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Transparency
Initiative



THE SAUDI LOBBY: HOW THE KINGDOM WINS IN WASHINGTON



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While investigations into Russian influence in the 2016 election regularly garner front-page headlines, 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.

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Executive Summary

The brutal murder of Washington Post contributor Jamal Khashoggi in the Saudi Arabia consulate in Turkey has placed newfound and long overdue scrutiny on Saudi Arabia's influence operation in the United States. In the wake of Khashoggi's death, politicians have called for a reevaluation of U.S.-Saudi relations, high-profile lobbying firms have cut off ties with the Kingdom, and the amicable relationship between the Saudi Arabian government and Washington hangs in the balance. However, Saudi money and influence have become entrenched in Washington politics and are unlikely to disappear after Khashoggi's death. For years, Saudi Arabia has employed an army of American lobbyists and public relations professionals to cultivate a positive Saudi image in the United States and steer U.S. foreign policy as they see fit.

In order to investigate the Saudis' pervasive campaign for influence, the Foreign Influence Transparency Initiative, a program of the Center for International Policy, analyzed records filed by firms registered under the Foreign Agents Registration Act (FARA) to represent Saudi clients in 2017. This report reviews all of the political contributions made by foreign agents at these firms, all of the political activity these firms reported doing on behalf of their Saudi clients, and, critically, the intersection of these political activities and campaign contributions.

From these 2017 FARA filings we found:

- Spending of approximately \$27 million by Saudi Arabia on FARA registered firms;
- More than 2,500 political activities done on behalf of Saudi Arabia by those firms;
- More than \$2 million in campaign contributions from these firms;
- Nearly \$400,000 in campaign contributions from these firms to Members of Congress these firms had contacted on behalf of Saudi interests;
- Twelve instances in which that contact and contribution occurred on the exact same day.

The timing of many of these political contributions coincides closely with key Congressional events involving Saudi Arabia, including the Justice Against State Sponsors of Terrorism Act (JASTA) votes and votes to block arms sales to Saudi Arabia. Yet, within our current campaign finance system such contributions are perfectly legal.

This report not only reveals the intersection of extensive political activity and contributions made by FARA registered firms working on behalf of Saudi interests, but also quantifies the enormity of Saudi influence in America. And, today, that influence remains extraordinary. Despite the brutal murder of Khashoggi, and the Saudi government's attempted cover up, more than two dozen firms are still registered under FARA to represent Saudi Arabia. If the findings in this report are any indication, the Saudi lobby in Washington is most likely feverishly contacting Congressional offices to stymie legislation that would punish Saudi Arabia for their actions, and they're likely making campaign contributions to those same Members of Congress.

Introduction

2017 was a turning-point for the Kingdom of Saudi Arabia's relationship with the United States. After years of an increasingly souring relationship with President Barack Obama's administration—including passage of the Iran nuclear agreement, despite strong opposition from Saudi Arabia—the Kingdom saw an immense opportunity in the election of President Donald Trump. After all, Trump's companies had been doing business with Saudi royals for at least twenty years, and during his Presidential campaign he launched eight new companies linked to a hotel project in Saudi Arabia.

With such strong ties already in place, the Kingdom wasted no time expanding its already massive influence operation in America. Before Trump even took office in early 2017 three new firms had already filed paperwork under the Foreign Agents Registration Act (FARA) to represent Saudi interests—the McKeon Group, headed by Howard “Buck” McKeon, the recently retired Republican Chairman of the House Armed Services Committee; the CGCN Group, with deep ties to conservative Republicans; and, to bolster Democratic support, the Podesta Group, headed by Tony Podesta, brother of long-time Democratic operative and former chairman of Hillary Clinton's presidential campaign, John Podesta.

Saudi Arabia's efforts to garner influence in Trump's Washington quickly bore fruit as Saudi Prince Mohammed bin Salman (MBS) became close friends with Jared Kushner, Trump's son-in-law. Kushner then became instrumental in convincing Trump to make Saudi Arabia the destination of his first trip abroad, just four months into his Presidency. During that trip in May 2017 Trump and Kushner were given the royal treatment and lavished with gifts. Trump was given the opportunity to grandstand on the global stage, announcing a \$110 billion arms deal with the Kingdom, which has subsequently been shown to be inaccurate but continues to be asserted by the President.

