

For Six Month Period Ending 12 DEC 1984
(Insert date)

Name of Registrant Dutton and Dutton, P.C. Registration No. 2591

Business Address of Registrant
Suite 801, 1140 Connecticut Avenue, N.W., Washington, DC 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 type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

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

RECEIVED
FEB 11 1985
U.S. DEPARTMENT OF JUSTICE
REGISTRATION UNIT

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

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

If yes, furnish the following information:

<i>Name</i>	<i>Position</i>	<i>Date Connection Ended</i>

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

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>

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>

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>

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

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

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.

The Royal Embassy of Saudi Arabia

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:

Traveled with Saudi officials holding meetings and meeting with media in New York City, Los Angeles, San Francisco, Dallas and Washington, D.C.; helped in part in arranging for those but primary contacts were by Saudi Embassy. Also traveled with Saudi officials for private meetings in Saudi Arabia. Attended Democratic and Republican conventions with Saudi Ambassador.

Informally and on request answered a number of business, legal, media and public inquiries about principal and its country, policies, developments, society and customs and related matters. But I am not a spokesman for principal, not authorized to speak for it, and sought to reply with constraints on that basis. Also on request, helped members of media seeking visas and appointments there. Also helped make legal and general arrangements for parts of public information campaign of principal in connection with Saudi Olympic participation in U.S., including Saudi Development Committee set up for Embassy for that purpose, retaining Joe Goldstein Public Relations Inc. on sports coverage of Saudi participation in 1984 Olympics, and arranging for shortening Saudi films in connection with principal's Olympic public information campaign.

(Continued on Page 3.a.)

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.

Activity for principal (Royal Embassy of Saudi Arabia) was informal discussion and answer inquiries on Saudi-U.S. relations and Mideast problems, per 11 above, which is also responsive to this item. Also helped set up and review public information campaign of principal on Saudi Arabia's participation in 1984 Olympics.

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 of course that a registrant does, benefits or should be consistent with one's clients or, in this case, principal; to be responsible 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, independent worth.

²The 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>
July, 1984	Principal	Retainer for Services	\$75,000.00
October, 1984	Principal	Retainer for Services	75,000.00
			Total 150,000.00

(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>
Travel and Hotels - Saudi Arabia three times and U.S. cities listed in Item 11 above.			

³A 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).

⁴Things 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.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
6/12-12/12	Frederick G. Dutton - Allocated	Services	\$65,000.00
6/12-12/12	Nancy H. Dutton - Allocated	"	35,000.00
6/12-12/12	Office Overhead - Allocated		36,000.00
6/12-12/12	Business Meals Pd. to Am. Express - Wash. DC and Travel - Allocated		4,500.00
6/15	Saudia	Travel	1,945.00
6/14;7/8;10/5	Eastern Airlines	Travel	400.00
7/14	U.S. Air	Travel	104.00
7/8	United Airlines	Travel	1,368.00
6/19	Al Hada Sheraton	Hotel	63.61
11/2	DHL	Courier	49.00
10/11	Bon Voyage Shop	Binders	143.78
10/24 & 11/6	McCoy, Court Reporter (Reimbursed)	Transcript	2,150.00
8/31 & 9/17	John Murray	Books	32.00
6/12-12/12	Petty Cash - Allocated	Miscellaneous	800.00

\$147,555.39

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>
----------------------	-------------------------------------	--	--------------------------------------	----------------

(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>
9/27	\$250.00	House for Congress Comm. (general election)	Arthur House
3/6 (Was unintentionally left out of prior filing)	\$250.00	Friends of Art House Comm. (primary)	Arthur House

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 Reviewed and made suggestions in material basically prepared by others on Saudi Arabia's participation in 1984 Olympics.
IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things 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

(But transmitted in legal/administrative capacity payments from principal*
 If yes, identify each such foreign principal, specify amount, and indicate for what period of time.
 *to the 2 companies preparing and disseminating public info campaign on part of Saudi Olympic participation.)

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:

Radio or TV broadcasts (Olympics per above) Magazine or newspaper articles (Olympics per above) Motion picture films (Olympics per above) Letters or telegrams

Advertising campaigns (Olympics per above) Press releases Pamphlets or other publications Lectures or speeches

Other (specify) Members of the public. I was not a primary person preparing, disseminating or causing dissemination of the material, but reviewed, made**

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) General public

21. What language was used in this political propaganda:

English Other (specify) _____

22. Did you file with the Registration Section, U.S. 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

Was not a primary person as to the material. See comment in 19. above.

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

See comment 22. above.

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes No

See comment above.

**suggestions and am making disclosure as to that.
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 ⁶	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N.A.
Exhibit B ⁷	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

If no, please attach the required exhibit.

(b) 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.
 N.A.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.
⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

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 N.A.

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 state... 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) 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.)

Dutton and Dutton, P.C.
By Frederick G. Dutton
Frederick G. Dutton

Subscribed and sworn to before me at Washington, DC

this 11th day of January, 19 85

Henry J. Catanzano
(Signature of notary or other officer)
My Commission Expires September 14, 1985

⁸The 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 upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

III - ACTIVITIES

Question 11. (Continued)

Met frequently with Embassy personnel and other Saudi officials to consider U.S., Saudi and other developments and policy, including pending executive and administrative actions, public statements, political process, court proceedings and other matters. Assisted on statements of Saudi officials. Monitored pending Congressional legislation that could importantly affect Saudi economic interests, including specifically possible petrochemical exports to U.S.]

