

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 (b) Registration Number  
 Thatcher & Company, Inc. 7497
- (c) Primary Business Address  
 1501 Broadway, Floor 27, New York, NY 10036

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 <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship           | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- |                          |                              |  |
|--------------------------|------------------------------|--|
| (1) Name                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
- (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 C<sup>1</sup>, 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.

<sup>1</sup> 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
Todd Irwin	Redwood, CA	UNITED STATES	Managing Director	12/29/2025

(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
Dennis Watson	Business Finland Oy	Dallas, TX	UNITED STATES	Senior Vice President	08/25/2025

(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
Eva Nordstrom	officer	08/25/2025
Kenneth Vesey	Senior Account Executive	08/25/2025

(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
Eva Nordstrom	officer	Business Finland Oy	08/25/2025
Kenneth Vesey	Senior Account Executive	Business Finland Oy	08/25/2025

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**


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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

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8. Has the registrant registered for any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes  No

If yes, furnish the following information:

Foreign Principal

Date Registered

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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.

Business Finland oy

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10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A<sup>3</sup> and/or B<sup>4</sup> 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

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<sup>2</sup> 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.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> 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
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity<sup>5</sup> 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

<sup>5</sup> "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.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Business Finland Oy	09/19/2025	Business Finland Oy	PR Services for Climate Week NYC Events	\$22,456.00	
Business Finland Oy	11/11/2025	Business Finland Oy	PR Services for work in Finland campaign (Launched January 26th, 2026)	\$10,678.00	
Business Finland Oy	-----	-----	-----	----->	\$33,134.00
					\$ 33,134.00
					Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign<sup>7</sup>, 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 D<sup>8</sup> 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 value<sup>9</sup> 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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<sup>6, 7</sup> 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)).

<sup>8</sup> 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.

<sup>9</sup> 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.

Business Finland Oy: No disbursements were made on behalf of the foreign principal during this reporting period. Our firm provided public relations services on behalf of the foreign principal and received payment of professional fees directly from the client. All event costs and any third-party expenditures were paid directly by the foreign principal or its designated payer, not by the registrant.

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
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Total

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

During this 6 month reporting period, has the registrant disposed of anything of value<sup>10</sup> 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 value<sup>11</sup> 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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<sup>10, 11</sup> 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?<sup>12</sup> 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.

Business Finland Oy

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
Business Finland Oy	OTHER: One-time payment as part of our global service fee to fund the creation of two email invitations.	\$ 2,000.00

\$ 2,000.00

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): \_\_\_\_\_

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) \_\_\_\_\_

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

<sup>12</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, 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.

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**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 <sup>13</sup>
01/30/2026	Bradley Thatcher	<input data-bbox="854 495 922 537" type="text" value="Sign"/> /s/Bradley Thatcher
_____	_____	<input data-bbox="854 583 922 625" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 672 922 714" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 760 922 802" type="text" value="Sign"/> _____

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<sup>13</sup> 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

1/30/26

Bradley Thatcher

Bradley Thatcher

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Appendix Response to Item 11

**Item 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? If yes, identify each foreign principal and describe in full detail all activities and services:**

Foreign Principal(s)	Activities/Services
Business Finland Oy	The agreement between Thatcher & Company, Inc. and Business Finland Oy entails the provision of strategic public relations and media outreach services aimed at increasing awareness and visibility of Finland's innovations and business potential in the U.S. market. The method of performance includes crafting media strategies, securing earned media coverage, developing content such as press releases and op-eds, facilitating media interviews, and advising on communication strategies. Our work will involve close collaboration with Finnish business leaders and U.S. media outlets to ensure timely and effective communication of Finland's key messages, particularly in sectors like green energy and digital transformation. Regular updates, media monitoring, and reporting will be part of the performance to track success.

## **Appendix**

### **Response to Item 12-Description**

Business Finland Oy: Business Finland Oy: The activities on behalf of Business Finland Oy primarily involve strategic public relations, perception management and promotion designed to enhance the visibility and reputation of Finland and its business sectors in the United States. This may indirectly influence U.S. economic and trade policies by highlighting Finland's strengths in innovation, sustainability, green energy and digital transformation.

## Appendix Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Business Finland Oy	09/19/2025	Elliott Maidenberg	Media Breakfast	<p>Event title: Strengthening the Finland-USA Partnership for Energy Security</p> <p>Location: Consulate of Finland in New York</p> <p>Speakers:</p> <ul style="list-style-type: none"> <li>- Jarmo Sareva, Consul General of Finland in New York</li> <li>- David Hebert, Vice President of Energy Storage Global Sales Management at Wärtsilä</li> <li>- Monil Malhotra, President at Kempower North America</li> <li>- Karl Smithback, Director of Sales, North America at Solar Foods</li> <li>- Helena Sarén, Lead of the Zero Carbon Future Mission at Business Finland</li> <li>- Jussi Manninen, Executive President at VTT</li> </ul> <p>Media attendees:</p> <ul style="list-style-type: none"> <li>- Carrie Klein, Reporter at Grist</li> <li>- Rachel Ziemba, author at Weaponized Economy</li> <li>- Peter Green, Journalist at Cheddar.com</li> <li>- Jackie Zhou, Booking Researcher at the TODAY Show, NBC</li> <li>- Rob Williams, Sr Editor, Energy &amp; Industrials at Seeking Alpha</li> <li>- Peter Mckillop, Founder at Climate and Capital Media</li> </ul>
Business Finland Oy	10/06/2025	Elliott Maidenberg	Media Campaign	<p>The goal of this campaign was to highlight Finland's capabilities and innovative approach in green hydrogen. The campaign led to interviews of Ilkka Homanen, Head of Hydrogen and Batteries at Business Finland in H2 View and on the Energy Mix Radio Show.</p>