

U.S. Department of Justice
Washington, DC 20530

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

I--REGISTRANT

1. Name of Registrant

Tricuro LLC

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

7682

3. Primary Business Address

7170 Woodmont Avenue, PH04, Bethesda, MD 20815

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

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 01/01/2015, Maryland

- (c) Name of responsible individual David Sowell
(e.g., officer, director or partner)

- (d) Other business address(es), if any, including 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
Mr. David Sowell	7170 Woodmont Avenue, PH04 Bethesda, MD 20815	UNITED STATES; Ms.	Principal

(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
Mr. David Sowell	The Council for the Development of Cambodia	Media engagement, strategic communications, and advisory support to promote foreign direct investment in Cambodia and to support communications on issues that may affect investor confidence in Cambodia.

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

Strategic communications, media relations, and advisory services for governments, NGOs, and corporate clients, including international investment promotion and stakeholder engagement.

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

Tricuro LLC is a single-member limited liability company wholly owned and controlled by David Sowell.

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
------	-------------------	----------------------	----------

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
The Council for the Development of Cambodia	Government Palace, Sisowath Quay Phnom Penh CAMBODIA 12000

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
-------------------	---------------------

IV--FINANCIAL INFORMATION

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

During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA to the date of registration, 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.³

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
The Council for the Development of Cambodia	08/25/2025	Council for the Development of Cambodia	Professional services	\$ 141,000.00	
The Council for the Development of Cambodia	10/14/2025	Council for the Development of Cambodia	Professional services and reimbursement of expenses	\$ 148,352.18	
The Council for the Development of Cambodia	-----	-----	-----	----->	\$ 289,352.18

\$ 289,352.18

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 10 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, 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 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 register⁴ under FARA to the date of registration, has the registrant received anything of value⁵ 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
-------------------	---------------	-----------	---------	----------------

10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ under FARA to the date of registration, 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	Subtotal
-------------------	------	-----------	---------	--------	----------

See Appendix for Response

\$ 145,060.75

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA to the date of registration, has the registrant disposed of any thing of value⁸ 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
-------------------	------	-----------	---------	----------------

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA to the date of registration, 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
------	-------	----------------------------------	--------	-----------------------

4, 6, 7 and 9 See *supra* note 2, at 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 MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ 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, list the type of informational materials, and file the informational materials.

Foreign Principal	Type of Informational Materials
The Council for the Development of Cambodia	Email; Magazine or newspaper

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.

The Council for the Development of Cambodia

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
-------------------	----------------	--------

14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of informational materials?

Yes No

If yes, furnish the names and addresses of the individuals or organizations.

Name	Address	Foreign Principal(s)
Tricuro LLC	7170 Woodmont Avenue, PH04 Bethesda, MD 20815	The Council for the Development of Cambodia

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*) _____

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, 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.

¹¹ See *supra* note 2, at 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 checked="" type="checkbox"/> Newspapers | <input type="checkbox"/> Nationality groups |
| <input checked="" 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* 28 C.F.R. § 5.201(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 fund raising campaign and transmitted for a foreign principal (*See* 28 C.F.R. § 5.201(e)).

VII--EXECUTION

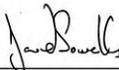
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 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 ¹²
12/30/2025	David Sowell	<input type="text" value="Sign"/> /s/David Sowell
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____

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
December 30, 2025	David Sowell	
_____	_____	_____
_____	_____	_____
_____	_____	_____

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
12/30/2025	NICOLA HEWITT	

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	Subtotal
The Council for the Development of Cambodia	08/26/2025	Nicolla Hewitt Communications	Professional services in furtherance of CDC engagement	\$ 49,000.00	
The Council for the Development of Cambodia	08/28/2025	Nicolla Hewitt Communications	Professional services in furtherance of CDC engagement	\$ 21,500.00	
The Council for the Development of Cambodia	10/06/2025	Nicolla Hewitt Communications	Reimbursement of expenses	\$ 4,060.75	
The Council for the Development of Cambodia	10/17/2025	Nicolla Hewitt Communications	Professional services in furtherance of CDC engagement	\$ 49,000.00	
The Council for the Development of Cambodia	10/24/2025	Nicolla Hewitt Communications	Professional services in furtherance of CDC engagement	\$ 21,500.00	
The Council for the Development of Cambodia	-----	-----	-----	----->	\$ 145,060.75