Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

U.S. Department of Justice
Washington, DC 20530

OMB No. 1124-0001; Expires May 31, 2020

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

I--REGISTRANT

1. Name of Registrant

Teneo Strategy LLC

2. Registration No. (To Be Assigned By the FARA Registration Unit) 6698

3. Principal Business Address
280 Park Avenue, 4th Floor, New York, NY 10017

4. If the registrant is an individual, furnish the following information:
(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

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

(g) 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 Liability Company

(b) Date and place of organization Delaware, February 23, 2011

(c) Address of principal office 280 Park Avenue, 4th Floor, New York, NY 10017

(d) Name of person in charge Declan Kelly

(e) Locations of branch or local offices Boston, Washington, Dallas, San Francisco, Toronto, Sao Paolo, London, Dublin, Brussels, Doha, Dubai, Johannesburg, Hong Kong, Singapore, Shanghai, Beijing, Sydney

(f) If a membership organization, give number of members N/A

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

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

Name	Residence Address(es)	Position	Nationality
Declan Kelly	On file with FARA unit	Chief Executive Officer	USA, Ireland
Douglas Band	On file with FARA unit	President	USA
Paul Keary	On file with FARA unit	Chief Operating Officer	USA, Ireland
Steven Sullivan	On file with FARA unit	Chief Financial Officer	USA

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

(i) Describe the nature of the registrant's regular business or activity.
Business Consulting /Communications Consulting

(j) Give a complete statement of the ownership and control of the registrant.
Teneo Strategy LLC is is subsidiary of Teneo Holdings LLC, a Delaware Limited Liability Company
Teneo Holdings LLC is a subsidiary of Teneo Global LLC, a Delaware Limited Liability Company

---

6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address(es)	Nature of Services
Richard Powell	On file with FARA unit	Communications
Padraic Riley	On file with FARA unit	Communications
Douglas Band	On file with FARA unit	Communications
Faten Alqaseer	On file with FARA unit	Communications
Dara Pavlich	On file with FARA unit	Communications
Sybille St. Arromand	On file with FARA unit	Communications

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

II--FOREIGN PRINCIPAL

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

Foreign Principal	Principal Address(es)
NEOM Company	Information Technology and Communications Complex, Building IN-01, Al Nakheel District, P.O. Box 10, Riyadh 11411, Kingdom of Saudi Arabia

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

IV--FINANCIAL INFORMATION

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

During the period beginning 60 days prior to the date of your obligation to register[2] to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, 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	Purpose	Amount

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 ten 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, moneys, 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)).

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

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

During the period beginning 60 days prior to the date of your obligation to register[4] to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value[5] other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose

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

During the period beginning 60 days prior to the date of your obligation to register[6] to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? 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.

Date	To Whom	Purpose	Amount
June 23-28, 2019	Various	Travel expenses for personnel of registrant (no travel expenses for U.S. government officials or media).	$12,326.24

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

During the period beginning 60 days prior to the date of your obligation to register[7] to the time of filing this statement, did you dispose of any thing of value[8] other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose

(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register[9] to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your 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	Amount or Thing of Value	Political Organization or Candidate	Location of Event

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.

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

V--INFORMATIONAL MATERIALS[10]

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount and for what period of time.

14. Will any 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 persons or firms.

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

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other *(specify)* _____

Electronic Communications

☐ Email
☐ Website URL(s): _____
☐ Social media website URL(s): _____
☐ Other *(specify)* _____

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

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

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

☐ English ☐ 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, 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.

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM

VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with an initial 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 7.

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, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)	(Print or type name under each signature or provide electronic signature[1])
July 8 2019	[signature]
	Richard Powell

1 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.

Received by NSD/FARA Registration Unit 07/08/2019 5:53:13 PM