

BEFORE THE FEDERAL ELECTION COMMISSION

Michael Johnson



Altamonte Springs, Florida 32701

v. MUR No. 8111

CORY L. MILLS

1198 Windrock Dr

McClellan, Virginia 22102

PACEM SOLUTIONS INTERNATIONAL LLC

2941 Fairview Park Dr

Falls Church, Virginia 22042

PACEM DEFENSE LLC

2941 Fairview Park Dr

Falls Church, Virginia 22042

1198 WINDROCK LLC

2941 Fairview Park Dr

Falls Church, Virginia 22042

PACEM ESTATE HOLDINGS LLC

2941 Fairview Park Dr

Falls Church, Virginia 22042

ALS, INC (AMTEC Less Lethal Systems, Inc.)

2941 Fairview Park Dr

Falls Church, Virginia 22042

UNKNOWN PERSONS

that made contributions and/or loans to Corey L Mills

for Congress in the name of Cory Mills Campaign

OFFICE OF
GENERAL COUNSEL
2023 FEB 15 AM 11:15

COMPLAINT

1. This complaint contains more information on the illegal use of campaign expenditures and possible use of foreign funds thru loans to LLCs that were then funneled to the Mills Campaign, amongst other acts of fraud. Cory Mills, who was recently elected to represent Florida's Seventh Congressional District, actively deceived the public throughout the 2022 election by fabricating his Army service, his Employment history, his multiple LLCs he filed in Virginia and Florida, obtaining Loans from the SBA program, obtaining Foreign Loans, making questionable Campaign Expenditures, claims of on-line degrees, and his State of residency. Mills also appears to have violated federal campaign finance laws by knowingly and willfully concealing the true sources of his campaign's funding, misrepresenting how his campaign spent its money, and illegally paying for personal expenses with campaign funds.
2. The Commission should thoroughly investigate what appear to be equally brazen lies about how his campaign raised and spent money.
3. Mills purported loaned his campaign \$1,848,900 during the 2022 election. But it is far from clear how he could have done so with his own funds, because financial disclosure reports indicate that Mills had only \$115,000 to \$315,000 to his name in 2021, and according to his most recent Financial Disclosure Report filed January 9, 2023 he had only \$100,000 to \$200,000 of his own funds, and his claims of having earned hundreds of thousands of dollars in 2021 and 2022 from a supposed consulting business that he had reinstated in March 2018, Pacem Solutions International LLC, are vague, uncorroborated, and non-credible considering his many contradicting statements and false filings on record.
4. Mills also personally signed loans with a High-Risk Foreign Lender in 2019 and 2021. Mills has also personally signed 2 loans in 2018, 2 loans in 2019 and 2 loans in 2021.

Mills for Congress, Financial Summary, 2021-2022, <https://www.fec.gov/data/committee/>

Cory Mills, Annual Report for Calendar Year 2020, Clerk of the House of Representatives (May 7, 2021), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2021/10040264.pdf ("Mills 2021 Financial Disclosure Report").

See Cory Mills, Annual Report for Calendar Years 2021 - 2022, Clerk of the House of Representatives (January 9, 2022) https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10050732.pdf ("Mills 2021 - 2022 Financial Disclosure Report").

