

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 12/31/2023  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant  
King & Spalding LLP
- (b) Registration Number  
6501
- (c) Primary Business Address  
1180 Peachtree Street, NE, Suite 1600, 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.

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

3. If the registrant previously filed an Exhibit C<sup>1</sup>, 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.

<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 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
See Appendix for Response				

(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
See Appendix for Additional Names		

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, did any employee or individual working in any capacity, other than in a clerical or secretarial capacity or in a related or similar capacity, begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s)?

Yes  No

Name	Foreign Principal	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

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.

**II - FOREIGN PRINCIPAL**

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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
America-Georgia Economic Cooperation Foundation	07/13/2023

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8. Has the registrant registered for any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Foreign Principal	Date Registered
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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 this 6 month reporting period.

The Honorable Moise Katumbi Chapwe  
Ministry of Energy of the Kingdom of Saudi Arabia

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10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A<sup>3</sup> and/or B<sup>4</sup> previously filed for any foreign principal(s)? Yes  No

If no, and there is a change to any Exhibit A and/or B, please file an amendment if it is required.

If yes, furnish the following information:

Foreign Principal	Date Amended
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<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**

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
The Honorable Moise Katumbi Chapwe	Registrant represented Hon. Katumbi before the U.S. Congress and Executive Branch to promote human rights and free, fair, and inclusive elections in the Democratic Republic of Congo.
Ministry of Energy of the Kingdom of Saudi Arabia	No Activities
America-Georgia Economic Cooperation Foundation	No Activities

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

Ministry of Energy of the Kingdom of Saudi Arabia: No Political Activity

America-Georgia Economic Cooperation Foundation: No Political Activity

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

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

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

<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, 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.

The Honorable Moise Katumbi Chapwe: Fees for representation of Hon. Katumbi were paid in the first-half of 2023.  
America-Georgia Economic Cooperation Foundation: The representation of the America-Georgia Economic Cooperation Foundation ended on July 13, 2023; consequently, no monies were received.

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

Foreign Principal See Appendix for Response	Date Received	From Whom	Purpose	Amount	Subtotal
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\$ 7,201,306.47

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant 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, has the registrant previously filed an Exhibit D<sup>8</sup> 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 registrant 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	From Whom	Purpose	Thing of Value
Ministry of Energy of the Kingdom of Saudi Arabia				None
America-Georgia Economic Cooperation Foundation				None

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

<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, 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.

See Appendix for Response

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
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Total

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

During this 6 month reporting period, has the registrant 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:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
Ministry of Energy of the Kingdom of Saudi Arabia				None
America-Georgia Economic Cooperation Foundation				None

**(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<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	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
See Appendix for Response				

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?<sup>12</sup> 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.

The Honorable Moise Katumbi Chapwe

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
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Total

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:

- |  |   |   |  |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper               | <input type="checkbox"/> Advertising campaigns  | <input type="checkbox"/> Press releases       | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches                | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams            |
| <input checked="" type="checkbox"/> Email                    |   |   |  |
| <input type="checkbox"/> Website URL(s): _____               |   |   |  |
| <input type="checkbox"/> Social media websites URL(s): _____ |   |   |  |
| <input type="checkbox"/> 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:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Public officials       | <input type="checkbox"/> Newspapers                   | <input type="checkbox"/> Libraries                |
| <input checked="" type="checkbox"/> Legislators | <input type="checkbox"/> Editors                      | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies    | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups       |
| <input type="checkbox"/> 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 file the required informational materials.

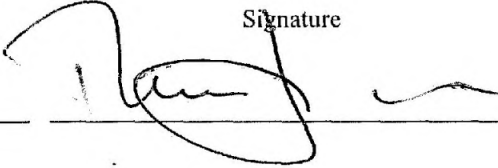
22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act? Yes  No

<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.



**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
February 2, 2024	Thomas J. Spulak	
_____	_____	_____
_____	_____	_____
_____	_____	_____

**Appendix**  
**Response to Item 4(a) Attached**

**Item 4(a): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? If yes, furnish the following information:**

List of Persons Who Were Added As Partners/Officers/Directors

*Have any persons become partners, officers, directors or similar officials during this 6-month reporting period?*

