

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 12/31/2025
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant
Mr. Bradley James Gordon

(b) Registration Number
6971

(c) Primary Business Address
Street 282, Phnom Penh, Phnom Penh, CAMBODIA 12000

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.

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
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(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
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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
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(b) During this 6 month reporting period, did any employee or individual working in any capacity (including a partner, officer, director or similar official), 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
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(c) Have any employees or individuals (including partners, officers, directors or similar officials), 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
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(d) Have any employees or individuals (including partners, officers, directors or similar officials), 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
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6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of this supplemental statement or submitted with this filing? Yes ☒ No ☐

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.

Ministry of Culture and Fine Arts

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

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
Ministry of Culture and Fine Arts	Legal Advice on the repatriation of cultural artefacts removed from Cambodia back to Cambodia

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.

See Appendix for Response

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

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

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
See Appendix for Response	

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, or from any other source, for or in the interests of any foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☐ No ☒

If no, please explain why no monies were received.

Ministry of Culture and Fine Arts: Registrant provides these services pro bono to the Ministry of Culture.

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
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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.

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
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	December field research costs	Siem Reap field visit	\$ 1,170.00	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Private van hire	Field research, Siem Reap and Koh Ker	\$ 575.00	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Premises, Unit 602 Amass Central Tower	Rent, service charge, VAT and electricity	\$16,483.81	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Equipment	Computer and printer for research use	\$ 749.50	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Staff salaries, seniority and related staff costs	Research and testimony collection	\$63,304.90	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Informant family expenses	Support for a witness family	\$ 1,300.00	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Air fares	Research and museum visits	\$ 3,406.50	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Staff expense claims reimbursed	Field research costs met by staff	\$ 3,126.49	
	07/01/2025-12/31/2025	FARA filing fees	Registration costs	\$ 610.00	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Travel, accommodation, subsistence, ground transport and US storage paid on the registrant's personal account	Research and museum visits	\$23,501.42	
Ministry of Culture and Fine Arts	07/01/2025-12/31/2025	Social security contributions (NSSF)	Employer contributions	\$ 1,010.00	
				\$ 115,237.62	
					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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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.

Ministry of Culture and Fine Arts

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:

- | | | | |
|--|---|--|--|
| ☒ 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 websites URL(s): <u>See Appendix for Response</u> | | | |
| ☐ Other (specify) _____ | | | |

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:

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

20. Indicate the language used in the informational materials:

- ☒ English ☒ Other (specify) khmer

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.

VI - 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 ¹³
08/31/2026	BRADLEY JAMES GORDON	Sign	/s/BRADLEY JAMES GORDON
		Sign	
		Sign	
		Sign	

¹³ 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.

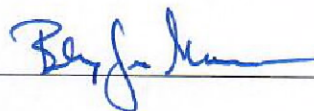
Date

Printed Name

Signature

31 August 2026

Bradley James Gordon



Registration No. 6971 — Bradley James Gordon
Supplemental Statement for the six month period ending 31 December 2025
Statement of basis

1. This note records the basis on which the financial information in this statement has been prepared, so that the figures reported at Items 14 and 15 can be reproduced from the underlying records.

2. Timing. This statement is filed late. During 2026 the registrant undertook a comprehensive review of the records of the registered activity from January 2024, in order to establish a consistent basis of reporting across all periods. That exercise took longer than anticipated and is the principal reason for the delay.

3. Basis of preparation. The following bases are applied consistently in this statement and in the statement for the other unfiled period.

3.1 Cash basis. Disbursements are reported in the period the money left the registrant's account, not the period the cost was incurred or invoiced. Receipts are reported when received; a sum receivable but not received is not a receipt.

3.2 Gross reporting. Costs met by the registrant and later reimbursed are reported in full at Item 15(a), with the reimbursement reported separately at Item 14(a) in the period received. The two are not netted.

3.3 Costs met personally. Where the registrant met a cost personally and was reimbursed by his firm, the disbursement is counted once, on the leg leaving the registrant. Transfers between his own accounts and the firm are neither disbursements nor receipts.

3.4 Air fares. The registrant's travel agent operates a rolling account settled in lump sums that cannot be matched to individual journeys. Air fares are reported by reference to the ticket rather than the date of settlement. This is the only departure from paragraph 3.1.

