



BEN FREEMAN

Foreign Influence
Transparency
Initiative

THE SAUDI LOBBY IN 2020



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About the Center for International Policy

The Center for International Policy (CIP) is an independent nonprofit center for research, public education and advocacy on U.S. foreign policy. CIP works to make a peaceful, just and sustainable world the central pursuit of U.S. foreign policy. CIP was founded in 1975 in the wake of the Vietnam War by former diplomats and peace activists who sought to reorient U.S. foreign policy to advance international cooperation as the primary vehicle for solving global challenges and promoting human rights. Today, we bring diverse voices to bear on key foreign policy decisions and make the evidence-based case for why and how the United States (U.S.) must redefine the concept of national security in the 21st century.

About the Foreign Influence Transparency Initiative

Since Russian meddling in the 2016 U.S. election, stories of foreign interference in America have continued to garner front-page headlines. Yet, this interference doesn't wait for elections. There is a half-billion-dollar foreign influence industry working to shape U.S. foreign policy every single day that remains largely unknown to the public. The Foreign Influence Transparency Initiative is working to change that anonymity through transparency promotion, investigative research, and public education.

ACKNOWLEDGEMENTS

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Cover photo is of Kingdom Tower in Riyadh, Saudi Arabia. March 25, 2016. Maher Najm/Flickr



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Damage from Saudi air strikes on the city of Sa'ada in Yemen's Sa'ada Governorate. August 5, 2015. United Nations OCHA/Flickr

EXECUTIVE SUMMARY

For several years, Saudi Arabia's influence in Washington has been slipping, due in large part to a series of foreign policy blunders. The Saudi-led coalition's devastating airstrikes in Yemen have led to the deaths of thousands of civilians there and, on multiple occasions, Congress has threatened to cut off sales of U.S. arms being used in the conflict.¹ The Saudi blockade of Qatar in 2017 threatened to destabilize the entire Middle East and left U.S. policymakers in a precarious position, as Qatar hosts the largest U.S. military base in the region.² And, most notably, there was widespread outrage in the U.S. and across the globe when Saudi dissident and Washington Post contributor Jamal Khashoggi was brutally murdered at the Saudi consulate in Turkey.

At every turn, however, the Saudi monarchy has been able to rely on an expansive and entrenched collection of lobbying and public relations firms in the U.S. that have worked to minimize the damage from these transgressions. Despite the best efforts of the Saudi lobby, it has become increasingly clear that Saudi Arabia has lost the battle for the Beltway and seen its influence in Washington dramatically decline. In response, the Kingdom has done what any monarchy with millions to spend on influence in America might do: shift its influence operations to the states. In 2020, the Saudi monarchy changed the focus of its influence in America from K Street to Main Street, with its Foreign Agents Registration Act (FARA)

1. Zachary Cohen and Betsy Klein, "Trump Vetoes 3 Bills Prohibiting Arms Sales to Saudi Arabia," CNN, July 25, 2019, <https://edition.cnn.com/2019/07/24/politics/saudi-arms-sale-resolutions-trump-veto/index.html>.

2. Adam Taylor, "As Trump Tries to End 'Endless Wars,' America's Biggest Mideast Base Is Getting Bigger," The Washington Post, August 21, 2019, https://www.washingtonpost.com/world/as-trump-tries-to-end-endless-wars-americas-biggest-mideast-base-is-getting-bigger/2019/08/20/47ac5854-bab4-11e9-8e83-4e6687e99814_story.html.

registered agents reaching out to individuals in nearly half of all U.S. states.

This report chronicles that year of transformation for the Saudi lobby by analyzing all FARA filings made by firms working on behalf of Saudi clients in 2020.

From this analysis we found:

- 123 individual foreign agents and 23 firms were registered under FARA to represent clients in Saudi Arabia in 2020;
- Those firms reported, in 2020 filings, receiving \$31,456,319 from their Saudi clients;
- 2,834 political activities conducted on behalf of those Saudi clients;
- 1,127 campaign contributions, totaling \$1,516,053, made by those firms and their registered foreign agents;
- 34 elected officials received \$98,600 in contributions from Saudi firms that had contacted their offices on behalf of Saudi clients;
- 11 times a Member of Congress or their staff was contacted by a Saudi lobbying firm on the exact day they received a campaign contribution from that firm.

INTRODUCTION

For Saudi Arabia's influence in the U.S., 2020 was a year of tumult and transition. After being repeatedly rebuked in Washington, the Kingdom shifted its influence strategy into the states. The reason for this move was rather straightforward—after years of foreign policy blunders, the Saudi monarchy had lost Congress' support, and the only man standing between the Kingdom and Congressional punishments, President Donald Trump, was in danger of losing office.

For more than five years the Saudis had been leading a coalition fighting against Houthi militants in Yemen. The Saudis' seemingly indiscriminate targeting of civilians in the Yemen war—including bombings of a wedding, a public market, and even a school bus³—have led to the deaths of thousands of civilians.⁴ To make matters worse, the Saudis were using American weapons in many of these airstrikes⁵, contributing to what the United Nations declared to be "the world's worst humanitarian crisis."⁶

3. "Yemen Events of 2019," Human Rights Watch, <https://www.hrw.org/world-report/2020/country-chapters/yemen>.

4. Matthias Sulz and Sam Jones, "Over 100,000 Reported Killed in Yemen War," ACLED, October 31, 2019, <https://acleddata.com/2019/10/31/press-release-over-100000-reported-killed-in-yemen-war/#:~:text=31%20October%202019%3A%20The%20Armed,civilians%20killed%20in%20direct%20attacks>.

5. Declan Walsh, "Saudi Warplanes, Most Made in America, Still Bomb Civilians in Yemen," New York Times, May 22, 2019, <https://www.nytimes.com/2019/05/22/world/middleeast/saudi-yemen-airstrikes-civilians.html>.

6. "From the Field: Millions of Yemenis Facing 'Death Sentence,'" UN News, February 25, 2021, <https://news.un.org/en/story/2021/02/1085292>.

Though, for years, Congress did little to respond to these atrocities, that all changed on October 2, 2018—the day Saudi dissident and Washington Post contributor Jamal Khashoggi was brutally murdered in the Saudi consulate in Istanbul, Turkey. The horrific murder and dismemberment of Khashoggi by Saudi officials led to outrage around the world. In the U.S., condemnation was nearly universal across party lines. Think tanks returned contributions from Saudi royals⁷, and even some lobbying and public relations firms on the Saudis' payroll severed ties with the Kingdom.⁸



Jamal Khashoggi speaking at POMED's "Mohammed bin Salman's Saudi Arabia: A Deeper Look." March 21, 2018. April Brady/POMED/Flickr

In response, Congress passed—by wide margins in both Chambers—three bills that would punish the Saudi government by blocking U.S. military weapon sales to the Kingdom,⁹ and another that would have ended U.S. support for the Saudi war in Yemen.¹⁰ Yet, none of these bills were enacted into law because the Saudis still had one man in their corner—President Donald Trump, who would ultimately veto all of these bills and stymie any effort to punish the Saudi government.

Trump's unabashed embrace of Saudi Arabia began long before these bills were introduced in Congress. In fact, the Saudi monarchy was working to cozy up to Trump even before the foreign policy neophyte took office. The charm offensive paid off in droves as Trump made his first trip abroad as President to Riyadh in May 2017. The Saudis rolled out the red carpet for Trump, literally, and lavished him with luxury throughout the trip.¹¹ The ingratiation

7. Alexander Nazaryan, "Think Tanks Reconsider Saudi Support Amid Khashoggi Controversy," Yahoo! Entertainment, October 16, 2018, <https://www.yahoo.com/entertainment/think-tanks-reconsider-saudi-support-amid-khashoggi-controversy-193104698.html>.

8. Tom Hamburger, "Two More Washington Lobbying Firms Drop Representation of Saudi Arabia in Wake of Alleged Killing of Jamal Khashoggi," The Washington Post, October 16, 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.

9. Zachary Cohen and Betsy Klein, "Trump Vetoes 3 Bills Prohibiting Arms Sales to Saudi Arabia," CNN, July 25, 2019, <https://edition.cnn.com/2019/07/24/politics/saudi-arms-sale-resolutions-trump-veto/index.html>.

10. Mark Landler and Peter Baker, "Trump Vetoes Measures to Force End to U.S. Involvement in Yemen War," The New York Times, April 16, 2019, <https://www.nytimes.com/2019/04/16/us/politics/trump-veto-yemen.html>.

