

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**

Mintovate, LLC

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

7322

3. Primary Business Address

500 East 3rd Street, Apt 312, Dayton, OH 45402

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 07/08/2022, Dayton, OH

(c) Name of responsible individual Brandy Foster
(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 2

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

Name	Residence Address	Citizenship	Position
Brandy Foster	500 East 3rd Street, Apt 312 Dayton, OH 45402	UNITED STATES	Chief Executive Officer
Nathan Dillard	1414 Leupp Ct Rochester Hills, MI 48307	UNITED STATES	Chief Strategy Officer

(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
See Appendix for Response		

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

See Appendix for Response

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

See Appendix for Response

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
Stephen Jones	6966 Royalgreen Drive Cincinnati, OH 45244	Amulus Security Ltd.	Steve Jones has contributed to developing the strategy to sell Amulus to the U.S. for Ukraine and has promoted Amulus by facilitating meetings with potential teaming partners and political aides. The Mintovate team has also curated relationships with potential U.S.-based fabricators. Steve has also shared Amulus's LinkedIn posts on her own LinkedIn account.

II--FOREIGN PRINCIPAL7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal

Amulus Security Ltd.

Foreign Principal Address

16 Great Queen Street, Covent Garden
London, United Kingdom
UNITED KINGDOM WC2B 5AH

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

See Appendix for Response

Activities/Services

IV--FINANCIAL INFORMATION9. (a) **RECEIPTS-MONIES**During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA, 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
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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 Rule 201(e), 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, 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
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10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ 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?

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
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(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA, 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
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA, 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
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

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 and file the informational materials.

Foreign Principal
Amulus Security Ltd.

Type of Informational Materials
Email; Letters or telegrams; Pamphlets or other publications; Social Media Website URL(s); Website URL(s)

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.

Amulus Security Ltd.

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

Yes ☐ No ☒

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

Name	Address	Foreign Principal(s)
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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): <u>www.amulus.org</u> | | | |
| ☒ Social Media website URL(s): <u>https://www.linkedin.com/company/amulus/</u> | | | |
| ☐ 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 Footnote 2, on page 3.

- ☒ Public officials
- ☒ Legislators
- ☒ Government agencies
- ☐ Newspapers
- ☐ Editors

☐ Civic groups or associations
☐ Libraries
☒ Educational groups
☐ Nationality groups
☒ Other (*specify*) Team Partners/Industry

☒ English ☐ Other (*specify*) _____

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

/s/Nathan Dillard

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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

09/10/2023Brandy FosterBrandy Foster

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
9/10/2023	Nathan Dillard	Nathan Dillard

Appendix

Response to Item 5(g)

Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s)	Services
Brandy Foster	Amulus Security Ltd.	Brandy Foster has led the development and implementation of the strategy for sAmulus to penetrate the U.S. market. She has promoted Amulus by facilitating meetings with potential teaming partners and political aides. Specifically, Brandy has facilitated a teaming agreement between Buffalo Horse, Inc. (BHI) and Amulus. Brandy has researched ITAR and export controls by contacting multiple federal agencies. Brandy has assisted Amulus with navigating the U.S. procurement process, including registering on SAM.gov. Brandy has monitored funding opportunities and would provide proposal writing support if a solicitation is issued. The Mintovate team has also curated relationships with potential U.S.-based fabricators. Brandy has also shared Amulus's LinkedIn posts on her own LinkedIn account.
Nathan Dillard	Amulus Security Ltd.	Nate Dillard curates social media content and maintains the Amulus LinkedIn page. He also assists with strategy.

Appendix

Response to Item 5(h)

Item 5(h): If the registrant is not an individual, furnish the following information: Describe the nature of the registrant's regular business or activity.

- a. Providing business strategy consultation to clients
- b. Brokering sales of third-party products and services
- c. Providing marketing and professional services to small business clients
- d. Working with related partners and associates to generate business deals.

Appendix

Response to Item 5(i)

Item 5(i): If the registrant is not an individual, furnish the following information: Give a complete description of the ownership and control structure of the registrant.

Mintovate, LLC is a partnership with two Class A Members who each control 50% of the company.

Class A Member means a holder/owner of one or more Class A Membership.

Officers and Agents of the Company: The Class A Members may authorize any Member or Members of the Company, or other individuals or entities, whether or not a Member, to take action on behalf of the Company, as the Class A Members deem appropriate. Any Member may lend money to and receive loans from the Company, act as an employee, independent contractor, lessee, lessor, or surety of the company, and transact any business with the Company that could be carried out by someone who is not a Member; and the Company may receive from or pay to any Member remuneration, in the form of wages, salary, fees, rent, interest, or any form that the Class A Members deem appropriate.

The Class A Members may appoint officers of the Company who, to the extent provided by the Class A Members, may have and may exercise all the powers and authority of the Members or Managers in the conduct of the business and affairs of the Company. The officers of the Company may consist of a President, a Treasurer, a Secretary, or other officers or agents as may be elected or appointed by the Class A Members. The Class A Members may provide rules for the appointment, removal, supervision and compensation of such officers, the scope of their authority, and any other matters relevant to the positions. The officers shall act in the name of the Company and shall supervise its operation, within the scope of their authority, under the direction and management of the Class A Members.

Any action taken by a duly authorized officer, pursuant to authority granted by the Class A Members in accordance with this Agreement, shall constitute the act of and serve to bind the Company, and each Member hereby agrees neither to dispute such action nor the obligation of the Company created thereby.

Appendix

Response to Item 8

Item 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?

Foreign Principal	Activities/Services
Amulus Security Ltd.	Mintovate's CEO Brandy Foster is also the Director of Strategy for Buffalo Horse, Inc. (BHI), a Montana-based tribal 8(a). BHI's general manager Dustin Monroe has waived Brandy's conflict of interest, given that both Mintovate and BHI will get a commission from Amulus sales to the United States. Mintovate will receive a commission of \$20,000 and \$30,000 for the sale of 20' and 40' ballistic grade B6, respectively, and of \$25,000 and \$35,000 for the sale of 20' and 40' ballistic grade B7, respectively. The Mintovate team will split the commission among the three team members. BHI will earn a 10% commission on the total sale. Brandy and Mintovate promote BHI as part of its discussions with the congressional aides. As a tribal 8(a) company, BHI can receive a sole-source contract up to \$100M from the DoD, and the award cannot be protested.