5. The IRS attached a Tax lien on Mills LLC called Pacem Solutions International LLC for \$111,815 in 16 June 2021 and again the IRS filed another Tax lien on 24 Feb 2022 for \$592,27 on Mills LLC as he reports on his Federal Taxes. Mills claimed 100 percent ownership on his State filings.
6. Mills continually maintained his residence in Virginia during the 2022 campaign. In March 2021 Mills went to a Department of Motor Vehicles (DMV) in Jacksonville, Fl to get a Florida Driver's license and while he was there, he immediately signed up to register to vote as a resident of Florida using a person's home who was known as one of his "employees." The home is a tiny 1,000 square foot house with 3 bedrooms, 1.5 bath bungalow, 120 miles far away in Winter Park, Florida, where 3 voting age adults were already living in at the time as his new Florida residence. A few days later on April 1st, 2021 Mills filed his FEC Form 1 and FEC Form 2 with the Commission. During the campaign Mills paid the owner and occupants of the home several times for "Memo items" from his campaign funds. Mills then used another location in another city from where he donated money to another candidate using another location without a specific address unit number in Orlando. He also used the vague location to sign a candidate petition form which was when presented to the Orange County, Florida Elections office for verification, was rejected for a invalid address and the Elections Office then sent a notice to the address that Mills used and it came back to the Elections office as undeliverable. Mills also used the fake address as his location to file his Florida Federal Candidate Oath from (June 10, 2022). Mills then after that filing within a few days, June 27, 2022, moved into a fully furnished Vacation Beach Rental from a Beach Rental Property Management company in New Smyrna Beach, Fl. He vacated the rental but during the entire 2022 election cycle Mills still resided in McClean, Virginia as evidenced by Virginia Corporation Commission Filings, loans signed on occupied residence, vehicle tags, bills, property tax notices, business, etc.
7. Mills used a fake business address in downtown Perry, Florida to file Florida LLC filings. He also continued to use the fake place of business on the loans that he signed for his LLCs and continued to use the fake address for more State filings afterwards.
8. An audit of his LLC companies from 2014 thru 2022 as to where the source of over \$11 to 16 million came from when his LLC just started in a 1-bedroom rental apartment mid-March 2014 in Arlington, VA and then in July 2015 he moved the principal place of business to a 3 bedroom Townhouse owned by others in Chantilly, VA. In 2018 after he had to get his LLC reinstated by the Virginia Corporation Commission and Mills moved to a small rented Office Suite on the 5th floor

of a commercial building in Falls Church, Virginia, with according to reports may have had 8 employees.

9. From the small noncommercial locations, by 2018 Mills, had enough money to purchase a \$4.7 million home without a recorded mortgage and a few months later a \$10 million-dollar Company and divided the land that it was on with a \$5.5 million dollar purchase according to the Deed filed in Taylor County, Florida. Then in just 2 years he has another \$1.8 million plus of cash to loan his Congressional Campaign without reporting any liabilities on his Congressional Financial Reports that he filed in May 2021 and in January 2023.

10. In May 2020 Mills moved his 5th floor office to the 3rd floor of his rented space after receiving two PPP loans with a Virginia Bank in 2020, one for his Pacem Solutions International LLC in Virginia and one for the AMTEC Less Lethal Systems, Inc. (now named ALS, Inc) which is based in Florida and not in Virginia. Mills now currently rents the small 3rd floor suite in Falls Church, Virginia when he lists himself as the Registered agent, resident of Virginia and as the Chair (owner) of the LLCs that he filed in Virginia and Florida. According to Federal websites and commercial websites that track all contracts and subcontracts awarded to these companies from Government entities it raises many questions as to where his huge sum of money came from in such a short period of time.

11. And moreover, Mills has embellished and lied on his campaign literature, campaign website and LinkedIn profiles about his Army record, medals (lack thereof) and his so-called service with the State Department, USAID and JSOC service, the size of his company, number of employees, etc.

12. As set forth below, the overall circumstances indicate that unknown individuals or corporations may have illegally funneled money to Mills' campaign through newly formed LLCs in 2018 and thru loans obtained from a Foreign High-Risk lender called WAYGAR Capital, Toronto, Canada. And possible use of Small Business Administration loans. And use of money earned from government contracts and foreign countries.

13. In addition, Mills' campaign appears to have falsified its disclosure of disbursements. Accordingly, there is reason to believe Mills' campaign deliberately falsified its disbursement reporting.

See Cory Mills Expenditures <https://www.fec.gov/>

14. Moreover, some of the reported disbursements made by Mills' campaign appear to violate federal laws prohibiting the conversion of campaign funds to personal use, including disbursements to pay "rent" on a candidate's personal places that he frequented as his room in the Central Florida area.

15. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that respondents violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101, et seq. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission shall make an investigation of such alleged violation."

FACTUAL BACKGROUND

16. Mills for Congress (the "Mills campaign") is the principal campaign committee of Cory L Mills ("Mills"), a candidate for the U.S. House of Representatives in Florida's Seventh Congressional District during the 2022 election cycle, and who won his election in November 2022. The Mills campaign first registered with the Commission on April 1st, 2021, with Steven Martin, P.O Box 30844 Bethesda, Maryland 20824 as its treasurer. The Mills campaign used a UPS store in a shopping mall as his mailing address for his campaign and he also used it as his origin of his loans he made to his campaign. PMB 288,501 N Orlando Ave, Suite 313, Winter park, Fl 32789.

17. In his initial personal financial disclosure filing with the House of Representatives on May 7, 2021, Mills reported two sources of income, \$100,000 in rent on 4700 Providence Rd, Perry, FL property, and an income of \$500,000 from his Pacem Solutions International LLC.

18. Mills reported financial situation had changed dramatically two years earlier and then 2 years later. In his January 9, 2023 financial disclosure report, Mills reported that he only earned \$312,000 in the preceding year (2021) and \$578,000 in the year 2022.

19. Mills reported that the value of the Pacem Solutions International LLC was between \$1,000,001 and \$5,000,000. Mills also stated that he had between \$115,000 and \$315,000 in bank accounts in May 7, 2021 and on his January 9, 2023 financial disclosure report, Mills reported that he had only \$100,000 to \$200,000 in his bank accounts.

52 U.S.C. § 30109(a)(2) (emphasis added); see also 11 C.F.R. § 111.4(a).

20. Mills did not report any liabilities on his financial disclosure reports including his LLC liabilities for his loans, as required by disclosure rules issued by the House of Representatives' Committee on Ethics.

21. Mills has made multiple conflicting statements regarding the business purpose and ownership of Pacem Solutions International LLC, which was re-instated in Virginia in March 2018.

22. The LLC's tax election status for federal and state tax purposes is not known. However, the IRS placed two Tax Liens on his property, one in 2021 and another one in February 2022. On his campaign website, he described the Pacem Solutions International LLC as "security and risk management services." When he filed for the Pacem Solutions International LLC he was the Sole Manager.

23. In a Politico interview, Mills offered fabrications regarding his background, Mills stated that "*as soon as he left the Army and he went right out and started a company that provided products for law enforcement.*" The fact is that Mills left the Army as a medic in October 2003, worked as a security guard for various companies for 10 years and did not appear on the AMTEC Less Lethal Systems, Inc, (company was already in existence making law enforcement products) Corporate filings until 16 November 2018 as the new Chairman along with other members. Note that Mills does not include that specific Florida Company on his Financial Disclosure Reports, yet a business tax license is paid on it in Perry County, Florida and Mills has personally signed loans for mortgagor for assignments of the company which are filed on record in Virginia and in Perry County, Florida. Mills also claims in his campaign literature and web site that he co-founded AMTEC Less Lethal Systems, Inc when in fact he knew that was a lie. He also falsely claims in his campaign literature that he created 100s of jobs in Florida when he knew that was a lie.

24. Prior to 2018 Mills was working out of a 3-bedroom townhouse in Chantilly, Virginia in a place owned by others. And prior to that when he first filed for the Pacem Solutions International LLC he was doing it out of a one bedroom, one bath apartment in Arlington, Virginia. There is no record of making money until 2017. Mills still maintains his Virginia Registered agent designations with it to this day.