11. Annie Karni, "Saudis Give Trump a Reception Fit for a King," POLITICO, May 20, 2017, <https://www.politico.com/story/2017/05/20/donald-trump-saudi-arabia-visit-238638>.

worked well, as Trump became something akin to the chief spokesman for arms sales to the Kingdom. He promoted the jobs created by these arms sales, while ignoring that many of these jobs would be in Saudi Arabia, not the U.S., as U.S. defense contractors have increasingly been transferring technology and production equipment to Saudi firms in connection with U.S. arms sales to the Kingdom.¹²

But, in 2020, with the presidential election looming, the prospect of the Saudis losing their chief cheerleader became very real. As the Coronavirus pandemic ravaged the U.S. and the President only served to fan the flames of nationwide protests over racial injustice, the prospect of Trump losing his reelection bid became more and more likely.



President Trump arriving at the Royal Court Palace in Riyadh. May 20, 2017. Trump White House Archived/Flickr

With this daunting prospect looming, and as strained as U.S.-Saudi relations were when 2020 began, the Kingdom quickly added to the growing rift early in the year when they launched an oil price war with Russia that led to plummeting oil prices globally.¹³ This, unsurprisingly, infuriated many Members of Congress from oil producing states—including several who had previously been staunch supporters of Saudi Arabia. "We are going to fundamentally, not only reevaluate, but take actions that will start to undermine the long term relationship that many of us have supported," with Saudi Arabia, explained Senator Dan Sullivan (R-AK).¹⁴

To be sure, the Saudis' lobbyists in D.C. worked feverishly to assuage these Senators' concerns, including explaining in an email to dozens of Hill staffers that, "Saudi Arabia has not, and will not, seek to intentionally damage U.S. shale oil producers."¹⁵ But, this event exemplified a painfully obvi-

12. Joe Gould, "New Report Clashes with Trump's Job Growth Claims from Saudi Arms Sales," DefenseNews, May 21, 2020, <https://www.defensenews.com/industry/2020/05/21/new-report-clashes-with-trumps-job-growth-estimate-from-saudi-arms-sale/>.

13. Weizhen Tan, "Oil Prices Fall to 17-Year Low as Saudi Arabia-Russia Standoff Continues, Coronavirus Hits Demand," CNBC, March 30, 2020, <https://www.cnbc.com/2020/03/30/oil-falls-amid-saudi-arabia-russia-price-war-coronavirus-hits-demand.html>.

14. Kylie Atwood and Jeremy Herb, "US Oil State Senators Threaten to Rethink Ties to Saudi Arabia in Fiery Call with Ambassador," CNN, April 11, 2020, <https://www.cnn.com/2020/04/10/politics/us-oil-state-senators-saudi-call/index.html>.

15. Efrata Obsa, "Informational Materials," U.S. Department of Justice, April 17, 2020, <https://efile.fara.gov/docs/2244-Informational-Materials-20200417-16.pdf>.

ous reality for Saudi Arabia: they were losing the battle for the Beltway. So, they did what any foreign government with millions to invest in American influence would do—they took the fight to the states and launched an unprecedented campaign to influence the hearts and minds of middle-America and, by proxy, the elected officials who represent them in Washington.

This report is the story of how they did it. It's the story of the Saudi lobby in 2020 which made 2,834 political contacts through the 23 different firms that served as Saudi Arabia's registered foreign agents in the U.S. It's a story of more than \$31 million spent by the Saudis on these firms.¹⁶ It's a story of nearly \$1.5 million dollars in campaign contributions made by firms and foreign agents working on behalf of Saudi clients. It's a story of how a large chunk of that money went to politicians who were targeted by the Saudi Lobby, some even receiving money the same day they met with Saudi lobbyists.

To tell this story, we at the Foreign Influence Transparency Initiative (FITI) analyzed every Foreign Agents Registration Act (FARA) document filed by organizations working on behalf of Saudi clients in 2020. From these documents, we recorded every single "political activity" done for Saudi clients, every campaign contribution mentioned in these FARA filings, every "informational material" distributed on the Saudis' behalf, and every dollar these organizations reported receiving from their Saudi clients.¹⁷

POLITICAL ACTIVITIES

FARA requires registered foreign agents to report all of their "political activities," which the statute defines broadly to include anything that will, "influence any agency or official of the government of the United States or any section of the public within the United States with reference to...the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party."¹⁸ This covers much of the lobbying and public relations work FARA registrants do on behalf of their foreign clients. Thus, collectively, the reports of these activ-

16. This more than \$31 million is revenue that was reported in 2020 filings. This money may not necessarily have been received in 2020 and may not have been intended to pay for work conducted in 2020. This is because there are no standardized reporting periods for FARA filings. Thus, a firm may receive payment for work it has done previously, or for work it is expected to do, and doesn't have to indicate which is the case in its FARA filings. Additionally, some firms, like Aramco, don't separately report expenditures and revenue because they are simply reimbursed by the Kingdom of Saudi Arabia for all expenditures. For the sake of this analysis, these are reported as revenue.

17. Because FARA does not have fiscal years or standardized reporting periods, and the Supplemental Statements, which contain much of this information, cover a six-month reporting period, some of the political activities and contributions reported in 2020 occurred in late 2019. Similarly, some of the activities and contributions that occurred in late 2020 will only be reported in the first half of 2021.

18. Foreign Relations and Intercourse (2010 version) U.S. Code 22 § 611 (o). <https://www.gpo.gov/fdsys/pkg/US-CODE-2009-title22/pdf/USCODE-2009-title22-chap11-subchapII.pdf>.

ities provide a fairly comprehensive picture of what a country's FARA registered agents are doing in America—and what issues matter to them.

And, the filings reveal they were doing quite a lot. Specifically, in their 2020 FARA filings, firms representing Saudi Arabia reported engaging in 2,834 political activities on behalf of Saudi clients—more than in any other year FITI has analyzed.¹⁹

In this section we break down these political activities to identify the most active firms, and the most contacted organizations, media outlets, and Congressional offices.



Crown Prince Mohammed bin Salman at a meeting with then-Secretary of Defense Jim Mattis. March 22, 2018. U.S. Secretary of Defense/Flickr

■ The Firms

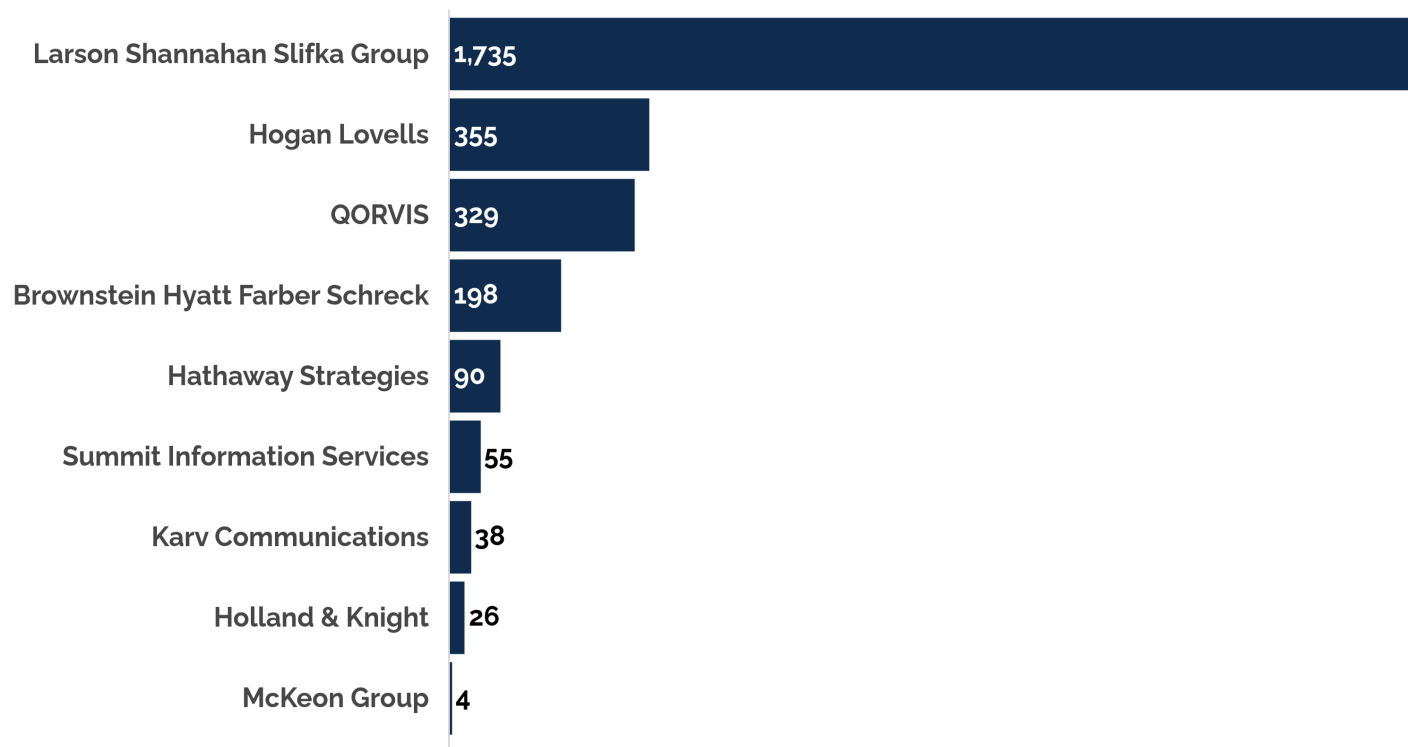
23 different firms or individuals were registered under FARA to represent Saudi interests at some point in 2020 and filed at least one Supplemental Statement, which are FARA filings made every six-months that provide a host of information, including descriptions of the work done on foreign clients' behalf and any campaign contributions made by these FARA registrants. The range of political activity reported by these registrants was immense. On one end, ten of these firms reported no political activities at all. Some of these FARA registrants—like Aramco Affiliated Services and Saudi Petroleum International—are focused on economic issues, specifically oil, and do not seem to engage in regular political work. In other cases, lobbying firms state there were no political activities to report without providing

