

U.S. Department of Justice  
Washington, DC 20530

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

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**I--REGISTRANT**

1. Name of Registrant

The Boston Consulting Group International, Inc.

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

6851

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3. Primary Business Address

200 Pier 4 Blvd, Boston, MA 02210

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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

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

- (a) Type of organization: Committee  Association  Partnership  Voluntary group   
Corporation  Other (*specify*) \_\_\_\_\_
- (b) Date and place of organization 07/03/1991, Boston, Massachusetts
  
  
- (c) Name of responsible individual James Bruce, Joerg Hilderbrandt, Mark Rosenthal  
(e.g., officer, director or partner)
  
- (d) Other business address(es), if any, including See Appendix for Response  
locations of branch or local offices
  
  
- (e) If a membership organization, provide number of members

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

Name	Residence Address	Citizenship	Position
James Bruce	5 Oakhurst Gardens London UNITED KINGDOM	UNITED STATES	President/Director
Thomas Balish	114 Mulpus Road Lunenburg, MA 01462	UNITED STATES	Treasurer
Mark Rosenthal	74 Belcher Drive Sudbury, MA 01776	UNITED STATES	Director/Secretary
Joerg Hildebrandt	Palm Jumeirah, Frond M 124 Dubai, UAE UNITED ARAB EMIRATES 32257	UNITED STATES	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

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

Holding company for global consulting firm.

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

The Boston Consulting Group International, Inc. is 100% owned by BCG Holding Corp, a Delaware Corporation. BCG Holding Corp is 100% owned by The Boston Consulting Group, Inc., a Massachusetts corporation. 100% of the voting shares of The Boston Consulting Group, Inc. is owned by The Boston Consulting Group LLP, a Delaware Limited Liability Partnership.

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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
See Appendix for Response			

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
Saudi Council of Economic and Development Affairs (CEDA)	Riyadh, Saudi Arabia Riyadh SAUDI ARABIA

**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
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**IV--FINANCIAL INFORMATION****9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>2</sup> 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.<sup>3</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount
Saudi Council of Economic and Development Affairs (CEDA)	01/17/2017	Saudi Aramco	Fees received from Saudi Aramco for consulting work conducted on behalf of CEDA	\$2,770,000.00

\$2,770,000.00

<sup>1</sup> 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.

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

<sup>3</sup> 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)).

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

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>4</sup> under FARA, has the registrant received anything of value<sup>5</sup> 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
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**10. (a) DISBURSEMENTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>6</sup> 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
			See Appendix for Response	

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

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>7</sup> under FARA, has the registrant disposed of any thing of value<sup>8</sup> 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
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>9</sup> 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
09/11/2016	Danny Werfel	Hillary For America	Funds transfer	\$500.00
09/11/2016	Danny Werfel	Hillary Victory Fund	Funds transfer	\$500.00
09/18/2016	Danny Werfel	Hillary for America	Funds Transfer	\$250.00
09/28/2016	Danny Werfel	Hillary for America	Funds Transfer	\$200.00
09/30/2016	Danny Werfel	Hillary for America	Funds Transfer	\$250.00
10/19/2016	Danny Werfel	Hillary for America	Funds Transfer	\$300.00
11/02/2016	Danny Werfel	Hillary for America	Funds Transfer	\$100.00
11/02/2016	Danny Werfel	Hillary Victory Fund	Funds Transfer	\$100.00

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.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Prior to the time of filing this statement,<sup>11</sup> 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 attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
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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
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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)
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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*) \_\_\_\_\_

<sup>10</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, 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.

<sup>11</sup> See Footnote 2, on page 3.

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

- |                                              |                                                         |
|----------------------------------------------|---------------------------------------------------------|
| <input type="checkbox"/> Public officials    | <input type="checkbox"/> Civic groups or associations   |
| <input type="checkbox"/> Legislators         | <input type="checkbox"/> Libraries                      |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups             |
| <input type="checkbox"/> Newspapers          | <input type="checkbox"/> Nationality groups             |
| <input type="checkbox"/> Editors             | <input type="checkbox"/> Other ( <i>specify</i> ) _____ |

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**

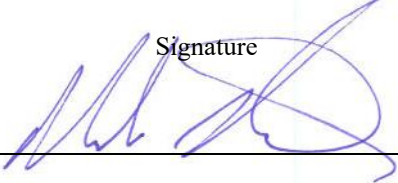
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 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 <sup>12</sup>
08/10/2020	Mark Rosenthal	/s/Mark Rosenthal

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.