See OPMWIRE article <https://opmwire.com/waygar-capital-ninepoint-canadian-senior-debt-fund/>

25. During his campaign for Florida's Seventh Congressional District during the 2022 election cycle, Mills had reported loaning his campaign committee a total of \$1,848,900 (More than his reported income and savings at the time). The chart below summarizes all of Mills reported personal loans to his principal campaign committee:

04/07/21	\$500
06/08/21	\$1000
06/30/21	\$200,000
09/30/21	\$290,000
12/31/21	\$150,000
03/31/22	\$17,400
03/31/22	\$25,000
03/31/22	\$100,000
06/22/22	\$500,000
07/27/22	\$125,000
08/01/22	\$125,000
08/28/2022	\$315,000

GRAND TOTAL \$1,848,900

26. During the 2022 election cycle, the Mills campaign reported disbursements of \$7,103.93 to "Derick Augustin" of 973 Wilma Ave, Winter Park, Florida for "see memo items" as set forth in the table below:

Recipient		Description	Date	Amount
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	9/23/2022	\$3,708.09
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	5/25/2022	\$513.36
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	4/6/2022	\$269.97
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	2/28/2022	\$390.21
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	1/25/2022	\$171.96
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	10/21/2021	\$224.73
AGUSTIN, DERICK	FL	SEE MEMO ITEMS	10/13/2021	\$1,825.61

Total Expenditures \$7,103.93

27. Mills used the home of Derick Augustin at 973 Wilma Ave., Winter Park, Florida as his place of residence in Florida in order to register to vote in Florida and to run for U.S. Congress in Florida. Mills had no other reason to move to Florida especially since his spouse and child still lived in a mansion in McClean, Virginia and claiming he was "rooming" with one of his "employees". And it

looks like for his services Mills paid Derick Agustin money out of the Mills Campaign account several times.

28. Contrary to the reported purposes for these expenditures, however, Mills, himself put himself as living somewhere else in Orlando in a high rise at the “260 S Osceola Ave” location. He used the vague, nonspecific address on a FEC Candidate Donation, on a Candidates Petition, and on his Florida Federal Candidate Oath (February 2022 thru June 10, 2022). He did this knowing that he did not reside at 973 Wilma Ave, Winter Park, Florida. Just a few days later on June 27, 2022 Mills found himself a Vacation Beach Rental house in New Smyrna Beach to live in part time with that was fully furnished with towels, wash rags and toilet paper. Mills still lived in Virginia too, traveling back and forth. Mills created another LLC in Virginia on 15 November 2022 just a few days after being elected in Florida, and designated himself as the Registered Agent which is by law a Virginia Resident.

SUMMARY OF THE LAW

Contributions in the Name of Another

29. FECA provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.” See 52 U.S.C. § 30122.

30. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:

- a. “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made.”
- b. “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.”

31. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive, and ensures that the public and

complainants are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”

32. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution, whether funds are advanced to another person to make a contribution in that person’s name or promised as reimbursement of a solicited contribution. Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”

33. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions in recent years. As explained in one such indictment, the straw donor ban works in tandem with other campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections. Another recent indictment highlighted how straw donor schemes have been used to skirt FECA’s source prohibitions, such as the ban on contributions by government contractors.

34. Even for contributions that would otherwise be legal — i.e., contributions that would not be prohibited or excessive, if made in the true contributor’s own name — the prohibition of contributions in the name of another serves FECA’s core transparency purposes by ensuring that voters have access to complete and accurate information regarding the sources of electoral contributions.

Excessive and/or Prohibited Contributions

35. FECA prohibits any “person” from making aggregate contributions in excess of a specified amount, currently \$2,900 per election, to any candidate and his or her authorized campaign committee. FECA further prohibits all candidates and political

committees from knowingly accepting any contributions in violation of the relevant contribution limits.

36. Moreover, FECA prohibits corporations from making contributions to candidates and their authorized campaign committees, and prohibits candidates and their authorized campaign committees from knowingly accepting or receiving any such prohibited corporate contributions. Under Commission regulations, an LLC that elects to be taxed as a corporation is treated as a corporation.

