

November 28, 2018

Scott Wheeler
President
Capitol Media Group
2100 M Street NW, Suite 170-340
Washington, D.C. 20037

Dear Mr. Wheeler:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Anna Lewis
Chief Executive Officer and Chairman
Churchill Ripley LLC
2011 Federal Avenue
Los Angeles, California 90025

Dear Ms. Lewis:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

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² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodorice Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

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- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
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6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

John Saunders
President and Chief Executive Officer
Fleishman-Hillard Inc.
200 North Broadway
St. Louis, Missouri 63102

Dear Mr. Saunders:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

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² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Richard F. Hohlt
Hohlt Group Global LLC
1455 Pennsylvania Avenue NW, Suite 1140
Washington, D.C. 20004

Dear Mr. Hohlt:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

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¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
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3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
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5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Joseph Grieboski
Chairman and Chief Executive Officer
Just Consulting LLC
500 North Washington Street, Suite 301
Alexandria, Virginia 22314

Dear Mr. Grieboski:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Robert D. Hays
Chairman
King & Spalding
1180 Peachtree Street NE, Suite 1600
Atlanta, Georgia 30309

Dear Mr. Hays:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

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- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
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6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

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¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

United States Senate

November 28, 2018

Ron Guirguis
Chief Executive Officer
MSLGROUP Americas Inc.
375 Hudson Street
New York City, New York 10014

Dear Mr. Guirguis:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

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⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

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⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

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¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

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¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

United States Senate

November 28, 2018

William F.B. O'Reilly
Partner
November Team LLC
Box 99
South Salem, New York 10590

Jessica A. Proud
Partner
November Team LLC
Box 99
South Salem, New York 10590

Dear Mr. O'Reilly and Ms. Proud:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodorice Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


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¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
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6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

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¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

United States Senate

November 28, 2018

David T. Dekker
Firm Chair
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street NW
Washington, D.C. 20036

Dear Mr. Dekker:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

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3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Alexandra Farley
Chief Operating Officer
Portland PR Inc.
1615 L Street NW, 10th Floor
Washington, D.C. 20036

Dear Ms. Farley:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodoric Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Salman Al-Ansari
Founder
SAPRAC Inc.
1101 30th Street NW, Suite 315
Washington, D.C. 20007

Dear Mr. Al-Ansari:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

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- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

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¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
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6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Jason Epstein
Founder
Southfive Strategies LLC
2021 L Street NW, Suite 101-295
Washington, D.C. 20036

Dear Mr. Epstein:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

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1550 MAIN STREET
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P: 413-788-2690

www.warren.senate.gov

November 28, 2018

Mark J. Ruehlmann
Chairman and Global Chief Executive Officer
Squire Patton Boggs LLP
201 E. Fourth Street, Suite 1900
Cincinnati, Ohio 45202

Dear Mr. Ruehlmann:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

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This ongoing status as a representative of Saudi government interests raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

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¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Adam J. Agron
Managing Partner
Brownstein Hyatt Farber Schreck
410 Seventeenth Street
Denver, Colorado 80202

Dear Mr. Agron:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that appears to be conducting business with the Saudi government or an entity associated with the Kingdom and remains registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing lobbying work raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Steve Clark
Senior Managing Partner
CGCN Group
1101 K Street NW, Suite 800
Washington, D.C. 20005

Dear Mr. Clark:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle_east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

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- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that appears to be conducting business with the Saudi government or an entity associated with the Kingdom and remains registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing lobbying work raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

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¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
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3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Jack Martin
Chief Executive Officer
Hill and Knowlton Strategies LLC
237 Park Avenue, 4th Floor
New York City, New York 10017

Dear Mr. Martin:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that appears to be conducting business with the Saudi government or an entity associated with the Kingdom and remains registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing lobbying work raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

In order to have a full, transparent accounting of your firm's business ties to the Saudi government, I request answers to the following questions and requests for information:

1. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provides directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:


¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Stephen J. Immelt
Chief Executive Officer
Hogan Lovells U.S. LLP
555 13th Street NW
Washington, D.C. 20004

Dear Mr. Immelt:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁸
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁹
- The Harbour Group (THG) received \$80,000 for similar services;¹⁰
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹¹ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹² a bill that would authorize

⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

All five of these lobbying firms have reportedly canceled their contracts with the Saudi government.¹³

Despite the termination of lobbying contracts with Saudi Arabia by these firms after the gruesome killing of Mr. Khashoggi, your firm is one of at least 18 U.S.-based lobbying firms that appears to be conducting business with the Saudi government or an entity associated with the Kingdom and remains registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of the Saudi government or an entity associated with the Kingdom.¹⁴

This ongoing lobbying work raises questions about whether your firm prioritizes profit margins over basic human rights, and whether it is ethically and morally defensible for American lobbyists to be providing services to a repressive foreign regime that does not share America's values. If enacted, the *Anti-Corruption and Public Integrity Act* would expressly prohibit your firm from accepting compensation from the Saudi government to lobby on its behalf.

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¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
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6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Howard P. McKeon
Chairman and Chief Executive Officer
McKeon Group Inc.
675 N Washington Street #340
Alexandria, Virginia 22314

Dear Mr. McKeon:

I write to request information on the scope of your firm's lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. In the aftermath of the brutal and apparently "premeditated"¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials² and the apparent efforts of the Saudi government to cover up this murder,³ five lobbying firms reportedly terminated business contracts with the Kingdom.⁴ But your firm remains registered under the Foreign Agents Registration Act (FARA) as representing the interests of Kingdom of Saudi Arabia.⁵ It is critical that your firm be transparent about the extent of your ties to the Saudi government and reevaluate whether your firm's relationship with this regime is consistent with American values.

¹ CNN, "Khashoggi killing was premeditated, Saudi attorney general says," , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, "Saudis blame 'fistfight' for Jamal Khashoggi's death," Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, "New footage appears to show Saudi suspect wearing Jamal Khashoggi's clothing," Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bf16c728b8c0.

⁴ Washington Post, "Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi," Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, "Gibson Dunn will no longer lobby for Saudi Arabia," Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, "Saudi Lobbyists in D.C. Caught in Pompeo Pickle," Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting compensation from foreign governments, foreign individuals, and foreign companies to influence U. S. policy.⁶ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁷ For example:

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⁶ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁷ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf> (BGR).

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf> (Glover Park Group).

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf> (The Harbour Group).

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf> (Gladstone Place Partners).

¹² U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf> (Gibson, Dunn & Crutcher).

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¹³ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015653-6589-Amendment-20181018-1.html> (Gibson Dunn); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 18, 2018, <https://www.documentcloud.org/documents/5015652-5666-Amendment-20181019-67.html> (Glover Park Group); U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, "Amendment to Registration Statement," October 16, 2018, <https://www.documentcloud.org/documents/5015654-5430-Amendment-20181016-23.html> (BGR).

¹⁴ Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

- a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁵ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.
2. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁶ covered in the contracts referenced in question 1, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
3. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 1.
4. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
5. Does your firm intend to continue providing any lobbying services to, or for the benefit of, the Saudi government or any entity associated with the Saudi government? Please explain.
6. Does your firm intend to remain an "Active Registrant"¹⁷ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? Please explain.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁵ 2 U.S.C. 1602(7).

¹⁶ 2 U.S.C. 1602(7) and (8).

¹⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

United States Senate

November 28, 2018

Lanny Griffith
Chief Executive Officer
BGR Group
601 13th Street NW, 11th Floor South
Washington, D.C. 20005

Dear Mr. Griffith:

In the aftermath of the brutal and apparently “premeditated”¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials,² and the apparent efforts of the Saudi government to cover up this murder,³ I write to request information on the scope of your firm’s lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. While the reported termination of business contracts with the Kingdom by your lobbying firm and four others is commendable,⁴ I believe it is in the public interest for your firm to be transparent about the extent of your previous ties to the Saudi government.

