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OMB No. 1124-0002; Expires June 30, 2023

U.S. Department of Justice

Washington, DC 20530

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

For 6 Month Period Ending 6-30-20
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

Sonoran Policy Group, LLC

(b) Registration Number

6399

(c) Primary Business Address

PO Box 52378
Washington, DC 20027

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.

None.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C[1], state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☒

If no, please file the updated Exhibit C.

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.)

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II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal	Date of Termination
Zari David (Eliezer) Kovo	4/7/2020
Reinaldo Munoz Pedroza	2/7/2020

8. Has the registrant added any new foreign principal(s)[2] during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal	Date Added
Reinaldo Munoz Pedroza	1/15/2020
Zari David (Eliezer) Kovo	1/17/2020
Saro Spadaro	3/02/2020
Hashim Mughal	5/15/2020

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

Government of Kenya (Ministry of Foreign Affairs)

Democratic Party of Albania

African Energy Chamber

Terra Peregrin, S.A.

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A[3] Yes ☒ No ☐ N/A ☐

Exhibit B[4] Yes ☒ No ☐ N/A ☐

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☒ No ☐

If yes, has the registrant filed an amendment to these exhibits? Yes ☒ No ☐

If no, please file 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.

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III - ACTIVITIES

11. During this 6 month reporting period, has the registrant 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 all activities and services:

Foreign Principal	Activities/Services
Please see the attachment at line 11, which identifies the activities and services relevant to each foreign principal.	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity[5] as defined below? Yes ☒ No ☐

If yes, identify each 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, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

Please see the attachment at line 12, which provides both a general description of the registrant's political activities and the detail required for each Foreign Principal as set forth in the table shown below.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services
None	

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.

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4. (a) 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

(b) 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 Ceased

5. (a) Has any person named in Item 4(a) 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.

Name	Foreign Principal(s) Represented	Services

(b) During this 6 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

(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

(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
Robert Stryk	Owner	Reinaldo Munoz Pedroza	2/7/2020
Robert Stryk	Owner	Zari David (Eliezer) Kovo	4/7/2020
Christian Bourge	Chief Executive Office	Reinaldo Munoz Pedroza	2/7/2020
Christian Bourge	Chief Executive Office	Zari David (Eliezer) Kovo	4/7/2020

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☐ No ☒

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

None

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IV - FINANCIAL INFORMATION

14. (a) **RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant 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, please explain why no monies were received.

Please see the attachment at line 14, which provides an account of such monies for each Foreign Principal separately.

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

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal

Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign[7], any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, has the registrant previously filed an Exhibit D[8] to its registration? Yes ☐ No ☐

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

If no, please file the required Exhibit D.

(c) **RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, has the registraint received any thing of value[9] 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	From Whom	Purpose	Thing of Value

6, 7 A registrant is required to file an Exhibit D if he/she 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.

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15. (a) **DISBURSEMENTS-MONIES**

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

Please see the attachment at line 15, which provides an account of such monies for each Foreign Principal separately

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.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal

Total

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(b) **DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value[10] 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:

Foreign Principal	Date	Recipient	Purpose	Thing of Value

(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value[11] 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	Donor	Political Organization/Candidate	Method	Amount/Thing of Value

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.

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V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?[12] Yes ☐ No ☒

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

☐ Magazine or newspaper ☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications
☐ Lectures or speeches ☐ Radio or TV broadcasts ☐ Motion picture films ☐ Letters or telegrams
☐ Email
☐ Website URL(s): _____
☐ Social media websites URL(s): _____
☒ Other *(specify)* none

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused 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)* none

20. Indicate the language used in the informational materials:

☐ English ☒ Other *(specify)* none

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☒

If no, please please file the required informational materials.

22. Has the registrant labeled 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.

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VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name		Signature[13]
July 30, 2020	Christian Bourge		/s/ Christian Bourge eSigned
		Sign	
		Sign	
		Sign	

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.

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SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)

SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2020

Response to Line 11.

Government of Kenya through the Ministry of Foreign Affairs: Consultant will provide U.S. Congressional and Executive Branch engagement to cement and deepen relations between Kenya and the U.S. Government as well as between the people of Kenya and the U.S. while assisting the Embassy of Kenya achieve its objectives on the issues of tourism, trade, investment and AGOA on an as-need and agreed-upon basis. NO ACTIVITY THIS PERIOD.

Democratic Party of Albania: Work with the Albanian opposition to build an anti- narcotics and anti-organized crime strategy for Albania, facilitate meetings and interactions with US Administration Officials for client, Congressional and Executive Branch engagement and economic issues, promote free enterprise, work with domestic law enforcement and international law enforcement agencies to contain and combat the epidemic of organized crime and perform any additional duties on an agreed-upon basis. SEE LINE 12, BELOW, FOR DETAILS OF MEETINGS

African Energy Chamber: Consultant will advise Client as to matters pertaining to the United States on an agreed-upon basis, including on potential interactions with the United States government, organizations and companies.; NO ACTIVITY THIS PERIOD.

