

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 06/30/2024

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number
 King & Spalding LLP 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 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.

The address of the London branch of the firm changed to 8 Bishopsgate / London EC2N 4BQ / United Kingdom.

See Appendix for Additional Addresses

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

3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes No

If yes, has the registrant filed an updated Exhibit C? Yes No

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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 Response		

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

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

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

Yes No

If yes, furnish the following information:

Foreign Principal

Date Registered

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

10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A³ and/or B⁴ 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

Ministry of Energy of the Kingdom of Saudi Arabia

01/30/2024

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

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

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
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12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes No

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

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

Foreign Principal	Date	Contact	Method	Purpose
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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
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⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS-MONIES

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If no, please explain why no monies were received.

The Honorable Moise Katumbi Chapwe: No services were performed on behalf of the client, therefore no invoices were issued to him and no payments were received from him.

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

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Ministry of Energy of the Kingdom of Saudi Arabia	04/29/2024	King Abdullah City for Atomic and Renewable Energy	client representation	\$219,740.88	
Ministry of Energy of the Kingdom of Saudi Arabia	-----	-----	-----	----->	\$219,740.88
				\$ 219,740.88	
					Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date _____

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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^{6, 7} A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes No

If no, explain why no disbursements were made.

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 foreign principal.

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 value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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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?¹² Yes No

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

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 type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | | |

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 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 (<i>specify</i>) _____ | | |

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.

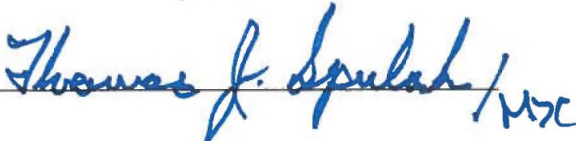
22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes No

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.

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
July 30, 2024	Thomas J. Spulak	 Thomas J. Spulak / MJC
_____	_____	_____
_____	_____	_____
_____	_____	_____

Appendix
Response to Item 2(c) Attached

Item 2(c): Has there been a change in the information previously furnished in connection with the following? Explain fully all changes, if any, indicated in Items 2(a) and 2(b) above.

List of Branch/Local Office Addresses

King & Spalding LLP – Organization branch or local office address(es)

Abu Dhabi
Level 15, Al Sila Tower
Abu Dhabi Global Market Square
PO Box 130522
Abu Dhabi, UAE

Geneva
5 Quai du Mont Blanc
5th Floor
Geneva 1201
Switzerland

Sacramento
621 Capitol Mall
Suite 1500
Sacramento, CA 95814

Atlanta
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309-3521

Houston
1100 Louisiana Street
Suite 4100
Houston, TX 77002-5213

San Francisco
50 California Street
Suite 3300
San Francisco, CA 94111

Austin
500 W. 2nd Street
Suite 1800
Austin, TX 78701

London
8 Bishopsgate
London EC2N 4BQ
United Kingdom

Silicon Valley
601 South California Avenue
Suite 100
Palo Alto, CA 94304

Brussels
Bastion Tower
5 Place du Champ de Mars
Brussels 1050
Belgium

Los Angeles
633 West Fifth Street
Suite 1600
Los Angeles, CA 90071

Singapore
1 Raffles Quay
#31-01 North Tower
Singapore 048583

Charlotte
300 S Tryon Street
Suite 1700
Charlotte, NC 28202

Miami
Southeast Financial Center
200 S Biscayne Boulevard
Suite 4700
Miami, FL 33131

Sydney
Level 24
Governor Phillip Tower
1 Farrer Place
Sydney, NSW 2000
Australia

Chicago
110 N Wacker Drive
Suite 3800
Chicago, IL 60606

New York
1185 Avenue of the Americas
34th Floor
New York, NY 10036-2601

Tokyo
Shin Marunouchi Building
12th Floor - Suite 1210
5-1, Marunouchi 1-chome
Chiyoda-ku, Tokyo 100-6512
Japan

Denver
1401 Lawrence Street
Suite 1900
Denver, CO 80202

Northern Virginia
1650 Tysons Blvd
Suite 400
McLean, VA 22102

Washington, D.C.
1700 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20006-4707

