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THE SAUDI LOBBY IN 2018



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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.

ACKNOWLEDGEMENTS

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Executive Summary

When 2018 began, Saudi influence in America was arguably greater than it had ever been. In March 2018, the same day the Senate defeated a measure to end U.S. military support for the Saudi-led coalition's war in Yemen, President Trump met Saudi Crown Prince Mohammed bin Salman in the White House and declared that the relationship between the U.S. and Saudi Arabia "is now probably as good as it's really ever been" and "will probably only get better."¹

But, by the end of 2018 Saudi Arabia had become a pariah to many. After the brutal murder of Saudi dissident and Washington Post contributor Jamal Khashoggi at the Saudi consulate in Turkey in October—which U.S. intelligence authorities have concluded was authorized by the Crown Prince²—there was suddenly greater public interest in the U.S.-Saudi alliance. Several lobbying and public relations firms dropped the Saudis as a client, some think tanks refused to take Saudi money, and many American universities reevaluated Saudi financial support.

2018 was an extraordinarily tumultuous year for the U.S.-Saudi relationship. While the Saudis were often front-page news, what didn't make headlines was the intense behind-the-scenes machinations of the Kingdom's Washington operations—the extraordinary lobbying and public relations campaign Saudi Arabia orchestrated in 2018 to maintain its privileged relationship with the U.S. In this report, we tell that story.

The Foreign Influence Transparency Initiative (FITI), 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 2018. From this analysis we found:

- 31 different firms served as Saudi Arabia's registered foreign agents in the U.S.;
- Reported spending of nearly \$15 million by Saudi Arabia on FARA registered firms;
- Nearly 2,000 political activities done on behalf of Saudi Arabia by those firms;
- Saudi lobbyists contacted the office of nearly every Senator and more than 200 Representatives;
- More than \$2.2 million in campaign contributions from those firms;
- \$172,200 in campaign contributions to Members of Congress from firms that had contacted them on behalf of Saudi interests;
- Five cases in which a contact and contribution occurred on the same day.

The timing of many of these political contributions and contacts coincides closely with key Congressional events concerning Saudi Arabia. In fact, some of these contributions went to Members of Congress on the exact day that they voted in line with Saudi interests. Yet, within our current campaign finance system, such contributions are perfectly legal.

Today, undeterred by the brutal murder of Khashoggi and the Saudi government's attempted cover up, nearly two dozen firms are still registered under FARA to represent Saudi clients.

If the findings in this report are any indication, the Saudi lobby in Washington is feverishly contacting Executive branch officials and Congressional offices to stymie legislation that would punish Saudi Arabia for its actions, and they're likely making campaign contributions to those same Members of Congress.

Introduction

While Saudi Arabia had strained relations with the Obama administration, due in no small part to passage of the Iran deal to halt its nuclear weapons program, the Saudis very quickly developed a strong relationship with the Trump administration. As our report on the Saudi lobby's work in 2017 showed, the Kingdom rapidly expanded its influence operation in America following the election of Donald Trump.³ And their efforts yielded results extremely quickly. Saudi Prince Mohammed bin Salman (MBS) became close friends with Jared Kushner, Trump's son-in-law, who then convinced Trump to make Saudi Arabia the destination of his first trip abroad.⁴

Weeks later when Saudi Arabia and several other countries, launched a blockade against US ally Qatar, Trump sided with the Saudis.⁵ Later in June 2017, when Prince bin Salman mounted a palace coup, taking the title of Crown Prince from his cousin, Trump reportedly exclaimed, "We've put our man on top!"⁶ In late 2017, when Crown Prince bin Salman kidnapped, imprisoned, and tortured Saudi royal family members opposed to his power grab, Trump offered no objections and Kushner had allegedly fed MBS the names of those who resisted his authority.⁷