Shortly after Trump's visit, Saudi Arabia helped orchestrate a blockade against its rival Qatar. And, presumably before realizing that Qatar is home to the largest U.S. air base in the Middle East, Trump applauded the Saudi-led blockade in a series of tweets. Then, just a few weeks later in June 2017, Prince bin Salman mounted what was quite literally a palace coup, taking the title of Crown Prince—first in line to be King of Saudi Arabia—from his cousin, Mohammed bin Nayef. Upon hearing news of the coup, Trump reportedly exclaimed, “We've put our man on top!” Later in 2017, now Crown Prince bin Salman launched a crackdown on corruption in the Kingdom, which was really just a guise to target Saudi royal family members opposed to bin Salman's power grab, and whose names may have been fed to bin Salman by Kushner.

Needless to say, 2017 was a pivotal year for U.S.-Saudi relations. But, what didn't make the headlines was the catalyst behind many of these events—the extraordinary lobbying and public relations campaign Saudi Arabia orchestrated in 2017. In this report, we tell that story. It's a story of more than 2,500 political contacts made by the more than 100 individuals that

serve as Saudi Arabia's registered foreign agents. It's a story of more than \$2 million dollars in campaign contributions made by foreign agents working at firms hired by the Saudi's. It's a story of how a large chunk of that money went to politicians lobbyists had contacted on behalf of the Saudi's, some even going to politicians on the very same day they were contacted. To tell this story, we at the Foreign Influence Transparency Initiative, a program of the Center for International Policy, analyzed every Foreign Agents Registration Act (FARA) Supplemental Statement filed by organizations working on behalf of clients in Saudi Arabia in 2017. From these documents we recorded every single "political activity" done on behalf of a Saudi client and every campaign contribution mentioned in these FARA filings. Because FARA does not have fiscal years or standardized reporting periods, firms representing Saudi Arabia submit their Supplemental Statements at different times throughout the year. Unless otherwise noted, all political activity and campaign contributions mentioned here were reported by these firms in 2017. Supplemental Statements cover a six-month reporting period, therefore some of the political activities and contributions reported in 2017 occurred in late 2016. Thus, we document more than \$100,000 in campaign contributions to the presidential campaigns of Hillary Clinton and Donald Trump by foreign agents working at firms representing Saudi Arabia. We also chronicle the extraordinary amount of political activity engaged in by Saudi lobbyists during and after the passage of the Justice Against State Sponsors of Terrorism (JASTA) in 2016.

Political Activities

FARA requires registered foreign agents to report all of their "political activities," which the statute defines very 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." Practically, this covers much of what lobbying and public relations firms do on behalf of their foreign clients. Thus, collectively, the reports of these activities provide a fairly comprehensive picture of what a country's FARA registered influencers are doing in America.

This does not, however, account for the considerable sums of money countries spend on other influence activities, including spending on unregistered foreign agents, think tanks, and American universities.

Nonetheless, the tip of the foreign influence iceberg seen in the FARA filings of firms registered to represent Saudi interests reveals an extraordinarily active operation that in 2017 alone reported 2,570 political activities. Identifying which are the firms that were conducting these political activities and whom their targets were is critical to understanding the whole picture of Saudi ploys in DC.

The Firms

Fully 29 different firms or individuals were registered under FARA to represent Saudi interests at some point in 2017. The range of political activity reported by these firms was immense. On one end, firms like the Harbour Group (which severed ties with the Saudi's following the death of Jamal Khashoggi) reported no political activity in their 2017 FARA filings. While it's not clear why the Saudis would have paid the firm \$339,000 for no work, this is what was reported in their FARA filings. On the other hand, the MSL Group (formerly Qorvis Communications) and the Podesta Group were the two busiest firms, reporting 555 and 491 political activities on behalf of their Saudi clients, respectively, and reporting \$6.2 million and \$4.5 million in revenue from their Saudi clients, respectively.

The MSL Group's work was public relations focused, as their parent company, Publicis Groupe, acquired the preeminent public relations firm working for the Saudis, Qorvis Communications, in early 2014. Prior to that, Qorvis had been working for the Saudi government since November 2001, just two months after 9/11, when fifteen Saudi citizens, along with four others, committed the most destructive terrorist attack on U.S. soil in U.S. history.

The Podesta Group's political activities were much more akin to what would be considered traditional lobbying, like contacting Members of Congress and the Executive Branch. The firm had a decidedly Democratic Party focus in its influence operations on behalf of the Saudi's given that the firm's namesake, Tony Podesta, was the brother of John Podesta, a long-time Democratic Party operative and Hillary Clinton's campaign manager.