Terra Peregrin, S.A.: Consultant will facilitate meetings and interactions with United States and United Kingdom stakeholders for Client on behalf of Isabel dos Santos and will perform additional duties on an agreed-upon basis. NO ACTIVITY THIS PERIOD.

Zari David (Eliezer) Kovo: Consultant will facilitate meetings and interactions with U.S. administration officials for Client and will perform additional duties on an agreed-upon basis. TERMINATED APRIL 7, 2020. NO ACTIVITY THIS PERIOD.

Saro Spadaro: Consultant will use reasonable best-efforts to facilitate meetings and interactions with U.S. administration officials, provide strategic advice on trade, Congressional and Executive Branch Engagement and economic issues, and will perform additional duties on an agreed-upon basis. The primary focus of the engagement is to remedy any issues with the United States Government, such that Mr. Spadaro is able to travel to-and-from the United States of America. NO ACTIVITY THIS PERIOD.

Hashim Mughal: Consultant will advocate for the release from Saudi Arabia detention of Salman bin Abdulaziz bin Salman Al Saud with the governments of the United States, United Kingdom, France, and the European Union based. in Brussels, Belgium. The client is a former senior associate of Salman bin Abdulaziz bin Salman Al Saud. NO ACTIVITY THIS PERIOD.

Reinaldo Munoz Pedroza: The Registrant is providing expert and advisory services to Foley & Lardner LLP ("Foley") to assist Foley in its legal representation of the Foreign Principal. The Registrant has been retained by Foley pursuant to 31 C.F.R. Sections 591.506(a) and 591.507, to perform only services ordinarily incident to the provision of legal services, including without limitation services typically provided by expert witnesses and consultants. The Registrant will assist Foley in the development of a

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narrative and strategy to advise the Foreign Principal on the requirements of, and compliance with, the law of the United States, including without limitation laws and regulations relating to U.S. economic sanctions. The Registrant will not provide any advocacy or lobbying services, and will act at all times pursuant to the direction and instruction of Foley. TERMINATED FEBRUARY 7, 2020. NO ACTIVITY THIS PERIOD.

Response to Line 12:

Foreign Principal	Date	Contact	Method	Purpose
Democratic Party of Albania	06/11/2020	Matthew Palmer, Deputy Assistant Secretary of State, U.S. Department of State	Telephone call	Diplomatic travel to the United States

Response to Line 14 (a)

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Government of Kenya (Ministry of Foreign Affairs)	1/14/2020	Embassy of the Republic of Kenya, Washington, DC	Contract payment	$300,000.00	$300,000.00
Reinaldo Munoz Pedroza	1/16/2020	Foley & Lardner LLP	Legal expert consulting fees	$2,000,000.00	$2,300,000.00
Zari David (Eliezer) Kovo	1/23/2020	Zari David (Eliezer) Kovo,	Contract payment	$50,000.00	$2,350,000.00
Terra Peregin S.A.	3/3/2020	Grosvenor Law Ltc.	Contract payment	$1,000,000.00	$3,350,000.00
Government of Kenya (Ministry of Foreign Affairs)	3/12/2020	Embassy of the Republic of Kenya,	Contract payment	$300,000.00	$3,650,000.00

		Washington, DC			
Democratic Party of Albania	3/26/2020	Democratic Party of Albania	Contract payment	$10,000.00	$3,660,000.00
Terra Peregin S.A.	4/2/2020	Grosvenor Law Ltd.	Contract payment	$200,000.00	$3,860,000.00
Government of Kenya (Ministry of Foreign Affairs)	6/2/2020	Embassy of the Republic of Kenya, Washington, DC	Contract payment	$365,000.00	$4,225,000.00
Democratic Party of Albania	6/19/2020	Democratic Party of Albania	Contract payment	$30,000.00	$4,255,000.00
Terra Peregin S.A.	6/23/2020	Grosvenor Law Ltd	Contract payment	$50,000.00	$4,305,000.00
Hashim Mughal	None	None	None	$0.00	$4,305,000.00
African Energy Chamber	None	None	None	$0.00	$4,305,000.00
TOTAL					$4,305,000.00

Response to Line 15 (a)

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Reinaldo Munoz Pedroza	1/24/2020	U.S. Department of Justice	FARA Filing Fee	$305.00	$305.00
Zari David (Eliezer) KOVO	1/25/2020	U.S. Department of Justice	FARA Filing Fee	$305.00	$610.00
Saro Spadaro	3/9/2020	U.S. Department of Justice	FARA Filing Fee	$305.00	$915.00
Zari David (Eliezer) Kovo	4/7/2020	Zari David (Eliezer) Kovo	Refund of contract fees received by the Registrant on 1/23/2020. This	$50,000.00	$50,915.00

			refund was due to termination of contract with the Foreign Principal.		
Hashim Mughal	5/18/2020	U.S. Department of Justice	FARA Filing Fee	$305.00	$51,220.00
				TOTAL	$51,220.00