Dubai
Al Fattan Currency House
Tower 2, Level 24
Dubai International Financial
Centre
P.O. Box 506547
Dubai, UAE

Paris
48 bis rue de Monceau
Paris 75008
France

Frankfurt
TaunusTurm
Taunustor 1
Frankfurt am Main 60310
Germany

Riyadh
Kingdom Centre
20th Floor
King Fahad Road
PO Box 14702
Riyadh 11434
Saudi Arabia

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 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
01/03/2024	Thomas Spulak	Suozzi for Congress	Credit Card	\$ 3,300.00
03/27/2024	Thomas Spulak	Beatty for Congress	Credit Card	\$ 2,500.00
03/28/2024	KSNCGG	Bob Casey for Senate, Inc.	Wire Transfer	\$ 1,500.00
03/28/2024	KSNCGG	Boozman for Arkansas	Wire Transfer	\$ 5,000.00
03/28/2024	KSNCGG	Buddy Carter for Congress	Wire Transfer	\$ 2,500.00
03/28/2024	KSNCGG	Citizens for John Rutherford	Wire Transfer	\$ 4,000.00
03/28/2024	KSNCGG	Finstad for Congress	Wire Transfer	\$ 1,000.00
03/28/2024	KSNCGG	Friends of John Barrasso	Wire Transfer	\$ 1,500.00
03/28/2024	KSNCGG	Friends of Rosa DeLauro	Wire Transfer	\$ 1,500.00
03/28/2024	KSNCGG	Friends of Sherrod Brown	Wire Transfer	\$ 2,500.00
03/28/2024	KSNCGG	Lummis for Congress	Wire Transfer	\$ 1,500.00
03/28/2024	KSNCGG	Martin Heinrich for Senate	Wire Transfer	\$ 1,000.00
03/28/2024	KSNCGG	People for Ben	Wire Transfer	\$ 1,000.00
03/28/2024	KSNCGG	Pete Ricketts for Senate	Wire Transfer	\$ 1,000.00
03/28/2024	King & Spalding Nonpartisan Committee for Good Government (KSNCGG)	Austin Scott for Congress	Wire Transfer	\$ 2,000.00
03/28/2024	Thomas Spulak	Jennifer Boysko for Congress	Credit Card	\$ 500.00
03/28/2024	KSNCGG	Texans for Henry Cuellar Congressional Campaign	Wire Transfer	\$ 2,500.00
03/28/2024	KSNCGG	Vern Buchanan for Congress	Wire Transfer	\$ 5,000.00
03/29/2024	KSNCGG	KSNCGG	Wire Transfer	\$ 1,000.00
03/29/2024	Thomas Spulak	KSNCGG	Wire Transfer	\$ 1,251.00
05/23/2024	Daniel Crosby	Kaine Victory Fund	Credit Card	\$ 5,000.00
05/25/2024	Daniel Crosby	Abigail Spanberger	Credit Card	\$ 250.00
05/26/2024	Thomas Spulak	Kaine for Virginia	Credit Card	\$ 400.00
06/17/2024	Daniel Crosby	Harrison Roday	Credit Card	\$ 4,000.00
06/28/2024	KSNCGG	Martin Heinrich for Senate	Wire Transfer	\$ 1,000.00
06/28/2024	KSNCGG	Scalise for Congress	Wire Transfer	\$ 1,000.00
06/28/2024	KSNCGG	Katie Britt for Alabama	Wire Transfer	\$ 2,500.00
06/28/2024	KSNCGG	Friends of Neal Dunn	Wire Transfer	\$ 1,000.00
06/28/2024	KSNCGG	Dr. Kim Schrier for Congress	Wire Transfer	\$ 1,000.00
06/28/2024	KSNCGG	Castor for Congress	Wire Transfer	\$ 1,000.00
06/28/2024	KSNCGG	Young Kim for Congress	Wire Transfer	\$ 1,000.00
06/28/2024	Thomas Spulak	KSNCGG	Wire Transfer	\$ 1,251.00
06/28/2024	KSNCGG	KSNCGG	Wire Transfer	\$ 1,250.00