19. Ben Freeman, "The Saudi Lobby: How the Kingdom Wins in Washington," Center for International Policy, October 2018, https://docs.wixstatic.com/ugd/3ba8a1_e129a4e0969846d78c9ade6f9ffb9a0.pdf; Ben Freeman, "The Saudi Lobby in 2018," Center for International Policy, April 2019, https://static.wixstatic.com/ugd/3ba8a1_dbf2bbd2e0d442e1a9d4848bc-7c7fb71.pdf.

further explanation. For example, Squire Patton Boggs stated in both its 2020 FARA Supplemental Statements that “there were no reportable political activities performed” on behalf of its client, the Center for Studies and Media Affairs at the Saudi Royal Court, despite the firm receiving more than \$1.2 million from the Center, according to those same FARA filings.²⁰ Incidentally, the Director of National Intelligence’s “Assessment of the Saudi Government’s Role in the Killing of Jamal Khashoggi” found that the fifteen member team responsible for the murder of Khashoggi “included officials who worked for, or were associated with, the Saudi Center for Studies and Media Affairs (CSMARC) at the Royal Court.”²¹

On the other end of the activity spectrum for Saudi FARA registrants are firms like Larson Shanahan Slifka Group (also known as LS2) and Hogan Lovells which, collectively, reported more than two-thousand political activities on behalf of their client, the Saudi Embassy. They, and the rest of the most active firms working for the Saudis in 2020, are listed in Graph 1.

Graph 1: Top Firms in Terms of Political Activities Reported on Behalf of Saudi Clients in 2020



20. Squire Patton Boggs (US) LLP, “Supplemental Statement,” U.S. Department of Justice, January 30, 2020, <https://efile.fara.gov/docs/2165-Supplemental-Statement-20200130-33.pdf>; Squire Patton Boggs (US) LLP, “Supplemental Statement,” U.S. Department of Justice, July 31, 2020, <https://efile.fara.gov/docs/2165-Supplemental-Statement-20200731-34.pdf>.

21. “Assessing the Saudi Government’s Role in the Killing of Jamal Khashoggi,” Office of the Director of National Intelligence, February 11, 2021, <https://www.dni.gov/files/ODNI/documents/assessments/Assessment-Saudi-Gov-Role-in-JK-Death-20210226v2.pdf>.

In its 2020 FARA filings, LS2 reported 1,735 political activities on behalf of the Saudi Embassy—more than the amount of political activity reported by all the other FARA registered firms working for Saudi clients, combined. Moreover, Summit Information Services’ work for the Saudi Embassy is actually done through LS2. And, as will be discussed in much greater detail later in this report, nearly all of LS2’s work was done outside the Beltway.

Hogan Lovells’ work for the Saudi Embassy, on the other hand, was almost entirely within D.C., and specifically within Congress. The firm’s FARA filings show more than 300 contacts with House and Senate offices on the Embassy’s behalf.

LS2 and Hogan Lovells are followed in Graph 1 by two heavyweights of Saudi influence in America—Qorvis Communications and Brownstein Hyatt Farber Schreck (BHFS).



The Embassy of Saudi Arabia in Washington, D.C. June 15, 2013. Farragutful/Wikimedia Commons

Qorvis Communications has been working for the Saudi government since November 2001, just two months after 9/11, when fifteen Saudi nationals and four others committed the worst terrorist attack in history on U.S. soil.²² Since then, the firm has worked as the Saudi monarchy’s premier public relations firm in the U.S. and 2020 was no exception. Qorvis reported more than 200 engagements with media outlets. The firm, unfortunately, does not provide detailed accounts of its engagement with think tanks—a common focus of foreign agents given think tanks’ role in shaping policy debates and the considerable funding they receive from foreign governments²³—so even the 329 political activities reported in Qorvis’ 2020 FARA filings are a floor, not a ceiling, for the amount of work the firm conducted on behalf of Saudi Arabia.

22. Qorvis Communications, LLC, “Exhibit AB Registration Statement,” U.S. Department of Justice, March 6, 2002, <https://efile.fara.gov/docs/5483-Exhibit-AB-20020306-GTEC2001.pdf>.

23. Ben Freeman, “Foreign Funding of Think Tanks in America,” Center for International Policy, January 2020, https://static.wixstatic.com/ugd/3ba8a1_4f06e99f35d4485b801f8dbfe33b6a3f.pdf.

The work of BHFS, the fourth most active FARA registrant working for the Saudis in 2020, was much more akin to what would be considered traditional lobbying. Nearly all of the 198 political activities the firm reported in its 2020 FARA filings involved Congress, with 115 directed at the House and 80 focused on the Senate. And, as discussed in much greater detail later in this report, an extraordinary number of Brownstein's political activities were directed at Members of Congress the firm or its foreign agents had made campaign contributions to.

The remainder of the firms listed in Graph 1 represent a fairly bipartisan group of influencers working for the Saudis in the U.S. On the Right are firms like the The McKeon Group—which is headed by retired Republican Congressman Howard “Buck” McKeon, who served as Chairman of the House Armed Services Committee. McKeon's firm also happens to represent Lockheed Martin,²⁴ one of the largest suppliers of military equipment to Saudi Arabia.²⁵ On the other side of the aisle for the Saudi lobby in 2020 were firms like Karv Communications, headed by Andrew Frank, a veteran of the Bill Clinton White House.²⁶

■ Organizations Contacted

In 2020 the Saudi lobby dramatically changed its approach to influence in America. While in previous years the Kingdom's influence peddlers focused overwhelmingly on Congress and mainstream media outlets,²⁷ in 2020 their influence was directed primarily at targets in middle-America. As Graph 2—which lists the top ten organizations most contacted by Saudi foreign agents—attests, the media and Congress were the most common targets for Saudi agents, but this constituted less than half of their work in 2020. The remainder of their activities were targeted at a host of organizations outside of D.C.'s traditional spheres of influence, including state and local governments, universities, and even religious organizations. The prevalence of organizations outside of D.C. is also unique compared to the other lobbying operations by foreign countries that we have previously analyzed, which typically concentrate their efforts in the Beltway.²⁸

24. The McKeon Group, Inc., “Lobbying Report,” Lobbying Disclosure Act of 1995 (Section 5), April 1, 2021, <https://lda.senate.gov/filings/public/filing/56720416-ea93-4874-b66d-06de1ada930c/print/>.