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on

¹ CNN, “Khashoggi killing was premeditated, Saudi attorney general says,” , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, “Saudis blame ‘fistfight’ for Jamal Khashoggi’s death,” Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, “New footage appears to show Saudi suspect wearing Jamal Khashoggi’s clothing,” Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bfl6c728b8c0.

⁴ Washington Post, “Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi,” Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, “Gibson Dunn will no longer lobby for Saudi Arabia,” Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, “Saudi Lobbyists in D.C. Caught in Pompeo Pickle,” Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting money from foreign governments, foreign individuals, and foreign companies to influence United States public policy.⁵ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁶ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁷
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁸
- The Harbour Group (THG) received \$80,000 for similar services;⁹
- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹⁰ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹¹ a bill that would authorize the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

⁵ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁶ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf>.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf>.

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf>.

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf>.

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf>.

I write to confirm that your firm is among the five that have reportedly terminated all lobbying contracts with Saudi Arabia after the gruesome killing of Mr. Khashoggi, unlike at least 18 other U.S.-based lobbying firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or an entity associated with the Kingdom.¹² If the reports are accurate, the decision to terminate lobbying services for the Saudi government is a positive step toward reducing the corrosive influence of foreign governments and other special interests on our democracy. But while your firm has dropped Saudi Arabia as a client, it remains in the public interest for your firm to provide a full, transparent accounting of its previous business ties to the Saudi government.

Accordingly, I request answers to the following questions and requests for information:

1. Please confirm that your firm no longer performs any lobbying services for the government of Saudi Arabia or any entities affiliated with the government and have terminated any contracts for such services. Please include copies in an electronically searchable format of any relevant filings or other documents that verify the date that your services to the Saudi government or any Saudi government-affiliated entity officially ended.
2. If your firm no longer performs any lobbying services for the government of Saudi Arabia or any Saudi government-affiliated entity, please explain why your firm made this decision.
3. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provided directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:
 - a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹³ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.

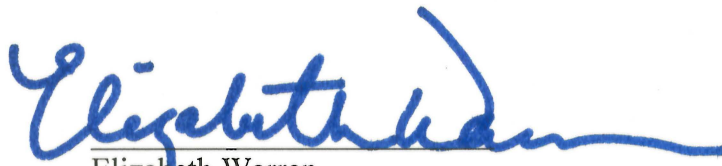
¹² Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

¹³ 2 U.S.C. 1602(7).

4. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁴ covered in the contracts referenced in question 3, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
5. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 3.
6. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
7. Please state whether your firm is or is not currently listed as an "Active Registrant"¹⁵ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? If your firm is currently listed, please explain how retaining this status is consistent with your reported termination of all contracts with the Kingdom.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁴ 2 U.S.C. 1602(7) and (8).

¹⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Kenneth M. Doran
Chairman and Managing Partner
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, California 90071

Dear Mr. Doran:

In the aftermath of the brutal and apparently “premeditated”¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials,² and the apparent efforts of the Saudi government to cover up this murder,³ I write to request information on the scope of your firm’s lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. While the reported termination of business contracts with the Kingdom by your lobbying firm and four others is commendable,⁴ I believe it is in the public interest for your firm to be transparent about the extent of your previous ties to the Saudi government.

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on

¹ CNN, “Khashoggi killing was premeditated, Saudi attorney general says,” , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, “Saudis blame ‘fistfight’ for Jamal Khashoggi’s death,” Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefdf992.

³ Washington Post, “New footage appears to show Saudi suspect wearing Jamal Khashoggi’s clothing,” Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bfl6c728b8c0.