37. Additionally, FECA prohibits foreign nationals from directly or indirectly making “a contribution or donation of money or other thing of value . . . in connection with a Federal, State, or local election” or “an expenditure, independent expenditure, or disbursement for an electioneering communication.” FECA further prohibits any person from soliciting, accepting, or receiving a foreign national contribution.

Disbursement Reporting and Recordkeeping

38. FECA mandates that all political committees, including a candidate’s authorized campaign committee, must file periodic disclosure reports with the Commission that accurately and completely disclose, among other things, the total disbursements made by the committee, and, in addition, the name and address of any person receiving disbursements aggregating in excess of \$200 in an election cycle.

39. Under Commission regulations, when itemizing a disbursement, authorized campaign committees must provide the “date, amount and purpose of each expenditure,” and the “purpose” must include a “brief statement or description of why the disbursement was made.”

40. FECA and Commission regulations require that the treasurer of a political committee keep accurate records of all disbursements made by the committee, “including a receipt, invoice, or cancelled check for each disbursement in excess of \$200.” The Commission may hold a treasurer personally liable for violating legal obligations imposed specifically on committee treasurers, such as recordkeeping and reporting requirements, or for knowingly or recklessly violating the law or turning a blind eye to troubling facts.⁵¹

Personal Use

41. Under FECA, campaign funds can be used for authorized expenditures arising from the campaign or the official duties of a sitting officeholder, as well as for “any other lawful purpose.” However, campaign funds cannot be “converted to personal use,” i.e., “used to fulfill any commitment, obligation, or expense . . . that would exist irrespective of the candidate’s election campaign” or official duties as an officeholder.

42. Under Commission regulations, certain types of expenses are considered per se prohibited personal use, including, e.g., mortgage, rent, or utility payments for the personal residence of a candidate or candidate’s family member. Other uses of campaign funds are subject to the Commission’s case-by-case determination of whether the obligation or expense would exist “irrespective of” the candidate’s campaign or officeholder status.

CAUSES OF ACTION

COUNT I

MILLS KNOWINGLY AND WILLFULLY SERVED AS A STRAW DONOR FOR UNKNOWN PERSONS TO MAKE CONTRIBUTIONS IN THE NAME OF ANOTHER TO THE MILLS CAMPAIGN COMMITTEE

43. The available information indicates that Cory Mills according to his FEC (**see Exhibit 1**) filings during the years of 2021 thru 2022 show that he personally loaned his campaign \$1,848,900. But according to his two Financial Disclosure Reports, one filed in 5/7/2021 (**see Exhibit 2**) and another one just filed on January 9, 2023 for the period of 1/01/2021 thru 12/31/2022 (**See Exhibit 3**) do not show any cash assets or liabilities as to where he got that amount of money from.

44. Cory Mills reported that he personally loaned his campaign \$1,848,900 from April 1st, 2021 to 28 October 2022. Cory Mills again on January 9, 2023 made several statements on his Financial Disclosure Report filing that are apparently false. The new Report (**see Exhibit 3**) filed on 9 January 2023 leads to more questions about his sources of funds, loans, and liabilities and how Mills was able to personally loan his Campaign loans as reported on his on FEC Form 3 submittals and how he got almost Two million dollars to loan to his campaign.

45. Again, on his Financial Disclosure Report that he filed on 01/09/2023 for the years 2021 thru 2022 he only reported six lines of assets in Schedule A.

46. In Schedule A Mills reports his home in McClean, VA on 1198 Windrock Drive valued at \$1,000,000 to \$5,000,000. See Deed in Fairfax County Clerk Office: Book 22422 Page 0586 and Book 25175 Pages 0540. (See **Exhibit 4**). (Note he reports no liabilities on the home on the Financial

Disclosure Reports)

47. On his two different Financial Disclosure Reports Schedule A Cory Mills reported that he only had the following assets of cash:

Bank of America	May 2021: \$15,000 to 50,000	Dec 31, 2023: \$50,000 to 100,000
PNC Bank	May 2021: \$100,000 to 250,000	Dec 31, 2023: \$50,000 to 100,000

According to his May 7, 2021 Report, Schedule A Mills had between a minimum of \$115,000 and a maximum of \$300,000 yet he personally loaned his campaign over One million eight hundred forty-eight thousand nine hundred dollars (\$1,848,900). At the end of the campaign, he shows that he has a total minimum of \$100,000 to a max of \$200,000 according to his latest Report. He listed no other assets or liabilities that would let him loan that amount of personal cash to his campaign (see FEC reporting of Contributions and loans made to Cory Mills Campaign Committees on **Exhibit 1**).

