

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 09/30/2024
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Lenape Legal Ltd
- (b) Registration Number
7388
- (c) Primary Business Address
406 Lloyd Avenue, Downingtown, PA 19335

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 C¹, 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.)

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, 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, 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
------	------------------------	-----------------

(d) Have any employees or individuals, 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
------	------------------------	-------------------	-----------------

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing?

Yes No

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.

Government of Cote d'Ivoire
Malian Government
Government of Nigeria

10. During this 6 month reporting period, has the registrant filed an amendment for changes to Exhibits A³ and/or B⁴ 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.

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 activity⁵ 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
-------------------	------	---------	--------	---------

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.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received 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, any contributions, income or money either as compensation or otherwise? Yes No

If no, please explain why no monies were received.

See Appendix for Response

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

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, 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 D⁸ 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 value⁹ 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
-------------------	---------------	-----------	---------	----------------

See Appendix for Response

^{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.

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.

See Appendix for Response

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

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ 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
See Appendix for Response				

(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 value¹¹ 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.

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.

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:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | | |

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:

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

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.

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
12/02/2024	David A. Spaulding	<input data-bbox="854 495 922 531" type="text" value="Sign"/> /s/David A. Spaulding
_____	_____	<input data-bbox="854 583 922 619" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 672 922 707" type="text" value="Sign"/> _____
_____	_____	<input data-bbox="854 760 922 795" type="text" value="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.

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

12/02/2024

David A. Spaulding

David A. Spaulding

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
Government of Cote d'Ivoire	The registrant is assisting the Government of Cote d'Ivoire in engaging U.S. companies as contractors for civil and agricultural products. The registrant is involved in vetting those companies, negotiating contracts, conducting due diligence, and overseeing contract compliance.
Malian Government	The registrant is assisting Mali in engaging U.S. companies as contractors for civil and agricultural products. The registrant is involved in vetting those companies, negotiating contracts, conducting due diligence, and overseeing contract compliance.
Government of Nigeria	The registrant is assisting Nigeria in engaging U.S. companies as contractors for civil and agricultural products. The registrant is involved in vetting those companies, negotiating contracts, conducting due diligence, and overseeing contract compliance.

Appendix Response to Item 12-Description

Government of Cote d'Ivoire: The registrant is assisting the Government of Cote d'Ivoire in engaging U.S. companies as contractors for civil and agricultural products. The registrant is involved in vetting those companies, negotiating contracts, conducting due diligence, and overseeing contract compliance.

Malian Government: The registrant is assisting Mali in engaging U.S. companies as contractors for civil and agricultural products. The registrant is involved in vetting those companies, negotiating contracts, conducting due diligence, and overseeing contract compliance.

Government of Nigeria: The registrant is assisting Mali in engaging U.S. companies as contractors for civil and agricultural products. The registrant is involved in vetting those companies, negotiating contracts, conducting due diligence, and overseeing contract compliance.

Appendix Response to Item 14(a)-Description

Government of Cote d'Ivoire: New Enterprise: Cote d'Ivoire is under no contract with Lenape Legal, Ltd. for which the government, or any subordinate party thereof, is obliged to pay Lenape Legal, Ltd. Lenape has contingency contracts with three U.S. entities (private sector).

Malian Government: New Enterprise: Mali is under no contract with Lenape Legal, Ltd. for which the government, or any subordinate party thereof, is obliged to pay Lenape Legal, Ltd. Lenape has a contingency contract with a Malian company which seeks investment in a shelf-stable milk facility.

Government of Nigeria: New Enterprise: The Federal Government of Nigeria is under no contract with Lenape Legal, Ltd. for which the government, or any subordinate party thereof, is obliged to pay Lenape Legal, Ltd. (NOTE: As noted elsewhere, the Nigerian Kogi State is under contract with Lenape Legal, Ltd. to find and deliver Foreign Direct Investment to the Kogi State and Lenape Legal, Ltd. will be compensated for this work from a portion of the monies invested in the Kogi State when this work is completed.) Lenape has contingency contracts with the Kogi State, a Canadian company which seeks to build a refinery in Nigeria, a U.S. drone manufacturer distributing agricultural drones in Nigeria, and a U.S. water purification company seeking to distribute spray purifiers in Nigeria.

