

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.

OM
No. 43-R226
Approval Expires Oct. 31, 1981
RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION
MAY 12 12 22 PM '81
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

1. Name of Registrant Dutton and Dutton, P.C.	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 _____
- 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-

Attached Response to Letter of 3 April 1981

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.

- 6 Months Filing for the period ending December 12, 1980
- 6 Months Filing for the period ending June 12, 1980

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 M. Dutton
For Dutton & Dutton PC

Subscribed and sworn to before me at Washington DC

this 12th day of May, 1981 Barbara Jackson
(Notary or other officer)

My commission expires 8-31-82

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Responses to Letter of 3 April 1981

MAY 12 12 22 PM '81

Re: 6 Month Filing for Period Ending December 12, 1980
INTERNAL SECURITY
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1. Role in arranging for Saudi official at meetings in San Francisco and Los Angeles (Item 11)

Invitation was extended by Commonwealth Club of San Francisco directly to Saudi Embassy and accepted by it. As a longtime Californian, I was asked to call the Commonwealth Club to inquire about arrangements. Since the official was thereafter going to Los Angeles for the weekend, I called the chief officer of two southern California companies long doing major business in Saudi Arabia to inform them and suggest a small, informal private luncheon, which they subsequently had without further involvement by me. I also arranged the hotel accommodations in southern California for the official. Having practiced law in Los Angeles in the 1950s, I have long known various personnel of the Los Angeles Times and had repeatedly been asked in recent years to let them know if any Saudi official would be coming to Los Angeles. I called one of the people at the Times and he extended an invitation to the Saudi official to visit the paper, comment and answer questions. That occurred. I was not in the state during any of this.

2. Purpose of Travel (Items 11 and 15a)

Regular consultation with officials in Saudi Arabia on general current developments, pending legal problems and related matters of interest to that country.

In Britain, saw a Saudi official normally residing in the Kingdom and whom I usually meet with there, but who happened to be in Britain at the time and whom I would have missed while in Saudi Arabia (for same briefing purposes as above).

In France, to meet with Saudi official who requested I brief him en route back from Saudi Arabia to U.S.; not a special trip.

In California, looked into legal matters pending in the federal district court there involving my client. (Did not go in connection with first item above in this supplementary filing.)

In New York met with Saudi officials at UN General Assembly session. Also on separate occasion, lawyer doing legal work for Saudis.

In Illinois, to meet with Saudi students with individual legal problems there. Also, separately, to develop fuller personal background on Middle East historically, socially, etc., personal education at generally available educational facilities there.

3. Details of any entertaining on behalf of the foreign principal (Item 15(a))

No entertaining was done "on behalf of the foreign principal." But a private party was given by registrant in their home for a younger Saudi official who had been in the U.S. taking courses for most of the preceeding year, whom registrant had worked with, knew well and had become personal friends with, who had entertained registrants in his home in the Kingdom, and who was leaving the U.S. the morning after the party to return to Saudi Arabia at the conclusion of his study period here. Saudis, U.S. and other nationals, all of whom were already friends of registrant or the guest of honor, were invited. Costs are itemized in original filing.

On another occasion a Saudi official and his wife were visiting Washington and were invited to registrant's home for a small private dinner. Registrants had been to the official's home in Saudi Arabia, and the Washington dinner was a courtesy reciprocal to that. All guests were already personal friends of registrants; the dinner was informal. Costs itemized in filing.

Re: 6 Month Filing for Period Ending June 12, 1980

1. Meeting with General Counsel, U.S. Army

Meeting was held at my request, as attorney for Saudi Arabian Embassy, to inquire about administrative regulations and any relevant statutes concerning possible construction of a Mosque on a U.S.-military facility for Muslim military persons from abroad frequently sent there for training purposes.

2. Purpose of Travel (Items 11 and 15a)

Regular consultation with officials in Saudi Arabia on general, current developments, pending legal problems and related matters of interest to that country.

Stopped in Britain and France en route. Also met there with key Saudis who were there at the time.

In Texas and California, worked on lawsuits pending in the federal district courts there involving registrant's client.

In Alabama, met with Saudi personnel in training and academic classes there at U.S. military facility.

In New York, met with legal personnel on Saudi Arabia and also, separately, with Saudi officials then in New York and with whom registrant regularly works.

3. Details of any Entertaining on Behalf of the Foreign Principal (Item 15(a))

No entertaining was done "on behalf of the foreign principal." But a small, informal buffet dinner was given in registrant's home for a Saudi official who was visiting Washington on a business, not governmental, matter and who had personally invited registrant to his home in the Kingdom several times. Our dinner was reciprocal to that. All guests were already friends of registrant's. Costs itemized in original filing.

The other entertaining expenses in the filing were for the dinner already referred to above, for the Saudi friend who had been in the U.S. taking courses. Billings for the food, flowers, etc. were paid near the end of the period covered by this filing and very early in the period of the next filing, so are in the statements for both periods.