No. 1105-R226
Approval Expires Oct. 31, 1981

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

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

FEB 5 1 30 PM '83

AMENDMENT TO REGISTRATION STATEMENT

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

1. Name of Registrant	2. Registration No.
Gray and Company	3301

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

- [X] To correct a deficiency in
  - [ ] Initial Statement
  - [X] Supplemental Statement for May 10, 1982
  - [ ] 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 -

Not applicable.

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 Attachment E, which lists dates, payees, purposes and amounts of all disbursements made on behalf of the foreign principals by Gray and Company, thereby supplementing item 15(a) of the May 10, 1982 Supplemental Statement.

Amended Item 14(a) Receipts - Monies also attached as Attachment D, pp. 1 and 2.

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 Washington, DC

this 31 day of January, 1983

Mary N. Grimm
(Notary or other officer)
Mary N. Grimm

My commission expires January 1987

DOJ

ATTACHMENT D

Item 14. RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

/x/YES / /NO

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

From Whom/Date	Purpose	Amount
Southern Cone		
No receivables during this reporting period.		
Hambros Bank Limited and Sharps, Pixley Limited		
4/2/82	Payment for services rendered 2/1-2/28/82 plus Retainer for 2/82, 3/82, 4/82	17,415.60
Domingo Moreira		
1/20/82	Payment of 2/82 Advertising minimum	10,000.00
Embassy of Venezuela		
11/10/81	Advance payment for services	10,000.00
12/11/81	Payment for services Nov. 1-30, 1981 (fee plus expenses)	22,026.62
Italian Aerospace Industries		
12/1/81	Payment for services rendered Oct. 1-31, 1981	10,000.00
1/12/82	Payment for services rendered Nov. 1-30, 1981	11,228.41
2/8/82	Payment for services rendered Dec. 1-31, 1981	4,017.12
Thyssen Nordseewerke		
1/22/82	Payment for services rendered Nov. 1-30, 1981	3,983.50
1/22/82	Payment for services rendered Dec. 1-31, 1981 and Jan. 1982 (part) plus 1/82 and 2/82 advertising	10,000.00
3/29/82	Balance of payment for services rendered January 1982	10,760.73
4/12/82	Payment for services rendered February 1-28, 1982	7,074.35
Kuwait Petroleum/Santa Fe International		
10/15/81	Payment of Oct. 1981 Retainer	5,000.00
11/24/81	Payment for services rendered Oct. 1-31, 1981	83,716.39
12/28/81	Payment for services rendered Nov. 1-30, 1981 plus Dec. 1981 Retainer	36,567.01
1/25/82	Payment for services rendered Dec. 1981 plus Jan. 1982 Retainer	22,136.50

From Whom/Date	Purpose	Amount
Kuwait Petroleum/Santa Fe International (continued)		
3/9/82	Payment for services rendered Jan. 1-31, 1982	5,027.97
4/6/82	Payment for services rendered Feb. 1-28, 1982 plus Feb. 1982 Advertising Expenses	6,412.60

ATTACHMENT E

Item 15(a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal names in items 8, 9 and 10 of this statement?

YES NO

(2) transmitted monies to any such foreign principal?

YES NO

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

Nov '81 - April 82

For Whom/Date	Description		Amount
Domingo Moreira			
Jan. 1982			
Telephone		151.17	
**Photcopy		15.20	
	TOTAL		167.17
Feb. 1982			
Telephone	C&P	139.10	
*Postage		29.06	
**Photocopy		5.72	
Travel & Expense:			
	Travel-Gray	1,181.40	
	Expense-Crawford	29.26	
Messenger Service:			
	Federal Express	39.60	
	IGE	100.92	
Supplies		5.18	
Miscellaneous:			
	Amenesty Inter.	8.69	
	Cabs	26.07	
	Publications	16.22	
	Refreshments	4.40	
	Travel Escape (Media Tour)	2,373.80	
	Washington Post	231.72	
	TOTAL		2,660.90