Given MBS's close ties to the Trump administration, once 2018 began, the U.S.-Saudi relationship appeared stronger than it had been in years. When MBS met with Trump in the White House this past March, Trump declared that this relationship "is now probably as good as it's really ever been" and "will probably only get better."⁸ And, there was ample justification for believing that Trump was right. The same day he met with MBS in the White House the Senate defeated a resolution that would have ended U.S. military support for the Saudi's war in Yemen,⁹ where U.S. bombs have been implicated in multiple Saudi air strikes that have killed civilians.¹⁰ MBS would then go on a whirlwind tour of the U.S., meeting mega-star Oprah Winfrey, the Rock (aka Dwayne Johnson), media-mogul Rupert Murdoch, and speaking at Harvard and MIT, which both have received money from the Saudi government.¹¹

Events during the second half of 2018 transformed the landscape of U.S.-Saudi relations, which appeared more strained than they had been since September 11, 2001, when 15 Saudi nationals and four others committed the greatest terrorist attack on U.S. soil. The catalyst for this change was clear—the vicious murder of Jamal Khashoggi. While President Trump continues to dismiss the intelligence community's assessment that MBS ordered Khashoggi's murder,¹² his regime's culpability in this heinous act was widely recognized and the Saudi influence juggernaut showed signs of unravelling. Several high-profile lobbying firms dropped the Saudis as a client.¹³ A number of think tanks refused to accept Saudi money.¹⁴ Universities, like Harvard and MIT, were reconsidering their Saudi ties.¹⁵

2018 witnessed the rise and near fall of the U.S.-Saudi relationship. While much of this story

made front-page news, less well known was the intense behind-the-scenes machinations of the Kingdom's Washington operations—the extraordinary lobbying and public relations campaign Saudi Arabia orchestrated in 2018. In this report, we tell that story.

It's a story of nearly 2,000 political contacts made by the 31 different firms that serve as Saudi Arabia's registered foreign agents in the U.S. It's a story of nearly \$15 million spent by the Saudis on these firms.¹⁶ It's a story of more than \$2.2 million dollars in campaign contributions made by foreign agents working at firms hired by the Saudis. 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) Supplemental Statement filed by organizations working on behalf of clients in Saudi Arabia in 2018. From these documents, we recorded every single “political activity” done for Saudi clients 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 2018. Supplemental Statements cover a six-month reporting period, therefore some of the political activities and contributions reported in 2018 occurred in late 2017. Similarly, some of the activities and contributions that occurred in late 2018 will only be reported in the first half of 2019.

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.”¹⁷ 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 activities provide a fairly comprehensive picture of what a country's FARA registered influencers are doing in America, and according to their filings, they were doing quite a lot. Specifically, in their 2018 FARA filings, firms reported engaging in 1,982 political activities on behalf of clients in Saudi Arabia. This is down from the approximately 2,500 political activities reported on behalf of Saudi clients by FARA registrants in 2017, as we previously reported.¹⁸ However, this may be the result of changes in these firms' reporting practices, as is discussed below, and does not necessarily reflect an actual reduction in work being done on behalf of Saudi Arabia.

In this section we break down these 1,982 political activities to identify the most active firms, and the most contacted organizations, media outlets, and Congressional offices.

The Firms

31 different firms or individuals were registered under FARA to represent Saudi interests at some point in 2018. The range of political activity reported by these registrants was immense. On one end, Gibson, Dunn, and Crutcher reported just one political activity on behalf of their client, the Saudi Embassy. Specifically, they “prepared written materials regarding the No Oil Producing and Exporting Cartels Act of 2018,” that were not distributed, but earned the firm a hearty \$250,000 payment from the Saudi Embassy.¹⁹