⁴ Washington Post, “Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi,” Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, “Gibson Dunn will no longer lobby for Saudi Arabia,” Marianne Levine and Theodoric Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, “Saudi Lobbyists in D.C. Caught in Pompeo Pickle,” Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting money from foreign governments, foreign individuals, and foreign companies to influence United States public policy.⁵ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁶ For example:

- BGR received \$80,000 per month from the Saudi government for “public relations and media management services;”⁷
- The Glover Park Group (GPG) received \$150,000 per month for “government relations and communications counsel and support [...] in connection with general foreign policy and related matters;”⁸
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- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹¹ a bill that would authorize the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

⁵ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁶ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf>.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf>.

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf>.

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf>.

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf>.

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Accordingly, I request answers to the following questions and requests for information:

1. Please confirm that your firm no longer performs any lobbying services for the government of Saudi Arabia or any entities affiliated with the government and have terminated any contracts for such services. Please include copies in an electronically searchable format of any relevant filings or other documents that verify the date that your services to the Saudi government or any Saudi government-affiliated entity officially ended.
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¹² Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

¹³ 2 U.S.C. 1602(7).

4. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁴ covered in the contracts referenced in question 3, including:
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Sincerely,



Elizabeth Warren
United States Senator

¹⁴ 2 U.S.C. 1602(7) and (8).

¹⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

United States Senate

November 28, 2018

Steven Lipin
Chairman and Chief Executive Officer
The Gladstone Place Partners LLC
485 Madison Avenue, 4th Floor
New York City, New York 10022

Dear Mr. Lipin:

In the aftermath of the brutal and apparently “premeditated”¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials,² and the apparent efforts of the Saudi government to cover up this murder,³ I write to request information on the scope of your firm’s lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. While the reported termination of business contracts with the Kingdom by your lobbying firm and four others is commendable,⁴ I believe it is in the public interest for your firm to be transparent about the extent of your previous ties to the Saudi government.

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on

¹ CNN, “Khashoggi killing was premeditated, Saudi attorney general says,” , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

² Washington Post, “Saudis blame ‘fistfight’ for Jamal Khashoggi’s death,” Suzan Fraser, Sarah El Deeb and Jon Gambrell, October 20, 2018, https://www.washingtonpost.com/world/europe/for-1st-time-saudis-say-jamal-khashoggi-killed-in-consulate/2018/10/19/6552f7ac-d3fe-11e8-a4db-184311d27129_story.html?utm_term=.293aeefd992.

³ Washington Post, “New footage appears to show Saudi suspect wearing Jamal Khashoggi’s clothing,” Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bfl6c728b8c0.

⁴ Washington Post, “Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi,” Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, “Gibson Dunn will no longer lobby for Saudi Arabia,” Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, “Saudi Lobbyists in D.C. Caught in Pompeo Pickle,” Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting money from foreign governments, foreign individuals, and foreign companies to influence United States public policy.⁵ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁶ For example:

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- The Gladstone Place Partners LLC (Gladstone) was slated to earn nearly \$200,000 to provide “strategic communications advice,” “executive thought leadership,” “proactive media engagement,” and “relationship-building with top-tier media, influential commentators, and business and finance leaders” for a Saudi government-sponsored economic development project;¹⁰ and
- Gibson, Dunn & Crutcher LLP (Gibson Dunn) earned \$250,000 to “assist in defeating passage of the No Oil Producing and Exporting Cartels Act,”¹¹ a bill that would authorize the U.S. government to sue Organization of the Petroleum Exporting Countries (OPEC) member states – such as Saudi Arabia – for anti-competitive oil price and production practices.

⁵ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁶ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf>.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf>.

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf>.

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf>.

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf>.

I write to confirm that your firm is among the five that have reportedly terminated all lobbying contracts with Saudi Arabia after the gruesome killing of Mr. Khashoggi, unlike at least 18 other U.S.-based lobbying firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or an entity associated with the Kingdom.¹² If the reports are accurate, the decision to terminate lobbying services for the Saudi government is a positive step toward reducing the corrosive influence of foreign governments and other special interests on our democracy. But while your firm has dropped Saudi Arabia as a client, it remains in the public interest for your firm to provide a full, transparent accounting of its previous business ties to the Saudi government.

