

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 12-31-19
(Insert date)

I - REGISTRANT

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

Sonoran Policy Group 6399

(c) Business Address(es) of Registrant

PO Box 25378
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 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.

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
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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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Anne Ekern	Employee	10/20/19
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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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Anne Ekern	Employee	All	10/20/19
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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
Elite Consulting Group	12/31/19
Embassy of the Kingdom of Bahrain	10/5/19
Mr. Saud A.A. Al Arfaj	12/31/19

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

Name and Address of Foreign Principal(s)	Date Acquired
Terra Peregrin, S.A. Avenida da Liberdade no 190, 1.º B Lisboa, Portugal 1250-147	12/13/19
African Energy Chamber Suite 24 Katherine & West 114 West Street Sandton, Johannesburg, South Africa	08/14/19

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.

Government of Kenya (Ministry of Foreign Affairs)
Democratic Party of Albania;

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

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 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.

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

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.

N/A

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
See attachment, Line 14 (a).			

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.

See attachment, Line 15 (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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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
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 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
N/Y			

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.

N/A/

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.

N/A

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)

January 30, 2020

/s/ Christian Bourge

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.

SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)
SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING DECEMBER 31, 2019

Line 11.

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. NO ACTIVITY THIS PERIOD

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. SEE LINE 12, BELOW, FOR DETAILS OF MEETINGS; TERMINATED OCTOBER 5, 2019

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

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; TERMINATED; TERMINATED DECEMBER 31, 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; TERMINATED DECEMBER 31, 2019

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

SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)
 SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING DECEMBER 31, 2019

Response to Line 12:

Client	Short Form	Date	Contact Name	Title	Type	Issue
Democratic Party of Albania	Christian Bourge	10/18/2019	Robert Karem	NSA. Sen. Mitch McConnell	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/18/2019	Luke Murray	NSA, Rep. Kevin McCarthy	Phone/Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Luke Murray	NSA, Rep. Kevin McCarthy	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Omri Ceren	NSA, Sen. Ted Cruz	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Darlene Murray	Office Manager, Rep. Elliot Engel	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Bubba White	LA, Rep. Michael Guest	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Debra Boutwell	Scheduler, Rep. Michael Guest	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Jen Jett	EA, Sen. Roger Wicker	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Patrick Thompson	NSA, Sen. Roger Wicker	Email	Meeting
Democratic Party of Albania	Christian Bourge	10/21/2019	Anderson Helton	Special Asst., Sen. Roger Wicker	Email	Meeting
Bahrain	Christian Bourge	7/11/2019	Rep. Brad Sherman	Rep. Brad Sherman	In person	General Policy Matters
Bahrain	Christian Bourge	7/11/2019	Johan S. Propst	Rep. Brad Sherman	In person	General Policy Matters
Bahrain	Christian Bourge	9/10/2019	Jonathan Green	MLA, Rep. Jason Crow	In person	General Policy Matters
Bahrain	Christian Bourge	9/10/2019	Rep. Jason Crow	Rep. Jason Crow	In person	General Policy Matters

SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)
 SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING DECEMBER 31, 2019

Response to Line 14. (a):

Client		Date	Amount
African Energy Chamber	Contract payment	7.29.19	\$19,980.00
African Energy Chamber	Contract payment	10.4.19	\$19,980.00
Government of Kenya (Ministry of Foreign Affairs)	Contract payment	8.5.19	\$300,000.00
Government of Kenya (Ministry of Foreign Affairs)	Contract payment	10.15.19	\$300,000.00
Embassy of the Kingdom of Bahrain	Contract payment	10.5.19	\$54,795.00 (Terminated October 5, 2019)
Terra Peregrin,S.A.	Contract payment	12.13.19	\$450,000.00
Democratic Party of Albania	No Payment Received	N/A	\$0.00
Mr. Saud A.A. Al Arfaj	No Payment Received	N/A	\$0.00 (Terminated December 31, 2019)
Elite Consulting Group	No Payment Received	N/A	\$0.00 (Terminated December 31, 2019)
		Total	\$1,144,935.00

SONORAN POLICY GROUP, LLC (REGISTRATION NUMBER 6399)
 SUPPLEMENTAL STATEMENT FOR THE PERIOD ENDING DECEMBER 31, 2019

Response to Line 15(a):

7/19/19	Ward & Lawless LLC	Administrative	Compliance Services and Reimbursement of FARA Filing Fees	\$4,657.50
9/19/19	Ward & Lawless LLC	Administrative	Compliance Services and Reimbursement of FARA Filing Fees	\$1,165.00
9/19/19	Ward & Lawless LLC	Administrative	Compliance Services and Reimbursement of FARA Filing Fees	\$2,841.25
10/28/19	Ward & Lawless LLC	Administrative	Compliance Services and Reimbursement of FARA Filing Fees	\$5,395.00
12/23/19			FARA Filing Fee	305.00
			Total	\$14,363.65