On the other hand, the MSL Group (formerly Qorvis Communications) was the most active firm, reporting 756 political activities on behalf of the Saudis. While this was an extraordinary amount of activity, it's important to note that it is a floor, not a ceiling, of the total amount of political activity the MSL Group engaged in on behalf of the Kingdom of Saudi Arabia. This is because, while the MSL Group lists the date, type of contact, media outlet, and a short description of all political activities reported on behalf of Saudi Arabia with media and U.S. Government contacts, the firm does not do the same for think tank and business contacts.²⁰ The firm simply lists the think tanks and businesses it has interacted with in each six month reporting period, without providing the date of each interaction, the type of contact, or what the interaction was regarding. This practice significantly reduces transparency of the firm's work with these actors that can wield significant influence over policymaking. Moreover, regulations governing FARA require firms to report activities to a “degree of specificity necessary to permit meaningful public evaluation of each of the significant steps taken by a registrant to achieve the purposes,” of their representation of the foreign client.²¹ Needless to say, the MSL Group's practice of providing little specificity regarding interactions with businesses and think tanks did not afford our public organization with the ability to fully evaluate the firms work on behalf of Saudi Arabia.

Had the firm been as transparent about its work with think tanks and businesses as it was with media and government contacts, the total number of political activities it conducted in 2018 would undoubtedly be significantly higher than what is reported here. But unless Congress or the Justice Department demand greater transparency from FARA registrants we can only speculate about the impact of this avenue of influence.

Nonetheless, from what we can analyze of the MSL Group's work, we can see that the firm was almost entirely public relations focused, with all but two political activities going to media outlets. This media focus is unsurprising given their parent company, Publicis Groupe, acquired the preeminent public relations firm working for the Saudis, Qorvis Communications, in early 2014.²² Prior to that, Qorvis had been working for the Saudi government since November 2001,²³ a mere two months after 9/11.

The work of Brownstein, Hyatt, Farber, Schreck (BHFS), the second most active FARA registrant working for the Saudis in 2018, was much more akin to what would be considered traditional lobbying. All of the 306 political activities the firm reported in its 2018 FARA filings involved Congress, with 196 directed at the Senate and 110 focused on the House.

Table 1 lists the top ten busiest FARA registrants for the Saudis and the number of political

activities these firms reported in their 2018 FARA filings. In addition to the MSL Group and BHFS, the list is filled with some of the largest and most influential lobbying and public relations firms in the country. For example, APCO Worldwide is the third largest public relations firm in the U.S.,²⁴ and boasts an extraordinary array of corporate clients, including Dell, eBay, and Mars Foods.²⁵ Not to be outdone, Hogan Lovells, which was also registered under FARA to represent Saudi Arabia in 2018, is one of the ten largest law firms in the world and advises half of the Fortune 100.²⁶

There's also a decidedly bipartisan approach to Saudi influence in America. Shortly after Donald Trump won the 2016 Presidential election, the McKeon Group inked a deal with the Saudi government.²⁷ 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, one of the largest suppliers of military equipment to Saudi Arabia.²⁸

On the other side of the aisle for the Saudi lobby in 2018 was the Democratic-leaning Glover Park Group. The firm severed ties with the Kingdom after the disappearance of Jamal Khashoggi,²⁹ but the firm's 2018 FARA filings show 250 political activities on the Saudi's behalf before that, all of which were with Congressional offices.

Table 1: Top Ten Firms in Terms of Political Activities Reported on Behalf of Saudi Clients in 2018

Firm Name	Contacts Made
MSL GROUP	756
Brownstein Hyatt Farber Schreck	306
Glover Park Group	250
Harbour Group	168
Churchill Ripley	100
APCO Worldwide	81
CGCN Group	79
Portland PR	71
Hogan Lovells	61
McKeon Group	31

It's important to note that there are considerable differences in the level of transparency firms provide in their FARA filings, and this has a direct impact on the public's ability to track their work and our ability to quantify the level of political activity of the firms in Table 1. In addition to the limited disclosures in the MSL Group's filings mentioned previously, many other firms that worked for the Saudis in 2018, but aren't listed in Table 10, provide only broad explanations of their political activities and don't include key details like dates of activity, the

foreign agents doing the work, the issue they are covering, or even whom they're contacting. For example, Fleishman-Hillard, as part of their work to help organize an event in March 2018, the firm's FARA filing states it "coordinated meeting of University Presidents with [sic] Crown Prince of Saudi Arabia."³⁰ The firm provides no information about which University Presidents met the Crown Prince, the date of the meetings, or what was discussed. This information would be worth knowing as many Universities have since been criticized for receiving Saudi money following the murder of Jamal Khashoggi.³¹

