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OMB No. 1124-0002; Expires October 31, 2026

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 09/30/2025
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Open Dialogue Foundation, Inc.

(b) Registration Number
7246

(c) Primary Business Address
Brickell Bayview Center 80 S.W. 8th Street, Suite 2000, Miami, FL 33130

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 C[1], 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.)

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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

(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

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

(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

(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
Jan Rymszewicz	Advocacy Officer	05/31/2025

(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
Jan Rymszewicz	Advocacy Officer	Open Dialogue Foundation	05/31/2025

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 ☐

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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.

Open Dialogue Foundation

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

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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
Open Dialogue Foundation	Advocacy at the United States Senate and the United States House of Representatives regarding the evasion of sanctions by Russia and its proxies, the impact the abuse of AML/CFT, MLAT cybersecurity laws on the national security and financial integrity of the U.S., the role of Crypto-Asset like Bitcoin on human rights, humanitarian aid & as a tool against transnational financial repression.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity[5] 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

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.

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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.[6]

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
See Appendix for Response					

$ 145,234.51

Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign[7], 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[8] 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 [9] 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

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.

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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
See Appendix for Response					

$ 129,200.00
Total

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

During this 6 month reporting period, has the registrant disposed of anything of value[10] 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

(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[11] 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

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.

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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.

Open Dialogue Foundation

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
		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 ☐

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.

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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 [13]
05/18/2026	Lydumyla Kozlovska	Sign	/s/Lydumyla Kozlovska
		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.

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Date	Printed Name	Signature
23 Feb 2026	Lyudmyla Kozlovska	Lyudmyla Kozlovska

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Appendix
Response to Item 12-Description

Open Dialogue Foundation: The Open Dialogue Foundation (ODF)'s objectives include the protection of human rights, democracy, and the rule of law in the post-Soviet countries. ODF pursues its goals through the organization of observation missions and monitoring individual human rights violation cases. It also advocates for international legislation better serving human rights, such as the Magnitsky Act or the adding of conditionality clauses to EU & international financial assistance programmes directed at non-democratic states and hybrid regimes. ODF publishes analytical reports and distributes them among the EU and the US institutions, the Organisation for Security and Cooperation in Europe, Council of Europe, United Nations, other human rights organisations, foreign ministries and parliaments, as well as the media.

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Appendix
Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Open Dialogue Foundation	06/23/2025	Daniel M. Rothschild, Reagan Presidential Foundation	In-person	at the Ronald Reagan Presidential Foundation and Institute: Educate stakeholders on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. Actions and materials: 1) Share key case studies and documentation, including ODF's report "Transnational Repression against Barlyk Mendygaziyev," which details the misuse of AML/CFT mechanisms and related cross-border pressure tactics. 2) Raise awareness of Strategic Lawsuits Against Public Participation (SLAPPs) used to silence watchdogs and opposition, drawing on ODF's reports "The Price of Exposing Sanctions Violations: Bakai Bank's Legal Attack on the Open Dialogue Foundation" and "SLAPP & Transnational Financial Repression across Belgium/EU and the United States: The Case Against Lyudmyla Kozlovska and the Open Dialogue Foundation." 3) Include analysis and recommendations from Jorge Jraissati's "Combating Transnational Financial Repression," highlighting how AML/CFT standards can be weaponized and proposing safeguards for financial access and civil society. Policy reform: Promote targeted reforms to AML/CFT frameworks, MLAT processes, and cybersecurity statutes to prevent their misuse as tools of repression, ensuring accountability mechanisms, and technology-neutral drafting that avoids stigmatizing privacy tools in line with FATF's technology-neutral standards and consultations.
Open Dialogue Foundation	06/24/2025	Mary Vigil, Teagan Gambert, Scott Flipse and Piero Tozzi of the Office of Congressman Chris Smith	In-person	Educate stakeholders on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. Actions and materials:

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				1) Share key case studies and documentation, including ODF's report "Transnational Repression against Barlyk Mendygaziyev," which details the misuse of AML/CFT mechanisms and related cross-border pressure tactics. 2) Raise awareness of Strategic Lawsuits Against Public Participation (SLAPPs) used to silence watchdogs and opposition, drawing on ODF's reports "The Price of Exposing Sanctions Violations: Bakai Bank's Legal Attack on the Open Dialogue Foundation" and "SLAPP & Transnational Financial Repression across Belgium/EU and the United States: The Case Against Lyudmyla Kozlovska and the Open Dialogue Foundation." 3) Include analysis and recommendations from Jorge Jraissati's "Combating Transnational Financial Repression," highlighting how AML/CFT standards can be weaponized and proposing safeguards for financial access and civil society. Policy reform: Promote targeted reforms to AML/CFT frameworks, MLAT processes, and cybersecurity statutes to prevent their misuse as tools of repression, ensuring accountability mechanisms, and technology-neutral drafting that avoids stigmatizing privacy tools in line with FATF's technology-neutral standards and consultations.
Open Dialogue Foundation	06/24/2025	John Sakellariadis, Politico	In-person	Educate stakeholders on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. Actions and materials: 1) Share key case studies and documentation, including ODF's report "Transnational Repression against Barlyk Mendygaziyev," which details the misuse of AML/CFT mechanisms and related cross-border pressure tactics. 2) Raise awareness of Strategic Lawsuits Against Public Participation (SLAPPs) used to silence watchdogs and opposition, drawing on ODF's reports "The Price of Exposing Sanctions Violations: Bakai Bank's Legal Attack on the Open Dialogue Foundation" and "SLAPP & Transnational Financial Repression across Belgium/EU and the United States: The Case Against Lyudmyla Kozlovska and the Open Dialogue Foundation." 3) Include analysis and recommendations from Jorge Jraissati's "Combating Transnational Financial Repression," highlighting how AML/CFT standards can be weaponized and proposing