ATTACHMENT E

Nov '81 - April 82

For Whom/Date	Description		Amount
Domingo Moreira			
March 1982			
Telephone		222.16	
*Postage		76.82	
**Photocopy		155.20	
Messenger:			
	Federal Express	106.15	
	IGE	219.06	
Miscellaneous:			
	Brewton's	104.88	
	Burrelle's	50.97	
	Cabs	17.10	
	Dennis Sullivan	167.20	
	George Allen Co.	40.71	
	Int'l Cons. Group	943.11	
	Marcia Bilonick	44.00	
	Metrocall	.86	
	N. Livingstone - cabfare	2.20	
	Reader's World	1.59	
	Washington Post	127.77	
	TOTAL		2,279.78
April 1982			
Telephone		121.77	
*Postage		12.18	
**Photocopy		51.20	
Travel and Expense:			
	P. Bray	34.70	
	C. Crawford	622.05	
	H. Dent	18.35	
	J. Jennings	37.11	
	N. Livingstone	133.70	
	B. Zorthian	31.11	
Messenger Service:			
	Federal Express	23.10	
	IGE	121.11	
Miscellaneous:			
	American Radio Telephone	4.80	
	Archer Air Courier	62.15	
	Brewton's	10.49	
	Cab	14.30	
	Geo. W. Allen Co.	24.81	
	TOTAL		1,322.92
	Domingo Moreira GRAND TOTAL		6,430.77

*Postage meter in-house
**Photocopy work done in-house at rate of .20 per copy

ATTACHMENT E

Nov '81 - April 82

For Whom/Date	Description		Amount
Italian Aerospace Industries, Inc.			
Nov. 1981			
Telephone		154.34	
*Postage		96.77	
**Photocopy		177.80	
Travel & Expense:			
	K. Iacocca	5.00	
Miscellaneous:			
	Gas	2.00	
Temporary Service		852.50	
	TOTAL		1,228.41
Dec. 1981			
Messenger Service		86.40	
Limosines		3,065.20	
Photocopy:			
	Copy General	.60	
	J. Wells Photograph	82.40	
Travel & Expense:			
	K. Iacocca	27.00	
	R. Gray	84.02	
	B. Zorthian	67.00	
Printing:			
	Mt. Vernon Publ. Co.	315.00	
Georgetown Club		215.30	
	TOTAL Italian Aerospace Industries, Inc.		3,942.92
	GRAND TOTAL		5,171.33

*Postage meter in-house
**Photocopy work done in-house at rate of .20 per copy

ATTACHMENT E

Nov '81 - April 82

For Whom/Date	Description		Amount
Southern Cone			
Nov. 1981			
Telephone	C&P	231.51	
	TOTAL		231.51
Postage:			
*Postage		7.86	
Federal Express		86.80	
	TOTAL		94.66
Photocopy:			
Copy General		166.20	
Photo Copy		10.40	
	TOTAL		176.60
Travel & Expense:			
Limousine Service		653.40	
K. Iacocca	Cabfare	10.00	
S. Worth		225.09	
Other Cabs		11.00	
	TOTAL		899.49
Messenger Service:			
World Courier, Inc.		200.00	
IGE		41.40	
	TOTAL		241.40
Miscellaneous:			
Publications		65.00	
Information Bank		324.98	
Inter. Monetary		5.00	
Intern. Management		46.00	
National Affairs		33.23	
Temporary Placements	Secretarial Staff	1,080.00	
Temporary Service	Secretarial Staff	1,070.00	
	TOTAL		2,625.21
Dec. 1981			
Telephone	C&P	262.10	
	TOTAL		262.10
Postage		68.24	
	TOTAL		68.24

ATTACHMENT E

For Whom/Date	Description	Amount	
Dec. 1981 (continued)			
Photocopy:			
Copy General		122.80	
Photo Copy		13.80	
	TOTAL		136.60
Travel & Expense:			
S. Worth		43.07	
Cabfares		15.00	
	TOTAL		58.07
Messenger Service:			
Federal Express		102.50	
IGE		60.15	
World Courier		200.00	
	TOTAL		362.65
Miscellaneous:			
Barron's	Publication	21.00	
Bus. Int'l Corp.		480.00	
PA Consultant		500.00	
Chamber/Commerce	Publication	50.00	
Chilean Digest	"	78.00	
Data Service	"	20.30	
Duns Marketing Serv.	"	21.50	
Financial Times		365.00	
Information Bank		300.32	
Int't Management	Publication	46.00	
Inter-Amer. Press		100.00	
Intern. Monit. Fund	Publication	20.00	
Legislate		47.34	
NACLA		29.00	
Nat'l Cath. Report		23.00	
Notary		7.50	
Philip Benson	Office Supplies	30.27	
Random House	Publication	30.95	
Super. of Documts.	Publication	19.00	
Swift Mailing Serv.	Mailing Service	810.90	
The Economist	Publication	17.00	
The Nation	"	30.00	
The New Republic	"	32.00	
Travel Escape		260.00	
U.S. News	Publication	39.00	
Universal Press	"	21.00	
Vision	"	49.00	
Supplies		1.46	
	TOTAL		3,479.54

