

DEC 12 1999

For Six Month Period Ending _____

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No. 2591

Dutton & Dutton P.C.

(c) Business Address(es) of Registrant

5017 Tilden Street, N.W.

Washington, D.C. 20016

2. 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 ☒

(c) Explain fully all changes, if any, indicated in items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C¹, 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.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws 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.)

4. (a) 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
		

- (b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
				

5. (a) Has any person named in item 4(b) rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☐ **NOT APPLICABLE**

If yes, identify each such person and describe his service.

- (b) Have any employee or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated
		

- (c) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
				

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes ☐ No ☐ **NOT APPLICABLE**

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. 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

8. Have you acquired any new foreign principal² during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principals² whom you continued to represent during the 6 month reporting period.

ROYAL EMBASSY OF SAUDI ARABIA
601 NEW HAMPSHIRE AVENUE N.W.
WASHINGTON D.C. 20037

10. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A ³	Yes ☐	No ☐
Exhibit B ⁴	Yes ☐	No ☐

If no, please attach the required exhibit.

NOT APPLICABLE

(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.

2 The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual 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 principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

3 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.

4 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.

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 7, 8, and 9 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Monitored Executive, Congressional and other public developments concerning Saudi Arabia and the Middle East; petroleum developments, Mid East peace process and U.S. political activities and consulted with Principal as to those. Responded to a very few media inquiries initiated by journalists, not Registrant. For more details, please see attached sheet.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ 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 above to cover information as to U.S. government, the media and private as well as public sector. Generally Registrant interfaces mainly with Saudi officials in the U.S. and the Kingdom; any exceptions as to that are specified in answer to paragraph 11 above. No Congressional or media lobbying by Registrant occurred in this registration period.

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.

⁵ The term "political activities" means any activity that the person engaging in believes will, or that the person intends to, in any 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 political or public interests, policies, or relations of a government, 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 7, 8, and 9 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 no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies⁶

Date	From Whom	Purpose	Amount
July 14, 1999	PRINCIPAL	RETAINER	\$125,000.--
October 13, 1999	PRINCIPAL	RETAINER	125,000.--
Total			\$250,000.---

(b) RECEIPTS - FUND RASING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fund raising campaign⁷, any money on behalf of any foreign principal named in items 7, 8, and 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, and 9 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:

Name of foreign principal	Date received	Description of thing of value	Purpose
PRINCIPAL PROVIDED REGISTRANT WITH ROUND TRIP TRAVEL WITH SAUDI OFFICIALS TO RIYADH AND JEDDAH, SAUDI ARABIA --- ALSO TO LONDON, PARIS, GENEVA SWITZERLAND, MOROCCO, CAPETOWN SOUTH AFRICA, AS WELL AS TO NEW YORK, ATLANTA, DALLAS, HOUSTON AND LOS ANGELES WITHIN U.S. DURING THIS REGISTRATION PERIOD, INCLUDING HOTEL AND PRIVATE-RESIDENCE ACCOMODATIONS, MEALS, CAR TRANSPORTATION AND MISCELLANEOUS SIMILAR SUPPORT REGISTRANT FREDERICK DUTTON TRAVELLED WITH SAUDI OFFICIALS ABROAD APPROXIMATELY 70 DAYS DURING THIS REGISTRATION PERIOD AND ANOTHER 15 DAYS IN U.S. CITIES STATED ABOVE.			

^{6, 7} 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).)

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal.

⁹ 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 named in Items 7, 8, and 9 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

Was involved only in interfacing with Saudi officials, not American or other individuals, and had no reason to make any disbursements other than Registrant's own personal expenses in travel. 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
June 13, 1999 to Dec. 12, 1999	Frederick Duuton	Salary and Expense Reimbursement	\$50,000. (allocated)
Same period	Nancy Dutton	Salary and Expense Reimbursement	\$85,000. (allocated)
Same period	General office expenses, communications, supplies, equipment, secretarial, accounting (allocated) professional memberships, shipping, books and publications, reimburseable expenses, etc.)		\$45,000.
	Business Meals, allocated, for the two firm partners named above		\$4,000.
	Business Travel		\$7,500.

Total

\$191,500.

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, and 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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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 value¹¹ 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:

Date	Amount or thing of value	Name of political organization	Name of candidate
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10, 11 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.

V - INFORMATIONAL MATERIALS

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials¹²?
 Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN SECTION V.