Table 1 lists the top ten busiest FARA registrants for the Saudi's and the number of political activities these firms reported in their 2017 FARA filings. In addition to the MSL Group and the Podesta Group, the list is filled with some of the largest and most influential lobbying and public relations firms in D.C. For example, the fourth largest lobbying firm in the world, DLA Piper, worked for the Saudi's in 2017, as did Squire Patton Boggs, which boasts the second highest lobbying revenues of any firm in the last twenty years, according to the Center for Responsive Politics.

There's also a decidedly bipartisan approach to Saudi influence in D.C. Shortly after Donald Trump won the 2016 Presidential election, the McKeon Group inked a deal with the Saudi government. The McKeon Group—which is headed by recently retired Republican Congressman Howard “Buck” McKeon, who served as Chairman of the House Armed Services Committee—also happens to represent Lockheed Martin, which sells military equipment to Saudi Arabia.

On the other side of the aisle for the Saudi lobby in 2017 was the Democratic leaning Glover Park Group. The firm severed ties with the Kingdom after the disappearance of Jamal Khashoggi, but that was well after reporting more than 300 political activities on the Saudis' behalf in 2017.

Table 1: Top Ten Firms in Terms of Political Activities Reported on Behalf of Saudi Clients in 2017

Firm Name	Contacts Made
MSLGROUP	555
Podesta Group	491
Glover Park Group	325
Brownstein Hyatt Farber Schreck	294
Hogan Lovells	272
Squire Patton Boggs	224
DLA Piper	202
McKeon Group	77
Flywheel Government Solutions	63
CGCN Group	52

Organizations Contacted

As Table 2 shows, a majority of the political activities reported by these firms were directed at Congress, according to their 2017 FARA filings. House and Senate offices were contacted 1,409 times—nearly three times per Member of Congress—by Saudi lobbyists. The most cited reasons for contacting Congressional offices by Saudi lobbyists in 2017 were “JASTA” (the Justice Against State Sponsors of Terrorism Act), “Yemen,” “Qatar,” and PGM (precision guided munitions) or arms sales. The intention of many other contacts isn’t always transparent, with firms often reporting that the issue they were contacting Members about was the ambiguous “U.S.-Saudi relations.”

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

Type	Times Contacted
Senate	1026
Media	744
House	383
Executive	211
Governor	60
Private Company	55
Think Tank	53
Unspecified	20
Nonprofit	12
Foreign	4
University	2

Saudi lobbyists contacted more than 200 different Congressional offices and every single Senators' office, according to their 2017 FARA filings. Their Congressional outreach was overwhelmingly directed towards Members on key committees, like the Senate Committee on Foreign Relations, and the leadership of both parties. And, unlike many issues in U.S. politics, foreign influence is a bipartisan affair. Table 3 lists the top 10 most contacted Congressional offices by Saudi lobbyists, demonstrating that the Saudi lobby isn't picking sides, contacting Democrats and Republicans at roughly the same rate. Lindsey Graham (R-SC), who serves on the Armed Services Committee, was the most contacted Republican, and Chris Coons (D-DE), who serves on the Foreign Relations Committee, was the most contacted Democrat. Behind Graham and Coons, Kevin McCarthy (R-CA), the House Majority Leader, was the third most contacted by Saudi lobbyists according to 2017 FARA filings. The list is then rounded out by Democrats and Republicans who sit on a number of key committees for Saudi interests.

Table 3: Top Ten Congressional Offices Contacted by Saudi Lobbyists

Congressional Office	Times Contacted
Lindsey Graham (R-SC)	36
Chris Coons (D-DE)	33
Kevin McCarthy (R-CA)	30
Mark Warner (D-VA)	29
Steny Hoyer (D-MD)	28
Ben Cardin (D-MD)	22
Chuck Schumer (D-NY)	21
Bob Corker (R-TN)	20
Tim Kaine (D-VA)	20
Darrell Issa (R-CA)	20

After Congress, media outlets were the second most likely targets of foreign agents representing the Saudis. In total, media outlets were contacted 744 times by Saudi foreign agents in 2017. While many of these activities are simple press release e-mails blasted out to media that the recipients may not even read, many others are phone calls and even meetings.