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

**Appendix**  
**Response to Item 4(b) Attached**

**Item 4(b): Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? If yes, furnish the following information:**

List of Persons Who Were Ceased As Partners/Officers/Directors

*Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6-month reporting period?*

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

## Appendix

### Response to Item 12-Detail

<b>Foreign Principal(s)</b>	<b>Date</b>	<b>Contact</b>	<b>Method</b>	<b>Purpose</b>
The Honorable Moise Katumbi Chapwe	07/14/2023	Piero Tozzi	E-mail	Providing links to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	07/14/2023	John Tomaszewki	E-mail	Providing links to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	07/14/2023	Brandon Ramsay	E-mail	Providing links to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	07/14/2023	Christopher Kulukundis	E-mail	Providing links to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	07/19/2023	Congressional-Executive Commission on China	Meeting	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	07/21/2023	Chris Del Beccaro	E-mail	Forwarding news alerts regarding the assassination of a politician in DRC.
The Honorable Moise Katumbi Chapwe	08/02/2023	Office of Senator Chris Coons	Call	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	08/09/2023	Kate Hunter	E-mail	Providing link to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	08/09/2023	Christopher Kulukundis	E-mail	Providing link to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	08/09/2023	Jonathan Stahler; Elizabeth O'Bagy	E-mail	Providing link to news related to elections in DRC.
The Honorable Moise Katumbi Chapwe	09/15/2023	Office of Senator Chris Coons	Meeting	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	09/19/2023	Senate Foreign Relations Committee	Meeting	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	09/22/2023	John Tomaszewki; Elizabeth Lewis	E-mail	Forwarding letters and articles related to democracy in DRC.
The Honorable Moise Katumbi Chapwe	09/22/2023	Elizabeth O'Bagy; Margaret Flynn Sapia	E-mail	Forwarding letters and articles related to democracy in DRC.

Foreign Principal(s)	Date	Contact	Method	Purpose
The Honorable Moise Katumbi Chapwe	09/22/2023	Kate Hunter	E-mail	Forwarding letters and articles related to democracy in DRC.
The Honorable Moise Katumbi Chapwe	09/22/2023	Joe Foltz; Christopher Kulukundis; Zach Isakowitz	E-mail	Forwarding letters and articles related to democracy in DRC.
The Honorable Moise Katumbi Chapwe	09/22/2023	Piero Tozzi	E-mail	Forwarding letters and articles related to democracy in DRC.
The Honorable Moise Katumbi Chapwe	09/27/2023	Senate Foreign Relations Committee	Call	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	10/14/2023	Office of Senator Chris Coons	Meeting	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	10/26/2023	Senate Intelligence Committee/Rubio Staff	Meeting	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	10/27/2023	Senate Appropriations Committee/Graham staff	Meeting	Free, Fair and Inclusive Elections in the DRC
The Honorable Moise Katumbi Chapwe	11/02/2023	Kate Hunter	E-mail	Forwarding an article regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/02/2023	Joe Foltz; Christopher Kulukundis	E-mail	Forwarding an article regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/02/2023	Elizabeth O'Bagy; Margaret Flynn Sapia	E-mail	Forwarding an article regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/02/2023	John Tomaszewki	E-mail	Forwarding an article regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/02/2023	Piero Tozzi	E-mail	Forwarding an article regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/07/2023	Kate Hunter	E-mail	Forwarding a press release regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/07/2023	Peter Metzger	E-mail	Forwarding a press release regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/07/2023	Samantha Schifrin	E-mail	Forwarding a press release regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	11/07/2023	John Tomaszewki	E-mail	Forwarding a press release regarding democracy in DRC.
The Honorable Moise Katumbi Chapwe	12/22/2023	Christopher Kulukundis	E-mail	Forwarding a link to an article on elections in DRC.
The Honorable Moise Katumbi Chapwe	12/22/2023	Drew Ross; Joe Foltz	E-mail	Forwarding a link to an article on elections in DRC.

<b>Foreign Principal(s)</b>	<b>Date</b>	<b>Contact</b>	<b>Method</b>	<b>Purpose</b>
The Honorable Moise Katumbi Chapwe	12/22/2023	John Tomaszewki	E-mail	Forwarding a link to an article on elections in DRC.

## Appendix

### Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Ministry of Energy of the Kingdom of Saudi Arabia	07/12/2023	King Abdullah City for Atomic Energy	Client representation	\$1,731,108.06	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$ 2,430.00	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$1,082,013.75	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$336,565.80	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$280,463.11	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$ 3,685.50	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$ 4,536.00	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$12,092.61	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$42,826.75	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$86,181.30	
Ministry of Energy of the Kingdom of Saudi Arabia	08/07/2023	King Abdullah City for Atomic Energy	Client representation	\$105,644.70	
Ministry of Energy of the Kingdom of Saudi Arabia	09/26/2023	King Abdullah City for Atomic Energy	Client representation	\$1,906,069.40	
Ministry of Energy of the Kingdom of Saudi Arabia	09/26/2023	King Abdullah City for Atomic Energy	Client representation	\$186,058.90	
Ministry of Energy of the Kingdom of Saudi Arabia	10/31/2023	King Abdullah City for Atomic Energy	Client representation	\$493,873.14	
Ministry of Energy of the Kingdom of Saudi Arabia	10/31/2023	King Abdullah City for Atomic Energy	Client representation	\$927,757.45	
Ministry of Energy of the Kingdom of Saudi Arabia	-----	-----	-----	----->	\$7,201,306.47

## **Appendix**

### **Response to Item 15(a)-Description**

The Honorable Moise Katumbi Chapwe: No monies were disbursed or expended on behalf of the foreign principal.  
Ministry of Energy of the Kingdom of Saudi Arabia: No monies were disbursed or expended on behalf of the  
Ministry of Energy, Industry, and Mineral Resources of the Kingdom of Saudi Arabia.  
America-Georgia Economic Cooperation Foundation: The representation of the America-Georgia Economic Cooperation  
Foundation ended on July 13, 2023; consequently, no work was performed or monies disbursed on their behalf.