17. Identify each such foreign principal.
- _____

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 informational materials? 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 informational materials 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 informational materials among any of the following groups: NOT APPLICABLE

- | | | |
|--|---|---|
| ☐ Public Officials | ☐ Newspapers | ☐ Libraries |
| ☐ Legislators | ☐ Editors | ☐ Educational institutions |
| ☐ Government agencies | ☐ Civic groups or associations | ☐ Nationality groups |
| ☐ Other (specify) _____ | | |

21. What language was used in the informational materials: NOT APPLICABLE
☐ English ☐ Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

NOT APPLICABLE

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

Yes ☐ No ☐

NOT APPLICABLE

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI--EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

JAN. 4, 2000

(Type or print name under each signature¹³)

Frederick G. Dutton

FREDERICK G. DUTTON
DUTTON & DUTTON P.C. LAW FIRM
5017 TILDEN ST. N.W.
WASHINGTON D.C. 20015

WASHINGTON, DC.

SUBSCRIBED AND SWORN TO

BEFORE ME THIS 4th DAY OF

January, 2000

BY Dutton Frederick Gary

Chang Ho Choi
NOTARY PUBLIC, DC.

CHANG HO CHOI, NOTARY PUBLIC
DISTRICT OF COLUMBIA
COMMISSION EXPIRES: 6/14/2004

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

SENIOR PARTNER, DUTTON & DUTTON P.C. LAW FIRM
Title

FURTHER DETAILS RESPONSIVE TO PARAGRAPH 11 OF FILING:

- June 29, 1999 Lunch with author David Halberstam for a new book he was researching. We are long-time friends going back nearly 40 years. Lunch was at his invitation.
- July 2 " Was invited to lunch by Los Angeles Times writer Don Shannon on a book he was researching with Mideast implications. We are long-time friends going back several decades.
- July 21, " Lunch with U.S. Undersecretary of State for Global Affairs Frank Loy at his request. Mideast discussed. We are long-time friends going back to the 1950s.
- July 30-31," Journalists Marianne Means of Hearst newspapers and Jack Kilpatrick (columnist) were house guests of Registrants. Principal was mentioned only in passing.
- Sept. 16, " N.Y. Times foreign correspondent Patrick Tyler was given a book party by his paper and Registrant was invited. Also met there with R.W. Apple of N.Y. Times, Ben Bradlee and other journalists, all long-time friends. Principal was mentioned in passing.
- Oct. 5, " Met with William Mattis of N.Y. public relations firm BBD Needham (Inc.) at request of Saudi officials to discuss a possible public relations project for Principal. Mattis a long-time friend and have seen him since then several times; but nothing came of the possible project, and I was acting in my legal capacity to draft a contract, not as a public relations person.
- Oct. 22-27, " Accompanied Saudi officials and South Africa's former President, Nelson Mandela on a brief speaking tour in the U.S. by Mandela, beginning in Wash. D.C. and saw U.S. Government officials, members of the media and others at a dinner honoring Mandela in Washington. Accompanied Mandela and Saudi officials to Atlanta for an Aspen Institute conference on global poverty. I had been the point of contact for Principal in helping to get the conference project started; but work of organizing the gathering was done by Aspen Institute personnel. Tom Friedman of N.Y. Times was a moderator of one of the sessions of the conference and talked briefly with him. U.S. and foreign officials were participants in the conference. Then accompanied Mandela and Saudi officials to Dallas, Texas for a brief appearance, as well as to Houston, Texas, where he was featured as speaker at a Rice University meeting organized by former U.S. Sec. of State James Baker III's Policy Center in that city.
- Nov. 5, " Met briefly with a number of members of the media at a book party for journalist Christopher Mathew's revised edition of his book "Hardball." Principal was mentioned only in passing by several of the journalists.
- Early Nov. " Received several phone calls over the course of five days from Wash. Post foreign correspondent Jonathan Randall, then in Riyadh, Saudi Arabia, seeking help to get

Responsive to Parapgraph 11 of filing - continued:

appointments with leading Saudi officials for research Randall is doing on developments in the Persian Gulf-Arabian Pensinsula sectors. I have since talked with Randall at his initiative, from Paris, on his book. Randall and Registrants are long-time friends going back several decades.

Date Unknown ~~by~~^{at} in late fall Had dinner with Washington Post journalist Richard Harwood and his wife at their home and initiative. They are long time friends going back 35 years. Principal was cited only incidentally.

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