission to the ITC; participation on behalf of CIS in the pre-hearing conference and the hearing on injury before the ITC, now scheduled for April 30 and May 9, respectively; responding to inquiries from and maintaining contact with the ITC staff; preparation of a

pre-hearing brief on remedy for submission to the ITC; participation in the pre-hearing conference and the hearing on remedy; preparation of post-hearing briefs; and making other contacts in connection with presidential review.

It has been agreed that you will make an initial retainer payment of $10,000, plus a monthly retainer of $3,000. We will credit these retainer payments against the fees to be incurred as we start work on these matters. Through the completion of the Section 201 proceeding, our fees will be based upon our usual time charges for professional, paraprofessional, and other direct hours devoted to these services. For the ongoing monitoring and reporting work after completion of the Section 201 proceedings, our fees will be the retainer of $3,000 per month. At the end of a year, we would review that monthly payment with you to determine if it is still appropriate. If any other extensive or especially burdensome projects, such as defending other trade remedy actions or gathering or analyzing extensive economic data, are assigned to us, those would be the subject of separate billing arrangements. Statements for our services will be sent to you on a monthly basis.

It is also understood that, in addition to the amounts to be paid us for our services, Dalmine Siderca will reimburse Arnold & Porter for out-of-pocket expenses incurred on behalf of Dalmine Siderca and CIS, including such items as travel expenditures and living expense when out of town, taxi fares, long-distance tolls, printing and other reproduction costs, and the like. Statements for these disbursements will be sent to you on a monthly basis.

It is understood that a copy of this agreement will be filed with the United States Department of Justice as part of the registration required under the Foreign Agents Registration Act with respect to our representation of Dalmine Siderca.

If the foregoing meets with your understanding, it would be appreciated if you could sign the enclosed copy of this letter and return it to us for our files.

If you have any questions, please do not hesitate to contact us.

Sincerely yours,

ARNOLD & PORTER

By _____
William D. Rogers

Accepted and agreed to:

DALMINE SIDERCA

By _____

Dated: May 9, 1984