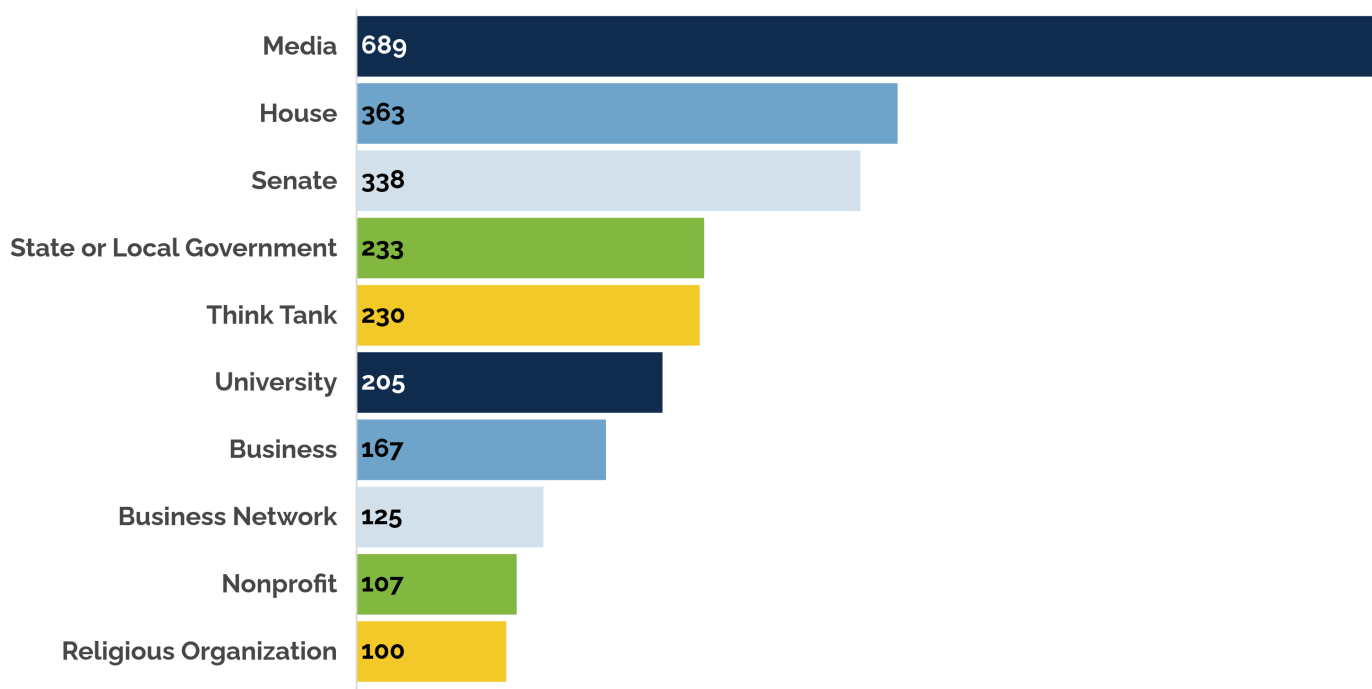
25. Cassandra Stimpson and William Hartung, “U.S. Arms Sales to Saudi Arabia: The Corporate Connection,” Center for International Policy, July 2019, https://static.wixstatic.com/ugd/fb6c59_bd62e10ae7b745069e9a6fa897de6a39.pdf.

26. “Andrew Frank,” Karv Communications, <https://www.karvcommunications.com/?team=andrew-frank>.

27. Ben Freeman, “The Saudi Lobby: How the Kingdom Wins in Washington,” Center for International Policy, October 2018, https://docs.wixstatic.com/ugd/3ba8a1_e129a4e0969846d78c9ade6f9ffbb9a0.pdf; Ben Freeman, “The Saudi Lobby in 2018,” Center for International Policy, April 2019, https://static.wixstatic.com/ugd/3ba8a1_dbf2bbd2e0d442e1a9d4848bc-7c7fb71.pdf.

28. See, for example, Ben Freeman, “The Emirati Lobby: How the UAE Wins in Washington,” Center for International Policy, October 2019, https://docs.wixstatic.com/ugd/3ba8a1_cc7f1fad2f7a497ba5fb159a6756c34a.pdf?index=true.

Graph 2: Top Ten Organizations Most Contacted by Saudi Foreign Agents

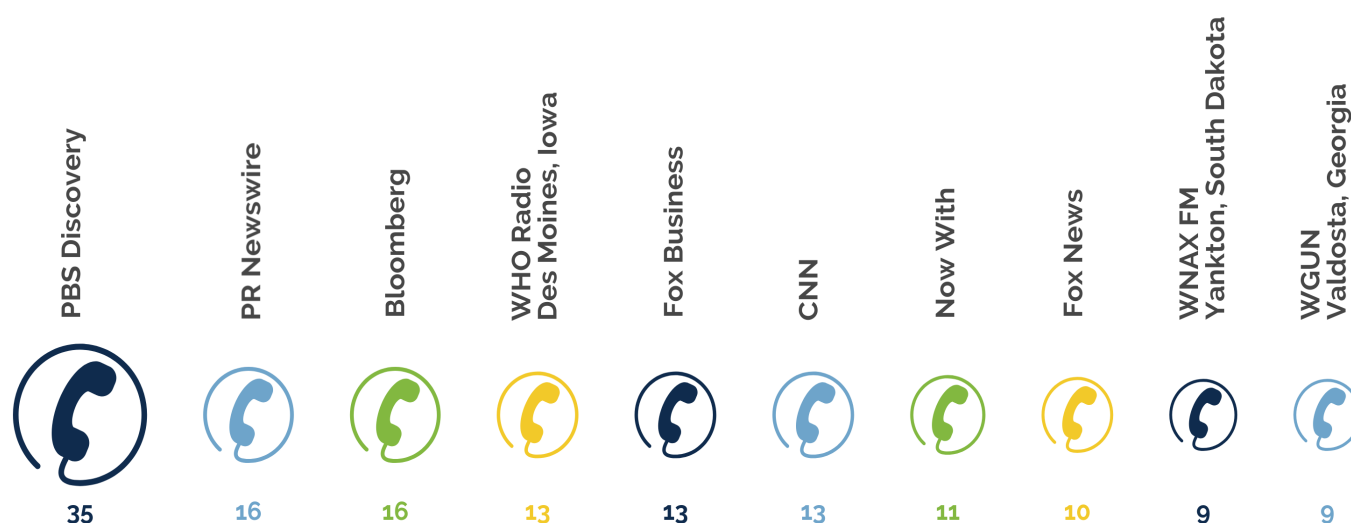


As Graph 2 shows, media organizations were the top target of Saudi Arabia's foreign agents in 2020. In total, media outlets were contacted 689 times by Saudi foreign agents. More than two-thirds of these were e-mails, including several apparent mass e-mail blasts with dozens of outlets contacted on the same day about the same topic. Perhaps reflecting the realities of life during the coronavirus pandemic, Saudi Arabia's agents reported very few in-person meetings with members of the media, or anyone for that matter, in 2020.

“MEDIA ORGANIZATIONS WERE THE TOP TARGET OF SAUDI ARABIA’S FOREIGN AGENTS IN 2020. IN TOTAL, MEDIA OUTLETS WERE CONTACTED 689 TIMES.”

The media outlets most frequently contacted by Saudi lobbyists are listed in Graph 3. Not surprisingly, national media outlets, like PBS, CNN, and Fox News, were common targets of Saudi Arabia's public relations campaigns. Yet, notably, a number of local media outlets appear in Graph 3 as well, including WHO Radio (Des Moines, Iowa), WNAX FM (Yankton, South Dakota), and WGUN (Valdosta, Georgia). To put this change in media outreach strategy into perspective, in the Foreign Influence Transparency Initiative's previous reports on the Saudi lobby no local media outlet has ever been amongst the top ten media outlets contacted by Saudi agents.

Graph 3: Top Ten Media Organizations Contacted by Saudi Foreign Agents



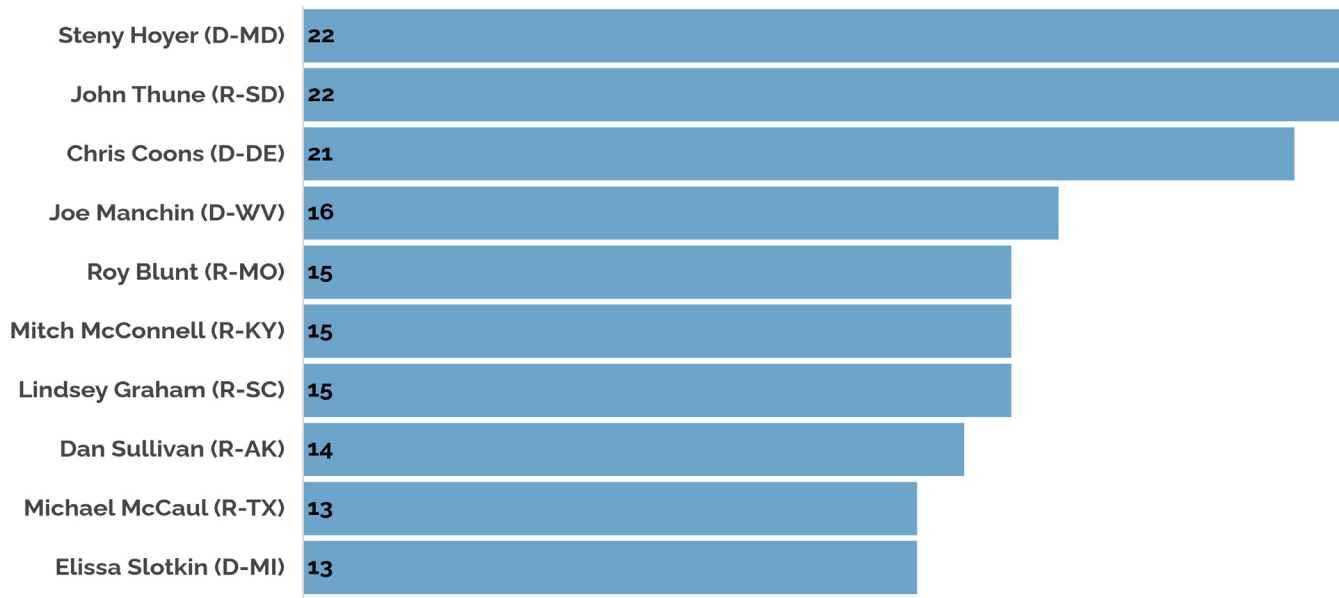
Though the media strategy for Saudi Arabia's public relations in the U.S. shifted heavily outside D.C., the Saudi lobby continued to exert considerable pressure on Congress, contacting Members of Congress and their staff more than 700 times, according to their 2020 FARA filings.