Similarly, the Hohlt Group, headed by Donald Trump political appointee Richard Hohlt, provided little information in its FARA filings about the political activities the firm conducted on behalf of the Saudi Embassy. The firm's FARA filing states that Hohlt "served as a Legislative/Public Advisor to the Embassy, and provided them with advice on legislative and political affairs strategies," and that "Richard Hohlt may attend meetings generally related to the interests of the foreign principals."³² Hohlt Group FARA filings provide no information about these meetings despite the statute requiring a, "detailed statement of every activity which the registrant is performing...which requires his registration."³³

Organizations Contacted

As Table 2 shows, media organizations were the top target of these firm's political activities, according to 2018 FARA filings. In total, media outlets were contacted 948 times by Saudi foreign agents. Just over half (492) 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. While e-mail blasts are fairly impersonal, the more than 400 other reported political activities directed at media outlets were not and included a number of in-person interviews and meetings with prominent media outlets.

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

Type	Times Contacted
Media	948
Senate	413
House	331
Private Company	104
Think Tank	64
Nonprofit	31
Unspecified	22
Executive	20
Museum	15
University	12

The most contacted media outlets by Saudi lobbyists are listed in Table 3. 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 2018, with CNN, The Washington Post, and The Wall Street Journal topping the list. In addition to the national media outlets that fill this top ten list, Saudi foreign agents also contacted more than 200 smaller and local media outlets, according to their 2018 FARA filings. They also delved well beyond politics in many of these activities, including discussing "the development of the sport of surfing in Saudi Arabia" with the World Surf League, and the "development of motor sports in the Saudi market," with ESPN.³⁴

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

Organization Name	Times Contacted
CNN	48
Washington Post	46
Wall Street Journal	42
NBC	39
Bloomberg	35
Fox News	34
MSNBC	34
Reuters	29
Associated Press	29
New York Times	27

After media outlets, House and Senate offices were the most likely targets of Saudi foreign agent's political activity, with 413 and 331 interactions, respectively. The most cited reasons for contacting Congressional offices by Saudi lobbyists in 2018 were related to the "Yemen Resolution," also referred to in these firms FARA filings as the "Sanders/Lee" bill. This was in reference to a bill introduced by Senators Bernie Sanders (I-VT) and Mike Lee (R-UT) that would end U.S. military support for the Saudi-led coalition's war in Yemen.³⁵ As discussed further below, Saudi lobbyists often spoke with Senate offices days before—and even the day of—key votes on the Yemen resolution.

All told, in 2018 Saudi lobbyists reported contacting more than a dozen Congressional committees, the offices of more than 200 Representatives, and nearly every Senator. The leadership of both parties and key Committees, like the Senate Foreign Relations Committee, were prime targets as evidenced by Table 4, which lists the top 10 most contacted Congressional offices by Saudi lobbyists. In fact, seven of the top ten most contacted offices by Saudi lobbyists were all on the Senate Foreign Relations Committee—Senators Cardin, Coons, Graham, Kaine, Menendez, Shaheen, and Udall. The list is rounded

out by House Speaker Nancy Pelosi (D-CA), as well as Senators John Boozman (R-AK) and Roy Blunt (R-MO), both of whom sit on the powerful Appropriations Committee. As the table indicates, unlike many issues in U.S. politics, foreign influence is a bipartisan affair. Saudi lobbyists reach out to Republican and Democratic offices with equal fervor, and, as is discussed below, make considerable contributions to both Democratic and Republican campaigns.

