

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

DEPT. OF JUSTICE  
JUL 11 1 10 PM '78  
RECEIVED  
OFFICE OF THE ATTORNEY GENERAL

SUPPLEMENTAL STATEMENT

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

For Six Month Period Ending JUN 12 1978  
(Insert date)

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
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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.

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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.**

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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 principal<sup>1</sup> 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 principals<sup>1</sup> 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 -

Further work on rezoning, architectural designs and other steps for a new Chancery in Washington, D. C.

Reviewed and helped negotiate commercial and personnel agreements for Embassy in regular course of business there. Made occasional purchases for Embassy on request.

Handled legal problems of Saudi students and other personnel in U.S. on a wide range of legal problems, from auto and plane accidents to rental agreements and house purchases, legal violations, admission problems, and a broad range of personal, commercial and other matters.

Answered routine inquiries for Embassy, American attorneys, U.S. and Saudi business persons, media and others concerning laws, regulations and developments in both U.S. and Saudi Arabia. Helped on a number of visas on request.

Met frequently with Embassy personnel to consider U.S., Saudi and other international developments and policy, including pending legislation, administrative regulations, judicial action, public statements and other matters.

(Continued on Attached Page)

<sup>1</sup>The 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 activity<sup>2</sup> as defined below?

Yes  \* No  \*For the Embassy

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

Within that context, the emphasis in this period was on behalf of the Presidential authorization of the sale of F-15 aircraft to Saudi Arabia and helping to augment Congressional support of the Presidential position. This included presentation of memorandum sent by Registrant to members of the Congress, the media and others, with the required notification and filing at the time with the U.S. Department of Justice; accompanying Saudi officials in meetings with, and Registrant himself meeting with and answering inquiries from, members of the Congress, media, executive agencies and others concerning the Presidential action, including (after the F-15 issue was resolved), a television interview May 16 on Public TV (McNeil-Leher Report); assisting Embassy in contracting with and overseeing public relations personnel and others retained by Embassy in that effort, including for advertisements, analysis of developing situation, appointments, briefings and public statements, with suggested drafting or changes at times proposed; helping to arrange travel of Saudi officials to California and Texas and accompanying them for meetings while in the U.S. on this matter. Also helped arrange for

(Continued on Attached Page)

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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 'together'; but to be responsive to the spirit of the Act, nothing new or additional has been undertaken not long done for own sake, rather than the principal, and having own primary and independent worth and purpose.)

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<sup>2</sup> 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.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Jan. 1978	Saudi Basic Industries Corp.	Professional Services fees and expenses for Registrant and those with short-form registration with him	\$ 37,685.00
April 1978	Same	Same	43,906.00
April 1978	Royal Embassy of Saudi Arabia	Same	102,500.00

Total \$184,091.00

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> 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>
Royal Embassy of Saudi Arabia	April 1978	Free air travel and hotel - Wash. to Beverly Hills, Cal. then to San Fran. and Houston	Accompany Saudi officials

<sup>3</sup> 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).

<sup>4</sup> 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.

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	Amount
Dec. 1977	British Airways	For trip - Wash - Saudi Arabia; 2 round trips	\$ 4,874.60
Jan. 1978	Air France	Paris trip, 2	2,538.00
February	United Airlines	Wash-Colorado trip	528.00
February	Eastern Airlines	Wash-Houston, 2	780.00
February	Swiss Air	Wash-Geneva, Switz.	1,487.00
March	Eastern Airlines	Wash-N.Y., 2 trips	120.00
April	P S A	Los Angeles-San Fran.	28.00
April	Eastern Airlines	Wash-N.Y.	80.00
May	National Airlines	Wash-Florida	314.00
May	Eastern Airlines	Wash-N.Y.	53.00
June	Pan-Am Airlines	Wash-Riyadh-Dhahran-Bahrain-San Francisco Extra	2,400.00 289.00
January	Intercontinental Hotel - London	Saudi Arabian trip - meet with Saudi officials	110.00
	" - Riyadh	Same	1,020.00
January	Kandara Palace - Jeddah	Same	102.00
January	Plaza, Athenee - Paris	Same	580.00
January	Inn On the Park - London	Same	185.00
February	Holiday Inn - Aspen Col.	trip - meet with Saudi officials	52.22
February	Galeria Plaza Hotel, Houston Tex.	Accompany Saudi officials	272.97
February	Hotel Richmond Geneva, Switz.	Switz. trip - meet with Saudi officials	467.60
April	Stanford Court	Cal. trip with Saudi officials	105.35
May	Breakers Hotel	On Saudi commercial business	98.85
June	Intercontinental Hotel - London	Trip to Saudi Arabia to meet with Saudi officials	105.00
June	" - Riyadh	Same	675.00
Dec.	AVIS	Saudi commercial business	37.97
Feb.	Hertz	To see Saudi officials	51.88
March	AVIS - Europe (bill late)	Meet with Saudi officials	1,502.98
Dec 77 - June 78	Taxis, Travel and Hotel Tips, Miscellaneous costs, Out of Pocket Travelling. Allocated		1,500.00
Same	American Express - Restaurants, Wash. D.C., London, Riyadh, Paris, Geneva, Houston, Los Angeles, San Francisco, New York on Saudi Business travelling. Allocated		2,600.00