48. On Schedule A of the Financial Disclosure Report, Cory Mills still claims at the end of 2022 that he personally owns property located at 4700 Providence Road in Perry, Florida, and claims rental income from \$100,000 to \$1,000,000 on the Perry County, Florida property. The property is owned by his Pacem Estate Holdings, LLC. The property is an LLC with a registered agent in Florida filed July 30, 2018 and has two other principles. (See **Exhibit 5** and **Exhibit 6**) of filings with Florida on official Sunbiz.org. (Note that on January 18, 2023 Mills name was taken off the LLC Florida filing)

49. Again, Cory Mills used an address on his Pacem Estate Holdings, LLC filing that was not his place of business at the time. That place (115A Drew St. Perry, FL) was rented by Michael Quesenberry, and the lease ended June 27, 2018 according to Perry City records. However, Mills continued using the address as his place of business for filing state corporation documents and for the place of business on loans taken in July, August, and October 2018. According to Taylor County, Florida, records, Mills signed for a loan in October 2018 for \$4,000,000 (**see Exhibit 7**) for the purchase of the \$5,500,000 property using his newly filed Pacem Estate Holdings LLC as the purchaser. Mills also signed for an SBA Loan in 15 August 2018 for \$5,000,000 for Pacem Solutions International LLC. Both loans were signed and notarized in Virginia but used a fake place of business (115A Drew St.

Perry, FL) in Florida. Mills continued to use the fake address again to do a supplemental security agreement of \$2,000,000 on the Virginia Access Bank SBA loan to secure the property in Perry, Florida on May 30, 2019 for extension of the loan. The address that Mills was using was being rented by a addict Recovery Charity and later by a hair cutting salon. Mills knew that the business location was false.

50. Again in January 2023, Cory Mills did not list as assets his Florida Pacem Estate Holdings LLC, which were acquired properties from AMTEC Less Lethal Systems, Inc in October 19, 2018. (See Deed **Exhibit 8**). Mills did not list any liabilities for this LLC company. According to Deed records “the multi” property was purchased for over \$5 .5 million dollars. There are three properties in Perry County, Florida owned by Pacem Estate Holdings, LLC.) (See **Exhibit 9 Tax billing** and See **Exhibit 10 (4 pages)** of parcels owned). They were not reported separately on his Schedule A of the Financial Disclosure Reports that he submitted.

51. Again, Cory Mills did not list as an asset the ALS, Inc., company which is in Taylor County, Perry, Florida. The name was changed from AMTEC Less Lethal Systems, Inc to ALS, Inc., in February 2022. (See **EXHIBIT 11**). The Company is located on the property owned by Pacem Estate Holdings, LLC at 4700 Providence Road, Perry, Fl. Mills did not list any liabilities for this company yet it is reported that the acquisition cost approximately \$10 million dollars in October 2018. (See **Exhibit 12.**)

52. According to the Taylor County Clerk of the Court records, Mills signed another Loan (after he declared his candidacy) on 24 May 2021 in Virginia for \$8,360,000 from WAYGAR Capital, Inc., an agent for Ninepoint Canadian Senior Debt Master Fund L.P. 25 King Street West, Suite 1700, Toronto, Canada, M5L, 2AI, for Mills LLC called Pacem Estate Holdings LLC and securing rents and fixtures from his Pacem Defense LLC and his ALS, Inc. (**See Exhibit 13**)