Appendix Response to Item 14(c)

Item 14(c): RECEIPTS-THINGS OF VALUE: During this 6 month reporting period, has the registrant received any thing of value 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? If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
Government of Cote d'Ivoire	07/30/2024	Jean Claude Yeo, Le Directeur General, Agence de Développement Economique de la Region Du Poro.	Social gift - Approximate value is \$2,000.	A celebratory dinner, a carved wooden statue, a traditional hat, and traditional garb.
Government of Cote d'Ivoire	07/30/2024	Jean Claude Yeo, Le Directeur General, Agence de Développement Economique de la Region Du Poro.	Provided vehicles, drivers, and security for touring potential assembly plant sites for the proposed drone assembly plant. - Approximate value is \$1,000.	Vehicles, drivers, and security.
Malian Government				None
Government of Nigeria				None

Appendix

Response to Item 15(a)-Description

Government of Cote d'Ivoire: The nature of Lenape Legal's business is that the company does not act as a conduit for monies going to or from any government or agent, to any other party.

Malian Government: The nature of Lenape Legal's business is that the company does not act as a conduit for monies going to or from any government or agent, to any other party.

Government of Nigeria: The nature of Lenape Legal's business is that the company does not act as a conduit for monies going to or from any government or agent, to any other party.

Appendix Response to Item 15(b)

Item 15(b): DISBURSEMENTS-THINGS OF VALUE: During this 6 month reporting period, has the registrant disposed of anything of value 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? If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
Government of Cote d'Ivoire	04/13/2024	Franck Sahou, Directeur des Investissements, Anglo Saxon, Centre de Promotion des Investissements en Cote d'Ivoire (CEPICE), Abidjan, Cote d'Ivoire.	CEPICE is the Ivory Coast's official government authority for spurring foreign direct investment (FDI). Met with various CEPICE officials to discuss the purchase of a cashew factory in the Ivory Coast (U.S. client decided not to buy), the building of a distribution center in Cote d'Ivoire (ongoing project - long timeline without investors yet), the establishment of an agricultural commodities trading company (ongoing project - long timeline), sale of U.S. made drones to Ivorian public and private sectors (ongoing and active project with signed MOUs and pending contracts), and initial discussions with Ivorian officials regarding renewable energy project (ongoing project - long timeline). - Approximate \$6,000 Cost.	Travel
Government of Cote d'Ivoire	07/28/2024	Franck Sahou (see description above), and Christelle Brouha Sea, Commercial Assistant Budget & Admin Manager, U.S. Commercial Service, U.S. Embassy, Abidjan, Cote d'Ivoire.	Met with CEPICE officials and other government officials to explore building a drone assembly plant in Cote d'Ivoire. - Approximate \$8,000 Cost.	Travel
Government of Cote d'Ivoire	07/30/2024	Jean Claude Yeo, Le Directeur General, Agence de Développement Economique de la Region Du Poro, Korhogo, Cote d'Ivoire.	Toured sites in Poro and met with governor, and other officials to explore building a drone assembly plant in the region. - Approximate \$2,000 Cost.	Travel
Government of Cote d'Ivoire	08/02/2024	Franck Sahou (see description above), Solange Amichia, Directrice Générale, CEPICE, and Lacina Ouattara, Conseiller Technique du	Further discussions on drone project (assembly plant and direct sales to public and private sectors in Cote d'Ivoire). - Approximate \$ 3,000 Cost.	Travel

		President, Republicque de Cote d'Ivoire, Abidjan, Cote d'Ivoire.		
Malian Government	04/11/2024	Nonse Traore, Director of Cooperation and Partnership, and Kissima dit Bakissima Sylla, Conseil, Malien des Chargeurs, Ministere des Transports et des Infrastructeurs.	Meeting with government officials on a proposed distribution center project that was not accepted. No further action on this project is expected. - Approximate \$4,000 Cost.	Travel
Government of Nigeria				None