ATTACHMENT E

For Whom/Date	Description	Amount	
Jan. 1982			
Telephone	C&P	50.00	
	TOTAL		50.00
**Photocopy		28.40	
	TOTAL		28.40
Travel & Expense:			
	Cabfare	5.00	
	TOTAL		5.00
Messenger Service:			
Federal Express		48.70	
IGE		106.35	
	TOTAL		155.05
Miscellaneous:			
Angllo Bonita Fl		28.25	
PA Consultant		500.00	
Congr. Quart. Inc.		52.15	
Data Service		20.30	
DHL Airways, Inc.	Courier Service	84.70	
Dun's Marketing	Publication	21.50	
Harv. Univ. Press	"	21.57	
Information Bank	"	5.34	
New York Times	"	9.75	
The Nation	"	30.00	
Univ. of CA Press	"	30.13	
Welt Publ. Co.	"	206.70	
Baker Webster Co.	"	221.22	
RCA Global Comm.		9.31	
Western Union	Telegram	8.34	
Victor Limo Service		713.54	
	TOTAL		1,962.50
Feb 1982			
Telephone	C&P	139.10	
*Postage		16.39	
**Photocopy		40.00	
Messenger Service		47.80	
	TOTAL		244.29
Miscellaneous:			
Cabfare		4.00	
Good Impressions	Graphics Services	455.80	
Intern. Buss. Affairs	Publication	31.80	
Latin Amer. Ltrs.	"	180.00	
PA Consultant		500.00	

ATTACHMENT E

For Whom/Date	Description	Amount	
Feb. 1982 (continued)			
Miscellaneious:			
RCA Global Comm.		48.00	
Superint of Doc.	Publication	6.00	
Swift Mailing Service		400.00	
Travel Escape		121.56	
	TOTAL		1,747.16
March 1982			
Telephone	C&P	122.16	
Travel & Expense	K. Iacocca	32.00	
*Postage		335.16	
**Photocopy		40.20	
IGE Messenger Service		70.50	
Swift Mailing Service		1,282.00	
Cabfares		8.50	
PA Consultant		1,000.00	
John Hemmings	Secretarial Staff	20.00	
Metro Call	Car Phone Calls	.79	
Readers World		1.45	
University of CA		126.00	
Good Impressions		646.60	
Stran Limosine Service		777.79	
The Madison Hotel		1,463.69	
	TOTAL		4,044.82
April 1982			
Telephone	C&P	60.00	
Travel & Expense		79.90	
*Postage		40.83	
**Photocopy		30.00	
Messenger Service	Federal Express	21.00	
Swift Mailing Service		267.80	
PA Consultant		500.00	
Good Impressions	Graphics	1,908.00	
	TOTAL		2,907.53
	Southern Cone GRAND TOTAL		19,780.82

*Postage meter in-house
**Photocopy work done in-house at rate of .20 per copy

ATTACHMENT E

Nov '81 - April 82

For Whom/Date	Description		Amount
Thyssen Nordseewerke			
Dec. 1981			
Telephone	C&P	30.00	
*Postage		1.18	
**Photocopy		3.40	
Travel & Expense:			
J. Jennings		8.00	
Other Cabfare		8.00	
	TOTAL		50.58
Jan. 1982			
Telephone	C&P	51.00	
IGE Messenger		7.80	
**Photocopy		10.20	
Cabefare		23.00	
Dun's Marketing		21.50	
Publication		3.71	
Traffic World		25.44	
	TOTAL		142.65
Feb. 1982			
Telephone	C&P	139.10	
*Postage		13.50	
**Photocopy		44.00	
IGE Messenger Service		94.76	
Cabfare		11.00	
House of Rep. Restaurant		385.33	
Notary		5.50	
Strand Limo Service		1,950.60	
	TOTAL		1,950.60
March 1982			
Telephone	C&P	102.16	
*Postage		20.17	
**Photocopy		406.00	
Messenger Service		61.65	
Travel & Expense		91.54	
Congressional Staff Directory		40.04	
Gov't Printing Office		6.60	
Silver Image		67.62	
Other Cabfares		58.30	
	TOTAL		854.08