(Continued )

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> 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 value<sup>5</sup> 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.

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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**

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<sup>5</sup> 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.

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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:  
 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

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

- 
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

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 A<sup>6</sup> Yes  No

Exhibit B<sup>7</sup> 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.

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<sup>6</sup> 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.

<sup>7</sup> 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 others except for memorandum filed with Justice Department per items 22/24 below.

26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, 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?

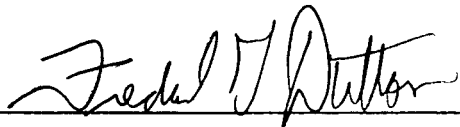
Yes  No

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.

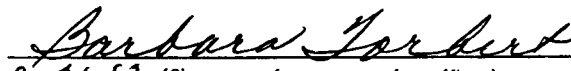
(Type or print name under each signature)

(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 DC

this 10<sup>th</sup> day of July, 19 78

  
\_\_\_\_\_  
8-31-82 (Signature of notary or other officer)

<sup>8</sup> 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

RECEIVED  
DEPT. OF JUSTICE  
JUL 11 1 15 PM '78  
FEDERAL BUREAU OF INVESTIGATION  
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):

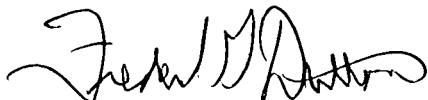
Yes  X  or No \_\_\_\_\_

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

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

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

July 11, 1978

Date

Frederick G. Dutton

Please type or print name of signatory on the line above

Attorney  
Title

III - ACTIVITIES (Continued) Question 11

Traveled to California, New York, Colorado, Texas, Great Britain, France, Switzerland and Saudi Arabia on business with Saudi officials, including for Embassy and Saudi Basic Industries Corp. Helped arrange for visits to U.S. by Saudi officials and citizens, including scheduling, briefings, statements and contracting with public relations personnel in connection with those.

Helped arrange, supervise and implement Embassy efforts in furtherance of Presidential authorization of sale of sixty F-15 aircraft to Saudi Arabia and Congressional consideration of that.

Saudi Basic Industries Corp.

Contract drafting and negotiations with U.S. companies and Saudi personnel for construction and operation of at least five major petrochemical complexes and other industrialization endeavors in Saudi Arabia. American firms include Shell, Fluor, Texas Eastern, Celanese Corp., Dow Chemical, Exxon, Aramco and others. Emphasis in this reporting period was on Shell and Texas Eastern-Celanese (and to lesser extent Saudi ) projects.

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

Research on visa needs and other matters of SABIC personnel training in U.S.

III - ACTIVITIES (Continued) Question 12

speaking engagement in Houston February 24, 1978, on overall Saudi-U.S. relations, with emphasis on trade. (Met with broad range of public and private persons in U.S., western Europe and Saudi Arabia in course of work and general activities as done for a number of years in the past (except for Saudi Arabia) and regardless of this representation.)

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, purchase of sixty F-15 aircraft, and basic understanding between the two countries. The overwhelming bulk of the work has been in interfacing with Saudi officials and in office researching and working alone.

15. (a) DISBURSEMENTS - MONIES (Continued)

March	Michael Moynihan	Personal Services	\$ 1,000.00
Jan-June	Christopher Dutton	Historical Research & Bibliography	1,800.00
April	Print Shop	Off-set Printing	601.66
Apr-May	Commercial Dup.Ser	Off-set Printing	550.10
Dec-June	Edmund Wise	Legal Services & reim- bursement for trav. exp.	60,275.00
Same	Nancy Dutton	Legal Services	35,000.00
Same	Office Overhead Accounting and Payments - Secretarial, Rent, Telephones, Supplies, Books, Messenger Service, Miscellaneous costs. Allocated		10,000.00
			<hr/>
Total			\$132,185.18