

GARY C. PETERS, MICHIGAN, CHAIRMAN

THOMAS R. CARPER, DELAWARE
MAGGIE HASSAN, NEW HAMPSHIRE
KYRSTEN SINEMA, ARIZONA
JACKY ROSEN, NEVADA
ALEX PADILLA, CALIFORNIA
JON OSSOFF, GEORGIA
RICHARD BLUMENTHAL, CONNECTICUT

RAND PAUL, KENTUCKY
RON JOHNSON, WISCONSIN
JAMES LANKFORD, OKLAHOMA
MITT ROMNEY, UTAH
RICK SCOTT, FLORIDA
JOSH HAWLEY, MISSOURI
ROGER MARSHALL, KANSAS

United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS
WASHINGTON, DC 20510-6250

DAVID M. WEINBERG, STAFF DIRECTOR
WILLIAM E. HENDERSON III, MINORITY STAFF DIRECTOR
LAURA W. KILBRIDE, CHIEF CLERK

July 27, 2023

VIA ELECTRONIC MAIL

Governor Yasir Al-Rumayyan
Public Investment Fund c/o USSA International LLC
767 5th Avenue, 45th Floor
New York, NY 10153

Dear Governor Al-Rumayyan:

On July 11, 2023, the Permanent Subcommittee on Investigations (PSI or the Subcommittee) held a hearing to examine the planned agreement between PGA TOUR, Inc. (PGA Tour) and the Saudi Arabian Public Investment Fund (PIF). During that hearing, PGA Tour leaders testified about the planned agreement to create a new for-profit golf entity in collaboration with PIF. Given your position as Governor of PIF and your integral role in the deal making process, the Subcommittee sent you a letter on June 21, 2023, inviting you to testify at that hearing.¹ On June 28, 2023, counsel for PIF sent a letter to the Subcommittee in response. Although the letter stated that you “respect and look forward to assisting the Subcommittee’s efforts to better understand the Agreement and its implications for the future of professional golf,” you declined the invitation to the hearing, citing “scheduling conflicts,” but offering to help “ensure that the Subcommittee is supplied with relevant information concerning the Agreement.” See Attachment A.

During a phone call between PSI staff and counsel for PIF the following day, PSI staff expressed that the Subcommittee would like to work with PIF to find a mutually acceptable date for your testimony. On July 7, 2023, PSI staff sent PIF’s counsel an email inquiring about your availability to testify in late July or September.² PIF’s counsel replied on July 10 that PIF “would be pleased to further engage with the Subcommittee at a date and time that is convenient” but did not otherwise specify when you will be available.³ PSI staff renewed the request for a specific date for your testimony in a July 12, 2023, email to PIF’s counsel.⁴ On July 24, 2023, PIF’s

¹ Letter from Chairman Richard Blumenthal and Ranking Member Ron Johnson, Permanent Subcommittee on Investigations, to Governor Yasir Al-Rumayyan, Public Investment Fund (June 21, 2023), https://www.hsgac.senate.gov/wp-content/uploads/2023-06-21-Blumenthal-and-Johnson-Hearing-Invitation-to-al-Rumayyan_Redacted.pdf.

² Email between Staff, Permanent Subcommittee on Investigations, and Counsel for PIF (July 7, 2023) (on file with Subcommittee).

³ Email between Staff, Permanent Subcommittee on Investigations, and Counsel for PIF (July 10, 2023) (on file with Subcommittee).

⁴ Email between Staff, Permanent Subcommittee on Investigations, and Counsel for PIF (July 12, 2023) (on file with Subcommittee).

counsel again declined to provide your availability for a hearing, while stating that “PIF desires to be helpful to the Subcommittee, and to work cooperatively with the Subcommittee.”⁵

Meanwhile, the Subcommittee’s ongoing inquiry has revealed important information about the planned agreement between PIF and PGA Tour, as well as PIF’s apparent desire for increased presence and influence in the United States and throughout the world. Questions remain as to the role that PIF will play in U.S. professional golf and how that role fits into PIF’s larger investment goals in the United States. Documents received as a part of the Subcommittee’s inquiry thus far indicate that PIF is seeking a significantly increased Saudi Arabian presence in professional golf. For example, one of PIF’s initial revisions to the Framework Agreement sought a year-end golf team tournament concluding in Saudi Arabia, although it was not ultimately included in the executed agreement.⁶

The agreement with PGA Tour appears to be only one element of PIF’s efforts at increased commercial engagement with the United States. PIF’s investments in Section 13(f) securities have increased from 2.3 billion dollars in March 2019 to over 35.5 billion dollars in March 2023.⁷ This includes significant investments in, among others, Lucid Motors, Activision Blizzard, Electronic Arts, and Live Nation Entertainment.⁸ A review of the partners and direct investments of PIF’s venture capital arm, Sanabil Investments, also shows significant and growing investment in the United States.⁹ In 2022, PIF established a New York-based subsidiary, USSA International LLC.¹⁰ Further, a PIF-run non-profit organization—the Future Investment Initiative Institute—

⁵ Email between Staff, Permanent Subcommittee on Investigations, and Counsel for PIF (July 24, 2023) (on file with Subcommittee).

