

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

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

DEC 12 1977

For Six Month Period Ending _____
(Insert date)

RECEIVED
DEPARTMENT OF JUSTICE
JAN 12 10 13 AM '78
REGISTRATION UNIT
CRIMINAL DIVISION

Name of Registrant

Registration No.

Frederick G. Dutton

2591

Business Address of Registrant

Suite 505, 1140 Connecticut Avenue, N.W., Washington, D.C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(b) If an organization: N.A.

(1) Name	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

N.A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes No N.A.

If yes, furnish the following information:

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes No **N.A.**

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes No **N.A.**

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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N.A.

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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N.A.

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes No

If yes, furnish the following information:

Name of foreign principal

Date of Termination

N.A.

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes No

If yes, furnish following information:

Name and address of foreign principal

Date acquired

N.A.

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Royal Embassy of Saudi Arabia, Washington, D.C.
Saudi Basic Industries Corporation

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Royal Embassy of Saudi Arabia -

Arranged for property acquisition in District of Columbia for new Chancery; prepared and filed application for necessary zoning changes on behalf of that, negotiated architectural contract and prepared for contractor stage. Also property acquisition, dissensions and drafting for N.Y. apartment acquisition.

Reviewed commercial and personnel agreements for Embassy in routine course of its activities.

Handled legal problems of various Saudi students and related personnel in U.S., working directly with local officials and local counsel around U.S. for, such individuals on housing, auto accidents, insurance and law enforcement matters.

Helped in arrangements for trip of Saudi Foreign Minister delegation to U.N. General Assembly and U.S. in October, including scheduling, briefings, and statements.

Reviewed and commented on Export Administration Act enactments and implementing regulations to Embassy pending energy legislation; and other legislative and administrative developments.

(Continued on Attached Page)

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Royal Embassy of Saudi Arabia

Work has consisted primarily of informal, regular discussions with Ambassador and Embassy personnel or contract parties on matters indicated above. Meetings are at least several times a week, informal, generally not scheduled in advance. Overwhelming bulk of work is interfacing with Saudi officials on activities listed in paragraph 11. Contracted for and helped in supervision of public relations consultants, retained or contracted for, by Embassy. Helped with others in arrangements for speaking engagements by Foreign Minister, H.R.H. Prince Saud al-Faisal, before Commonwealth Club of San Francisco, at St. Francis Hotel October 28, National Press Club in Washington, D.C., October 26, Southern Leadership Conference in Atlanta, Georgia, October 22, and Face The Nation at CBS's station in Washington, D.C. October 23, all concerned with overall Saudi-U.S. relations and Middle East settlement problems. Counseled on draft statements on same related matters in public statements prepared and presented by Embassy. Answered occasional inquiries initiated from members of the press. Also met socially with broad range of public and private persons in U.S., Saudi Arabia and Western Europe in ordinary course of work and general activities, as done for many years previous to and regardless of this representation. (See Attached Sheet)

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes No

If yes, describe fully.

All that a registrant does benefits one's clients, or in this case foreign principal, if one is consistent and integrated, or together; but to be responsive to the spirit of the Act, nothing new or additional has been undertaken not long done for their own sake, rather than the principal, and having their own primary and independent worth and purpose.

² The term "political activities" 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.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
June	Embassy	Reimbursement for funds advanced for expenditures in prior filing	\$23,900.
August	SABIC	Comp. for services and expenses	55,110.
September	Embassy	Comp. for services and expenses	100,000.

Total \$179,010.

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes No

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
Embassy	Oct 20-21	Transportation Pvt. Plane NY-Wash-Atlanta	Travel with Saudi officials
Embassy	Oct 28-31	Same - SF-Wash-SF	Same
Embassy	Oct 20	Hotel Room, Omni, Atlanta	Same
Embassy	Sept 30 - Oct 6	Hotel Room, Waldorf Towers, N.Y.	Same
Embassy	Oct 28-30	Hotel Room, Mark Hopkins San Francisco	Same

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

Embassy	June 10	Wrist Watch	Gift
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15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose (For Ambassador)	Amount
June 10	American Airlines	Wash-LA-SF	\$ 673.40
June 23	Eastern Airlines	Wash-NY	76.00
July 14	TWA	Wash-SF	515.00
July 29	TWA	Wash-Rome-Paris	595.00
July 29	British Airlines	Wash-Jeddah-Rome	2,053.38
July 29	British Airlines	Extra Luggage Charge	
Aug 16	Alitalia	Venice-Jeddah	890.00
Sept 29	Eastern Airlines	Wash-NY	78.00
Sept 30	Eastern Airlines	Wash-NY	156.00
Oct 3	Eastern Airlines	Wash-NY	78.00
Oct 4	Eastern Airlines	Wash-NY	78.00
Oct 5	Eastern Airlines	Wash-NY	78.00
Oct 20	Eastern Airlines	Wash-NY	78.00
Oct 21	Eastern Airlines	Wash-NY	78.00
Oct 21	United Airlines	Wash-SF (NHD one way)	330.00
Nov 7	United Airlines	Wash-SF	662.00
Nov 18	Eastern Airlines	Wash-NY	160.00
June 17-19	Hyatt Regency Hotel	San Francisco	174.21
July 12-13	Stanford Ct. Htl	San Francisco	185.98
July 24	Excelsior Arpt H	London	34.00
July 24-29	Kandara Palace H	Jeddah	483.00
Jul 30 - 8/4	Hotel Hassler	Rome	
		Apportioned	1,100.00
Aug 12-13	Hotel Marc E Pinta	Maritime	
Aug 9-11	Hotel Savoy	Florence	
Aug 14-16	Hotel Excelsior	Venice	
19-20		Apportioned	500.00
Aug 16-18	Kandara Palace H	Jeddah	266.00
		Apportioned Share of Hotel Costs - Lucerne, Gstaad, Baden-Baden, Liverdun	500.00
Sept 2-6	Hotel Paris	Apportioned	210.00
		Meals, Traveling and entertain. June-Dec.	
		Apportioned, Wash, N.Y., S.F., LA, Western Europe	
		Jeddah, Gstaad, Amer. Exp. several dozen restaurants	1,800.00
June 19	Hertz		71.00
June 26	Avis		89.62
July 13	Hertz		153.75
July 20	Avis		120.65
July 21	Avis		72.65
Sept 8	Avis		49.01
Sept 12	Avis		86.96
Sept 15	Avis		57.51
Sept. 19	Avis		89.95
Sept 22	Avis		111.99
Sept 25	Avis		64.31
Sept 29	Avis		85.84
Nov 8	Avis		41.82

