

For Six Month Period Ending JUN 12 1989
(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 No
- (2) Citizenship Yes No
- (3) Occupation Yes No

(b) If an organization:

- (1) Name Yes No
- (2) Ownership or control Yes No
- (3) Branch offices Yes No

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:

Name	Position	Date Connection Ended
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 REGISTRATION SECTION

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>
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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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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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II—FOREIGN PRINCIPAL

(PAGE 3)

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

The Royal Embassy of Saudi Arabia

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.

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:

Worked on U.S. military sales to Saudi Arabia and monitored pending trade legislation and strengthen petroleum reserve hearings. Responded to press inquiries on Saudi security, economic and other matters, including Saudi interest in Middle East peace settlement, post-Gulf war negotiations, relations with other countries, and other current matters. Worked on preparations for a new public exhibition opening on "Saudi Arabia: Yesterday and Today." Traveled to California, N.Y., Missouri and Texas for visits by Saudi officials at U.S.-defense plants and with personnel there, and to Colorado for meetings on property acquisition and development with civic leaders and others there. Attended public presentations by Saudi officials to civic leaders, members of the press and public in San Jose, Cal., San Antonio and Ft. Worth, Texas, but did not arrange or actively participate in those sessions; monitored them. Met editor of San Jose Mercury-Herald at the luncheon in San Jose. Attended press meetings of Saudi officials in San Antonio but did not arrange or take part. Arranged for informal dinner at my home with Saudi officials and following writers of the press: Bruce Van Voorst, Time Magazine; John Berry, Newsweek; Joan Mower, AP; Ray Moseley, Chicago Tribune; Don Oberdorfer, Washington Post; Norman Kempster, L.A. Times; Tom Friedman, N.Y. Times; John Dancy, NBC; and Terrence Smith, CBS;

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.) *July 28th in Washington, D.C. Convention Center

(No. 11 continued on separate page)

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

Yes No

Registrant undertook in paragraph 11 to cover information also responsive to 12, as indicated but seeks below to be responsive to and in 12.

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.

Military sales: evaluated Congressional, Executive Branch, international and U.S. public developments in discussions with Saudi officials. Accompanied latter in meetings with Lockheed, McDonald Douglas, General Dynamics and FMC defense industry officials, employees and others where Middle East developments and reasons for Saudi Arabia making foreign rather than U.S. arms purchases were discussed, along with presentation by U.S. company officials of U.S. product purchase possibilities. Registrant accompanied Saudi officials and observed rather than being a primary participant and discussant. Did not help arrange meetings.

Trade Legislation: Evaluated for Saudi officials, U.S. legislative, executive branch and public developments that could affect pending trade and other legislation on oil, petrochemical and related matters, particularly

(Continued on separate 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.

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>
February 1, 1989	Principal	Compensation	\$100,000.00
April 10, 1989	Principal	Compensation	100,000.00

Total \$200,000.00

(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>
Royal Embassy of Saudi Arabia	Dec. 1 1988 - June 1989	Received free transportation, room and meals Travel was on a Saudi govt. plane	For travel on Saudi business

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>
12/16/88 to 6/12/89	Frederick G. Dutton, Attorney Nancy H. Dutton, Attorney Office Operations, including personnel, equipment, sup- plies, communications, rent, services, business travel, pension plan, etc. Business Meals and Enter- tainment	Personal Services \$ 85,000.00 Personal Services 50,000.00 All Costs Allocated 55,000.00 Paid through American Express 10,000.00	

To **\$200,000.00**

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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(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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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. N.A.

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

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

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
- 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) _____

N.A.

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 N.A.

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.

N.A.

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 N.A.

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.

(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.

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 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) 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 D.C.

this 10th day of July, 19 89

Dianna Paviso Stern
Notary Public, District of Columbia
My Commission Expires November 14, 1992

Dianna Paviso Stern
(Signature of notary or other officer)

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 (Continued) #11

press questions on Kingdom and Middle East were answered by Saudi official; sat in on meetings of Harry Reasoner and George Crile of CBS with Saudi officials in Saudi Arabia and Washington, D.C., participating in a secondary way. Talked on telephone with David Ottaway and Don Oberdorfer, Washington Post, at their initiative, a number of times. Talked with officials of Hannaford & Co. and NAAA on public message they handled and published on Palestinian-Israeli issues. Also talked with and briefed Congressman Joseph Kennedy, at his initiative, on same issues. Accompanied Saudi officials in meeting with Congressman Wayne Owens and Commerce Department officials.

Met frequently with Embassy personnel and other Saudi officials to consider U.S.-Saudi and other developments and policy, including pending executive, legislative and administrative actions, public statements, personnel matters, political processes, court proceedings and other aspects. Monitored pending Congressional legislation that could importantly affect Saudi economic concerns, including possible exports to U.S., tax measures, energy proposals, arms sales and other matters.

Infrequently and on request answered business, legal and other inquiries on principal and its policies and actions, but am not a spokesman for principal nor authorized to speak on its behalf. On request, considered Saudi-U.S. developments with nongovernmental individuals who might be considered public figures in their own right. Also on request, helped members of the media and public on visas, appointments with Saudi officials and other arrangements.

III - ACTIVITIES (Continued) #12

increased charges and potential restraints on U.S. import of those. Here, too, registrant is essentially interfacing with Saudi officials.

Sat in on meetings of Saudi officials with members of the press named in response to No. 11 above, but was primarily an observer, not a main participant, in those meetings.

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

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 _____ or No X

(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:

Yes _____ or No X

(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.)

Frederick G. Dutton

Signature

July 7, 1989

Date

FREDERICK G. DUTTON

Please type or print name of signatory on the line above

HEAD OF FIRM

Title

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