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Open Dialogue Foundation	06/24/2025	Todd Stein of the Human Rights Commission, Rep. James P. McGovern, Co-Chair	In-person	Spoke at a US House of Representatives Hearing on Transnational Repression: Trends and Policy Approaches
Open Dialogue Foundation	06/25/2025	Rep. Warren Davidson and his staff	In-person	Attending Bitcoin Policy Summit 2025: 1) Educating on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. 2) Promoting targeted reforms to AML/CFT frameworks, MLAT processes, and cybersecurity statutes to prevent their misuse as tools of repression, ensuring accountability mechanisms, and technology-neutral drafting that avoids stigmatizing privacy tools in line with FATF's technology-neutral standards and consultations.
Open Dialogue Foundation	06/26/2025	Rep. Warren Davidson and his staff	In-person	Attending Bitcoin Policy Summit 2025: 1) Educating on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. 2) Promoting targeted reforms to AML/CFT frameworks, MLAT processes, and cybersecurity statutes to prevent their misuse as tools of repression, ensuring accountability mechanisms, and technology-neutral drafting that avoids stigmatizing privacy tools in line with FATF's technology-neutral standards and consultations.
Open Dialogue Foundation	08/01/2025	Jenney Rees in the office of US Senator John Curtis	In-person	Educate stakeholders on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. Actions and materials:

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				1) Share key case studies and documentation, including ODF's report "Transnational Repression against Barlyk Mendygaziyev," which details the misuse of AML/CFT mechanisms and related cross-border pressure tactics. 2) Raise awareness of Strategic Lawsuits Against Public Participation (SLAPPs) used to silence watchdogs and opposition, drawing on ODF's reports "The Price of Exposing Sanctions Violations: Bakai Bank's Legal Attack on the Open Dialogue Foundation" and "SLAPP & Transnational Financial Repression across Belgium/EU and the United States: The Case Against Lyudmyla Kozlovska and the Open Dialogue Foundation." 3) Include analysis and recommendations from Jorge Jraissati's "Combating Transnational Financial Repression," highlighting how AML/CFT standards can be weaponized and proposing safeguards for financial access and civil society. Policy reform: Promote targeted reforms to AML/CFT frameworks, MLAT processes, and cybersecurity statutes to prevent their misuse as tools of repression, ensuring accountability mechanisms, and technology-neutral drafting that avoids stigmatizing privacy tools in line with FATF's technology-neutral standards and consultations.
Open Dialogue Foundation	09/30/2025	Mary Trechock for the office of Representative Markley and Todd Stein for the office of Representative McGovern	In-person	Educate stakeholders on emerging tactics of transnational financial repression by authoritarian regimes such as Kazakhstan and underscore the importance of neutral, technology-agnostic language for privacy-preserving payments, communications, and travel tools in U.S. law and FATF guidance. Actions and materials: 1) Share key case studies and documentation, including ODF's report "Transnational Repression against Barlyk Mendygaziyev," which details the misuse of AML/CFT mechanisms and related cross-border pressure tactics. 2) Raise awareness of Strategic Lawsuits Against Public Participation (SLAPPs) used to silence watchdogs and opposition, drawing on ODF's reports "The Price of Exposing Sanctions Violations: Bakai Bank's Legal Attack on the Open Dialogue Foundation" and "SLAPP & Transnational Financial Repression across Belgium/EU and the United States: The Case Against Lyudmyla Kozlovska and the Open Dialogue Foundation." 3) Include analysis and recommendations from Jorge Jraissati's "Combating Transnational Financial Repression," highlighting how AML/CFT standards can be weaponized and proposing

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				safeguards for financial access and civil society. Policy reform: Promote targeted reforms to AML/CFT frameworks, MLAT processes, and cybersecurity statutes to prevent their misuse as tools of repression, ensuring accountability mechanisms, and technology-neutral drafting that avoids stigmatizing privacy tools in line with FATF's technology-neutral standards and consultations.

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