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OMB No. 1124-0001; Expires October 31, 2026

U.S. Department of Justice
Washington, DC 20530

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

I--REGISTRANT

1. Name of Registrant

Sovereign Strategy Limited

2. Registration Number (To be assigned by the FARA Unit)

7421

3. Primary Business Address

Manor House, Westoe Village, South Shields, Tyne and Wear, UNITED KINGDOM NE333EQ

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐
Corporation ☐ Other *(specify)* Limited Company Registered in England and Wales

(b) Date and place of organization 02/04/2000, United Kingdom of Great Britain

(c) Name of responsible individual (e.g., officer, director or partner) Alan Donnelly

(d) Other business address(es), if any, including locations of branch or local offices See Appendix for Response

(e) If a membership organization, provide number of members

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(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Mr. Jonothon Donnelly	31 Penrose Place Hebburn, Tyne and Wear UNITED KINGDOM NE312AY	UNITED KINGDOM	Chief Operating Office and Director
Ms. Hatice Beton	Flat 34, Hamlet Court London UNITED KINGDOM N87FJ	GERMANY	Chief Executive and Director
Mr. Alan John Donnelly	Manor House, Westoe Village South Shields, Tyne and Wear UNITED KINGDOM NE333EQ	UNITED KINGDOM	Executive Chairman and Director

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
Ms. Hatice Beton	The Ministry of the Kingdom of Saudi Arabia	Project management, Stakeholder relations management services, policy guidance.
Mr. Alan John Donnelly	The Ministry of the Kingdom of Saudi Arabia	Stakeholder and policy advisory services.

(h) Describe the nature of the registrant's regular business or activity.

Political communications strategy, Public Affairs/Public Relations consultants, business to business services, strategic events management, media and strategic communications advisory services.

(i) Give a complete description of the ownership and control structure of the registrant.

Sovereign Strategy is Limited by shares company registered in the United Kingdom of Great Britain. The company shares have been distributed to private individuals who have a stake in the success of the business. There are also share options available to certain employees which will be granted once the business meets certain performance related KPI's. The board of Directors form the control structure of the business.

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6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
Mr. Tamer Hesham Farag	2139 8th Avenue W, Unit A Seattle, WA WA 98119	The Ministry of the Kingdom of Saudi Arabia	Business to Government relations services, managing and prepping for meetings with BARDA. Stakeholder management with BARDA and other relevant departments/sub departments.

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II--FOREIGN PRINCIPAL

7. List every foreign principal[1] for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
The Ministry of the Kingdom of Saudi Arabia	3493 King Abdulaziz Road,, 8556 Al Sulaimaniyah District Riyadh SAUDI ARABIA 12234

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

IV--FINANCIAL INFORMATION

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register[2] under FARA, has the registrant received from any foreign principal named in Item 7 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 for disbursement or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.[3]

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
The Ministry of the Kingdom of Saudi Arabia	05/13/2024	Paid from the project budget of the Ministry of Health of the Kingdom of Saudi Arabia	First quarter payment of contract fees	$ 599,193.00	
The Ministry of the Kingdom of Saudi Arabia	----------	----------	----------	---------->	$ 599,193.00

$ 599,193.00

Total

1 The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual 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.

2 An agent must register within 10 days of becoming an agent, and before acting as such.

3 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

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

During the period beginning 60 days prior to the date of the registrant's obligation to register[4] under FARA, has the registrant received anything of value[5] other than money, from any foreign principal named in Item 7 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

10. (a) **DISBURSEMENTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register[6] under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal

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

During the period beginning 60 days prior to the date of the registrant's obligation to register[7] under FARA, has the registrant disposed of any thing of value[8] other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value

(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register[9] under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 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.

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V--INFORMATIONAL MATERIALS[10]

11. Prior to the time of filing this statement,[11] has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☐ No ☒

If yes, identify each foreign principal and file the informational materials.

Foreign Principal	Type of Informational Materials

12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☐ No ☒

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

13. 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 foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount

14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☐ No ☐

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)

15. Activities in preparing or disseminating informational materials will include the use of the following:

☐ Magazine or newspaper ☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications
☐ Lectures or speeches ☐ Radio or TV broadcasts ☐ Motion picture films ☐ Letters or telegrams
☐ Email
☐ Website URL(s): _____
☐ Social Media website URL(s): _____
☐ Other *(specify)* _____

10 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, electronic communications, 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.

11 See Footnote 2, on page 3.

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16. Informational materials will be disseminated among the following groups:

- ☐ Public officials
- ☐ Legislators
- ☐ Government agencies
- ☐ Newspapers
- ☐ Editors
- ☐ Civic groups or associations
- ☐ Libraries
- ☐ Educational groups
- ☐ Nationality groups
- ☐ Other *(specify)* _____

17. Indicate the language to be used in the informational materials:

- ☐ English
- ☐ Other *(specify)* _____

VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

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

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, 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. (See Rule 201 (e)).

VII--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[12]
06/13/2024	Jonothon Donnelly	Sign	/s/Jonothon Donnelly
06/13/2024	Alan Donnelly	Sign	/s/Alan Donnelly
06/13/2024	Hatice Beton	Sign	/s/Hatice Beton
		Sign	

12 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.

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Date	Printed Name	Signature
12 June 2024	Alan John Donnelly	
12 June 2024	Jonothon Donnelly	
12 June 2024	Hatice Beton	

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Appendix
Response to Item 5(d)

Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.

The Bloomsbury Building, 10 Bloomsbury Way, London, UNITED KINGDOM WC1A 2SL

81A Rue de la Loi, Brussels, BELGIUM B-1000

Ministry of Health of the Kingdom of Saudi Arabia, 3493 King Abdulaziz Rd, 8556 Al Sulaimaniyah Dist., Riyadh, SAUDI ARABIA 12234

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