Table 4: Top Ten Congressional Offices Contacted by Saudi Lobbyists

Congressional Office	Times contacted
Jeanne Shaheen (D-NH)	34
Robert Menendez (D-NJ)	21
Chris Coons (D-DE)	18
John Boozman (R-AK)	13
Roy Blunt (R-MO)	13
Lindsay Graham (R-SC)	12
Tim Kaine (D-VA)	11
Ben Cardin (D-MD)	11
Tom Udall (D-NM)	11
Nancy Pelosi (D-CA)	10

Political Contributions

The FARA Supplemental Statements, from which we tracked all political activities done on behalf of 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 2018. Note that, given the six-month reporting periods of FARA Supplemental Statements, some of the contributions that were reported in 2018 actually occurred in 2017 and some of the 2018 contributions will only be reported in the first half of 2019.³⁶

In total, firms representing Saudi Arabia and their foreign agents gave \$2.24 million to political campaigns, according to their 2018 FARA filings. Almost a quarter of that—\$531,000—was given to a Political Action Committee (PAC), not individual candidates. However, more than \$1.6 million of these campaign contributions are 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 2018

Recipient	Contribution
Kevin McCarthy (R-CA)	\$50,000
Michael McCaul (R-TX)	\$34,500
Tim Kaine (D-VA)	\$34,450
Barbara Comstock (R-VA)	\$28,450
Michael Guest (R-MS)	\$27,500
Mitch McConnell (R-KY)	\$26,500
Marsha Blackburn (R-TN)	\$20,750
Richard Cordray (D-OH)	\$20,700
Ted Cruz (R-TX)	\$19,100
Robert Menendez (D-NJ)	\$18,250

Unsurprisingly, many of the top recipients of contributions from firms representing the Saudis are party leaders. Kevin McCarthy (R-CA), the House Majority Leader in 2018 and current Minority Leader, was the top recipient of campaign contributions from firms representing the Saudis. Former Vice Presidential candidate Senator Tim Kaine (D-VA) and Representative Mike McCaul (R-TX), the top ranking Republican on the House Homeland Security Committee, netted the second and third most campaign contributions from Saudi lobbyists in 2018, respectively. They're joined on the top ten list by a bipartisan group of influential lawmakers, including Senate Majority Leader Mitch McConnell (R-KY) and Robert Menendez (D-NJ), the top-ranking Democrat on the Senate Foreign Relations Committee.

While 31 firms were registered under FARA to work for the Saudis in 2018, almost all of the campaign contributions made by Saudi firms came from just the ten firms listed in Table 6.

Table 6: Campaign Contributions Reported in 2018 by Firms Representing Saudi Arabia

Recipient	Total Contribution Amount
Squire Patton Boggs	\$672,570
Brownstein Hyatt Farber Schreck	\$435,400
Akin Grump	\$243,556
CGCN Group	\$222,019
King & Spalding	\$172,329
BGR Government Affairs	\$153,505
Glover Park Group	\$121,611
Hohlt Group Global	\$65,800
McKeon Group	\$62,000
Hogan Lovells	\$35,525

The general trend here is that larger firms make more campaign contributions. In fact, Table 6 includes the top four largest lobbying firms in 2018 in terms of lobbying revenue generated—Akin Gump, Brownstein Hyatt, BGR Group, and Squire Patton Boggs—according to lobbying revenue data compiled by the Center for Responsive Politics.³⁷ 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 amassed a decidedly bipartisan influence operation in Washington.

The firms listed in Table 6 also reported the most political activity on behalf of the Saudis in 2018 and, as we detail below, there appears to be a strong correlation between campaign contributions and political activities conducted on behalf of the Saudi's for many of these firms.