Graph 4 lists the top ten Congressional offices contacted by Saudi lobbyists, and shows that Saudi lobbying in 2020 was heavily focused on influential members of Congress from both parties. Topping the list of most contacted members are Steny Hoyer (D-MD), the House Majority Leader, and Senator John Thune (R-SD), the second-ranked Republican in the Senate. Thune is joined in the top ten list of representatives contacted by Saudi lobbyists by the highest ranking Republican in the Senate, Mitch McConnell (R-KY), and other prominent Republicans that sit on committees of critical importance to the Saudis, like Senators Lindsey Graham (R-SC) and Roy Blunt (R-MO), who both serve on the powerful Appropriations Committee, which writes the legislation determining where federal funds are spent. Similarly, Hoyer is accompanied in Graph 4 by Senator Chris Coons (D-DE) and Senator Joe Manchin (D-WV), who is often a critical swing vote for Democrats in the Senate.

As Graph 4 indicates, unlike many issues in U.S. politics, foreign influence is a bipartisan affair. Saudi lobbyists reach out to Republican and Democratic offices with nearly equal fervor, and, as is discussed below, make considerable contributions to the campaigns of both Democrats and Republicans.

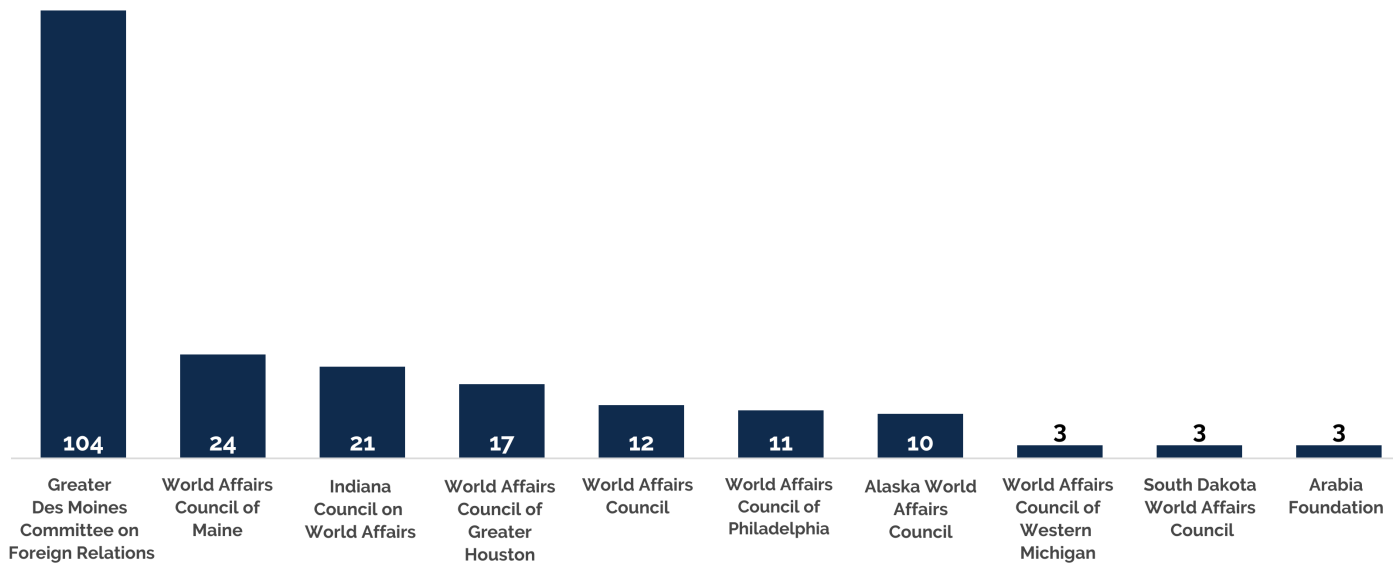
**“UNLIKE MANY ISSUES
IN U.S. POLITICS,
FOREIGN INFLUENCE IS A
BIPARTISAN AFFAIR.”**

Graph 4: Top Ten Congressional Offices Contacted by Saudi Lobbyists



In addition to Congress, think tanks have historically been a prime target of Saudi Arabia's agents in D.C. Yet, as Graph 5—which lists the top ten think tanks contacted by Saudi agents—reveals, the Saudis' foreign agents have nearly stopped working with D.C. think tanks. In fact, just one D.C. based think tank cracks this top ten list—the Arabia Foundation. And, even this think tank—which was partially funded by Saudi Arabia and abruptly shut down in August 2019²⁹—was contacted just three times by Saudi Arabia's foreign agents.

Graph 5: Top Ten Think Tanks Contacted by Saudi Agents



29. Alex Gangitano, "Pro-Saudi Arabia Think Tank Abruptly Closes in Washington," The Hill, August 1, 2019, <https://thehill.com/business-a-lobbying/455756-questions-about-funding-looms-over-pro-saudia-arabia-think-tank-closure>.



Princess Reema Bint Bandar Al-Saud in Davos. January 25, 2018. World Economic Forum/Flickr

■ The Saudis' Shift to the States

Graph 5 is indicative of a larger pattern to the Saudi lobby's work in 2020—an enormous focus on influence outside of D.C. In fact, well over half of the contacts reported by the Saudi lobby in 2020 were to individuals and organizations far outside the Beltway. These contacts spanned a wide range, including state governments, media outlets, political advocacy organizations, small businesses, and even religious groups. Examples include the Maine Lobstermen's Union, the Metro Atlanta Chamber of Commerce, the Colorado School of Mines, and the office of South Dakota Governor Kristi Noem.

Many of these contacts have served as the building blocks of an astroturfed network of support for U.S.-Saudi ties. LS2 laid the foundations for this network, repeatedly contacting local entrepreneurs and public health officials like John Temte, chair of

the Jackson Hole Global Technology Partnership, and Linda Klain, director of Iowa Poison Control. These local figures then became akin to community envoys for the Kingdom, introducing Saudi officials like Ambassador Reema bint Bandar Al Saud at forums such as the Wyoming Global Technology Summit and the Siouxland Chamber of Commerce.³⁰ Hogan Lovells then highlighted the roles of these local leaders in its emails to Congressional offices, mentioning issues and local stakeholders most relevant for its intended audiences. These emails, however, neglect to disclose the Saudi lobby's instrumental role in organizing the events, presenting them as seemingly-organic shows of constituents' "overwhelmingly positive feedback" and support for Saudi Arabia, as one Hogan Lovells e-mail stated.³¹ Other contacts have provided opportunities to promote business partnerships under the auspices of Vision 2030, touting factsheets describing historic trade ties between Michigan and Saudi Arabia³² or characterizing the Kingdom as "South Dakota's fastest growing export

30. Ben Freeman, Brian Steiner and Leila Riaz, "The Saudi Lobby Moves from K Street to Main Street," *The Nation*, April 21, 2021, <https://www.thenation.com/article/politics/saudi-lobbying-central-us/>.

31. "Recent Events in Iowa Involving Kingdom of Saudi Arabia," U.S. Department of Justice, November 19, 2020, <https://efile.fara.gov/docs/2244-Informational-Materials-20201119-27.pdf>.

32. "Economic Ties Between the United States and Saudi Arabia," U.S. Department of Justice, March 17, 2021, <https://efile.fara.gov/docs/6749-Informational-Materials-20210317-458.pdf>; "Trade Facts and Background Material," U.S. Department of Justice, June 20, 2020, <https://efile.fara.gov/docs/6749-Informational-Materials-20200620-38.pdf>.

partner.”³³ Still other contacts with small-market media outlets have enabled Saudi officials to reach new audiences, as when Saudi embassy spokesman Fahad Nazer conducted radio interviews with South Dakota Public Radio last October³⁴ and Michigan’s Big Show this February.³⁵

LS2 and its subcontractors were the drivers of this stateside shift, with much of their contacts concentrated in places like Iowa and South Dakota, where Larson’s top partners have strong political ties.³⁶ However, as Figure 1 shows, Saudi agents were active in a vast swath of the country during 2020, making contacts in at least 22 states beyond D.C.

