

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

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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DEPARTMENT OF JUSTICE
OCT 12 12 16 PM '77
REGISTRATION UNIT
CRIMINAL DIVISION
Approval Expires Oct. 1, 1981
No. 48-R226.5

1. Name of Registrant Frederick G. Dutton	2. Registration No. 2591
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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
 - 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.
- for 6 months ending June 12, 1977

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

Additional information re Supplemental Statement for
Six Months Ending June 17, 1977

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 attached sheets providing additional detail for
Items 11, 12 and 15(a) of Supplemental Statement for
Six Months Ending June 12, 1977

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.)

Frederick G. Dutton

Subscribed and sworn to before me at Washington, DC.

this 7th day of October, 1977

Betty O. Stancee
(Notary/other officer)

My commission expires 1/31/81

ADDITIONAL INFORMATION RE SUPPLEMENTAL STATEMENT FOR SIX MONTHS
ENDING JUNE 17, 1977

Item 11

Legal work involved Embassy's regular ongoing commercial relations and contracting with companies and individuals, including for Embassy and Chancery improvements and supplies, employing personnel, property acquisition in both Washington D.C. and New York, and particularly dealing with architectural firms working with Embassy. Also assisted on legal and related problems of Saudi students and others in U.S., including automobile accidents, law suits, and related matters. Legal work for Saudi Basic Industries Corp. concerns drafting of comprehensive basic contract provisions and related documents, and participation with SABIC officials in continuing negotiations in U.S., Saudi Arabia and western Europe with Shell Oil Co. (U.S.), Dow Chemical, Exxon, Fluor and others for construction of petrochemical production complexes in Saudi Arabia over the next half decade; a broad range of legal and procedural problems are involved; also extensive review in this period of published U.S. contracting procedures and provisions, and experience of various international organizations on same matters. Also worked on contractual questions involved in a projected iron-processing facility by SABIC, including with U.S., Japanese, West German and other companies; and research on possible basic environmental, safety and related questions in SABIC's overall industrialization plans, including arranging for individual experts to go there.

Embassy counselling involved frequent but not regularly scheduled, informal discussions with Embassy personnel on ongoing public, governmental, economic and other developments, including particularly on energy, trade, financial and overall relations with U.S., including particularly in this period Export Administration Act developments and new U.S. Administration; much more infrequently, briefings for Saudi officials, businessmen, and others visiting U.S., with that done both in U.S. and Saudi Arabia informally and on same subjects. Work in this period particularly involved assisting in preparations for visit of Saudi officials to U.S. in late May. Work with public relations personnel (small portion of total) involved assisting Embassy in appraising and negotiating agreements with firms and personnel it retained, and helping to oversee and at times make specific suggestions concerning the carrying out of the work, which included advertising in magazines and newspapers, public material issued by the Embassy, and some filming of and for the late May visit. Made several purchases of Embassy facilities and other goods and helped arrange for medical assistance. Also assisted expediting travel between U.S. and Saudi Arabia several times. Travelled to Saudi Arabia and western Europe extensively in legal and counselling work, per item 15(a)

Item 12

Work has consisted primarily of discussions directly with Ambassador and Embassy personnel on matters stated above. Meetings are informal, frequent, generally unscheduled in advance. Also similarly met with a number of Saudi businessmen, students and officials from the Ministries of Petroleum,

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Industry & Electricity, PTT, Royal Commission for Industrialization, Foreign Affairs, and others on same basis and subjects. In this period, substantial time given to visit of Saudi delegation to U.S. in late May and to contract problems of SABIC referred to in Item 11. Activities overwhelmingly involved interfacing with Saudi Arabians but also dealt with U.S. and western European individuals and commercial firms in activities stated in Item 11, and socially met wide range of public and private persons in ordinary course of legal work and general activities, as long done before and regardless of this representation.

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Item 15(a)

American Express monthly billings included payment for air travel below except \$5,883 paid directly to British Airways March 14, and air tickets for Christopher Dutton and Jan Fisler, \$3,657.21, paid March 9 with Fred Maroon item shown later here.
Pam Am Wash - Riyadh - Jan. 12-17, \$2,321. Air France charge on return \$550. British Airways Wash - Paris - London Feb. 15-17, \$865. United Air Lines: March 1-2 Wash - S.F. \$329. British Airways - Wash - Riyadh - Dhahran - Jeddah, March 18 - April 2-3, \$4,983. Surcharge \$110.79. United, April 12-13 - 2, \$1,276. Eastern, Wash - N.Y. \$49. Later allocated refund reduced total to \$ 19,885.00

Swiss Air - (Advance payment April 11 for air ticket N.Y. - Riyadh for environmental expert invited to appraise problems in S.A.) Reimbursed by S.A. (*) 1,113.00

International Hotel Riyadh, paid March 7 for rooms and meals there in Nov. and Jan. 1,850.00

St. Francis Hotel, S.F. - May 14 for room and meals, presentation by head of S.A. archeological program in Riyadh (Dr. Masari), on latest archeological developments there. (*) 1,503.69

American Express monthly billing paid for hotels in London, Paris, Jeddah, Riyadh (except Intercontinental bill paid directly for Jan. trip as listed above) during trips as shown under air fares above. Allocated to this client 5,000.00

Avis Car Rental. Paid directly for car rentals March 1, 7, April 7, 15, 20, May 1, 4, 12, 22, 31. Allocated (*) Wash., Calif. 1,630.19

American Express paid for Hertz and National Car Rentals (*) Wash., Calif 121.80

Saudi Review publication subscription, May 4. Information 748.00

Books - a considerable number of small individual purchases Dec. - June, largely Middle East books for working library. Research, general info.; background 795.00

American Express billing for a number of eating places abroad and in U.S. during trips as listed above and other times during this six month period. Allocated 1,760.00

Edmund Wise, legal associate, for services and expense reimbursement for Dec. - June. SABIC work 21,190.00

Nancy Dutton, legal associate for services Dec - June 35,500.00
Reimbursed Costs - March 3,500.00

Nick Zumas, legal associate - monthly, allocated office overhead, Dec. - June

Robert Pierce: Advance paid 3/15 \$6,000 for filming trip to S.A. and May 6 \$12,000, downpayment on contract for filming late May Saudi delegation U.S. visit

Michael Moynihan - advance paid May 15 for Embassy. Reimbursed (*) Public relations counselling

Legal Office - office personnel, Dec. - June. Allocated

Nell Morgan - Temp. in office - advance paid April. Reimbursed (*)

Nancy Hargess - Temp. in office, May. Allocated (*)

Suzanne White - office work - advance 3/7. Reimbursed (*)

Sophie Nalde - Office work - advance 3/7. Reimbursed (*)

Jan Fisler - Research, March, June (*)

Christopher Dutton - Feb. - May. Research. Allocated (*)

Fred Maroon - Advance - Reimbursed - Paid for trip to S.A. British Airways March 9. (*)

W. & J. Sloan - Chairs shipped to S.A. in April. Reimbursed (*)

IBM - Allocated, office overhead, monthly (*)

Woodward & Lothrop - Household purchases on request for shipment to S.A. Reimbursed (*) March, April

Office Expenses - small individual items allocated. Paid in every month.

Balance on hand for incurred costs to Metro Fuel Co. for Embassy heating unit - advance paid for, May (*)

Total

\$154,896.76

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7,500.00

(*) The items above allocable only or overwhelmingly to work for the Embassy are marked with an asterisk. All other items involve trips, work and meetings for both the Saudi Arabian Embassy and Saudi Basic Industries Corp. to such a substantial extent that no allocation is made.