Connecting Political Activities to Contributions

Separately analyzing political activities and campaign contributions made by firms working for Saudi Arabia in itself is telling, but considering these activities together reveals that Saudi lobbyists are far more likely to contact Congressional offices whose campaigns they've contributed to. Of the 745 political activities reported by Saudi foreign agents in 2018 that were directed at Congress, 52 were aimed at Congressional Committees. The remaining 693 interactions occurred with 299 individual House and Senate offices, including with nearly every Senator and just over 200 Representatives. Among these elected officials, 56 received campaign contributions from the exact same firms that contacted them on behalf of Saudi Arabia. These firms contacted the Member's offices whose campaigns they had contributed to 171 times or, on average, just over three times per Member. As for the offices that were contacted by a Saudi-represented firm but did not receive a campaign contribution from that same firm, they were only contacted an average of two times. In other words, firms

representing Saudi Arabia contacted Congressional Offices to whom they made political contributions to 50% more than those whose campaigns they did not contribute to. In general, there is a rather strong flow of money from Saudi firms to the Members of Congress whom they're contacting in order to advance their client's interests. In fact, at least \$176,200 in campaign contributions reported in 2018 FARA filings by firms representing Saudi Arabia went to Members of Congress whose offices they were contacting on behalf of their Saudi clients.³⁸

This is just a conservative estimate of the flow of money from firms representing the Saudis to elected officials. Of the \$2.24 million in campaign contributions we tracked, at least \$531,000 went to PAC's—contributions that cannot be traced to individual Members of Congress. Considerable sums also went to candidates in various 2018 elections who were not then Members of Congress—including challengers to incumbent Members and candidates in state and local elections—and were thus highly unlikely to have been contacted on behalf of the Saudis. Our numbers also only reflect direct campaign contributions made from these Saudi foreign agents to Members of Congress and don't reflect other fundraising activities like bundling, which allow lobbyists to solicit contributions for candidates from friends, family, or literally anyone.

Same Day Contacts and Contributions

Even with all these limitations to fully following the money, we still found 56 different Senators and Representatives who received campaign contributions from registered Saudi foreign agents at firms who had contacted them, or staff in their Congressional offices regarding Saudi interests. Nearly a third of these contributions (47) were made within a month of the firm contacting the elected officials' office on behalf of the Saudis. 21 of these donations were made within a week of contacting the elected official or their staff on behalf of Saudi Arabia. And, in five cases, Members of Congress received campaign contributions from firms representing the Saudi's on the same day they were contacted by lobbyists working for those same firms. These same day contacts and contributions by firms representing Saudi Arabia were to Senator Ben Cardin (D-MD), Representative Mike Conaway (R-TX), Senator Jim Inhofe (R-OK), Senator Robert Menendez (D-NJ), and Senator Tina Smith (D-MN).

Some of these instances appear to have been less than successful. For example, on September 14, 2017 BHFS lobbyist Elizabeth Gore requested a meeting with Senator Cardin's chief-of-staff and, that same day, the firm's PAC reportedly made a \$1,000 contribution to Cardin's campaign.³⁹ But, BHFS did not later report a meeting with anyone in Cardin's office, and Cardin has been an outspoken critic of the Kingdom, even co-sponsoring legislation condemning their treatment of women's rights activists.⁴⁰ Similarly, though the CGCN Group contacted Representative Conaway's office the same day—March 19, 2018—that a registered lobbyist at the firm, Sam Geduldig, made a \$1,500 contribution to Conaway, the contact was an e-mail that the firm sent out to more than 60 Hill offices.⁴¹

Other same day contacts and contributions appear less innocuous, however, and occurred close to key votes for Saudi Arabia. For example, the McKeon Group reported talking to

Senator Inhofe's Military Legislative Assistant about the Kingdom on November 14, 2018 and reported making a \$1,000 contribution to Inhofe that same day.⁴² Two weeks later Inhofe voted against a resolution to end U.S. involvement in the Saudi-led war in Yemen.⁴³ Similarly, a BHFS lobbyist working for the Saudis spoke with Senator Tina Smith's about the Yemen Resolution on March 7, 2018 by BHFS the same day BHFS lobbyist Alfred Mottur made a \$500 contribution to Smith's campaign.⁴⁴

