

For Six Month Period Ending **12 JUN : 1983**
(Insert date)

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

Business Address of Registrant **Suite 801, 1140 Connecticut Ave., NW, 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 ☒

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SECTION
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:

Name

Position

Date Connection
Ended

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 ☒

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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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

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

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:

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, public statements, court proceedings and other matters. Counseled on statements of Saudi officials. Traveled to Saudi Arabia, France, Switzerland, New York, Illinois, ^{Texas} and Florida. Answered a number of media, business, legal and other inquiries. The business inquiries were in regard to legal, investment, personnel and general inquiries. The media inquiries also concerned the possibility of obtaining visas to Saudi Arabia and questions generally on matters about the country and ongoing developments in which the media person took the initiative; and sought to obtain appointments for various Americans while in that country. I am not a spokesman for the principal, am not authorized to speak for it, and sought to reply factually and with constraints on that basis. Accompanied Saudi Defense Attache to appearance by him at International Investors Forum in Florida, December '82; hosted dinner for that official later that month; also arranged for his meeting with Washington Post staff; met with Robert Kimmet, Roger Robinson and Robert Lilac of NSC staff; helped arrange CBS interview with Saudi

(Continued - 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 as factually as possible on Saudi-U.S. relations and Mideast problems, per 11 above. Registrant is not authorized to be a spokesman for principal. Did not sponsor or deliver speeches, lectures or broadcasts, nor arrange except to extent set forth in 11 above.

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 ☒

(All of course, that a registrant does, benefits or should be consistent with one's clients or, in this case, principal; to be responsive to the ~~if yes, describe fully.~~

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.)

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>
Jan. 1983	Principal	Retainer for Services	\$75,000.
April 1983	Principal	Retainer for Services	75,000.
			Total \$150,000.

(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, Private Plane and Hotel on business, Twice, Washington-Paris-Geneva, in May			

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.

Date	To Whom	Purpose	Amount
12/14	Foreign Policy Association	Membership	\$ 254.95
4/18	Middle East Institute	Printed Material	100.00
12/22	Yale University Press	"	18.75
2/1-3/30	American Lawyer	"	72.00
2/4	University of Chicago Press	"	37.50
3/3	Economist	"	67.00
3/24	Liberty	"	10.00
3/25	Cornell University Press	"	51.00
5/19	SAIS Review	"	25.00
6/8	Mideast Observer	"	40.00
12/13-1/31	Francesco Pulpa	Personal Ser. Allocated	80.00
"	Recaldo Garcia	"	150.00
"	Elana Tunes	"	200.00
5/16	Aida Milberg	"	215.22
Dec-June	Intermittently Willa Moore	"	750.00
"	Flower Designer	Plants, Flowers	300.00
12/28-5/29	Brewtons	Office Purchases	220.69
1/11	Cotned Co.	"	73.86
5/4	All State	"	202.38
5/18	Lanes	"	204.20
3/11-5/23	Ginns	"	73.93
3/2	Riyadh Intercontinental	Hotel	783.37
2/24	Jeddah Meridian	Hotel	171.27
1/29	Houston Remington	Hotel	205.75
12/27	Travel Lodge	Hotel	124.50
3/7	Arabian Hala	Car Rental	97.09
5/16	Amtrak	Transportation	45.00
12/27	American Airlines	"	1,052.98
2/17	PanAm	"	2,384.03
1/29-4/12	Eastern	"	986.00
3/11	DHL	Courier	63.00
1/14	Ridgewells	Supplies	165.42
1/15;2/10	Finesse	Catering	1,399.46
12/12-6/12	Office Overhead Expenses - Personnel, Rent, Telephones, Messenger Service, Answering Service, etc.		29,000.00
"	Business Meals Paid to AmEx- N.Y., Wash. D.C., Houston, Chicago, California - allocated	Saudi Arabia, Paris,	2,900.00
"	Frederick G. Dutton	Services	65,000.00
"	Nancy H. Dutton	Services	35,000.00

(Continued on next sheet)

To

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.

Letter to members of Congress and some of media on U.S. aid to Israel per 11 above.

Was personal letter, not for or at request of or as principal's position on matter.

17. Identify each such foreign principal.

Principal is Embassy of Saudi Arabia

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: *Congressional letter previously referred to; sent in personal capacity.*

☒ 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, 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 ☐

But not required

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐ *Was a personal statement but identified self as registered.*

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 ☐

But see 11, 16 and 23 above

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.

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 ☐

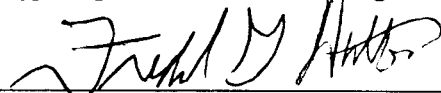
NA

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.

(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.)

(Type or print name under each signature)

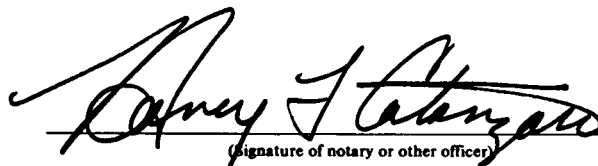


Dutton and Dutton, P.C.

By Frederick G. Dutton

Subscribed and sworn to before me at 1140 Conn. AVE NW

this 12th day of July, 19 83



(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.)

Petroleum Minister; arranged appointments for staff members of Senate Foreign Relations Committee with various Saudi officials there; luncheon at home for wife of Saudi Defense Attache 1/21, private women's group;

[Also sent letter to all members of the Congress and some of media on U.S. aid to Israel; did this as private citizen and stated own position, not that of principal; notified Registration Unit at time though believe that not required in instant situation. Stated here only to be complete in this regard.]

15. Disbursements (Continued)

Cost of Sending Congressional Letter Referred to Above:		
4/18	Commercial Duplicating Ser.	Reproducing \$ 312.58
4/18-5/10	U.S. Postmaster - Postage	Postage 350.00
(Envelopes came from general office supply and that is in general costs)		
Total		\$143,186.93

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

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CRIMINAL DIVISION
JUL 12 3 40 PM '83
INTERNAL SECURITY
SECTION UNIT
REGISTRATION UNIT

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:

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.)

For Dutton & Dutton PC,

Frederick G. Dutton
Signature

July 12, 1983
Date

Frederick G. Dutton
Please type or print name of
signatory on the line above

Head of Firm
Title