

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 06/30/2019  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant (b) Registration No.
- Sonoran Policy Group, LLC 6399
- (c) Business Address(es) of Registrant  
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.  
N/A

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

3. If you have previously filed Exhibit C<sup>1</sup>, 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.

<sup>1</sup> 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.

N/A

(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
Anne Ekern	13252 Audrain Road 913 Mexico, MO 65265	USA	Employee	02/06/2019

(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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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	Date of Termination
Embassy of Iceland	January 23, 2019
Federal Government of Somalia	March 31, 2019
Ms. Zury Mayte Rios Sosa de Weller	June 30, 2019

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes  No   
If yes, furnish th following information:

Name and Address of Foreign Principal(s)	Date Acquired
Mr. Saud A. A. Al Arfaj PO Box 2410 safat 13025 Kuwait	2/11/2019
Ms. Zury Mayte Rios Sosa de Weller 2 de Calle "B" 13-76 Colonia Tecun Uman Zona 15, Guatemala	04/19/2019
Elite Consulting Group c/o Aden Osham Hussein Airport Road, Mogadashu, Somalia	06/24/2019

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

Government of Kenya  
Embassy of the Kingdom of Bahrain  
Democratic Party of Albania

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

Exhibit A<sup>3</sup> Yes  No   
Exhibit B<sup>4</sup> 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.

<sup>2</sup> 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.)

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

<sup>4</sup> 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:

See Attachment Line 11

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> 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.

See Attachment, Line 12

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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.

N/A

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<sup>5</sup> "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.

N/A

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

Date	From Whom	Purpose	Amount
See Attachment, Line 14			

Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, 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 D<sup>8</sup> 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 value<sup>9</sup> 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
N/A			

<sup>6, 7</sup> 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)).

<sup>8</sup> 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.

<sup>9</sup> 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.

N/A

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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See Line  
Attachment, Line  
15(a)

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Total

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

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> 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
N/A				

**(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<sup>11</sup> 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
N/A			

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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?<sup>12</sup>

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.

The Embassy of the Kingdom of Bahrain in the United States of America compensated the registrant to assist in hosting a reception. The copy of the invitation is included as an attachment to this report.

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*) constant contact email for The Embassy of the Kingdom of Bahrain reception \_\_\_\_\_

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*) N/A \_\_\_\_\_

21. What language was used in the informational materials:

- English       Other (*specify*) N/A \_\_\_\_\_

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

<sup>12</sup> 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 signature<sup>13</sup>)

July 30, 2019



/s/ Christian Bourge

eSigned

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

<sup>13</sup> 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.

**SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)**

**SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2019**

Response to Line 11:

**Federal Government of Somalia:** Consultant was retained to facilitate meetings and interactions with U.S. administration officials for Client; provide U.S. Congressional and Executive Branch engagement; and provide counsel on strategic defense, counter-terrorism, and security matters along with engagement on such issues with relevant U.S. government agencies as well as any additional duties on an agreed-upon basis. **NO ACTIVITY THIS PERIOD – TERMINATED MARCH 31, 2019**

**Embassy of the Republic of Kenya:** 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. **SEE LINE 12, BELOW, FOR DETAILS OF MEETINGS;**

**Embassy of Iceland, Washington, DC:** **NO ACTIVITY – TERMINATED JANUARY 23, 2019.**

**Embassy of The Kingdom of Bahrain:** Meetings and interactions with U.S. administration officials for client on matters related to defense, trade, and security issues; Assisted in preparing and directing a reception for the Minister of the Interior **SEE LINE 12, BELOW, FOR DETAILS OF MEETINGS;**

**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; **NO ACTIVITY THIS PERIOD**

**Mr. Saud A.A. Al Arfaj:** Promotion and counsel for client and his private companies including on disputed oil region between Kuwait and Saudi Arabia. Consultant shall act solely as an independent contractor, not as an employee or agent of Client. **NO ACTIVITY THIS PERIOD**

**Zury Mayté Ríos Sosa de Weller:** Advise Client's campaign for President of Guatemala as related to the United States and will perform additional duties on an agreed-upon basis. Consultant will help Client promote the right of all Guatemalan citizens to participate in free and fair elections in opposition to all those whose aim is to subvert the will of the Nation's citizenry from both within, as well as from outside the Nation's borders. **NO ACTIVITY THIS PERIOD – TERMINATED JUNE 30, 2019**

**Elite Consulting Group:** Provide US Congressional and Executive Branch Engagement and provide counsel on Somalia related to democracy, constitution, elections, rule of law and governance; **NO ACTIVITY THIS PERIOD**

**SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)****SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2019**

Response to Line 12:

Client	Short Form	Date	Contact Name	Title	Type	Issue
Bahrain	Christian Bourge	1/22/2019	Chris Socha	Senate Foreign relations Committee Staff Director Chris Socha	In-Person	general policy matters
Bahrain	Christian Bourge	2/7/2019	Rep. Bill Keating	Congressman	In-Person	general policy matters
Bahrain	Christian Bourge	4/10/2019	Tim Lenderking	Deputy Assistant Secretary of State for Arabian Gulf Affairs, U.S. Department of State.	In-Person	general policy matters
Bahrain	Christian Bourge	5/9/2019	James Libovic	Branch Manager, International Industry , Representatives, Policy, Plans, and Engagement , TSA	In-Person	Manama Airport Exspansion
Bahrain	Christian Bourge	5/9/2019	Danielle Fraher Smith	Program Analyst, Global Affairs, Preclerance Program, Office of Global Strategies TSA	In-Person	Manama Airport Exspansion
Bahrain	Christian Bourge	5/9/2019	Paul Fujimura	Assistant Administration, Office of Global Strategies TSA	In-Person	Manama Airport Exspansion

## SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)

## SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2019

Bahrain	Christian Bourge	5/9/2019	Andrew Haas	Regional Desk Officer Team Lead for Africa/Middle East TSA	In-Person	Manama Airport Expansion
Bahrain	Christian Bourge	6/11/2019	Rep. Jim Langevin	Congressman	In-Person	general policy matters
Bahrain	Christian Bourge	6/11/2019	Jarad Stout	Military Legislative Fellow	In-Person	general policy matters
Kenya	Anne Ekern	2/25/2019	Rudy Sheffer	Personal aide SecAF Wilson, DoD	Phone	follow up on FMS
Kenya	Anne Ekern	2/25/2019	Rudy Sheffer	Personal aide SecAF Wilson, DoD	eMail	follow up on FMS
Kenya	Anne Ekern	3/4/2019	Rudy Sheffer	Personal aide SecAF Wilson, DoD	eMail	follow up on FMS
Kenya	Anne Ekern	3/6/2019	Rudy Sheffer	Personal aide SecAF Wilson, DoD	eMail	follow up on FMS
Kenya	Anne Ekern	3/6/2019	Evette Strain	Regional director at US Air Force, DoD Internal Affairs	Phone	follow up on FMS
Kenya	Anne Ekern	3/25/2019	Aaron Jost	Deputy Director Office of Regional Security and Arms Transfers, State Dept.	In-Person	FMS
Kenya	Anne Ekern	3/25/2019	Sonya Weston	Foreign Affairs Officer, State Dept.	In-Person	FMS
Kenya	Anne Ekern	3/25/2019	James Lowen	Regional Director international security affairs office of african affairs, DoD	In-Person	FMS

**SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)****SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2019**

Kenya	Anne Ekern	3/25/2019	Ken Comer	Team Lead, Foreign Military Sales, State Dept.	In-Person	FMS
Kenya	Christian Bourge	3/25/2019	Aaron Jost	Deputy Director Office of Regional Security and Arms Transfers, State Department	In-Person	DCM meeting regarding FMS
Kenya	Christian Bourge	3/25/2019	Sonya Weston	Foreign Affairs Officer, State Department	In-Person	DCM meeting regarding FMS
Kenya	Christian Bourge	3/25/2019	James Lowen	Regional Director international security affairs office of african affairs, Department of Defence	In-Person	DCM meeting regarding FMS
Kenya	Christian Bourge	3/25/2019	Ken Comer	Team Lead, Foreign Military Sales, State Department	In-Person	DCM meeting regarding FMS
Kenya	Christian Bourge	4/10/2019	Joe Weir	Director for Defense Policy and Strategy, NSC	In-Person	Intro to Kenya DCM

## SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)

## SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2019

Response to Line 14. (a):

Client		Date	Amount
Federal Government of Somalia	NO PAYMENTS RECEIVED	N/A	0.00 (Terminated March 31, 2019)
Government of Kenya	Contract Payments	14-Jan \$499,965.00 1-Mar \$300,000.00 25-Mar \$300,000.00 23-May \$300,000.00	\$ 1,399,965.00
Embassy of Iceland	NO PAYMENTS RECEIVED	N/A	0.00 (Terminated January, 2019)
Embassy of The Kingdom of Bahrain	Contract Payments	3/5 \$50,000 3/21- \$75,000 6/10 - \$125,000	\$ 250,000.00
Democratic Party of Albania	Contract Payment	6/14/2019	\$40,000.00
Mr. Saud A.A. Al Arfaj	Contract Payment	02/11/2019	\$600,000.00
Zury Mayté Ríos Sosa de Weller	NO PAYMENTS RECEIVED	N/A	\$0.00 (Terminated June, 2019)
Elite Consulting Group:	NO PAYMENTS RECEIVED	N/A	0.00
		<b>Total</b>	<b>\$ 2,289,965.00</b>

## SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)

## SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING JUNE 30, 2019

Response to Line 15(a):

01/30/2019	Ward & Lawless LLC	Administrative	Compliance Services and Reimbursement of FARA Filing Fees	\$1,120.00
02/13/2019	Ward & Lawless LLC	Administrative	Compliance Services and Reimbursement of FARA Filing Fees	\$1,732.50
				2,852.50
4/10/2019	Constant Contact	Reception: Minister of Interior, Bahrain	Graphic BAH Flag	8.00
4/10/2019	Constant Contact	Reception: Minister of Interior, Bahrain	Additional Graphics	8.00
4/10/2019	Alamo Flag Co of VA inc.	Reception: Minister of Interior, Bahrain	Country Flags	1,125.73
4/10/2019	Baldwin Graphics	Reception: Minister of Interior, Bahrain	Name tags, table mounts	295.70
4/10/2019	Simone Baron	Reception: Minister of Interior, Bahrain	Pianist	300.00
4/10/2019	Namecheap.com	Reception: Minister of Interior, Bahrain	Domain Purchase	13.16
			SUBTOTAL	1,750.59
			<b>Total</b>	<b>\$4,603.09</b>



**The Embassy of the Kingdom of Bahrain  
in the United States of America**

requests the pleasure of your company  
at a reception featuring

**His Excellency Gen. Shaikh Rashed bin Abdulla Al Khalifa**  
The Minister of Interior of the Kingdom of Bahrain

**The Decatur House**  
1610 H Street, NW Washington D.C. 20006  
Enter at 748 Jackson Place NW  
**Wednesday, April 10, 2019 at 6:30 PM**

Dress Code: Business Attire