

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

Lenape Legal Ltd

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

7388

3. Primary Business Address

406 Lloyd Avenue, Downingtown, PA 19335

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 04/08/2024, Pennsylvania

- (c) Name of responsible individual David Alan Spaulding
(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
David Alan Spaulding	Provided to DOJ Under Separate Cover	UNITED STATES	Managing Director

(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.

Transatlantic trade consultancy, assisting North American companies seeking to do business in West Africa and West African companies seeking to do business in North America, this can include: foreign governments, quasi-government entities, non-government entities, and private parties.

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

Lenape Legal Limited is owned, operated, and managed by David Alan Spaulding.

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
See Appendix for Response			

II--FOREIGN PRINCIPAL

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

Foreign Principal Government of Cote d'Ivoire Malian Government Government of Nigeria	Foreign Principal Address 2424 Massachusetts Ave Washington, DC 20008 2130 R Street NW Washington, DC 20008 3519 International Court NW Washington, DC 20008
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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
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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, 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
Government of Cote d'Ivoire				None	
Malian Government				None	
Government of Nigeria				None	
					\$.00
					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 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
See Appendix for Response				

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
Government of Cote d'Ivoire Malian Government				None	
Government of Nigeria				None	
				\$.00
					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, 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
See Appendix for Response				

(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

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	Type of Informational Materials
See Appendix for Response	

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.

Government of Cote d'Ivoire; Malian Government; Government of Nigeria

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): _____
 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 Footnote 2, on page 3.

16. Informational materials will be disseminated among the following groups:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Public officials | <input type="checkbox"/> Civic groups or associations |
| <input checked="" type="checkbox"/> Legislators | <input type="checkbox"/> Libraries |
| <input checked="" type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups |
| <input type="checkbox"/> Newspapers | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Editors | <input type="checkbox"/> Other (<i>specify</i>) _____ |

17. Indicate the language to be used in the informational materials:

- English Other (*specify*) French; French; French

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 Rule 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 fundraising campaign and transmitted for a foreign principal. (See Rule 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
<u>03/27/2024</u>	<u>David Spaulding</u>	<u>/s/David Spaulding</u>
<u>03/27/2024</u>	<u>Isobel Spaulding</u>	<u>/s/Isobel Spaulding</u>
<u>03/27/2024</u>	<u>Caroline Colmary</u>	<u>/s/Caroline Colmary</u>
_____	_____	_____

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

<u>03/26/2024</u>	<u>David Spaulding</u>	<u>David A. Spaulding</u>
<u>3/26/24</u>	<u>Isobel Spaulding</u>	<u>Isobel Spaulding</u>
<u>03/26/2024</u>	<u>Caroline Conway</u>	<u>Caroline Conway</u>
<u> </u>	<u> </u>	<u> </u>

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
David Alan Spaulding	Government of Cote d'Ivoire	Project management, communication, contract oversight, due diligence, site visits, consultations, and negotiation. Work is not expected to commence until April 16, 2024.
	Malian Government	Project management, communication, contract oversight, due diligence, site visits, consultations, and negotiations. Work is not expected to commence until April 16, 2024.
	Government of Nigeria	Project management, communication, contract oversight, due diligence, site visits, consultations, and negotiations. Work is not expected to commence until April 16, 2024.

Appendix

Response to Item 6

Item 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)	Nature of Services
Isobel Spaulding	Provided to DOJ Under Separate Cover	Government of Cote d'Ivoire	Project management and communication. Work is not expected to commence until April 16, 2024.
Isobel Spaulding	Provided to DOJ Under Separate Cover	Malian Government	Project management and communication. Work is not expected to commence until April 16, 2024.
Isobel Spaulding	Provided to DOJ Under Separate Cover	Government of Nigeria	Project management and communication. Work is not expected to commence until April 16, 2024.
Caroline Colmary	Provided to DOJ Under Separate Cover	Government of Cote d'Ivoire	Project management, communication, and translation. Work is not expected to commence until April 16, 2024.
Caroline Colmary	Provided to DOJ Under Separate Cover	Malian Government	Project management, communication, translation. Work is not expected to commence until April 16, 2024.
Caroline Colmary	Provided to DOJ Under Separate Cover	Government of Nigeria	Project management, communication, translation. Work is expected to start April 16, 2024.

Appendix
Response to Item 9(b)

Item 9(b): RECEIPTS-THINGS OF VALUE: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant received anything of value 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? If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
Government of Cote d'Ivoire				None
Malian Government				None
Government of Nigeria				None

Appendix
Response to Item 10(b)

Item 10(b): DISBURSEMENTS-THINGS OF VALUE: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant disposed of any thing of value 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? If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
Government of Cote d'Ivoire				None
Malian Government				None
Government of Nigeria				None

Appendix

Response to Item 11

Item 11: Prior to the time of filing this statement, 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? If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Type
Government of Cote d'Ivoire	Lectures or speeches; Letters or telegrams; Pamphlets or other publications; Press releases
Malian Government	Lectures or speeches; Letters or telegrams; Pamphlets or other publications; Press releases
Government of Nigeria	Lectures or speeches; Letters or telegrams; Pamphlets or other publications; Press releases