

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

For Six Month Period Ending July 31, 2017

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration No.

King & Spalding LLP

6307

(c) Business Address(es) of Registrant

1700 Pennsylvania Avenue, NW

Suite 200

Washington, D.C. 20006

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- (1) Residence address(es) Yes No
- (2) Citizenship Yes No
- (3) Occupation Yes No

(b) If an organization:

- (1) Name Yes No
- (2) Ownership or control Yes No
- (3) Branch offices Yes No

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

n/a

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

3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Position	Date Connection Ended
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(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes No

If yes, identify each such person and describe the service rendered.

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

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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See Attachment 1.

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes No

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

n/a

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No

If yes, furnish the following information:

Foreign Principal

Ministry of Commerce and Investment, Kingdom of Saudi Arabia

Date of Termination

July 31, 2017

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

None

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No

Exhibit B⁴ Yes No

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

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11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

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

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If no, explain why.

During the reporting period, King & Spalding LLP neither engaged in any activities for nor rendered any services to the Ministry of Commerce and Investment, Kingdom of Saudi Arabia.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
			Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, have you filed an Exhibit D⁸ to your registration? Yes No

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

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).
⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.
⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

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

No disbursements were made by King & Spalding LLP associated with our representation of the foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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Total

(b) DISBURSEMENTS-THINGS OF VALUE

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

Yes No

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See Attachment
2.

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²
Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?
Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- Radio or TV broadcasts
- Magazine or newspaper
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Other (specify) _____

Electronic Communications

- Email
- Website URL(s): _____
- Social media websites URL(s): _____
- Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

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

21. What language was used in the informational materials:

- English
- Other (specify) _____

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

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes No

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

VI - EXECUTION

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

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)

August 31, 2017 _____

/s/ Thomas J. Spulak _____

eSigned

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

KING & SPALDING LLP**Attachments to Supplemental Statement****Reporting Period: February 1 -- July 31, 2017****Attachment 1**

5. (d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? If yes, furnish the following information:

NAME	POSITION OR CONNECTION	FOREIGN PRINCIPAL	DATE TERMINATED
Michael A. Andrews	Partner	Ministry of Commerce and Investment, Kingdom of Saudi Arabia	July 31, 2017
J.C. Boggs	Partner	Ministry of Commerce and Investment, Kingdom of Saudi Arabia	July 31, 2017
George C. Crawford	Senior Government Relations Advisor	Ministry of Commerce and Investment, Kingdom of Saudi Arabia	July 31, 2017
Daniel C. Crosby	Partner	Ministry of Commerce and Investment, Kingdom of Saudi Arabia	July 31, 2017
Lloyd N. Hand	Senior Counsel	Ministry of Commerce and Investment, Kingdom of Saudi Arabia	July 31, 2017
Thomas J. Spulak	Partner	Ministry of Commerce and Investment, Kingdom of Saudi Arabia	July 31, 2017

Attachment 2**15. (c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? If yes, furnish the following information:

KING & SPALDING NONPARTISAN COMMITTEE FOR GOOD GOVERNMENT (KSNCGG) - PAC CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
June 28, 2017	\$1500.00	Barry Loudermilk for Congress (Rep. Barry Loudermilk (GA-11))	Washington, D.C.
March 28, 2017	\$1000.00	Bob Casey for Senate, Inc. (Sen. Bob Casey (PA))	Washington, D.C.
June 28, 2017	\$1000.00	Castro for Congress (Rep. Joaquin Castro (TX-20))	Washington, D.C.
June 28, 2017	\$1500.00	Collins for Congress (Rep. Doug Collins (GA-09))	Washington, D.C.
March 14, 2017	\$2500.00	Feinstein for Senate (Sen. Dianne Feinstein (CA))	Washington, D.C.
March 28, 2017	\$2500.00	Gillibrand for Senate (Sen. Kirsten Gillibrand (NY))	Washington, D.C.
June 28, 2017	\$2500.00	Kay Granger Campaign Fund (Rep. Kay Granger (TX-12))	Washington, D.C.
March 28, 2017	\$2500.00	Mario Diaz-Balart for Congress (Rep. Mario Diaz-Balart (FL-25))	Washington, D.C.
February 3, 2017	\$2500.00	McCaul for Congress (Rep. Michael McCaul (TX-10))	Washington, D.C.
June 28, 2017	\$2500.00	McHenry for Congress (Rep. Patrick timothy McHenry (NC-10))	Washington, D.C.
June 28, 2017	\$1500.00	McSally for Congress (Rep. Martha McSally (AZ-02))	Washington, D.C.