⁶ PSI Majority Staff Memorandum to PSI Members Re: Preliminary Information on Agreement Between PGA Tour and Saudi Arabian Public Investment Fund at 8 (citing Appendix 20 at PGAT-PSI-001362), <https://www.hsgac.senate.gov/wp-content/uploads/2023-07-10-PSI-Majority-Staff-Memorandum-Regarding-Preliminary-Information-on-Agreement-Between-PGA-Tour-and-Saudi-Arabian-Public-Investment-Fund-with-Consolidated-Appendix.pdf>.

⁷ Public Investment Fund, Quarterly report filed by institutional managers, Holdings (Form 13-F) (Mar. 31, 2019); Public Investment Fund, Quarterly report filed by institutional managers, Holdings (Form 13-F) (Mar. 31, 2023).

⁸ See e.g., *Saudi PIF Held Nearly \$56 Bln of U.S.-Listed Stocks in December 2021*, REUTERS (Feb. 14, 2022), <https://www.reuters.com/markets/europe/saudi-pif-held-nearly-56-bln-us-listed-stocks-december-2021-2022-02-15/>; Caitlin Kelley, *Saudi Arabia’s Public Investment Fund Buys \$500 Million Stake in Live Nation*, FORBES (Apr. 29, 2020), <https://www.forbes.com/sites/caitlinkelley/2020/04/29/saudi-arabias-public-investment-fund-buys-500-million-stake-in-live-nation/?sh=1547f21d1daf>; *Saudi Arabia’s PIF Raises Stake in U.S. Game Maker Activision by 13.3 pct-filing*, REUTERS (Aug. 16, 2021), <https://www.reuters.com/world/middle-east/saudi-arabias-pif-raises-stake-us-game-maker-activision-by-133-pct-filing-2021-08-16/>; Stephen Totilo, *Saudi Stake in EA, Take-Two Grows as It Pours Money into Gaming*, AXIOS (Feb. 16, 2023), <https://www.axios.com/2023/02/16/saudi-arabia-ea-activision>.

⁹ See Sanabil Investments, *Our Portfolio*, <https://www.sanabil.com/en/our-partners>.

¹⁰ *The Big Apple Is Blossoming as PIF Begins Hiring for Its New NYC Office*, GLOBAL SWF (Sept. 20, 2022), <https://globalswf.com/news/the-big-apple-is-blossoming-as-pif-begins-hiring-for-its-new-nyc-office>.

held its Priority Summit in Miami in March 2023 and has announced that it will likely open a Miami office in the near future.¹¹

While public reporting indicates dramatically increased engagement with the United States, much about PIF's U.S. investments and future intentions remains unknown. This is due to PIF's lack of transparency: the most recent version of the widely recognized Sovereign Wealth Fund Scoreboard—a ranking compiled by the Peterson Institute for International Economics which assesses the transparency and accountability of sovereign wealth funds worldwide—ranked PIF 56th out of the 64 funds surveyed.¹²

While the Subcommittee's July 11, 2023 hearing revealed important information regarding the Framework Agreement between PGA Tour and PIF, the Subcommittee requires additional information to understand PIF's future role in American professional golf and its plans for other investments in U.S.-based entities. Given this need for additional information, the Subcommittee renews its request for your in-person testimony on a mutually acceptable date in September 2023. Please confirm your willingness to testify on a voluntary basis by August 4, 2023.

Additionally, the Subcommittee requests documents and information to assist with its inquiry. To assist the Subcommittee, please provide the information requested below by August 18, 2023. For the purposes of this request, the term "PIF" includes, but is not limited to the Public Investment Fund and any other subsidiaries, divisions, partnerships, properties, affiliates, branches, groups, special purpose entities, joint ventures, predecessors, successors, or any other entity in which the Public Investment Fund had or has a controlling interest—including, specifically, USSA International LLC, Sanabil Investments, and the Future Investment Initiative Institute. The term "Agreement" refers to the "agreement that combines PIF's golf-related commercial businesses and rights (including LIV Golf) with the commercial businesses and rights of PGA Tour and DP World Tour into a new, collectively owned, for-profit entity," announced on June 6, 2023.¹³ The period covered by this request is March 1, 2015, to present unless otherwise noted.

1. A list of all assets currently held by PIF in the United States, including:
 - a. the name and value of all stock or securities held in entities incorporated in the United States;
 - b. the name and value of all U.S.-based assets;

¹¹ Felipe Marques et al., *Saudi Oil Billions Lure Neumann, Klein, Novogratz to Miami Beach*, BLOOMBERG (Mar. 31, 2023), <https://www.bloomberg.com/news/articles/2023-03-31/saudi-oil-billions-lure-neumann-klein-novogratz-to-miami-beach#xj4y7vzkg>.

¹² Peterson Institute for International Economics, *Sovereign Wealth Funds Are Growing More Slowly, and Governance Issues Remain* (Feb. 2021), <https://www.piie.com/sites/default/files/documents/pb21-3.pdf>.