Accordingly, I request answers to the following questions and requests for information:

1. Please confirm that your firm no longer performs any lobbying services for the government of Saudi Arabia or any entities affiliated with the government and have terminated any contracts for such services. Please include copies in an electronically searchable format of any relevant filings or other documents that verify the date that your services to the Saudi government or any Saudi government-affiliated entity officially ended.
2. If your firm no longer performs any lobbying services for the government of Saudi Arabia or any Saudi government-affiliated entity, please explain why your firm made this decision.
3. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provided directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:
 - a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹³ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.


¹² Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

¹³ 2 U.S.C. 1602(7).

4. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁴ covered in the contracts referenced in question 3, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
5. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 3.
6. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
7. Please state whether your firm is or is not currently listed as an "Active Registrant"¹⁵ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? If your firm is currently listed, please explain how retaining this status is consistent with your reported termination of all contracts with the Kingdom.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁴ 2 U.S.C. 1602(7) and (8).

¹⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

November 28, 2018

Michael Feldman
Founding Partner and Managing Director
The Glover Park Group
1025 F Street NW, 9th Floor
Washington, D.C. 20004

Dear Mr. Feldman:

In the aftermath of the brutal and apparently “premeditated”¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials,² and the apparent efforts of the Saudi government to cover up this murder,³ I write to request information on the scope of your firm’s lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. While the reported termination of business contracts with the Kingdom by your lobbying firm and four others is commendable,⁴ I believe it is in the public interest for your firm to be transparent about the extent of your previous ties to the Saudi government.

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on

¹ CNN, “Khashoggi killing was premeditated, Saudi attorney general says,” , Laura Smith-Spark and Hamdi Alkhshali, October 25, 2018, <https://www.cnn.com/2018/10/25/middleeast/saudi-turkey-khashoggi-investigation-intl/index.html>.

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³ Washington Post, “New footage appears to show Saudi suspect wearing Jamal Khashoggi’s clothing,” Erin Cunningham, October 22, 2018, https://www.washingtonpost.com/world/middle-east/saudi-consulate-employees-talking-to-turkish-prosecutors-in-khashoggi-inquiry/2018/10/22/ba5980da-d3d2-11e8-a4db-184311d27129_story.html?noredirect=on&utm_term=.bfl6c728b8c0.

⁴ Washington Post, “Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi,” Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, “Gibson Dunn will no longer lobby for Saudi Arabia,” Marianne Levine and Theodorice Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, “Saudi Lobbyists in D.C. Caught in Pompeo Pickle,” Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting money from foreign governments, foreign individuals, and foreign companies to influence United States public policy.⁵ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

Lobbying for the Saudi government has been a profitable industry. According to *Bloomberg*, “[o]ver the past decade, Washington lobbyists have raked in \$76.9 million advocating for the Saudis on everything from nuclear power to fending off legislation that would leave the kingdom liable in lawsuits filed by family members of victims in the Sept. 11 terrorist attacks.”⁶ For example:

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⁵ Senator Warren Press Office, “Warren Delivers Speech on Comprehensive Plan to End Corruption in Washington,” press release, August 21, 2018, <https://www.warren.senate.gov/newsroom/press-releases/warren-delivers-speech-on-comprehensive-plan-to-end-corruption-in-washington>.

⁶ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf>.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf>.

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf>.

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf>.

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf>.

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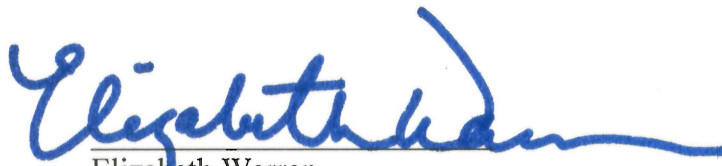
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¹³ 2 U.S.C. 1602(7).

