

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

OMB No. 43-R226
Approval Expires Oct. 31, 1981

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

AMENDMENT TO REGISTRATION STATEMENT

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

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INTERNAL SECURITY
SECTION
REGISTRATION UNIT

1. Name of Registrant ARNOLD & PORTER	2. Registration No. 1750
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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 _____
- 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, The London International Financial Futures Exchange Limited, 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.

(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.)

Brooksley E. Landau
Brooksley E. Landau, Partner

Subscribed and sworn to before me at Washington, DC

this 18 day of March, 1982

My commission expires Oct. 31, 1984

Patricia H. Davis
(Notary or other officer)

EXHIBIT A
TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

*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
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3. Name of foreign principal The London International Financial Futures Exchange Limited	4. Principal address of foreign principal 66 Cannon Street London EC 4N 6AE
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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
 - Corporation
 - Association
 - Committee
 - Voluntary group
 - Other (specify) _____
- Individual - State his nationality _____

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6. If the foreign principal is a foreign government, state: N. A.

a) Branch or agency represented by the registrant.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address N. A.

b) Name and title of official with whom the registrant deals.

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

The foreign principal is an exchange for trading futures contracts in financial instruments.

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.)

To the best of our information, the institutions listed in Appendix A own and control the foreign principal.

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
March 18, 1982	Brooksley E. Landau, Partner	<i>Brooksley E. Landau</i>



THE LONDON INTERNATIONAL FINANCIAL FUTURES EXCHANGE

The Board of Directors is pleased to announce that the following
have been accepted as members of the Exchange:-

Ace Koeki Co Ltd	Credit Suisse First Boston Ltd
ACLI International Commodity Services Ltd	Cresvale International Ltd
Agro Investors Services SA	CSA Inc
Akroyd & Smithers Ltd	Cue & Co
Alajalal Trading (UK) Ltd	C W Commodities Ltd
Shahryar Alamouti	C Czarnikow Ltd
Yusuf A Alghanim & Sons WLL	Dai-ichi Kangyo Bank Ltd
Allied Irish Investment Bank Ltd	The Daiwa Bank Ltd
Amalgamated Metal Corporation Ltd	Daiwa Europe Ltd
Anderson Man Ltd	Dean Witter Reynolds Inc
The Anglo Chemical & Ore Co Ltd	Derby & Company Ltd
Henry Ansbacher & Co Ltd	Deutsche Bank AG
A P Bank Ltd	De Zoete & Bevan
Arbuthnot Latham & Co Ltd	Dingwall Main (Near East) Ltd
J Aron & Company Inc	Discount Corporation of New York Futures
Astaire & Co Ltd	Diversalton Ltd
Astley & Pearce Ltd	Drexel Burnham Lambert Ltd
Australia & New Zealand Banking Group Ltd	Elder's Finance Ltd
Bache Halsey Stuart (London) Ltd	The English Association Trust Ltd
E Bailey Commodities Ltd	European Banking Company Ltd
Banco Urquijo Hispano Americano Ltd	Fielding Newson-Smith & Co
Keith Banham Ltd	S Figgis & Co Ltd
Bank of America NT/SA	J M Finn & Co
Bank of Scotland International Division	The First National Bank of Chicago
The Bank of Tokyo Ltd	L M Fischel & Company Ltd
The Bank of Yokohama Ltd	J R Fitzpatrick
Bankers Trust Company	Robert Fleming & Co Ltd
Banque Belge Limited	Friedberg Mercantile Group
Banque Nationale de Paris Ltd	The Fuji Bank Ltd
Barclays Bank Ltd	Charles Fulton & Co Ltd
A G Becker Commodities Ltd	A W Galadari Commodities
A G Becker Incorporated	Gardner Lohmann Ltd
V Berg & Sons Ltd	Gerald Metals Ltd
Berkeley Service Corporation	Gerrard & National P.L.C.
Bisgood Bishop & Co Ltd	Gill & Duffus Ltd
Bone Fitzgerald & Co Ltd	G N I Ltd
Boustead Commodities Ltd	G N P Commodities Inc
M C Brackenbury & Co	Godsell & Company Ltd
The Britannia Group of Investment Companies Ltd	Goldman Sachs & Co
Brown Shipley & Co Ltd	Goldschmidt & Charteris Ltd
Guy Butler (International) Ltd	Ronald Goodman
James Capel & Co	Goodman-Manaster & Co Ltd
Cargill Investor Services Ltd	W Greenwell & Co
Cater Allen P.L.C.	Grieverson Grant & Co
Central Trustee Savings Bank Ltd	Grindlays Bank Ltd
Charterhouse Japhet Ltd	Guinness Mahon & Co Ltd
Chemical Bank	Hambros Bank Ltd
The Chuo Trust & Banking Co Ltd	Harlow Meyer Savage Ltd
Citicorp International Bank Ltd	Havana International Bank Ltd
Cocoa Merchants Ltd	C E Heath & Co Ltd
Commarco Ltd	Heinold Commodities Ltd
The Commercial Metal Company Ltd	David G Henner
Comfin (Commodity & Finance) Company Ltd	Hennessy & Associates Ltd
COMINCO (UK) Ltd	John A Hewison
Commodity Analysis Ltd	Hill Samuel & Co Ltd
Comweld Ltd	Hoare Govett Ltd
Conticommodity Services Ltd	The Hokkaido Takushoku Bank Ltd
Continental Illinois National Bank & Trust Company of Chicago	Hong Kong & Shanghai Banking Corporation
Henry Cooke Lumsden & Co	Hungarian International Bank Ltd
County Bank Ltd	E F Hutton & Co (London) Ltd
	Industrial Bank of Japan
	Inter Commodities Ltd