¹³ PGA TOUR, *PGA TOUR, DP World Tour and PIF Announce Newly Formed Commercial Entity to Unify Golf*, PGA TOUR (June 6, 2023), <https://www.pgatour.com/article/news/latest/2023/06/06/pga-tour-dp-world-tour-and-pif-announce-newly-formed-commercial-entity-to-unify-golf>.

- c. the date when the asset, stock, or security was initially purchased; and
 - d. for stocks or securities, the date of any sale or purchase of additional stocks and securities.
2. A detailed list of any United States-based contractors, consultants, public relations firms, strategic consultants, crisis consultants, lobbyists, or law firms currently or previously employed by PIF, including a brief description of the scope and timeframe of their engagement with PIF.
 3. The total number of personnel employed by PIF or its subsidiaries in the United States for each year from March 1, 2015 to the present, broken down by year, entity, and function.
 4. A detailed description of the relationship between PIF and the Future Investment Initiative Institute.
 5. A detailed description of the relationship between PIF and Sanabil Investments.

Please also provide the following documents by August 18, 2023:

1. All records¹⁴ referring or relating to any activities in the United States, including but not limited to investments, in furtherance of Saudi Vision 2030.¹⁵
2. All records referring or relating to Project Wedge.¹⁶
3. All records referring or relating to any activities by the Future Investment Initiative Institute in the United States or with United States-based entities.
4. All records referring or relating to any activities by Sanabil Investments in the United States or with United States-based entities.
5. All records referring to any current or planned investment by PIF in entities located in the United States.
6. All records related to any current or planned assets owned by PIF in the United States.

¹⁴ “Records” include written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically-created or stored information), calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether or not they resulted in final documents).

¹⁵ See generally Kingdom of Saudi Arabia, *Vision 2030*, <https://www.vision2030.gov.sa/>.

¹⁶ See Alan Blinder and Sarah Hurtes, *Confidential Records Show a Saudi Golf Tour Built on Far-Fetched Assumptions*, N.Y. TIMES (Dec. 11, 2022), <https://www.nytimes.com/2022/12/11/sports/golf/liv-saudi-pga.html>.

7. All records referring or relating to the relationship between PIF or any of its officers, agents, or other representatives and PGA TOUR, Inc., or any of its subsidiaries or affiliates, including but not limited to all communications with Members of the Board of Directors of PGA Tour referring or relating to the Agreement.
8. All records referring or relating to the Agreement, including but not limited to all internal or external communications related to the possibility of entering the Agreement, and all records related to the structure of the “new, collectively owned, for-profit entity” to be formed by the Agreement.
9. Organizational charts reflecting corporate structure, officers, directors, and employees of PIF and any and all subsidiaries or affiliated organizations with a presence or investment in the United States, including but not limited to USSA International LLC, Sanabil Investments, and the Future Investment Initiative Institute.

To expedite the Subcommittee’s review, we ask that you submit the material responsive to this request as it becomes available, rather than waiting to provide it all at once. To avoid any unnecessary delays in connection with this production, we ask that you carefully review the attached *Procedures for Transmitting Documents to the Permanent Subcommittee on Investigations*. Please contact [REDACTED] with Chairman Blumenthal at [REDACTED] with any questions. Thank you for your attention to this request.

Sincerely,



Richard Blumenthal
Chairman
Permanent Subcommittee on Investigations

cc: The Honorable Ron Johnson
Ranking Member

Attachment

Attachment A



RAPHAEL A. PROBER

June 28, 2023

VIA ELECTRONIC MAIL

The Honorable Richard Blumenthal
Chairman
Permanent Subcommittee on Investigations

The Honorable Ron Johnson
Ranking Member
Permanent Subcommittee on Investigations

Re: June 21, 2023 Letter to His Excellency Yasir Othman Al-Rumayyan

Dear Chairman Blumenthal and Ranking Member Johnson:

I write on behalf of my client, the Public Investment Fund of the Kingdom of Saudi Arabia (“PIF”) and its Governor His Excellency Yasir Othman Al-Rumayyan (“HE”), in response to your June 21, 2023 letter inviting HE to testify at a July 11, 2023 hearing (the “Hearing”) concerning the pending transaction involving the PGA Tour, Inc. and LIV Golf (the “Agreement”). The PIF and HE appreciate the Subcommittee’s invitation to appear at the Hearing, and respect and look forward to assisting the Subcommittee’s efforts to better understand the Agreement and its implications for the future of professional golf.

Unfortunately, HE is unable to participate in the Hearing on July 11 due to scheduling conflicts. Accordingly, my client respectfully declines your invitation for HE to testify. In the spirit of cooperation, the PIF would be amenable to exploring alternative options to ensure that the Subcommittee is supplied with relevant information concerning the Agreement, as appropriate and consistent with applicable law. We would be pleased to further engage with the Subcommittee on these points at a date and time that is convenient to you and your staffs.

The Hon. Richard Blumenthal
The Hon. Ron Johnson
June 28, 2023
Page 2

Finally, please understand that this letter is sent while reserving all relevant rights, immunities and defenses. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. A. Prober', with a stylized flourish at the end.

Raphael A. Prober
Counsel for PIF