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
June 28, 2017	\$2500.00	Pittenger for Congress LLC (Rep. Robert Pittenger (NC-09))	Washington, D.C.
March 28, 2017	\$2500.00	Rob Bishop for Congress (Rep. Rob Bishop (UT-01))	Washington, D.C.
June 28, 2017	\$5000.00	Royce Campaign Committee (Rep. Ed Royce (CA-39))	Washington, D.C.
June 28, 2017	\$1000.00	Stivers for Congress (Rep. Steve Stivers (OH-15))	Washington, D.C.

MICHAEL A. ANDREWS - POLITICAL CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
February 28, 2017	\$100.00	KSNCGG	Washington, D.C.
March 31, 2017	\$100.00	KSNCGG	Washington, D.C.
April 30, 2017	\$100.00	KSNCGG	Washington, D.C.
May 31, 2017	\$100.00	KSNCGG	Washington, D.C.
June 30, 2017	\$100.00	KSNCGG	Washington, D.C.
July 31, 2017	\$100.00	KSNCGG	Washington, D.C.
March 27, 2017	\$500.00	Gillibrand for Senate (Sen. Kirsten Gillibrand (NY))	Washington, D.C.
March 29, 2017	\$500.00	Friends of Rosa DeLauro (Rep. Rosa DeLauro (CT-03))	Washington, D.C.
April 26, 2017	\$1000.00	Wyden for Senate (Sen. Ron Wyden (OR))	Washington, D.C.
June 6, 2017	\$500.00	Kaine for Virginia (Sen. Tim Kaine (VA))	Washington, D.C.
June 21, 2017	\$1000.00	Carper for Senate (Sen. Thomas R. Carper (DE))	Washington, D.C.
July 26, 2017	\$500.00	Blumenauer for Congress (Rep. Earl Blumenauer (CT-03))	Washington, D.C.

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J.C. BOGGS - POLITICAL CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
March 22, 2017	\$500.00	KSNCGG	Washington, D.C.
February 28, 2017	\$500.00	McCaul for Congress, Inc. (Rep. Michael McCaul (TX-10))	Washington, D.C.

GEORGE C. CRAWFORD - POLITICAL CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
March 27, 2017	\$250.00	Gillibrand for Senate (Sen. Kirsten Gillibrand (NY))	Washington, D.C.
April 4, 2017	\$500.00	Pelosi for Congress (Rep. Nancy Pelosi (CA-12))	Washington, D.C.
April 26, 2017	\$500.00	Wyden for Senate (Sen. Ron Wyden (OR))	Washington, D.C.
May 18, 2017	\$500.00	Rosen for Nevada (Rep. Jacky Rosen (NV-03))	Washington, D.C.
June 6, 2017	\$1000.00	Kaine for Virginia (Sen. Tim Kaine (VA))	Washington, D.C.
June 21, 2017	\$1000.00	Carper for Senate (Sen. Tom Carper (DE))	Washington, D.C.

DANIEL C. CROSBY - POLITICAL CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
April 30, 2017	\$1000.00	KSNCGG	Washington, D.C.
June 2, 2017	\$2700.00	Kaine Victory Fund	Washington, D.C.
May 24, 2017	\$5000.00	Wyden for Oregon (Joint Fundraising Committee)	Washington, D.C.