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A C Israel Woodhouse Co Ltd
 Jessel Toynbee & Co Ltd
 Johnson Matthey Bankers Ltd
 G W Joynson & Co Ltd
 Theodore E Keefer
 Ted H Kohl
 Kidder Peabody International Ltd
 Kitcat & Aitken
 Kleinwort Benson Ltd
 Krato Invest A G Glarus (Bierbaum)
 The Kyowa Bank Ltd
 Laurie Milbank & Co
 Lazard Brothers & Co Ltd
 Lehman Commercial Paper Incorporated
 Lewisohn & Marshall Ltd
 Jean Lion & Cie
 Lloyds Bank Ltd
 Lloyds Bank International Ltd
 Lonconex Ltd
 London & Universal Financial
 Futures Ltd
 The Long Term Credit Bank of Japan Ltd
 E D & F Man Ltd
 Manufacturers Hanover Ltd
 Marshall French & Lucas Ltd
 Marshall Rouse Woodstock Ltd
 R P Martin & Co Ltd
 Arthur Matyas & Co Ltd
 G Maurer SA
 McGuire Financial Company
 Merrill Lynch Pierce Fenner & Smith
 (Brokers & Dealers) Ltd
 L Messel & Co
 Nathan S Metzger
 Midelton James & Company Ltd
 Midland Bank Ltd
 The Mitsubishi Bank Ltd
 Mitsubishi Trust & Banking Corporation
 (London Branch)
 The Mitsui Bank Ltd
 The Mitsui Trust & Banking Co Ltd
 Mocatta & Goldsmid Ltd
 Mocatta International Inc
 Samuel Montagu & Co Ltd
 Morgan Futures Corporation
 Morgan Grenfell & Co Ltd
 Muirpace Ltd
 Mullens & Co
 National Bank of Abu Dhabi
 National Westminster Group
 New York London Finance Co Ltd
 The Nikko Securities Co (Europe) Ltd
 The Nippon Credit Bank Ltd
 Messrs R Nivison & Co
 Walter Nokes & Company
 Nomura International Ltd
 Nordic Bank Ltd
 The Northern Trust Company
 Opclear Ltd
 Pacol Ltd
 Paine Webber Jackson & Curtis Inc
 Panmure Gordon & Company