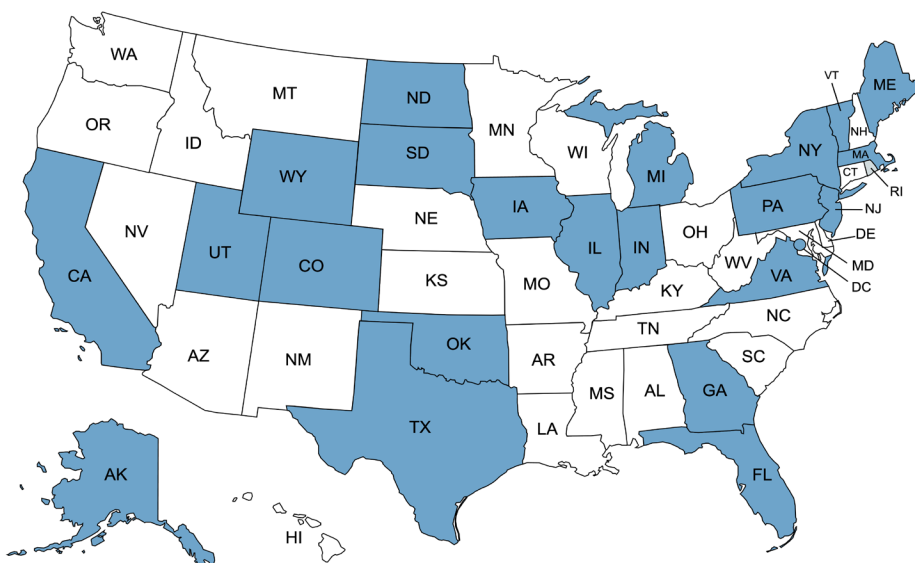


Figure 1: States Where Saudi Agents Were Active in 2020

POLITICAL CONTRIBUTIONS

The Supplemental Statements, from which we tracked all political activities carried out on behalf of foreign principals in Saudi Arabia, also require those firms and their registered foreign agents to report any political contributions they make. We recorded all of the contributions that FARA registered firms working for Saudi Arabia reported in 2020. Note that, given the six-month reporting periods of Supplemental Statements, some of the contributions that were reported in 2020 actually occurred in 2019 and some of the 2020 contributions will only be reported in the first half of 2021.³⁷ In their 2020 FARA filings, firms representing Saudi Arabia reported making 1,127 campaign contributions, totaling \$1,516,053. The top donating firms, ranked by the total dollar amount of their donations, are listed in Graph 6.

33. “Trade Facts and Background Material,” U.S. Department of Justice, June 20, 2020, <https://efile.fara.gov/docs/6749-Informational-Materials-20200620-38.pdf>.

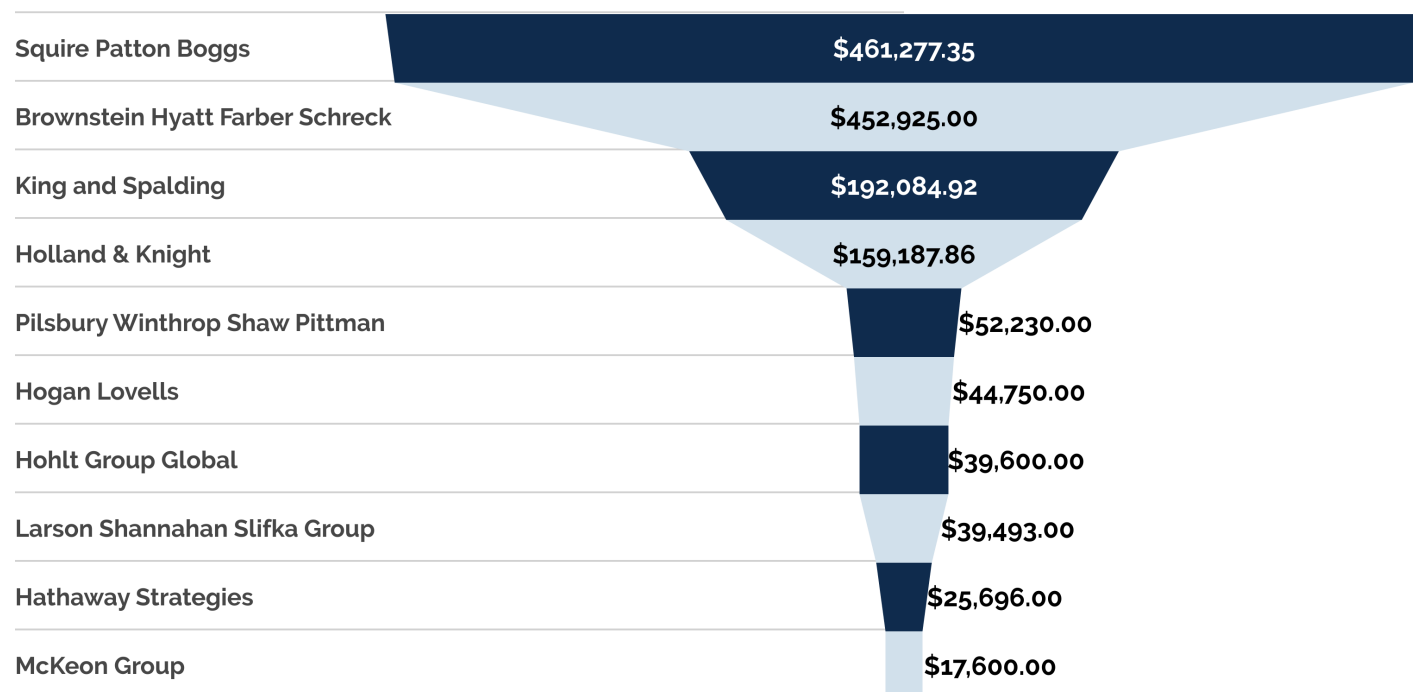
34. Joshua Haiar, “Fahad Nazer: Vision 2030,” SDPB Radio, October 20, 2020, <https://listen.sdpb.org/post/fahad-nazer-vision-2030>.

35. Spotlight Media Studios, “Fahad Nazer, Spokesperson of the Royal Embassy of Saudi Arabia,” Luminary, February 11, 2021, <https://consumer.luminarypodcasts.com/listen/spotlight-media-studios/michigans-big-show/fahad-nazer-spokesperson-of-the-royal-embassy-of-saudi-arabia/ad3647ba-0a35-4461-ada4-8617f54c95ad>.

36. “Meet the Team,” LS2 Group, <https://www.ls2group.com/who-we-are/team/>.

37. It’s important to note that we have included contributions from all foreign agents working at these firms, not just those registered to represent Saudi clients. The reason for this is simply that the value of campaign contributions extends beyond individual donors, and firms can benefit from the contributions of all their lobbyists. For example, a large donor to a specific Member can introduce a lobbyist colleague to that office, even if the latter hasn’t donated to that Member.

Graph 6: Campaign Contributions by FARA Registered Firms Representing Saudi Arabia



As Graph 6 shows, the vast majority of campaign contributions from firms representing the Saudis came from just two firms—Squire Patton Boggs and Brownstein Hyatt—both of which were amongst the top lobbying firms in the U.S. in 2020, according to lobbying revenue data compiled by the Center for Responsive Politics.³⁸