Connecting Contacts, Contributions, and Key Votes

On March 20, 2018 when the Senate voted on that Yemen resolution, Senator Smith did not side with the Saudis, but a majority of her Senate colleagues did. And, a majority of her colleagues that voted the Saudi's way had, or would, receive campaign contributions from Saudi lobbyists. In fact, many of them received campaign contributions from Saudi lobbyists just days before the vote. For example, Senator Nelson received a campaign contribution from the Glover Park Group, on February 23, and was contacted by the firm regarding "US-Saudi relations" just five days later when the bill was introduced.⁴⁵ Then, on March 16, 19, and 20—the day of the vote—Senator Bill Nelson (D-FL) received a total of \$3,000 from BHFS lobbyists.⁴⁶ The Glover Park Group also made a \$1,000 contribution to Senator Heidi Heitkamp (D-ND) on March 12.⁴⁷ Senator Heitkamp, in just the month prior to the vote on March 20, got an additional \$2,500 in contributions from BHFS lobbyists.⁴⁸ On March 9, Senator Robert Menendez (D-N.J.) received \$1,000 from Squire Patton Boggs, which was also representing the Saudis.⁴⁹ Two months later, on May 16, Senator Menendez's campaign would receive a \$500 contribution from BHFS lobbyist Elizabeth Gore the same day they report meeting with the Senator and his chief of staff to discuss the Yemen Resolution.⁵⁰

All of these Senators voted against the Yemen resolution on March 20 in line with Saudi interests.⁵¹ And, in total, firms representing Saudi Arabia made more than \$203,000 in campaign contributions in just the three-week period from when the Yemen resolution was introduced until it was voted on.

While some might consider these practices as pay-to-play politics or as outright bribery, this is all perfectly legal. FARA Supplemental Statements, where all of the contacts and contributions listed here are self-reported by each of these firms, 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,"⁵² 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.⁵³ 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, even if that lobbyist is working on behalf of a foreign power.

Conclusion: Saudi Influence in America Today

To be sure, this report only documents the tip of the iceberg of Saudi influence in the U.S. 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,⁵⁴ and at American universities, for example.⁵⁵

Yet, just the tip of the Saudi influence iceberg documented here is immense. Just from 2018 FARA filings we found:

- 31 different firms served as Saudi Arabia's registered foreign agents in the U.S.;
- Reported spending of nearly \$15 million by Saudi Arabia on FARA registered firms;
- Nearly 2,000 political activities done on behalf of Saudi Arabia by those firms;
- Saudi lobbyists contacted the office of nearly every Senator and more than 200 Representatives;
- More than \$2.2 million in campaign contributions from those firms;
- \$172,200 in campaign contributions to Members of Congress from firms that had contacted them on behalf of Saudi interests;
- In five cases, a contact and contribution occurred on the same day.

Saudi influence in the U.S. may have declined after the murder of Jamal Khashoggi, as many lobbying firms, think tanks, and Universities chose to distance themselves from the Kingdom. This contributed to reductions in the Saudi lobby's reach from the levels we saw in 2017, when Saudi foreign agents reported more than 2,500 political activities and revenues of approximately \$27 million.⁵⁶

But, make no mistake, the Saudis continue to possess one of the largest and most powerful foreign influence networks in America. Despite the brutal murder of Jamal Khashoggi, most of the FARA registered firms on the Saudi's payroll at the beginning of 2018 remained on it at the end of 2018. In fact, Southwind Strategies, even reported a new deal to represent the Saudis shortly following Khashoggi's death.⁵⁷ As of March 2019, there are still nearly two dozen FARA registered firms on the Saudi's payroll.⁵⁸

This army of lobbyists and public relations professionals continue to work to thwart Congressional efforts to sanction Saudi Arabia for murdering Jamal Khashoggi, and, just as they have multiple times before, they are working to defeat proposals to cut off U.S. military support for the Saudis in the disastrous war in Yemen, including encouraging a Presidential veto of the Yemen War Powers Resolution that Congress recently passed. Regardless of what the President does, Saudi lobbyists will continue to contact Members of Congress whose campaign coffers they have lined, meet with them before key votes, and, if the findings here are any indication, they might even be lining those coffers on the very same day they meet with Members of Congress to discuss Saudi Arabia.

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