

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 Dec. 31, 2020
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant	(b) Registration Number
King & Spalding LLP	6501
(c) Primary Business Address	
1180 Peachtree Street, NE Atlanta, GA 30309	

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 <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
- (c) Explain fully all changes, if any, indicated in Items (a) and (b) above.
n/a

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

3. If the registrant previously filed an Exhibit C¹, 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.)

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
Partners join the firm on a regular basis; none are affiliated with the foreign principal.				

(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
Partners leave the firm on a regular basis; none were affiliated with the foreign principal.		

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
n/a		

(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
n/a				

(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
n/a		

(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
n/a			

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.

n/a

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

n/a

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

n/a

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.

Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia (MEIM) and King Abdullah City for Atomic and Renewable Energy (KA CARE)

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

Exhibit A³ Yes No N/A

Exhibit B⁴ 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.

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
Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia (MEIM) and the King Abdullah City for Atomic and Renewable Energy (KA CARE)	Registrant advised the foreign principal in connection with a potential bilateral agreement on cooperation with the United States concerning peaceful uses of nuclear energy under Section 123 of the Atomic Energy Act of 1954 and related legal matters concerning the development of a commercial nuclear program within Saudi Arabia.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ 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.

Registrant advised the Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia (MEIM) and the King Abdullah City for Atomic and Renewable Energy (KA CARE) on the US procedure for considering and agreeing to a 123 Agreement and on the US political system.

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

Foreign Principal	Date	Contact	Method	Purpose
n/a				

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
n/a	

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, 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.

n/a

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
Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia (MEIM) and the King Abdullah City for Atomic and Renewable Energy (KA CARE)	December 24, 2020	Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia (MEIM) and the King Abdullah City for Atomic and Renewable Energy (KA CARE)	Payment for services rendered.	\$453,136.29	\$453,136.29
					\$453,136.29
					<u>Total</u>

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant 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, has the registrant previously filed an Exhibit D⁸ to its registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date n/a

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant 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	From Whom	Purpose	Thing of Value
n/a				

^{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.

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.

Registrant did not make any disbursements on behalf of the foreign principal in the reporting period.

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
n/a					

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant 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:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
n/a				

(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 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	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
See Appendix.				

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, 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.

n/a

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
n/a		

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*) _____

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*) _____

20. Indicate the language used in the informational materials:

- English Other (*specify*) _____

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.

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	
January 30, 2021	Thomas J. Spulak	/s/ Thomas J. Spulak	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.

KING & SPALDING LLP**Appendix to Supplemental Statement****Reporting Period: July 1 – December 31, 2020****15(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 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.**

If yes, furnish the following information:

Date	Donor	Political Organization / Candidate	Method	Amount / Thing of Value (\$)
6/22/2020	King & Spalding Nonpartisan Committee for Good Government (KSNCGG)	Hastings for Congress (FL)	Wire transfer	5,000.00
6/22/2020	KSNCGG	Clarke for Congress (NY)	Wire transfer	3,500.00
6/29/2020	KSNCGG	Josh Gottheimer for Congress (NJ)	Wire transfer	1,000.00
6/29/2020	KSNCGG	Val Demings for Congress (FL)	Wire transfer	1,500.00
6/29/2020	KSNCGG	Reed for Congress (NY)	Wire transfer	1,000.00
6/29/2020	KSNCGG	McCaul for Congress Inc (TX)	Wire transfer	5,000.00
6/29/2020	KSNCGG	Hoyer for Congress (MD)	Wire transfer	2,500.00
6/30/2020	KSNCGG	Ben Sasse for US Senate Inc. (NE)	Wire transfer	3,500.00
9/23/2020	KSNCGG	Castro for Congress (TX)	Wire transfer	2,500.00

Date	Donor	Political Organization / Candidate	Method	Amount / Thing of Value (\$)
10/26/2020	KSNCGG	Adam Schiff for Congress (CA)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Friends of Rosa DeLauro (CT)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Gerry Connolly for Congress (VA)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Barragan for Congress (CA)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Lisa Blunt Rochester for Congress (DE)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Dwight Evans for Congress (PA)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Ted Deutch for Congress (FL)	Wire transfer	1,000.00
10/26/2020	KSNCGG	French Hill for Arkansas (AK)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Jimmy Gomez for Congress (CA)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Bilirakis for Congress (FL)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Moore for Congress (WI)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Robin Kelly for Congress (IL)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Debbie for Congress (FL)	Wire transfer	2,000.00
10/26/2020	KSNCGG	Maloney for Congress (NY)	Wire transfer	1,000.00
10/26/2020	KSNCGG	Kweisi Mfume for Congress (MD)	Wire transfer	2,000.00
10/26/2020	KSNCGG	Tom O'Halleran for Congress (AZ)	Wire transfer	1,000.00