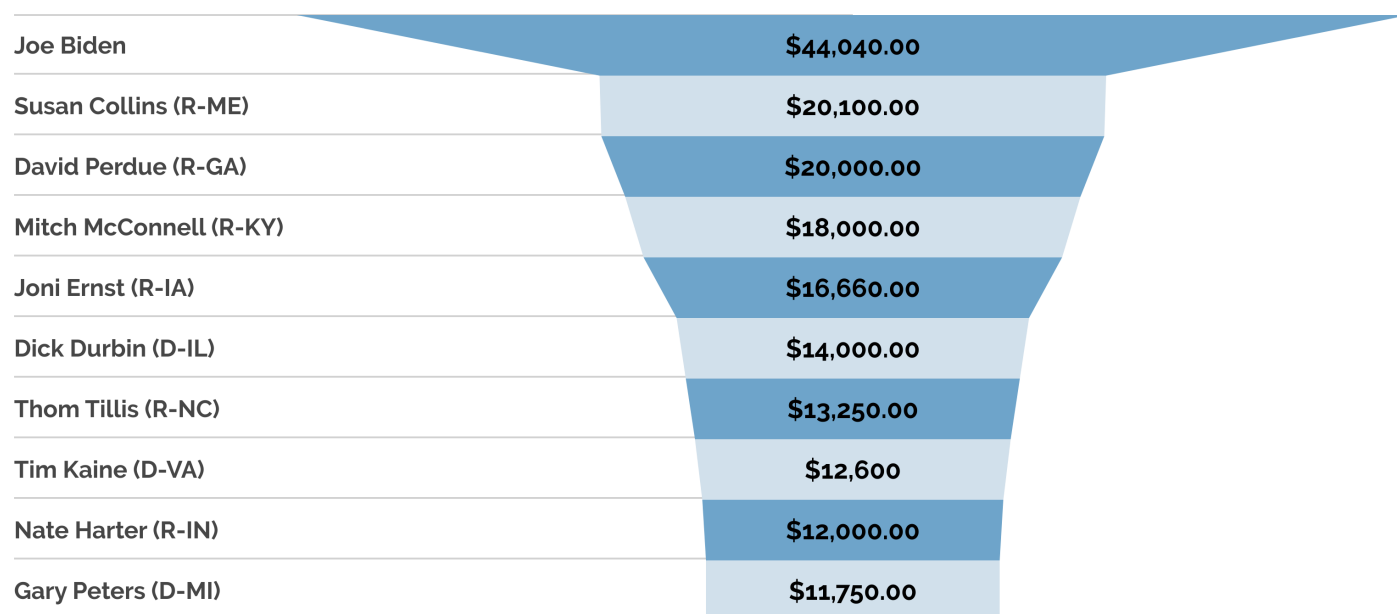
Another trend apparent within this contributions data is that individual donors at these firms give mostly to one political party, but overall, there doesn't appear to be a strong partisan bias in terms of whom foreign agents working at firms hired by Saudi Arabia donate to. Again, Saudi Arabia has created a decidedly bipartisan influence operation in Washington.

The firms listed in Graph 6 also reported the most political activity on behalf of the Saudis in 2020 and, as detailed later in this report, there appears to be a strong correlation between campaign contributions and political activities conducted on behalf of Saudi clients.

Roughly a third—\$512,378—of all the campaign contributions reported in the 2020 FARA filings of firms representing Saudi clients was given to Political Action Committees (PACs) or party organizations, making it impossible to track this money to individual candidates. But, this still leaves just over \$1 million in campaign cash traceable to individual campaigns. Graph 7 lists the top ten recipients of that money.

38. "Top Lobbying Firms," OpenSecrets, <https://www.opensecrets.org/federal-lobbying/top-lobbying-firms>.

Graph 7: Top Ten Recipients of Campaign Contributions from Firms Representing Saudi Arabia



Unsurprisingly, many of the top recipients of contributions from firms representing the Saudis are party leaders. As Graph 7 shows, Joe Biden's 2020 campaign for President received more than double the amount of contributions from firms representing clients in Saudi Arabia than any other campaign. Yet, these firms also donated heavily to a number of Republicans, including then-Senate Majority Leader Mitch McConnell, Republican moderate Susan Collins, and the junior Senator from Iowa Joni Ernst. One notable exception to this is Nate Harter, who unsuccessfully ran for Attorney General of Indiana in 2020, but received \$12,000 of in-kind contributions from Hathaway Strategies during his campaign.³⁹

The list of politicians in Graph 7 is also noteworthy because many of these top recipients of contributions from these firms representing Saudi clients were also amongst the most contacted by the Saudi's lobbyists. This is indicative of a larger pattern for the Saudi lobby: the strong correlation between the politicians they contact on behalf of their Saudi clients and the politicians they donate to.

CONNECTING POLITICAL ACTIVITIES TO CONTRIBUTIONS

Separately analyzing political activities and campaign contributions made by firms working for Saudi Arabia in itself is telling, but connecting the two shows there is a rather strong flow of money from firms working for Saudi clients to the Members of Congress whom they're contacting on behalf of those Saudi clients. In fact, 34 elected officials received \$98,600 in

39. Hathaway Strategies, "Supplemental Statement," U.S. Department of Justice, July 23, 2020, <https://efile.fara.gov/docs/6761-Supplemental-Statement-20200723-1.pdf>.

contributions from Saudi firms that had contacted their offices on behalf of Saudi clients.⁴⁰

This is just a conservative estimate of the flow of money from firms representing Saudi clients to elected officials whom they contacted on the Saudis' behalf, as it cannot account for donations from these firms to PACs or party organizations that ultimately go to these elected officials. This also only reflects direct campaign contributions made from these Saudi foreign agents to Members of Congress and does not reflect other fundraising activities like bundling, which allow lobbyists to solicit contributions for candidates from friends, family, or literally anyone.



US Capitol building in DC. October 20, 2012. denisbin/Flickr

Yet, even with these challenges of tracking campaign contributions, it is easy to see that Saudi foreign agents are considerably more likely to donate to offices whom they contact on behalf of their Saudi clients. The work of Brownstein Hyatt is particularly emblematic of this pattern. The firm reported 198 political activities on behalf of the Saudi Ministry of Foreign Affairs in its 2020 FARA filings, of these more than a third (77) were directed at Members of Congress that had received campaign contributions from the firm or its foreign agents during this same time period. In over half of these cases (40) Brownstein's lobbyists reached out to these Congressional offices within a month of the elected official receiving their contribution from the firm or its foreign agents. Moreover, in eleven cases the contact and contribution occurred on the exact same day. Those "same day" contacts and contributions are listed in Table 8.

40. For a variety of reasons, this is a conservative estimate for the amount of campaign contributions that went to Members contacted on behalf of Saudi clients. First and foremost, this analysis relies on the self-reporting of campaign contributions and political activities in each firm's FARA filings. Thus, any contributions or political activities omitted would not be captured here. Second, even if all contacts and contributions are reported, firms vary in how they report them, which can make it challenging to keep the coding of them consistent, and particularly to match a contact of a Member's office with a contribution to a Member's campaign. For example, some firms report contacting Lindsey Graham, while others report contacting Senator Graham, and still others report contacting Senator Lindsey Graham. While we maintained rigorous coding standards throughout our analysis and checked for errors in coding extensively, we realize that mistakes might still remain and would thus lead to not capturing every single instance where a contribution went to a Member of Congress that was contacted by a Saudi lobbyist at that firm.

Table 1: Members of Congress Who Received a Campaign Contribution from Brownstein Hyatt on the Same Day that Their Office Was Contacted by the Firm's Saudi Lobbyists

Recipient	Date	Amount	Donor	Contact Type	Official Contacted
Chris Coons (D-DE)	7/9/19	\$500	Douglas Maguire	Meeting	Legislative Director
Mark Warner (D-VA)	9/23/19	\$500	Alfred Mottur	Meeting	Senator
Gary Peters (D-MI)	11/18/19	\$1,000	BHFS PAC	Email	Deputy Legislative Director
Gary Peters (D-MI)	11/18/19	\$1,000	BHFS PAC	Email	Military Legislative Correspondent
Gary Peters (D-MI)	11/18/19	\$1,000	BHFS PAC	Email	Chief of Staff
Tina Smith (D-MN)	2/4/20	\$250	Zachary Pfister	Email and in Person	Chief of Staff
Angie Craig (D-MN)	5/11/20	\$1,000	BHFS-E, PC PAC	Email	Chief of Staff
Angie Craig (D-MN)	5/11/20	\$1,000	BHFS-E, PC PAC	Email	Legislative Director
Jack Reed (D-RI)	6/3/20	\$100	Brian McKeon	Zoom Meeting	Senator
Jack Reed (D-RI)	6/3/20	\$500	Alfred Mottur	Zoom Meeting	Senator
Derek Kilmer (D-WA)	6/18/20	\$500	BHFS-E, PC PAC	Multiple Emails	Defense Fellow

In some cases listed in Table 1, multiple e-mails were sent to staff the same day the firm made a contribution to the campaign, like on June 18, 2020, when Derek Kilmer's (D-WA) Defense Fellow received multiple e-mails from BHFS on behalf of the Saudi embassy and Kilmer's campaign also received a \$500 contribution from the firm's PAC.

In other cases listed in Table 1, multiple donations were made to a Member of Congress on the same day they, personally, met with BHFS's agents working for the Saudi Embassy. For example, on June 3, 2020, Senator Jack Reed (D-RI) met over Zoom with Martha Burke to discuss the National Defense Authorization Act and, that same day, received two campaign contributions from Burke's foreign agent colleagues at BHFS—Alfred Mottur and Brian McKeeon.

In many more cases not listed in Table 1, BHFS lobbyists donated to Members of Congress they personally met with on behalf of the Saudi Embassy just days before. For example, when Burke met with Senator Mark Warner on September 23, 2019 “regarding issues in Saudi Arabia,” the next day she made a \$500 contribution to Friends of Mark Warner, according to a BHFS FARA filing.⁴¹

This close connection between contacts and contributions is also not isolated to just the specific elected officials listed in Table 1 or to BHFS. In fact, fourteen different Members of Congress received a campaign contribution from BHFS or its foreign agents within a week of one of the firm's Saudi lobbyists contacting them or their staff. And, several other firms—including LS2, Hogan Lovells, Holland and Knight, and the McKeeon Group—donated to elected officials they had contacted on behalf of their Saudi clients.