The most contacted media outlets by Saudi lobbyists are listed in Table 4. Not surprisingly, large national media outlets got the lion's share of attention from the public relations side of Saudi Arabia's influence operation in 2017, with The New York Times, The Washington Post, The Wall Street Journal, Reuters, and CNN near the top of the list. The most contacted organization might seem surprising, but PBS Frontline has aired multiple documentaries critical of Saudi Arabia, which might be what occasioned such a high level of contacts. In addition to these prominent national media outlets, Saudi foreign agents also contacted a large swath of smaller local media outlets and even reached out to ESPN multiple times.

Table 4: Top Ten Media Organizations Contacted by Saudi Foreign Agents

Organization Name	Times Contacted
PBS Frontline	47
Wall Street Journal	39
Reuters	37
New York Times	35
CNN	28
Washington Post	27
FOX	23
Politico	22
Foreign Policy	20
The Hill	16

In addition to media outlets and Congress, in 2017 FARA filings Saudi foreign agents reported contacting Executive Branch officials more than 200 times. Within the Executive Branch, the White House, the Department of State, Department of Defense, and Department of Justice were the most contacted, with many of these contacts being related to arms sales to the Kingdom.

Political Contributions

The FARA Supplemental Statements, from which we tracked all political activities done on behalf of Saudi Arabia, also require firms' 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 2017. Note that, given the six-month reporting periods of FARA Supplemental Statements, some of the contributions that were reported in 2017 actually occurred in 2016. In fact, the Hillary Clinton campaign was the single largest recipient of contributions from foreign agents working at firms that represented Saudi Arabia in 2017.

In total, foreign agents working at firms representing Saudi Arabia gave \$2,322,153 to political campaigns, according to their 2017 FARA filings. More than a quarter of that was given to a Political Action Committee (PAC), which means we have no way of ultimately knowing who that money went to. However, more than \$1.5 million of these campaign contributions is traceable to individual candidates. Table 5 lists the top ten recipients of that money.

Table 5: Top Ten Recipients of Campaign Contributions from Firms Representing Saudi Arabia in 2017

Recipient	Contribution
Hillary Clinton (2016 Presidential Campaign)	\$94,496
Kevin McCarthy (R-CA)	\$52,000
Ed Gillespie (R-VA)	\$27,500
Bill Nelson (D-FL)	\$21,300
Tim Kaine (D-VA)	\$20,700
Heidi Heitkamp (D-ND)	\$20,000
Roy Blunt (R-MO)	\$19,250
Joe Manchin (D-WV)	\$19,200
Luther Strange (R-AL)	\$18,550
Robert Menendez (D-NJ)	\$17,700

Not surprisingly, many of the top recipients of contributions from firms representing the Saudis are party leaders. Hillary Clinton led all recipients with \$94,496 in campaign contributions from foreign agents working at firms representing the Saudis. Kevin McCarthy (R-CA) the House Majority Leader, and Tim Kaine (D-VA) Democratic Vice Presidential Nominee for the 2016 election, join Clinton in the top ten list. Heidi Heitkamp (D-ND), Joe Manchin (D-WV), and Bill Nelson (R-FL) are also among the top ten, and facing tough 2018 reelection bids as Democrats in states that voted for Donald Trump in the 2016 election. Also of note is Ed Gillespie, the Republican who was seeking to become Governor of Virginia in the 2016 election cycle, who enjoyed \$27,500 in campaign contributions from firms that represented Saudi Arabia.

While 29 firms were registered under FARA to work for the Saudis in 2017, almost all of the campaign contributions made by them came from the ten firms listed in Table 6. Not surprisingly, the firms donating the most were the firms reporting the most activity on behalf of the Saudis and receiving the most money from the Saudis in 2017.

Table 6: Campaign Contributions Reported in 2017 by Firms Representing Saudi Arabia

Firm	Contribution
Squire Patton Boggs	\$510,875
DLA Piper	\$444,454
Brownstein Hyatt Farber Schreck	\$332,981
Podesta Group	\$310,713
King and Spalding	\$221,833
CGCN Group	\$209,050
BGR Government Affairs	\$143,371
Glover Park Group	\$95,200
McKeon Group	\$30,000
Hogan Lovells	\$23,675

The general trend amongst individual donors at these firms is to 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 amassed a decidedly bipartisan influence operation in Washington.

