

U.S. Department of Justice
Washington, DC 20530

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

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

<p>1. Name and Address of Registrant Pillsbury Winthrop Shaw Pittman LLP Four Embarcadero Center, 22nd Floor San Francisco, CA 94111</p>	<p>2. Registration No. 5198</p>
<p>3. Name of Foreign Principal Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia</p>	<p>4. Principal Address of Foreign Principal Postal Code 11191 Riyadh Kingdom of Saudi Arabia</p>

5. Indicate whether your foreign principal is one of the following:

- Government of a foreign country¹
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
 - Partnership
 - Corporation
 - Association
 - Committee
 - Voluntary group
 - Other (specify) _____
- Individual-State nationality _____

6. If the foreign principal is a foreign government, state:

- a) Branch or agency represented by the registrant
Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia
- b) Name and title of official with whom registrant deals

7. If the foreign principal is a foreign political party, state:

- a) Principal address
N/A
- b) Name and title of official with whom registrant deals
- c) Principal aim

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

N/A

b) Is this foreign principal:

- | | |
|---|--|
| Supervised by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Owned by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Directed by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Controlled by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Financed by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Subsidized in part by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> |

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

N/A

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and 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 of Exhibit A	Name and Title	Signature	
February 19, 2018	Stephan E. Becker, Partner	/s/ Stephan E. Becker	eSigned

U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.* for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Pillsbury Winthrop Shaw Pittman LLP

2. Registration No.

5198

3. Name of Foreign Principal

Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia

Check Appropriate Box:

4. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant will advise the Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia 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 by the King Abdullah City for Atomic and Renewable Energy.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

See response to item 7.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant will advise the Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia 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 by the King Abdullah City for Atomic and Renewable Energy.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and 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 of Exhibit B	Name and Title	Signature
February 19, 2018	Stephan E. Becker, Partner	/s/ Stephan E. Becker eSigned

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which 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 the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Becker, Stephan E.

From: David Kultgen <David.Kultgen@outlook.com>
Sent: Saturday, February 17, 2018 8:00 PM
To: Huttler, Stephen B.
Cc: Merrifield, Jeffrey S.; Becker, Stephan E.; Thunayan, Turki A (turki.thunayan@meim.gov.sa); Mohammed I. Alshubrumi (mohammed.alshubrumi@meim.gov.sa); David Kultgen
Subject: RE: MEIM/ Pillsbury/ initial engagement

Steve:

I am pleased to confirm that the terms of engagement set out in your email (sent Saturday, February 17, 2018 12:49 PM) are acceptable. I have been advised by MEIM that such terms and conditions are acceptable to MEIM.

Regards,

Dave

David B. Kultgen
The Law Office of David B. Kultgen, PLLC
11841 Overlook Pass
Austin, Texas 78738
+1 (512) 582 0853(o)
+1 (512) 586 4692(m)

From: Huttler, Stephen B. [mailto:stephen.huttler@pillsburylaw.com]
Sent: Saturday, February 17, 2018 12:49 PM
To: David Kultgen <David.Kultgen@kultgenlaw.net>; David B. Kultgen (David.Kultgen@outlook.com) <David.Kultgen@outlook.com>
Cc: Merrifield, Jeffrey S. <jeff.merrifield@pillsburylaw.com>; Becker, Stephan E. <stephan.becker@pillsburylaw.com>
Subject: MEIM/ Pillsbury/ initial engagement

Dear David,

We have been asked to provide legal assistance to the Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia ("MEIM") for an initial term of approximately thirty days. We are prepared to do so on the following conditions:

1. The scope of our assistance during the initial term will be to advise MEIM 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 ("123 Agreement") and related legal matters concerning the development of a commercial nuclear program.

2. Our fees will be based on an agreed "blended" billing rate of \$890/hr. for each attorney devoting time to this matter. We will bill for our services at the end of the month, and MEIM agrees to pay such invoice promptly following receipt.

3. Our client will be MEIM, and not any affiliated or constituent individuals or entities, such as any subsidiary entities, government officials, or employees. MEIM agrees that this representation does not create a conflict of interest with any such non-represented entities or individuals in the event the firm represents other clients adversely to them. MEIM also agrees that our assistance pursuant to this agreement will not preclude the firm from working on other matters associated with the civil nuclear power program of the Kingdom of Saudi Arabia for other new or existing clients, including matters adverse to MEIM, if our work with respect to the *Saudi National Atomic Energy Project* does not extend past the initial 30-day period of this arrangement (or as such initial term may be extended).

4. The initial term may be extended by mutual agreement, confirmed by an email from both parties.

5. The parties anticipate executing a formal engagement letter to provide for legal services beyond the initial term, as it may be extended.

Please review this email and let us know if you or MEIM have any questions. If these terms are acceptable, please confirm by email. By doing so, you are confirming that you have been advised by MEIM that such terms and conditions are acceptable to MEIM.

We thank you for this opportunity to be of service.

With kind regards,
Steve

Stephen B. Huttler | Senior Partner
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street NW | Washington, DC 20036-3006
t 202.663.8121 | m 202.415.9640
stephen.huttler@pillsburylaw.com | [website bio](#)

ABU DHABI AUSTIN BEIJING DUBAI HONG KONG HOUSTON LONDON
LOS ANGELES MIAMI NASHVILLE NEW YORK NORTHERN VIRGINIA
PALM BEACH SACRAMENTO SAN DIEGO SAN DIEGO NORTH COUNTY
SAN FRANCISCO SHANGHAI SILICON VALLEY TOKYO WASHINGTON, DC



The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Help Desk at Tel: 800-477-0770, Option 1, immediately by telephone or by return E-mail and delete this message, along with any attachments, from your computer. Thank you.