3.5 Travel. Whether a journey relates to the registered activity is determined by its destination and purpose, not by the airports through which it passed. Where a private element affected only the routing, the fare is apportioned; where the purpose of the journey was itself mixed, the fare is excluded in full.

3.6 Shared suppliers. The same travel agent, and the same firm bank account, are used for the registrant's personal travel and for other client matters. Payments to that agent, and movements on that account, therefore exceed the amounts reported here.

4. Estimate. Social security contributions of USD 1,010.00 are an estimate. Cambodian social security is charged per employee up to a cap and paid firm-wide; one evidenced monthly figure has been extended across the period and allocated by reference to the proportion of staff engaged on the registered activity.

5. Items 12 and 13. Both are answered Yes. The statement for the period ending 31 December 2024 answered Item 12 Yes but described the activity as not amounting to political activity, and answered Item 13 No. The present answers reflect the growth of the registrant's public-facing and own-behalf activity across 2025 and 2026, and are given consistently in the statement for the other unfiled period.

6. Reported disbursements are higher than in earlier periods, principally because this period and the next are dominated by the physical return of objects to Cambodia, and because the gross basis at paragraph 3.2 reports both the cost and the reimbursement.

Appendix

Response to Item 12-Description

Ministry of Culture and Fine Arts: The registrant acts for the Ministry of Culture and Fine Arts of the Kingdom of Cambodia on the recovery and return of Khmer cultural property held abroad, principally in the United States. Most of that work is legal and investigative and is reported at Item 11.

Part of it is public-facing and is reported here: press releases issued jointly with the foreign principal announcing returns of objects, contact with journalists, participation in a cultural film festival in the United States, and posts on the registrant's LinkedIn and Facebook accounts concerning the return of Khmer objects. Those communications were directed in part at sections of the public within the United States and concerned the public interests of a foreign government, and are reported as political activity under Section 1(o).

The registrant did not lobby any officer or official of the United States Government and received no compensation for the activity described.

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Ministry of Culture and Fine Arts	07/01/2025	Tom Mashberg, New York Times	Electronic/Phone Calls (ongoing)	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	07/01/2025	Matthew Campbell, author, The Man Who Stole the Gods (Portfolio)	Electronic/Phone Calls (ongoing)	Trade Book about the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	07/01/2025	Sam Tabachnik, Denver Post	Electronic/Phone Calls (ongoing)	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	11/15/2025	Long Beach film festival (15 to 18 November, seven posts)	Personal linkedin and facebook; interviews by Cambodian American reporters	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	11/21/2025	Return ceremony	Personal linkedin and facebook	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	11/21/2025	Speaking at the showing of the movie LOOT in Long Beach	Live audience	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	11/25/2025	Khmer Times	Electronic/Phone Calls (ongoing)	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	12/05/2025	Visit to Denver	Personal linkedin and facebook	The topic was the repatriation of Cambodian statues
Ministry of Culture and Fine Arts	12/17/2025	Reposting Press Release	Personal linkedin and facebook	The topic was the repatriation of Cambodian statues

Appendix

Response to Item 13

Item 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)? If yes, describe fully.

Foreign Principal(s)	Activity
Ministry of Culture and Fine Arts	The registrant pursued, on his own behalf and at his own expense, four undertakings that benefit the foreign principal by drawing attention to Cambodia's cultural heritage. (1) A narrative non-fiction book about the repatriation campaign. (2) An illustrated book on Khmer cultural heritage, which the registrant is developing at his own expense using a researcher engaged by him; the Minister of Culture and Fine Arts gave interviews for the book during this period and is expected to review it and to contribute a foreword; there is no written agreement, the foreign principal has not funded the project and no money has passed between them; the registrant anticipates that the Minister may contribute towards costs following publication, and any such contribution will be reported when received. (3) The establishment of the Punaravartan Foundation, a Singapore-registered non-profit concerned with conservation, museum training, internships, fellowships and excavation. (4) A prospective immersive film experience concerning Khmer cultural heritage, a commercial venture under discussion since 2022 intended in part to recover costs incurred over many years, for which the registrant paid an adviser a consulting fee during this period. None is undertaken at the request of the foreign principal and none is funded by it. Their costs are not reported at Item 15(a).

Appendix

Response to Item 18

Item 18: During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following: Website URL(s):

<https://www.facebook.com/KhmerCultureMinistry/>; <https://www.facebook.com/bradgordonpnh>;
<https://www.linkedin.com/in/gordonbradley/>