ATTACHMENT E

For Whom/Date	Description	Amount	
April 1982			
Telephone	C&P	40.00	
*Postage		13.64	
**Photocopy		222.80	
Travel & Expense:			
A. Norris		33.00	
G. Hymel		112.15	
S. Worth		147.67	
Messenger Service:			
Federal Express		40.70	
IGE		66.00	
Other Cabfares		23.10	
	TOTAL		699.06
	Thyssen Nordseewerke		
	GRAND TOTAL		3,696.90

*Postage meter in-house
**Photocopy work done in-house at rate of .20 per copy

ATTACHMENT E

For Whom/Date	Description	Amount	
Santa Fe			
Oct./Nov. 1981			
Telephone	C&P	1,389.07	
*Postage		17.64	
**Photocopy		32.00	
Travel & Expense:			
B. Anderson		179.97	
R. Gray		3,433.43	
B. Cebuhar		188.00	
G. Hymel		138.99	
J. Jessar		834.46	
C. Trimble		31.50	
Messenger Service		606.65	
Miscellaneious:			
Philip Benson		54.59	
A.V. Monitoring		396.50	
Cabfares		5.00	
Copy General		29.00	
Creative Video		665.00	
Federal Express		18.00	
Information Bank		262.63	
ITT World Comm.		18.69	
MSC		50.00	
Notary Fee		12.00	
Publication		3.10	
TRT Tele Comm.		1,116.21	
Western Union		365.47	
Gas		20.00	
	TOTAL		10,156.67
Dec. 1981			
Telephone	C&P	1,160.78	
*Postage		16.23	
Photocopy:			
Copy General		29.00	
**Photocopy		10.60	
Messenger Service:			
Federal Express		20.90	
IGE		603.62	
Travel & Expense:			
B. Anderson	Cabfare	5.50	
N. Holch	Cabfare	4.40	
G. Hymel		14.30	
J. Jessar		87.52	
J. Lengel	Cabfare	4.40	
J. Trammell		48.48	
R. Gray		52.57	

ATTACHMENT E

For Whom/Date	Description	Amount	
Jan 1982			
Telephone	C&P	9.70	
Travel & Expense	J. Jessar	96.59	
Messenger Service	IGE	288.53	
Miscellaneious:			
Congr. Quart., Inc.		19.58	
Hudson's Directory		41.25	
ITT World Comm. Inc.		42.90	
Larimi Comm.		16.23	
Luce Press Clipps		999.78	
Nat'l Journal		27.92	
New York Times, Inc.		10.73	
Publications		24.53	
TRT Telecomm.		264.09	
Western Union		9.17	
	TOTAL		1,456.18
Feb. 1982			
Telephone	C&P	139.10	
*Postage		9.31	
**Photocopy		22.66	
Travel & Expense:			
G. Hymel		52.66	
R. Gray		74.37	
Luce Press Clippings		499.54	
	TOTAL		797.60
March 1982			
**Photocopy		2.00	
Western Union		65.41	
IGE Messenger Service		88.00	
Information Bank		44.79	
Luce Press Clippings		287.70	
Metrocall		.87	
	TOTAL		488.77
April 1982			
Telephone		6.77	
**Photocopy		4.00	
Miscellaneous		32.39	
	TOTAL		43.16
	Santa Fe		
	GRAND TOTAL		12,942.38

*Postage meter in-house
**Photocopy work done in-house at rate of .20 per copy

ATTACHMENT E

Nov '81 - April 82

For Whom/Date	Description		Amount
Hambros Bank Ltd. & Sharps, Pixley			
Feb. 1982			
Telephone	C&P	139.10	
	TOTAL		139.10
March 1982			
Telephone	C&P	122.16	
Travel & Expense:			
G. Hymel		8.80	
R. Freiberg		39.09	
Cabfares		13.20	
*Postage		4.62	
**Photocopy		125.00	
Metrocall		.86	
Reader's World		1.60	
	TOTAL		315.33
April 1982			
Telephone	C&P	121.77	
*Postage		6.82	
Travel & Expense	R. Freiberg	58.50	
Messenger Service	IGE	7.04	
Amer. Radio Tele.		4.81	
Cabfare		11.00	
Motorola		3.50	
Reader's World		1.50	
	TOTAL		214.93
	Hambros Bank Ltd. & Sharps, Pixley & Co. Ltd		
	GRAND TOTAL		669.36

*Postage meter in-house
**Photocopy work in-house at rate of .20 per copy

ATTACHMENT E

Item 15(a) DISBURSEMENTS - MONIES

During this 6-month reporting period, there were no disbursements for the following clients:

Arab Women's Council

Embassy of Venezuela