U.S. Department of Justice
Washington, DC 20530

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
Gray and Company Public Communications International, Inc.
3255 Grace Street, N.W., Washington, D.C. 20007

2. Registration No.
3301

3. Name of foreign principal
Portals, Inc.

4. Principal address of foreign principal
P.O. BOX 627
Portals Road
Hawkinsville, GA 31036

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

☐ Foreign government

☐ Foreign political party

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

☐ Partnership ☐ Committee

☒ Corporation ☐ Voluntary group

☐ Association ☐ 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.

Not Applicable.

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

Not Applicable.

TERMINATED
DATE 10-19-84

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

Portals Inc. is a manufacturer of watermarked security paper for bank notes and other valuable documents.

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.)*

Portals Inc. is a wholly-owned subsidiary of Portals Holdings PLC, based in London, England.

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.

Not Applicable.

Date of Exhibit A	Name and Title	Signature
February 29, 1984	Bette B. Anderson Senior Vice President	Bette B. Anderson

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
Gray and Company Public Communication International, Inc.	Portals Inc.

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. ☐ 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.

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

On behalf of Portals Inc., our activities may include lobbying members of the Administration, members of Congress, and other top U.S. government officials in promoting government and private sector sales of security paper to national and international markets.

TERMINATED
DATE 10-19-84

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

Refer to Question #4 on the reverse side.

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☒ 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.

Refer to Question #4 on the reverse side.

Date of Exhibit B	Name and Title	Signature
February 29, 1984	Bette B. Anderson Senior Vice President	Bette B. Anderson

[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 the 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.

GRAY AND COMPANY

BETTE B. ANDERSON
SENIOR VICE PRESIDENT

RECEIVED
CRIMINAL DIVISION
MAR 5 4 55 PM '84
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

February 8, 1984

Colin S. Brady, President and
Chief Executive Officer
Portals, Inc.
P. O. Box 627 - Portals Road
Hawkinsville, GA 31036

Dear Mr. Brady:

Please let this serve as our letter of agreement by which Gray and Company Public Communications International, Inc. (Gray and Company) will provide Portals, Inc. ("Portals") with public relations/public affairs counsel and services.

The fee for Gray and Company services will be a monthly retainer of $5,000.00, payable in advance, plus the sum of hourly charges of officers and staff who participate on the account. Manpower charges are exclusive of out-of-pocket expenses, which will be billed with a ten percent (10%) markup. Any invoice unremitted for a period of sixty (60) days will incur a carrying charge of 2% per month.

Gray and Company cannot independently verify factual material supplied to it by "Portals" or its surrogates and therefore "Portals" will indemnify and hold harmless Gray and Company for any claim, loss, damage, expense or other legal liability based upon information, representation, reports, news releases or other material produced by the Company for "Portals'" use.

This agreement will commence February 8, 1984, and continue for a period of one year. Either party has the right to terminate the agreement by providing thirty (30) days' advance written notice.

ACCEPTED:

By: Colin S. Brady

Colin S. Brady, President and
Chief Executive Officer
Portals, Inc.

Date: 2/10/84

GRAY AND COMPANY PUBLIC COMMUNICATIONS INTERNATIONAL, INC.

By: Kent K. Gray

TERMINATED
DATE 10-19-84

NATIONAL PUBLIC RELATIONS PUBLIC AFFAIRS
THE POWER HOUSE
WASHINGTON, D.C. 20007
202 333-7400