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November 28, 2018

Richard Mintz
Managing Director
The Harbour Group
1200 New Hampshire Avenue NW, Suite 850
Washington, D.C. 20036

Dear Mr. Mintz:

In the aftermath of the brutal and apparently “premeditated”¹ killing of journalist and U.S. resident Jamal Khashoggi by Saudi government officials,² and the apparent efforts of the Saudi government to cover up this murder,³ I write to request information on the scope of your firm’s lobbying services to, or for the benefit of, the government of the Kingdom of Saudi Arabia. While the reported termination of business contracts with the Kingdom by your lobbying firm and four others is commendable,⁴ I believe it is in the public interest for your firm to be transparent about the extent of your previous ties to the Saudi government.

Ensuring that the U.S. government works in the best interest of the American people involves limiting opportunities for special interests, including foreign governments and entities, to tilt U.S. law and policy in their favor. Today, foreign governments spend hundreds of millions on

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⁴ Washington Post, “Two more Washington lobbying firms drop representation of Saudi Arabia in wake of alleged killing of Jamal Khashoggi,” Tom Hamburger, October 15, 2018, https://www.washingtonpost.com/politics/two-more-washington-lobbying-firms-drop-their-representation-of-saudi-arabia-in-wake-of-alleged-killing-of-jamal-khashoggi/2018/10/15/97ef1a38-d0b6-11e8-b2d2-f397227b43f0_story.html?noredirect=on&utm_term=.e9c3c120afb3; Politico, “Gibson Dunn will no longer lobby for Saudi Arabia,” Marianne Levine and Theodor Meyer, October 19, 2018, <https://www.politico.com/newsletters/politico-influence/2018/10/19/gibson-dunn-will-no-longer-lobby-for-saudi-arabia-381279>; Roll Call, “Saudi Lobbyists in D.C. Caught in Pompeo Pickle,” Kate Ackley, October 17, 2018, <https://www.rollcall.com/news/politics/saudi-lobbyists-pompeo/>; Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi’s Killing,” Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

lobbying efforts to influence the U.S. government. To combat the harmful influence of foreign lobbying on American democracy, I introduced the *Anti-Corruption and Public Integrity Act*, a comprehensive bill that, among other policies, would prohibit American lobbyists from accepting money from foreign governments, foreign individuals, and foreign companies to influence United States public policy.⁵ The ongoing ties between American lobbying firms and the Saudi government are a prime example of why this legislation is necessary.

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⁶ Bloomberg, “Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing,” Ben Brody, Naomi Nix, and Bill Allison, October 26, 2018, https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing?cmpid=socialflow-twitter-business&utm_medium=social&utm_content=business&utm_source=twitter&utm_campaign=socialflow-organic.

⁷ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” August 14, 2018, <https://efile.fara.gov/docs/5430-Exhibit-AB-20180814-69.pdf>.

⁸ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit B to Registration Statement,” July 28, 2018, <https://efile.fara.gov/docs/5666-Exhibit-AB-20180728-45.pdf>.

⁹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” June 6, 2017, <https://efile.fara.gov/docs/5478-Exhibit-AB-20170606-24.pdf>.

¹⁰ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 12, 2018, <https://efile.fara.gov/docs/6591-Exhibit-AB-20180912-3.pdf>.

¹¹ U.S. Department of Justice, Foreign Agents Registration Act (FARA) Filing, “Exhibit A to Registration Statement,” September 7, 2018, <https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf>.

I write to confirm that your firm is among the five that have reportedly terminated all lobbying contracts with Saudi Arabia after the gruesome killing of Mr. Khashoggi, unlike at least 18 other U.S.-based lobbying firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or an entity associated with the Kingdom.¹² If the reports are accurate, the decision to terminate lobbying services for the Saudi government is a positive step toward reducing the corrosive influence of foreign governments and other special interests on our democracy. But while your firm has dropped Saudi Arabia as a client, it remains in the public interest for your firm to provide a full, transparent accounting of its previous business ties to the Saudi government.