Connecting Political Activities to Contributions

Separately analyzing political activities and campaign contributions made by firms working for Saudi Arabia can tell us much, but considering the activities together reveals that there is a rather strong flow of money from these firms to the Members of Congress they're contacting on behalf of Saudi interests. In fact, at least \$390,496 in campaign contributions reported in 2017 FARA filings by firms representing Saudi clients went to Members of Congress the firms contacted on behalf of those same Saudi clients.

This is just a conservative estimate of the flow of money from firms representing the Saudis to elected officials. Of the \$2.3 million in campaign contributions we tracked, at least \$660,000 went to PAC's – contributions that cannot be traced to individual Members of Congress. Similarly, Hillary Clinton and Donald Trump combined received more than \$100,000 in campaign contributions in 2016, which are also not traceable to Members of Congress. What's more, these numbers just reflect direct campaign contributions made from these Saudi foreign agents to Members of Congress and don't reflect other fundraising activities like bundling, which allows lobbyists to solicit contributions for candidates from friends, family, or literally anyone.

Of the remaining approximately \$1.5 million in campaign contributions from foreign agents at firms representing Saudi clients, more than a quarter went to Members contacted by a Saudi lobbyist. A total of 75 different Senators and Representatives received campaign contributions from registered foreign agents at firms who had contacted them, or staff in their Congressional offices, on behalf of Saudi Arabia. In at least twelve cases, a lobbyist working for the Saudis contacted a Congressional office on the exact same day that the firm or a registered foreign agent at the firm made a campaign contribution to that same Member of Congress.

For example, on September 26, 2016, when Congress was debating whether to override President Obama's veto of JASTA, Senator John Boozman (R-AR) received a \$1,000 contribution from Squire Patton Boggs PAC. That same day, the firm's lobbyists reported calling Boozman's Chief of Staff and e-mailing his Legislative Director on behalf of their Saudi client, the Center for Studies and Media Affairs at the Saudi Royal Court. Perhaps coincidentally, the firm's PAC also made a \$1,000 contribution to Senator Mike Crapo (R-ID) that day and reported calling Crapo's Chief of Staff and e-mailing his Legislative Director on behalf of their Saudi client. Just five days prior, on September 21, 2016, one of the firm's lobbyists spoke with Senator John McCain (R-AZ) on behalf of the Saudi Royal Court—the very same day one of the firm's registered foreign agents, Jack Deschauer, donated to McCain's campaign.

Brownstein, Hyatt, Farber, Schreck (BHFS) was also working hyperactively for Saudi interests during the JASTA fight in Congress. On September 20, 2016, one of their lobbyists, Marc Lampkin, reported meeting with Senator Richard Burr (R-NC) about JASTA. That same day Burr's campaign received a \$2,500 contribution from BHFS's PAC and another \$500 from BHFS lobbyist William Moschella. Lampkin also reported a phone call with Senator Tim Scott's (R-SC) Legislative Director on May 16, 2017, about a motion to disapprove the sale of bombs to Saudi Arabia, and that same day, Lampkin made a \$2,000 contribution to the Senator's campaign. A few weeks later on September 6, 2017, Lampkin's BHFS colleague, Elizabeth Gore, reportedly e-mailed Senator Tom Udall's (D-NM) Military Legislative Assistant about the Saudi arms sale. That same day, BHFS PAC made a \$2,000 contribution to Udall's campaign.

U.S.-made bombs provided to the Saudis in arms sales like these, that foreign agents like Lampkin and Gore lobby for, have been used in multiple airstrikes that have killed civilians in Yemen, including in a strike that killed 21 civilians at a wedding in April, 2018. All twelve instances we found of a Member of Congress or their staff being contacted by a Saudi lobbyist on the exact same day they received a campaign contribution from that lobbyist's firm are listed in Table 7.

While some might consider this pay-to-play politics or outright bribery, this is all perfectly legal. FARA Supplemental Statements, where all of the contacts and contributions listed here are reported, make it perfectly 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," which shields these lobbyists from accusations that they are guilty of helping the Saudis violate the Federal Election Commission's prohibition on campaign contributions from foreign nationals. And, while official resources, including Congressional offices, can't 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've met with them.