## Appendix

### Response to Item 15(c)

**Item 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? If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/ Thing of Value
07/24/2023	Thomas Spulak	Pedro Pierulisi for PR Governor	Credit Card	\$ 1,000.00
07/26/2023	Thomas Spulak	Re-Elect McGovern Committee	Credit Card	\$ 1,700.00
07/26/2023	Thomas Spulak	Re-Elect McGovern Committee	Credit Card	\$ 800.00
08/01/2023	Steven Kupka	Chris Christie	Credit Card	\$ 500.00
08/02/2023	Thomas Spulak	Rip Sullivan for Delegate	Credit Card	\$ 2,500.00
08/14/2023	Daniel Crosby	Spanberger for Congress	Credit Card	\$ 250.00
09/06/2023	J.C. Boggs	Thom Tillis Committee	Credit Card	\$ 500.00
09/16/2023	Daniel Crosby	Spanberger for Congress	Credit Card	\$ 1,000.00
09/27/2023	Steven Kupka	Nikki Haley for President	Credit Card	\$ 3,300.00
09/29/2023	KSNCGG	Schneider for Congress	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Pete Aguilar for Congress	Wire Transfer	\$ 2,000.00
09/29/2023	KSNCGG	Nikema for Congress, Inc.	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Montanans for Tester	Wire Transfer	\$ 1,500.00
09/29/2023	KSNCGG	McHenry for Congress	Wire Transfer	\$ 5,000.00
09/29/2023	KSNCGG	Mario Diaz-Balart for Congress	Wire Transfer	\$ 5,000.00
09/29/2023	KSNCGG	Kay Granger Campaign Fund	Wire Transfer	\$ 5,000.00
09/29/2023	KSNCGG	Jenniffer for Congress	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Johnson for Congress	Wire Transfer	\$ 1,000.00
09/29/2023	KSNCGG	Jared Moskowitz for Congress	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Friends of Raja for Congress	Wire Transfer	\$ 1,000.00
09/29/2023	KSNCGG	Friends of Jim Clyburn	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Debbie Wasserman Schultz for Congress	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Clarke for Congress	Wire Transfer	\$ 2,500.00
09/29/2023	KSNCGG	Citizens for John Rutherford	Wire Transfer	\$ 1,000.00
09/29/2023	King & Spalding Nonpartisan Committee for Good Government (KSNCGG)	Cathy McMorris Rodgers for Congress	Wire Transfer	\$ 1,500.00
10/23/2023	Thomas Spulak	Matt Cartwright for Congress	Credit Card	\$ 1,000.00
11/02/2023	Thomas Spulak	Adams for NYC Mayor	Credit Card	\$ 2,100.00
11/09/2023	Thomas Spulak	McCormick for Congress	Credit Card	\$ 500.00
11/09/2023	Thomas Spulak	Boysko for Congress	Credit Card	\$ 500.00
12/07/2023	Thomas Spulak	Espillat for Congress	Credit Card	\$ 1,500.00
12/08/2023	Thomas Spulak	McGovern for Congress	Credit Card	\$ 2,500.00
12/28/2023	Thomas Spulak	Jeff Jackson for NC AG	Credit Card	\$ 500.00
12/29/2023	KSNCGG	Dan Goldman for New York	Wire Transfer	\$ 1,000.00
12/29/2023	KSNCGG	Byron Donalds for Congress	Wire Transfer	\$ 5,000.00
12/29/2023	KSNCGG	Adrian Smith for Congress	Wire Transfer	\$ 1,000.00
12/29/2023	KSNCGG	Davidson for Congress	Wire Transfer	\$ 1,000.00
12/29/2023	KSNCGG	Jeffries for Congress	Wire Transfer	\$ 1,000.00

<b>Date</b>	<b>Donor</b>	<b>Political Organization/Candidate</b>	<b>Method</b>	<b>Amount/ Thing of Value</b>
12/29/2023	KSNCGG	Marc Veasey Congressional Campaign Committee	Wire Transfer	\$ 1,000.00
12/29/2023	KSNCGG	Menendez for Congress	Wire Transfer	\$ 500.00
12/29/2023	KSNCGG	Adriano Espaillat for Congress	Wire Transfer	\$ 2,500.00
12/29/2023	Thomas Spulak	KSNCGG	Payroll Deduction	\$ 2,498.00
12/29/2023	KSNCGG	Mike Flood for Nebraska	Wire Transfer	\$ 1,000.00
12/29/2023	KSNCGG	Re-Elect McGovern Committee	Wire Transfer	\$ 3,000.00