

12 JUN 1991

For Six Month Period Ending

(Insert date)

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

Business Address of Registrant 5017 Tilden Street, N.W., Washington, DC 20016

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.

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

68 JUN 15 1991

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

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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

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 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*

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.

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:

Primary work focus in this period was on Gulf crisis matters. But also Monitored executive branch, Congressional, media and other public developments concerning Gulf crisis, petroleum developments, Palestinian-Israeli and other Arab issues, arms sales and other bilateral U.S.-Saudi questions, and consulted with principal on those. Responded to press inquiries but did not initiate those unless specifically stated later here, on Saudi Arabia. Talked with the following journalists at their initiation on the Gulf Crisis, Saudi-U.S. relations and visa requests:

(See Attached Sheet)

<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

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.

Registrant undertook in paragraph 11 to cover information as to U.S. government, the media and public/private sector. Generally, registrant interfaces with Saudi officials but exceptions to that are specified in 11 above. No legislative lobbying by registrant occurred in this period.

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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.

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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>
2/15/91	Saudi Basic Industries Corp.	Compensation	\$ 22,900.00
1/11/91	Principal	Compensation	100,000.00
3/23/91	Principal	Compensation	100,000.00
Total			222,900.00

## (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	Dec 12, 1990 - Jun 12, 1991	Received free transportation, room and meals to accompany Saudi officials on trips in U.S. and abroad.	For travel on Saudi business

<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.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
12/13/91 to	Frederick G. Dutton, Attorney	Personal Services	\$103,624.00
6/12/91	Nancy H. Dutton, Attorney	Personal Services	68,950.00
	Office Operations, including overhead, office, personnel, equipment, supplies, communications, services, pension plan, etc.	All costs Allocated	35,000.00
	Business travel for Registrant's two principal officers (above)		5,000.00
	Business Meals and Entertainment. (For principal/client)		7,500.00

Total      \$220,074.00

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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(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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**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.

<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.

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) \_\_\_\_\_

None

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) \_\_\_\_\_

None

21. What language was used in this political propaganda:

- English
- Other (specify) \_\_\_\_\_

None

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.

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, 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.

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.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represent 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.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The 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 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  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)

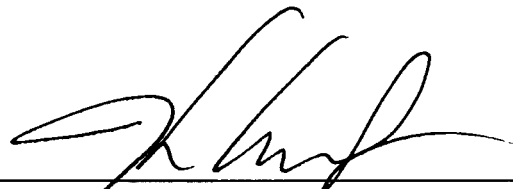
(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States,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

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

District of Columbia ss

Subscribed and sworn to before me at Washington, D.C.

this 4th day of July, 19 91



(Signature of notary or other officer)

H. KITTREDGE

NOTARY PUBLIC DISTRICT OF COLUMBIA

My Commission Expires February 14, 1996

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

- 1/3 Leslie Stahl, CBS
- 1/4 John Simpson, USA Today  
Tim Russert, NBC-TV  
Sonia Goldberg  
Jim Anderson, UPI  
George Lardner, Washington Post  
Frank Manning, Aero-Space Daily  
Jill Abramson, Wall Street Journal  
Nick Horrack, Chicago Tribune
- 1/11 Paul McGinn, American Medical News
- 1/12 John Willard, Hearst Newspapers
- 1/17 Jeff Smith, Washigton Post  
Kathy Perrino, CBS  
Tim Russert, NBC  
Lolly Weymouth, Washington Post  
Carl Bernstein, Time Magazine  
Patrick Reap, CNN  
Scott Armstrong, Freelance  
Jerry Seib, Wall Street Journal  
Christine Harding, ABC  
Ruth Swan  
Joan Gilbertson, CBS  
Eric Schmidt, New York Times  
Ann Compton, ABC  
Ruth Simon, AP  
Jack Nelson, Los Angeles Times  
Ralph Begleiter, CNN  
Bill Headline, CNN  
Carl Bernstein, Time Magazine  
Richard Pollack, ABC-TV  
Tim Russert, NBC-TV  
Al Hunt and Jerry Seib, Wall Street Journal  
Tony Cordesman, aide to Senator John McCain  
Jeff Smith and Don Oberdorfer, Washington Post  
Mark Mathews, Baltimore Sun  
Nick Horowitz, Chicago Tribune  
Mike Benson, Gannett Newspapers
- 1/18 Joan Mower, AP  
Pat Tyler, New York Times  
Samuel Ratan, Fortune Magazine  
Tim Russert, NBC-TV
- 1/21 Tom Brokaw, NBC-TV

