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	2. Registration No.
Gray and Company Public Communications International, Inc. The Power House, Washington, D.C. 20007	3301

3. Name of foreign principal	4. Principal address of foreign principal
Minebea Company	c/o Mr. William Tanaka 1919 Pennsylvania Ave., N.W. Washington, D.C. 20006

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 _____

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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. Not Applicable.

c) Principal aim

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

Minebea Company is a privately - owned Japanese industrial firm

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 ☐

Not Applicable.

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page may be used.)*

Not Applicable.

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.

Please refer to Question #8 on the reverse side.

Date of Exhibit A	Name and Title	Signature
February 6, 1985	Neil C. Livingtone Senior Vice President	Neil C. Livingstone

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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 Communications International, Inc.	Minebea Company

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.

Registrant will provide general public relations/public affairs counsel and services.

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

Registrant will counsel foreign principal on the acquisition of the New Hampshire Ball Bearing Company of Peterboro, NH.

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.

Date of Exhibit B	Name and Title	Signature
February 7, 1985	Neil C. Livingstone Senior Vice President	Neil C. Livingstone

[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 ORFILA INTERNATIONAL

NEIL C. LIVINGSTONE
SENIOR VICE PRESIDENT

January 30, 1985

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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Mr. William Tanaka, Esq.
Tanaka, Walders & Ritger
1919 Pennsylvania Avenue, N.W.
Suite 303
Washington, D.C. 20006

Dear Bill:

Please accept this letter as our Letter of Agreement, by which Gray and Company Public Communications International, Inc. (hereafter known as "Gray and Company") will provide you with public relations/public affairs counsel and services in conjunction with your representation of Minebea Company.

The fee for Gray and Company services will be a monthly retainer of five thousand dollars ($5,000), 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 to which a ten percent (10%) administrative handling will be added. Any unpaid invoice for a period of sixty (60) days will incur a carrying charge of two percent (2%) per month against the outstanding balance due.

Gray and Company cannot independently verify factual materials supplied to it by you or Minebea Company, and therefore you and Minebea Company will indemnify and hold harmless Gray and Company for any claim, loss, damage, expense or other legal liability based upon information, representations, reports, news releases, or other material prepared by Gray and Company on behalf of you, Minebea Company, or your agents.

This agreement became effective on January 30. Either party has the right to terminate the agreement at any time, with thirty (30) days advance written notice required for any such termination.

ACCEPTED:

By: H. William Tanaka
William Tanaka
Legal Counsel for Minebea Co.

February 2 1985
Date

GRAY AND COMPANY COMMUNICATIONS INTERNATIONAL, INC.

By: Neil C. Livingstone
Neil Livingstone
Senior Vice President

Jan 30, 1985
Date

A DIVISION OF GRAY AND COMPANY PUBLIC COMMUNICATIONS INTERNATIONAL
THE POWER HOUSE
WASHINGTON D.C. 20007-3814
202-333-7400

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TWX 710-822-9282 GRAY CO WSH