

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

No. 43-R226.5  
Approval Expires Oct. 31, 1981

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

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OFFICE OF JUSTICE  
APR 11 2 52 PM '78  
REGISTRATION UNIT  
ORGANIZATION DIVISION

AMENDMENT TO REGISTRATION STATEMENT

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

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 for 12/12/77
  - 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 -

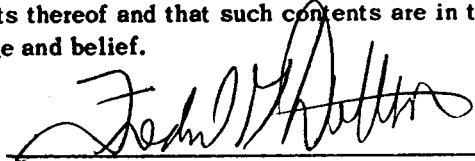
N.A.

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 sheet which is incorporated herein by reference.

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 7<sup>th</sup> day of APRIL, 1978 Barbara Gerdert  
(Notary or other officer)

My commission expires 8-31-82

Insert for Item 5. on Attached Sheet

1. The payment to Christopher Dutton was for providing archeological, cultural, historical and sociological materials on the Arabian Peninsula and Islamic societies, plus some very minimal translating. The work was entirely academic in nature and included selecting various books and an extensive bibliography for the Registrant, used for personal education. The material was not political in any way nor was there any drafting of any materials or presentation that could be so characterized.

2. The payment to Nancy Dutton, an attorney, was for legal work in connection with property acquisition and zoning problems of the Saudi Arabian Embassy and contract research work in negotiations for the Saudi Basic Industry Corporation in both the U.S. and Saudi Arabia.

3. The payments to Edmund Wise, an attorney, were for legal work, including drafting and negotiating in both the U.S. and Saudi Arabia, for the Saudi Basic Industry Corporation in connection with the petrochemical complexes it is planning there. The payments to Wise in this filing period total \$41,618, of which \$14,438 was for air travel, hotels, meals and miscellaneous in connection with four trips to Saudi Arabia, two separately to London and several within the U.S.; and the balance for legal services.

4. Taxis and out-of-pocket cash expenditures, as reported, were the estimate for the listed Middle Eastern, European and domestic U.S. travel. The amount was set forth in order to be sure to cover any possible expenditures while traveling and for which a receipt had not been provided. The total amount involved is \$1,000 as shown on the December 12, 1977 report and not the larger sum on the preceding line, which was the second of the two indicated payments to Edmund Wise.

Your letter of March 29 requested in my next filing I should separate the total funds received from the Royal Embassy of Saudi Arabia from the monies received from Saudi Basic Industries Corporation, rather than lumping them together. For the record, let me say that for the December 12 filing, the division was \$100,000 total income from the Embassy and \$79,010 from the Saudi Basic Industries Corporation work.

For the reporting period ending December 12, the social meetings referred to in Item 12 were that -- social -- and Registrant did not conduct business negotiations, briefings or comparable work at such events, with the exception of one possible dinner at which Saudi officials answered questions and Registrant did not take part in any way other than to be present and listen to the discussion.

I strongly believe in the principle of disclosure which underlies the registration statements, and would like to bring to your attention

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the possibility of an additional item on the form the next time that it is revised, in order to facilitate greater accuracy by those making use of the disclosure reports. Some recent media use of registration material has referred to the reports of income as though that was all for personal services and benefit, without taking into account or deducting in any way the expenditures which are also disclosed. In order to try to encourage accuracy in the use of the reports, consideration might be given to having a statement of net income, in so far as the disclosure reports are concerned, taking into account income less expenditures. That is approximately analogous to the well established approach for income tax procedures and could reduce the abuse of the disclosure statements by individuals examining the data on file.