Date	Donor	Political Organization / Candidate	Method	Amount / Thing of Value (\$)
10/26/2020	KSNCGG	Harley Rouda for Congress (CA)	Wire transfer	1,000.00
10/28/2020	KSNCGG	Bucshon for Congress (IN)	Wire transfer	1,000.00
10/28/2020	KSNCGG	Tim Ryan for Congress (OH)	Wire transfer	3,000.00
10/28/2020	KSNCGG	Liz Cheney for Wyoming (WY)	Wire transfer	2,500.00
10/28/2020	KSNCGG	Nikema for Congress Inc. (GA)	Wire transfer	1,000.00
10/28/2020	KSNCGG	Joe Neguse for Congress (CO)	Wire transfer	1,500.00
10/28/2020	KSNCGG	Friends of Lucy McBath (GA)	Wire transfer	1,000.00
10/28/2020	KSNCGG	Joni for Iowa (IA)	Wire transfer	2,500.00
10/28/2020	KSNCGG	Mike Kelly for Congress (PA)	Wire transfer	1,000.00
10/28/2020	KSNCGG	Friends of Roy Blunt (MO)	Wire transfer	2,500.00
10/28/2020	KSNCGG	Bill Cassidy for US Senate (LA)	Wire transfer	2,500.00
10/28/2020	KSNCGG	Kurt Schrader for Congress (OR)	Wire transfer	1,000.00
10/28/2020	KSNCGG	Capito for West Virginia (WV)	Wire transfer	2,500.00
10/29/2020	KSNCGG	McConnell Senate Committee (KY)	Wire transfer	2,500.00
10/29/2020	KSNCGG	Thom Tillis Committee (NC)	Wire transfer	2,500.00
10/29/2020	KSNCGG	Sanford Bishop for Congress (GA)	Wire transfer	1,500.00

Date	Donor	Political Organization / Candidate	Method	Amount / Thing of Value (\$)
12/28/2020	KSNCGG	Perdue for Senate Inc. (GA)	Wire transfer	5,000.00
12/28/2020	KSNCGG	Georgians for Kelly Loeffler (GA)	Wire transfer	5,000.00
8/4/2020	Thomas J. Spulak	Stephanie Murphy for Congress (FL)	Online/credit card	1,000.00
8/31/2020	Thomas J. Spulak	BACKPAC	Online/credit card	1,000.00
8/31/2020	Thomas J. Spulak	Virginia House Victory PAC	Online/credit card	1,500.00
8/31/2020	Thomas J. Spulak	Elaine for Congress (VA)	Online/credit card	500.00
8/31/2020	Thomas J. Spulak	Spanberger for Congress (VA)	Online/credit card	500.00
9/14/2020	Thomas J. Spulak	Victory 2020	Online/credit card	1000.00
9/16/2020	Thomas J. Spulak	Dr. Cameron Webb for Congress (VA)	Online/credit card	500.00
9/21/2020	Thomas J. Spulak	AB PAC	Online/credit card	500.00
9/21/2020	Thomas J. Spulak	Carper for Senate (DE)	Online/credit card	500.00
9/21/2020	Thomas J. Spulak	Unite the Country	Online/credit card	500.00
9/30/2020	Thomas J. Spulak	Wexton for Congress (VA)	Online/credit card	500.00
10/6/2020	Thomas J. Spulak	Cartwright for Congress (PA)	Online/credit card	500.00
10/12/2020	Thomas J. Spulak	Common Ground PAC	Online/credit card	1500.00
10/12/2020	Thomas J. Spulak	Hoyer for Congress (MD)	Online/credit card	1000.00
10/18/2020	Thomas J. Spulak	Pallone for Congress (NJ)	Online/credit card	1500.00

Date	Donor	Political Organization / Candidate	Method	Amount / Thing of Value (\$)
10/19/2020	Thomas J. Spulak	Florida Democratic Majority	Online/credit card	1000.00
10/26/2020	Thomas J. Spulak	Kweisi Mfume for Congress (MD)	Online/credit card	1000.00
11/3/2020	Thomas J. Spulak	Margaret Good for Congress (FL)	Online/credit card	500.00
9/17/2020	Thomas J. Spulak	Morrissey for AG (WV)	Online/credit card	500.00
10/19/2020	Thomas J. Spulak	FL Democratic Majority Fund	Online/credit card	1000.00
7/30/2020	Thomas J. Spulak	KSNCGG	Payroll deduction	416.66
8/30/2020	Thomas J. Spulak	KSNCGG	Payroll deduction	416.66
9/30/2020	Thomas J. Spulak	KSNCGG	Payroll deduction	416.66
10/30/2020	Thomas J. Spulak	KSNCGG	Payroll deduction	416.66
11/30/2020	Thomas J. Spulak	KSNCGG	Payroll deduction	416.66
12/30/2020	Thomas J. Spulak	KSNCGG	Payroll deduction	416.66