Pember & Boyle
 Peters & Co
 M D Phelan
 Phillips & Drew
 J H Rayner (Mincing Lane) Ltd
 Rea Brothers
 Refco International Futures
 (London) Ltd
 Richco Bullion
 RIT Trading Ltd
 N M Rothschild & Sons Ltd
 The Royal Bank of Scotland Ltd
 The Saitama Bank Ltd
 Salomon Brothers Asia Ltd
 Salvaj & Cie SA
 The Sanwa Bank Ltd
 J Henry Schroder Wagg & Co Ltd
 Scott Goff Hancock & Co
 Norman Seltzer
 Shatkin Trading Company
 Shearson/American Express Ltd
 William R Shepard
 Sheppards & Chase
 J Sinclair & Co Ltd
 Singer and Friedlander Ltd
 Smith Bros Ltd
 S N W Commodities
 Societe Generale
 Socomex Ltd
 Standard Chartered Bank Ltd
 Henry Stephens & Sons (London) Ltd
 Stock & Commodity Services SA
 The Sumitomo Bank Ltd
 The Sumitomo Trust & Banking Co Ltd
 The Taiyo Kobe Bank Ltd
 Tate & Lyle PLC
 Thomson McKinnon Securities Ltd
 The Tokai Bank Ltd
 Toyo Trust & Banking Co Ltd
 Trade Development Bank
 Tullett & Riley International Ltd
 The Union Discount Co of London Ltd
 The United Bank of Kuwait Ltd
 Union Bank of Switzerland
 UOB Bullion Ltd
 Van Lessen Richardson & Co Ltd
 Peter John Wait
 Wallace Brothers Commodities Ltd
 Wallace Smith Trust Co Ltd
 S G Warburg & Co Ltd
 Wedd Durlacher Mordaunt & Company
 P J Watling
 Andrew Weir Finance Co Ltd
 Williams & Glyn's Bank Ltd
 Williams de Broe Hill Chaplin & Co
 Wilson Smithett & Cope Ltd
 Rudolf Wolff & Co Ltd
 Woodhouse Drake & Carey Ltd
 Wood Mackenzie & Co
 Yamaichi International (Europe) Ltd
 The Yasuda Trust & Banking Co Ltd

The above members have been allocated a total of 354 seats
 and any further enquiries concerning membership of LIFFE should be addressed to:-
 Michael Jenkins, Chief Executive, London International Financial Futures Exchange,
 66 Cannon Street, London EC4 Telephone 01-236 7501

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

EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

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	The London International Financial Futures Exchange Limited

Check Appropriate Boxes:

- 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.
 - 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.
 - 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.

The Registrant will render advice on U. S. laws, regulations and policies that may affect or relate to the activities of the foreign principal. The fee for such representation is to be determined periodically as set forth in the attached March 12, 1982 letter. The duration of the agreement is indefinite.

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

The Registrant 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.

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.

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 proposed 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
March 18, 1982	Brooksley E. Landau, Partner	<i>Brooksley E. Landau</i>

^{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.

ARNOLD & PORTER

1200 NEW HAMPSHIRE AVENUE, N. W.

WASHINGTON, D. C. 20036

(202) 872-6700

CABLE: "ARFOPO"

TELECOPIER: (202) 872-6720

TELEX: 89-2733

633 SEVENTEENTH STREET

DENVER, COLORADO 80202

(303) 832-2900

March 12, 1982

The London International Financial
Futures Exchange Limited
66 Cannon Street
London EC4N 6AE, England

Attention: Mr. Michael Jenkins, Chief Executive

Gentlemen:

This will confirm the basis upon which you have retained Arnold & Porter to represent The London International Financial Futures Exchange Limited ("LIFFE") in connection with efforts to obtain modification of proposed reauthorization legislation of the Commodity Futures Trading Commission and other matters you may specify.

It has been agreed that LIFFE will pay Arnold & Porter a fee for its services with respect to this matter. This fee will be in accordance with the usual and customary charges we make for matters of this nature and will be based primarily upon the difficulty and complexity of the questions and problems involved and the amount of time and effort spent on your behalf. A statement for our services will be sent to you on a monthly basis.

It is also understood that, in addition to the amounts paid to us for our services, LIFFE will reimburse Arnold & Porter for out-of-pocket expenses incurred on behalf of LIFFE, including such items as travel expenditures, living expenses when out of town, taxi fares, long-distance telephone and telex charges,

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March 12, 1982

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secretarial charges, photocopying and other reproduction costs and charges, and the like. Statements for these disbursements will be sent to you from time to time.

If the foregoing meets with your understanding, we would appreciate your signing the enclosed copy of this letter and returning it to us.

Sincerely yours,

ARNOLD & PORTER

By Brookley E. Lusk

The London International Financial
Futures Exchange Limited

By _____