LLOYD N. HAND - POLITICAL CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
February 28, 2017	\$416.66	KSNCGG	Washington, D.C.
March 31, 2017	\$83.33	KSNCGG	Washington, D.C.
April 30, 2017	\$83.33	KSNCGG	Washington, D.C.
May 31, 2017	\$83.33	KSNCGG	Washington, D.C.
June 30, 2017	\$83.33	KSNCGG	Washington, D.C.
July 31, 2017	\$83.33	KSNCGG	Washington, D.C.
March 6, 2017	\$500.00	Collins for Senate (Sen. Susan Collins (ME))	Washington, D.C.
March 27, 2017	\$500.00	Gillibrand for Senate (Sen. Kirsten Gillibrand (NY))	Washington, D.C.
April 17, 2017	\$500.00	Wyden for Oregon (Joint Fundraising Committee)	Washington, D.C.
April 17, 2017	\$500.00	Friends of Mark Warner (Sen. Mark Warner (VA))	Washington, D.C.
June 28, 2017	\$1000.00	Whitehouse for Senate (Sen. Sheldon Whitehouse (RI))	Washington, D.C.
March 28, 2017	\$500.00	Kathleen Murphy for Delegate (VA; state contribution)	Washington, D.C.
March 17, 2017	\$250.00	Susan Platt for Virginia (VA; state contribution)	Washington, D.C.

THOMAS J. SPULAK - POLITICAL CONTRIBUTIONS

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
February 28, 2017	\$416.66	KSNCGG	Washington, D.C.
March 31, 2017	\$416.66	KSNCGG	Washington, D.C.
April 30, 2017	\$416.66	KSNCGG	Washington, D.C.
May 31, 2017	\$416.66	KSNCGG	Washington, D.C.
June 30, 2017	\$416.66	KSNCGG	Washington, D.C.
July 31, 2017	\$416.66	KSNCGG	Washington, D.C.
March 31, 2017	\$500.00	Friends of Dan Kildee (Rep. Dan Kildee (MI-05))	Washington, D.C.

DATE	AMOUNT OR THING OF VALUE	POLITICAL ORGANIZATION OR CANDIDATE	LOCATION OF EVENT
March 8, 2017	\$500.00	Stephanie Murphy for Congress (Rep. Stephanie Murphy (FL-07))	Washington, D.C.
April 21, 2017	\$1000.00	Wyden for Senate (Sen. Ron Wyden (OR))	Washington, D.C.
March 2, 2017	\$1500.00	Re-Elect McGovern Committee (Rep. Jim McGovern (MA-02))	Washington, D.C.
March 27, 2017	\$500.00	Gillibrand for Senate (Sen. Kirsten Gillibrand (NY))	Washington, D.C.
June 19, 2017	\$1000.00	Mario Diaz-Balart for Congress (Rep. Mario Diaz-Balart (FL-25))	Washington, D.C.
June 12, 2017	\$600.00	BACKPAC (Rep. Don Beyer Jr. (VA-08) (Leadership PAC))	Washington, D.C.
February 28, 2017	\$500.00	Cooper for Congress (Rep. Jim Cooper (TN-05))	Washington, D.C.
June 7, 2017	\$500.00	Cooper for Congress (Rep. Jim Cooper (TN-05))	Washington, D.C.
June 8, 2017	\$1000.00	Granger Campaign Fund (Rep. Kay Granger (TX-12))	Washington, D.C.
June 9, 2017	\$1500.00	AMERIPAC: The Fund for a Greater America (Rep. Steny Hoyer (MD-05) (Leadership PAC))	Washington, D.C.
June 7, 2017	\$500.00	Ed Meier for Congress (Mr. Edward Meier (TX-32))	Washington, D.C.
June 28, 2017	\$250.00	Elizabeth Guzman for Delegate (VA; state contribution)	Washington, D.C.