**“MULTIPLE DONATIONS
WERE MADE TO A
MEMBER OF CONGRESS
ON THE SAME DAY THEY,
PERSONALLY, MET WITH
BHFS'S AGENTS WORKING
FOR THE SAUDI EMBASSY.”**

While some might deem these practices as pay-to-play politics or as outright bribery, these contributions are all perfectly legal. Supplemental Statements, where all of the contacts and contributions listed here are self-reported by each of these firms, make it clear that foreign agents are not declaring that these contributions are being made on behalf of Saudi Arabia or any other foreign client, but that these contributions are “from your own funds and on your own behalf,”⁴² which shields these lobbyists from accusations that they are helping the Saudis violate the Federal Election Commission's prohibition on campaign contributions from foreign nationals.⁴³ And, while official resources, including Congressional offices, cannot be used to raise campaign funds, no law prohibits a Member of Congress from accepting a campaign contribution from a lobbyist the same day they have met with them, even if that lobbyist has disclosed a relationship with a foreign power.

41. Brownstein Hyatt Farber Schreck, “Supplemental Statement,” U.S. Department of Justice, April 30, 2020, <https://efile.fara.gov/docs/5870-Supplemental-Statement-20200430-26.pdf>

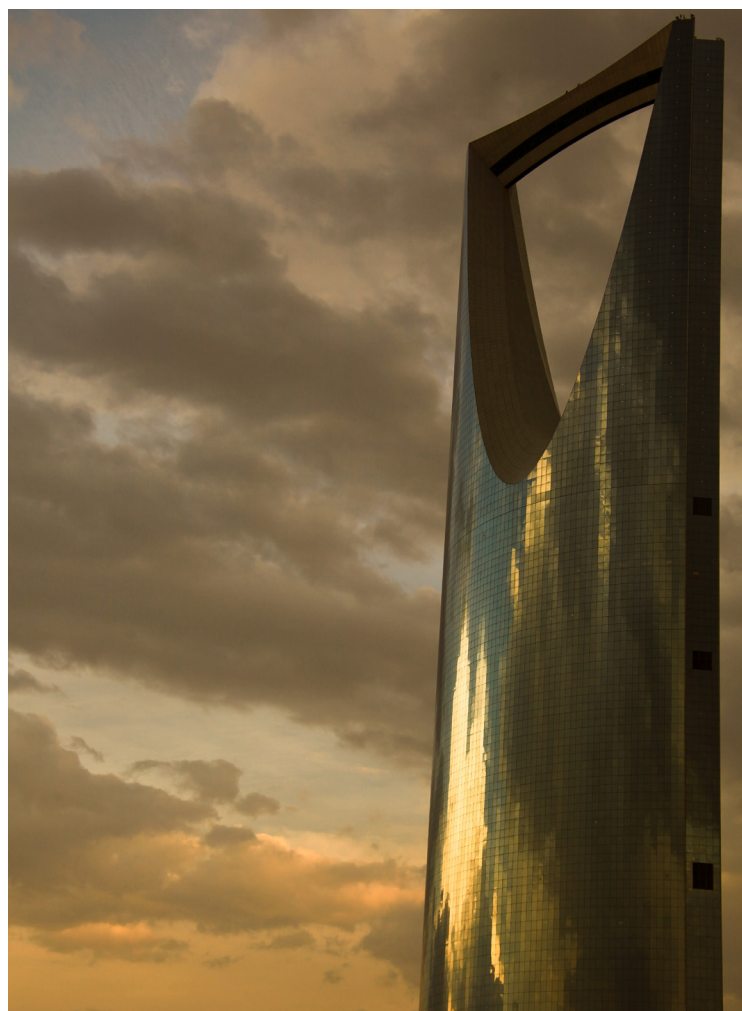
42. This is the precise language of question 15(c) in all FARA Supplemental Statements.

43. “Foreign Nationals,” Federal Election Commission, June 23, 2017, <https://www.fec.gov/updates/foreign-nationals/>.

SAUDI INFLUENCE IN AMERICA TODAY

In 2020, the Saudi lobby made a dramatic shift—moving away from K Street and toward Main Street America. With something of a grassroots campaign for a Gulf monarchy now operating in at least 22 states, and their D.C. lobbying firms lobbying Members of Congress about the Saudi orchestrated events in their home states and districts, the Saudis have made a sizable bet on a new approach to influence in America.

And, to be sure, this report only covers one part of the Saudi monarchy's influence operations. This report, for example, does not address considerable Saudi influence on American business, the more than \$1 billion Saudis have given to American colleges and universities since 2014,⁴⁴ or Saudi information operations on social media platforms. Yet, this analysis of just one part of Saudi influence in America—the Kingdom's FARA registrants—is telling.



Kingdom Tower in Riyadh, Saudi Arabia. December 7, 2009. Ahmed Rabea/Flickr

From this research we found:

- 123 individual foreign agents and 23 firms were registered under FARA to represent clients in Saudi Arabia in 2020;
- Those firms reported, in 2020 filings, receiving \$31,456,319 from their Saudi clients;
- 2,834 activities conducted on behalf of those Saudi clients;
- 1,127 campaign contributions, totaling \$1,516,053, made by those firms and their registered foreign agents;
- 34 elected officials received \$98,600 in contributions from Saudi firms that had contacted their offices on behalf of Saudi clients;
- 11 times a Member of Congress or their staff was contacted by a Saudi lobbying firm on the exact day they received a campaign contribution from that firm.

44. "Foreign Gift and Contract Report," Federal Student Aid, <https://studentaid.gov/data-center/school/foreign-gifts>.

In 2021, the Saudi monarchy certainly has not reduced its influence efforts in America. Since the election of Joe Biden, five new firms have registered under FARA to represent Saudi clients, and, as of April 2021, the Kingdom has 28 different organizations on its payroll of FARA registrants.

2021 has also already been a tumultuous year for Saudi influence in America. Perhaps in a move to appease the incoming Biden administration, in early 2021 Saudi Arabia finally halted a years old blockade of Qatar, ending a Gulf rift that threatened to destabilize the region. But, this sensible act that engendered plenty of positive press in the U.S. was overshadowed in February when the Director of National Intelligence's "Assessment of the Saudi Government's Role in the Killing of Jamal Khashoggi" was released, pointing a direct link from the heinous murder to Saudi Crown Prince Mohammed bin Salman. The report also noted that the fifteen member team responsible for the murder of Khashoggi, "included officials who worked for, or were associated with, the Saudi Center for Studies and Media Affairs (CS-MARC) at the Royal Court,"⁴⁵ which remains a client of Squire Patton Boggs.

Though the Biden administration declared it would not punish Saudi Crown Prince Mohammed bin Salman for his involvement in Khashoggi's murder,⁴⁶ Biden is reportedly considering stopping arms sales to Saudi Arabia that could be used in offensive operations in Yemen.⁴⁷

"IT WILL REMAIN AS IMPERATIVE AS EVER TO CLOSELY MONITOR SAUDI INFLUENCE IN WASHINGTON AND ACROSS AMERICA."

Biden's signaling that he'll be much tougher on the Saudis than Trump could also be a signal that the Kingdom's influence in America will wane even further under a Biden Presidency, particularly if the Saudis' efforts to influence hearts and minds in middle America does not pay off. Yet, regardless of the outcome of this new strategy, it is certain that the Saudis will not stop trying to bend U.S. foreign policy to their will. Thus it will remain as imperative as ever to closely monitor Saudi influence in Washington and across America.

45. "Assessing the Saudi Government's Role in the Killing of Jamal Khashoggi," Office of the Director of National Intelligence, February 11, 2021, <https://www.dni.gov/files/ODNI/documents/assessments/Assessment-Saudi-Gov-Role-in-JK-Death-20210226v2.pdf>.

46. David E. Sanger, "Biden Won't Penalize Saudi Crown Prince Over Khashoggi's Killing, Fearing Relations Breach," New York Times, February 26, 2021, <https://www.nytimes.com/2021/02/26/us/politics/biden-mbs-khashoggi.html>.

47. Patricia Zengerle and Mike Stone, "Exclusive: Biden Team Considering a Halt to 'Offensive' Arms Sales for Saudis," Reuters, February 27, 2021, <https://www.reuters.com/article/us-usa-saudi-arms/exclusive-biden-team-considering-a-halt-to-offensive-arms-sales-for-saudis-idUSKBN2AQ2J6>.



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