**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
2020-06-02	Mark Rosenthal	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

## 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.**

Avenida 4 de Fevereiro Edificio Kilamba, 8°Andar Marginal de Luanda- Ingombota, Luanda, ANGOLA

23rd Floor Menarco Tower 32nd Street, Bonifacio Gl, Manila, PHILIPPINES

Al Niyadi Building, 1st Floor Airport Road, Abu Dhabi, Dubai, UNITED ARAB EMIRATES 109619

11th floor, Tower A Olaya Towers, Riyadh, Saudi Arabia, SAUDI ARABIA 11213

41/F, Phase II Shanghai ifc, 8 Century Avenue, Shanghai, CHINA 200120

Level 28, Menara IMC No. 8 Jalan Sultan Ismail, Kuala Lumpur, MALAYSIA 50250

CENTER 1 Building East Tower, 31F, 26, Euljiro 5-g, Seoul, KOREA, SOUTH 04539

16 Dostyk Street, 8th floor Talan Towers Offices, Nur-Sultan, KAZAKHSTAN

Al Fardan Office Tower 61 Al Funduq street, 8th floor, office 815/816, West Bay Doha, QATAR 31316

17 C.A. Rosetti 2nd District Regus City Center, Bucharesti, ROMANIA 020011

## Appendix

### Response to Item 6

**Item 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.**

<b>Name</b>	<b>Residence Address</b>	<b>Foreign Principal(s)</b>	<b>Nature of Services</b>
Danny Werfel	122 North Wakefield Street Arlington, VA 22203 200 Pier 4 Blvd Boston, MA 02210	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.
Ihab Khalil	Adulrahim Diab Street, Khatoun Building Beirut LEBANON Trade Centre 2 Dubai UNITED ARAB EMIRATES	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.
Greg Mallory	7507 Honeywell Lane Bethesda, MD 20814 4800 Hampden Lane, Suite 400 Bethesda, MD 20814	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.
Boxiao Hu	12775 Millennium Dr., Apt. 426 Los Angeles, CA 90094 200 Pier 4 Blvd Boston, MA 02210	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.
Dr. Jaykumar Patel	Villa 25, Street 11, Meadows 2 Dubai UNITED ARAB EMIRATES Trade Centre 2 Dubai UNITED ARAB EMIRATES	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.
Mel Wolfgang	19 Old Neck Road Machester-by-the-Sea, MA 01944 200 Pier 4 Blvd Boston, MA 02210	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.

Name	Residence Address	Foreign Principal(s)	Nature of Services
Jonathan Croog	35 Brewster Terrace New Rochellle, NY 10804 10 Hudson Yards New York, NY 10001	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.
Govinda Avasarala	131 P Street NW Washington, DC 20001 4800 Hampden Lane, Suite 400 Bethesda, MD 20814	Saudi Council of Economic and Development Affairs (CEDA)	Helped to organize and provide support for meetings between the Kingdom of Saudi Arabia's Saudi Delegation and U.S. public interest groups and U.S. corporations to promote the 21st Century strategic partnership between the United States and Saudi Arabia and to strengthen U.S. understanding with respect to Saudi Arabia.

## Appendix

### Response to Item 10(a)

**Item 10(a): DISBURSEMENTS-MONIES:** During the period beginning 60 days prior to the date of the registrant's obligation to register 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? 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	To Whom	Purpose	Amount
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Accommodation (e.g., hotels) fees during course of project (December 2015 to June 2016)	\$113,073.36
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Air/rail (travel to and from U.S. and international destinations, including Saudi Arabia, Dubai, New York) fees during course of project (December 2015 to June 2016)	\$262,953.31
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Auto/local travel (e.g., cabs, Uber) fees during course of project (December 2015 to June 2016)	\$26,715.98
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Computer/telecom (e.g., mobile hotspots) fees during course of project (December 2015 to June 2016)	\$371.37
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Courier/freight fees during course of project (December 2015 to June 2016)	\$139.50
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Entertainment/meal fees during course of project (December 2015 to June 2016)	\$26,545.07
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Publication/printing fees during course of project (December 2015 to June 2016)	\$2,015.51
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Services (e.g., translation services) fees during course of project (December 2015 to June 2016)	\$26,487.50
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Sundry fees during course of project (December 2015 to June 2016)	\$7,980.32
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Administrative support fees during course of project (December 2015 to June 2016)	\$591.53
Saudi Council of Economic and Development Affairs (CEDA)	06/30/2016	Vendors	Communication charge fees during course of project (December 2015 to June 2016)	\$41,264.08