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- 1/22 Al Hunt, Wall Street Journal  
 Robin Chapman, NBC  
 Joan Mower, AP  
 Steve Robinson, Sports Illustrated  
 George Cornell, AP  
 Ellie Keslow, Legal Times  
 Jane Friedman, Christian Science Monitor
- 1/23 Tim Russert, NBC-TV  
 Ellie Keslow, Legal Times  
 Richard Cohen, Washington Post  
 George Connell, AP
- 1/24 Pat Tyler, New York Times  
 George Clifford, Jr., Des Moines Register  
 David Ignatius, Washington Post  
 Don Oberdorfer, Washington Post  
 Barbara Cohen, CBS-TV
- 1/25 Bill Plante, CBS-TV  
 Gail Evans, CNN  
 Jim Anderson, UPI
- 1/28 Mike Getler, Washington Post  
 Jack Nelson, Los Angeles Times
- 1/31 Rowland Evans, Columnist  
 Karen Pratt, CBS-TV  
 Al Hunt, Wall Street Journal  
 Robert Anson, Vanity Fair
- 2/1 Patrick Reap, Newsday  
 Barbara Cohen, CBS-TV  
 David Edwards for Gov. Bill Clinton, re meeting with Ambassador  
 Jack Nelson, Los Angeles Times
- 2/5 Walter Pincus, Washington Post  
 Sue Bennett, CNN  
 Lolly Weymouth, Washington Post
- 2/12 John Wallach, Hearst Newspapers  
 Maureen Orth, Vanity Fair
- 2/13 Peter Strauss, Legal Times  
 Peter Stone, Legal Times  
 Elizabeth Drew, New Yorker  
 Jim Hoagland, Washington Post
- 2/14 Tim Russert, NBC-TV  
 Sandra McElwain, Freelance  
 Jack Nelson, Los Angeles Times

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- 2/14 Continued  
Gary Clifford, People Magazine  
George Clifford, Jr., Des Moines Register  
Patrick Reap, Newsday  
Joan Mower, Associated Press
- 2/15 Jack Nelson, Los Angeles Times
- 2/19 Mel Elfin, US News & World Report  
Jerry Seib, Wall Street Journal
- 2/20 Don Oberdorfer, Washington Post  
Tim Russert, NBC-TV
- 2/21 Bruce Van Voorst, Time Magazine  
Bob McCartney, Washington Post
- 2/22 Sarah Just, ABC-TV  
Ann Compton, ABC-TV  
James Long, Washington Post  
Michael Gordon, New York Times  
Jack Nelson, Los Angeles Times
- 3/1 Sander Vanocur, ABC  
Pat Tyler, New York Times  
Lou Dobbs, CNN
- 3/15 Jack Nelson, Los Angeles Times
- 3/18 Peter Strauss, Legal Times
- 3/19 Gary Lee, Washington Post
- 3/21 Karen Pratt, CBS-TV  
Sarah Just, ABC-TV
- 3/22 Tim Russert, NBC-TV
- 3/25 Mel Elfin, US News & World Report  
Richart Pollack, ABC-TV
- 3/26 Peter Gosslin, Boston Globe  
Al Cayman, Washington Post  
Jack Nelson, Los Angeles Times
- 3/27 Christine Harding, ABC-TV  
Walter Pincus, Washington Post  
John Newhouse, New Yorker  
Linda Robinson, US News & World Report

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- 3/28 David Ignatius, Washington Post  
Andrew Glass, Cox Newspapers  
Judy Woodruff, Public TV
- 3/29 Tim Russert, NBC-TV
- 5/15 Jim Flanagan, Los Angeles Times
- 5/22 Melissa Healy, Boston Globe
- 5/16; 5/22 Elaine, Senator Wirth's Office (re constituent letter)
- 5/23 Mel Elfin, U.S. News & World Report  
Rowland Evans, Columnist
- 6/4 Eric Schmidt, New York Times
- 6/6 Cong. Wayne Owens (constituent inquiry on water matters)  
Washington Times luncheon with Ambassador and following  
journalists:

Wesley Pruden  
Josette Shiner  
David Jones  
Peter Sisler  
Warren Strobel  
Ken Hanner  
Rowan Scarborough  
Bill Gertz  
Michael Hedges  
Tod Lindberg  
Sam Francis  
Ed Foster-Simeon  
John Podhoretz  
Danielle Pletka  
Jonas Bernstein

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12/18/90 - Gave Private Dinner at Home attended by Saudi Ambassador  
and:

Bob Woodward, Washington Post  
Richard Cohen, Washington Post  
Jim Wooten, ABC-TV

12/23/90 - Gave Christmas Reception that included the following  
journalists:

Jim Anderson, UPI  
John Cochran, NBC  
Barbara Cohen, CBS  
Ann Compton, ABC  
Bill Headline, CNN  
David Ignatius, Washington Post  
Jim Leherer, Public  
Tom Lippman, Washington Post  
Josh Mankiewicz, WNBC-TV  
Jef McCallister, Time Magazine  
Joan Mower, AP  
Jack Nelson, Los Angeles Times  
Steve Roberts, US News & World Report  
Cokie Roberts, ABC/NPR  
Marcus Stern, Copley News Service  
George Watson, ABC-TV  
Sander Vanocur, ABC-TV  
Bernard Weintraub, New York Times  
Linda Wertheimer, Public Radio  
Jim Wooten, ABC-TV

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**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 CRM-154, formerly 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 3, 1991  
Date

FREDERICK G. DUTTON  
Please type or print name of signatory on the line above

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HEAD OF LAW FIRM  
Title