Continued on Attached Sheet

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes No

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N.A.

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes No

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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N.A.

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Royal Embassy of Saudi Arabia

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N.A.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: **Assisted at times in***

- Radio or TV broadcasts
- Magazine or newspaper articles
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: **N.A.**

- Public Officials
- Newspapers
- Libraries
- Legislators
- Editors
- Educational institutions
- Government agencies
- Civic groups or associations
- Nationality groups
- Other (Specify) _____

21. What language was used in this political propaganda:

- English
- Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes No **N.A.**

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes No **N.A.**

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes No **N.A.**

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes No

Exhibit B⁷ Yes No

N.A.

If no, please attach the required exhibit.

(a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

*editing and drafting but work done primarily by others and disseminated by Embassy or others.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

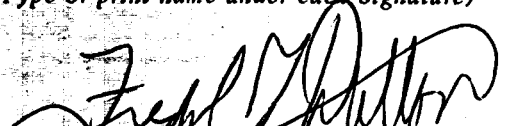
Yes No

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits 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, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

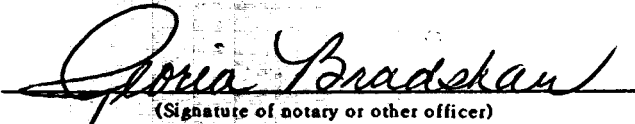
(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)


Frederick G. Dutton

Subscribed and sworn to before me at

Washington D.C.

this 4th day of January, 19 78


(Signature of notary or other officer)
My Commission Expires July 14, 1981

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

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CRIMINAL DIVISION

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

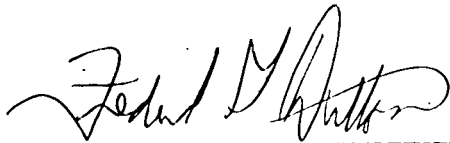
Yes X or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.) N.A.

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)



Signature

January 4, 1978

Date

Frederick G. Dutton

Please type or print name of signatory on the line above

Registrant 2591

Title

III - ACTIVITIES (Continued) Question 11

Provided informal regular briefings and counsel to Embassy on major public developments and their possible relevance for it.

Answered inquiries from Embassy, attorneys, U.S. and Saudi businesses, press, and others on request concerning laws, regulations and developments in both U.S. and Saudi.

Made occasional purchases of facilities for Embassy and arranged for personnel and contractors Embassy wished to consider in its regular operations.

Contracted on behalf of Embassy with public relations person and helped to oversee what they provided to Embassy for its approval.

Overwhelming bulk of work consists of interfacing with Saudi officials on informal discussions at least several times a week. Washington meetings are generally unscheduled in advance. Also traveled extensively to Saudi Arabia for discussions with officials of Ministries of Petroleum, Foreign Affairs, Industries & Electricity, Planning and others, as well as Royal Commission for Industrialization, and with Saudi officials at their request for same purposes.

Saudi Basic Industries Corp.

Contract drafting and negotiations with U.S. companies, World Bank staff and others for construction and operation of at least 4 major petrochemical complexes and other industrialization endeavors in Saudi Arabia. American firms include Shell, Fluor, Lummus, Dow Chemical, Exxon, Aramco and others. Emphasis in this reporting period was on Shell.

Development of basic contract procedures and provisions for possible institutionalizing of some overall governmental procurement work there, covering contract law, taxation questions, possible conflicts of law problems, and other relevant issues.

III - ACTIVITIES (Continued) Question 12

Work has sought to anticipate and meet problems in Saudi-U.S. relations. Interests and policies included have been Saudi-U.S. trade, energy questions, Middle East settlement, financial developments and basic understanding between the two countries.

15. (a) DISBURSEMENTS - MONIES (Continued)

Office Rental, Overhead Acct. (Dutton, Zumas, Wise) Apportioned June - Dec	\$ 7,000.00
Office - Zerox Account, June - Dec	1,800.00
Miscellaneous Office Separate Costs, June - Dec	
Small Individually, Apportioned, June - Dec	750.00
Books, Small Individually, Apportioned, June - Dec	400.00
DHL, Delivery Service, June - Dec	150.00
Oct 9 Camalier & Buckley	60.00
Oct 28 Fairmont Shop, S.F.	58.58
July 24 Allders, International, London	192.92
Palace Florists, June - Dec, Apportioned	125.00
Oct 6 Metro Fuel Co. - Embassy Installation	2,740.91
Christopher Dutton, Research - Saudi Arabia	4,000.00
Nancy Dutton, Legal Work and expenses reimbursed	35,000.00
Edmund Wise, Legal Work and expense reimbursement (Sept 7	13,561.00
Taxis and Out of Pocket Cash, Traveling, Tips, (Nov 1	28,057.00
Miscellaneous, June - Dec., Apportioned	1,000.00

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Total

\$94,895.41