Table 8: Members of Congress Contacted by a Saudi Lobbyist the Same Day They Received a Campaign Contribution from that Lobbyist's Firm

Date	Recipient	Firm	Amount	Donor	Contact Type	Contacted
4/26/2017	Bob Corker	Hogan Lovells	\$2,700	Unspecified	Meeting	Senators
11/1/2016	Cedric Richmond	Squire Patton Boggs	\$5,000	Squire Patton Boggs PAC	Email	LD
11/28/2016	Darrell Issa	DLA Piper	\$2,700	George Salem	Phone	Rep.
9/26/2016	John Boozman	Squire Patton Boggs	\$1,000	Squire Patton Boggs PAC	Phone	COS
9/26/2016	John Boozman	Squire Patton Boggs	\$1,000	Squire Patton Boggs PAC	Email	LD
9/21/2016	John McCain	Squire Patton Boggs	\$250	Jack Deschauer	Phone	Senator
9/26/2016	Mike Crapo	Squire Patton Boggs	\$1,000	Squire Patton Boggs PAC	Email	LD
9/26/2016	Mike Crapo	Squire Patton Boggs	\$1,000	Squire Patton Boggs PAC	Phone / Email	COS
9/20/2016	Richard Burr	Brownstein Hyatt Farber Schreck	\$500	William Moschella	Meeting	Senator
9/20/2016	Richard Burr	Brownstein Hyatt Farber Schreck	\$2,500	BHFS PAC	Meeting	Senator
5/16/2017	Tim Scott	Brownstein Hyatt Farber Schreck	\$2,000	Marc Lampkin	Phone	LD
6/6/2017	Tom Udall	Brownstein Hyatt Farber Schreck	\$2,000	BHFS PAC	Email	Military LA

Conclusion: Saudi Influence in America Today:

This report has quantified the enormity of Saudi influence in Washington reported in just one year, 2017.

- Reported spending of nearly \$27 million by Saudi Arabia on FARA registered firms.
- More than 2,500 political activities done on behalf of Saudi Arabia by those firms.
- More than \$2 million in campaign contributions from those firms.
- Nearly \$400,000 in campaign contributions to Members of Congress their firms had contacted on behalf of Saudi interests.
- Twelve times a contact and contribution occurred on the same day.

2017 turned out to be an extraordinarily pivotal year for Saudi Arabia, including hosting President Trump on his first trip abroad as President, leading a blockade of rival Qatar, MBS's palace coup to become Crown Prince, the continued devastation of the Saudi-led coalitions war in Yemen, and MBS's detention of political rivals, just to name a few of the major developments in Saudi Arabia's domestic and foreign policies.

To be sure, this report only documents the tip of the iceberg of Saudi influence in the U.S., and does not purport to fully explain the U.S. response to all these incidents in Saudi Arabia. This report does not analyze oil and business interests between Saudi Arabia and the U.S., and the considerable sums of money Saudi Arabia spends on other influence activities, including at think tanks, and at American universities, for example. Moreover, the number of FARA registered firms representing the Saudi's has declined since 2017. As of this writing in late October 2017, BGR, Glover Park Group, Gibson-Dunn, and the Harbour Group, have all terminated their Saudi contracts following Jamal Khashoggi's murder at the Saudi consulate in Turkey.

But, while Saudi influence in the U.S. may have declined recently, more than two dozen FARA-registered firms continue to represent the Saudi's in the U.S. and one, Southwind Strategies, even reported a deal to represent the Saudis shortly after the murder of Jamal Khashoggi. In short, Saudi Arabia still has an army of lobbyists and public relations pros on its payroll that are quietly working to thwart Congressional efforts to sanction Saudi Arabia for brutally murdering Jamal Khashoggi, and, just as they have multiple times before, Saudi lobbyists are working to defeat proposals to cut off U.S. arms and military support for the Saudi's disastrous war in Yemen.

If the findings in this report are any indication, many firms representing Saudi Arabia right now are likely contacting Members of Congress whose campaign coffers they have lined. And, especially in an election year, they might even be lining those coffers on the very same day they meet with Members of Congress to discuss proposals that would punish Saudi Arabia for the brutal murder of Jamal Khashoggi.

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- 29 Also, 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 individuals, and firms benefit from the contributions of all their lobbyists. For example, a large donor to a specific Member can easily introduce a lobbyist colleague to that office even if the latter hasn’t donated to that Member.
- 30 This is a floor, not a ceiling, of campaign contributions that went to Members contacted on behalf of Saudi clients for a variety of reasons. First and foremost, this analysis relies on the self-reporting of campaign contributions and political activities by the firms in question. 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 Members 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.

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