Accordingly, I request answers to the following questions and requests for information:

1. Please confirm that your firm no longer performs any lobbying services for the government of Saudi Arabia or any entities affiliated with the government and have terminated any contracts for such services. Please include copies in an electronically searchable format of any relevant filings or other documents that verify the date that your services to the Saudi government or any Saudi government-affiliated entity officially ended.
2. If your firm no longer performs any lobbying services for the government of Saudi Arabia or any Saudi government-affiliated entity, please explain why your firm made this decision.
3. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time from January 20, 2017 to the present, for lobbying services that your firm provided directly to, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government. These documents should include:
 - a. the total compensation received for services rendered, and
 - b. specific issue on which the firm engaged in lobbying activities (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹³ including, to the maximum extent practicable, each bill number and specific federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government.

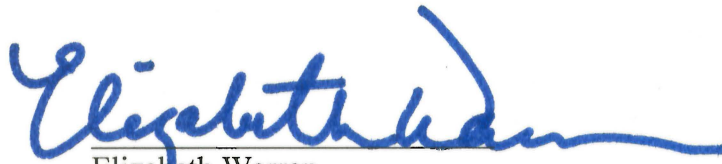
¹² Bloomberg, "Saudi Lobbyists in D.C. Hunker Down After Khashoggi's Killing," Ben Brody , Naomi Nix , and Bill Allison, October 26, 2018, <https://www.bloomberg.com/news/articles/2018-10-26/saudi-lobbyists-in-d-c-hunker-down-after-khashoggi-s-killing>; The 18 firms that appear to be conducting business with, have not terminated business with, or otherwise remain registered under federal Foreign Agents Registration Act (FARA) records to represent the interests of, the Saudi government or a Saudi government-affiliated entity include Brownstein Hyatt Farber Schreck, MSLGroup Americas Inc., Hohlt Group Global LLC, Hogan Lovells U.S. LLP, Fleishman-Hillard Inc., Hill and Knowlton Strategies LLC, Just Consulting LLC, Portland PR Inc., Southfive Strategies LLC, SAPRAC Inc., Capitol Media Group, Churchill Ripley LLC, McKeon Group Inc., Pillsbury Winthrop Shaw Pittman LLP, Squire Patton Boggs LLP, November Team LLC, CGCN Group, and King & Spalding. See U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].

¹³ 2 U.S.C. 1602(7).

4. Any and all records associated with the lobbying activities or lobbying contacts (as defined in Section 3 of the Lobbying Disclosure Act of 1995),¹⁴ covered in the contracts referenced in question 3, including:
 - a. any Executive Branch officials or offices with which the firms had meetings on behalf of, or for the benefit of, the government of Saudi Arabia or any entities affiliated with the government;
 - b. the dates that these Executive Branch meetings occurred, the subject, and name and position of each individual who was a party to the meeting;
 - c. any documents transmitted by the firms to an Executive Branch official or employee in the course of lobbying.
5. Please describe which, if any, current or former Trump Administration officials were involved in any aspect of the negotiation or performance of the contracts referenced in question 3.
6. How does your firm evaluate which foreign governments to accept as clients, including any risk management calculations? If available, please provide any official firm documents, in an electronically searchable format, that explain this process.
7. Please state whether your firm is or is not currently listed as an "Active Registrant"¹⁵ representing the interests of Saudi Arabia under the Foreign Agents Registration Act (FARA)? If your firm is currently listed, please explain how retaining this status is consistent with your reported termination of all contracts with the Kingdom.

I request answers to these questions by December 5, 2018.

Sincerely,



Elizabeth Warren
United States Senator

¹⁴ 2 U.S.C. 1602(7) and (8).

¹⁵ U.S. Department of Justice, Foreign Agents Registration Act (FARA), Active Registrants by Country or Location, Saudi Arabia (accessed November 20, 2018) [on file with office of Sen. Warren].