53. Also note that in 2019 WAYGAR CAPITAL WAYGAR CAPITAL filed a Notice of Lien on Mills Pacem Defense LLC in 2019 in Virginia and they also secured a Patent rights transfer from AMTEC Less Lethal Systems, Inc to WAYGAR CAPTITAL (note use of Virginia address instead of Florida Address for AMTEC Less Lethal Inc). (**See Exhibit 14**)

54. Again according to Mills Financial Disclosure Report that he just filed on January 9, 2023, note that Pacem Defense LLC is 100 percent owned by Mills and he reports no income from that LLC. There currently is no business license for that company in Taylor County, Florida or Fairfax, Virginia.

55. Again on his Financial Disclosure Report on Schedule A Mills claims he owns 98 percent of Pacem Solutions International LLC of Virginia. Note that Mills is the Virginia resident who is the Corporation Registered Agent for the company according to Virginia official records and Virginia Law.

56. On his January 2023 Schedule C Financial Disclosure Report Mills now claims he took a salary of \$587,000 in 2022 and that his spouse had no salary and in the previous year (2021) he claims he took a salary of \$310,000 and his spouse took a salary of \$233,469 in 2021 from Pacem Solutions International, LLC., based out of an office in Falls Church, VA. However, this contradicts his May 5, 2021 Report where Mills claims he earned a salary of \$500,000 a year and his wife earned \$300,000 in 2021 from his Pacem Solutions International LLC. Mills is the Registered Agent and the Executive Chairman of his Pacem Solutions International LLC and the Articles of Incorporation of the Company show him as the sole owner according to Virginia State Corporation Commission(SCC) (See **Exhibit 15**). It is unclear how Mills reports his Pacem Solutions International LLC, Pacem Estate Holdings LLC and his ALS, Inc. dba Pacem Defense LLC on his Federal and State Income Taxes.

57. Mills left off his Financial Disclosure Reports the AMTEC Less Lethal Systems, Inc (now ALS, Inc) in Florida which has a paid Business Tax License in Perry, Fl (**See Exhibit 16**). Mill also leaves off the income and liabilities from that business (if any). Where does he report his taxes to? Which State?

58. Federal Contracts databases show that contracts are being awarded to Pacem Solutions International, LLC and being performed by AMTEC Less Lethal Systems, Inc (ALS, Inc.). According to Federal Reporting of Contract awards Mills company has only received \$360,000 in contracts in 2021 and \$680,000 the previous year. Recent Contracts that are awarded to Pacem Solutions International LLC in Virginia are saying that the work is being performed at ALS, Inc in Perry, Florida according to government contract awards data bases.

See https://www.usaspending.gov/keyword_search/pacem

(Note that in October 2022 Florida records now show that Mills name was taken off the Florida Pacem Solutions International LLC and now only shows a Florida Registered Agent named Bill Havre, and Andrew Knaggs as CEO and Tarun Handa as CFO, and in a sudden change just a couple weeks ago, January 18, 2023 Mills was taken off the ALS, Inc and Pacem Estate Holdings LLC Florida filings and now only show Andrew Knaggs and Tarun Handa on them also. Both live outside Florida. See Florida sunbiz.org website.)

59. In 29 May 2021 a loan for a \$4,290,000 line of Equity Credit was filed on his residence 1198 Windrock Dr, McLean , Virginia. (**see Exhibit 17**). This was done shortly after he filed his first Financial Disclosure Report on May 7, 2021. Notice that he also rerecorded the WAYGAR CAPITAL

Loan adding another 2 million dollars to it in August 11, 2021. (Also see the Perry County, Florida Clerk of Clerk of Court filing, **Exhibit 13** - note Canadian dollars)

60. In June 15, 2021 the IRS filed A Tax lien against Mills Pacem Solutions International LLC for \$111,815 for back taxes and again in February 2022 the IRS filed another Tax Lien for back taxes against Mills Pacem Solutions International LLC for \$592,278. A review of Mills IRS Federal Taxes and Virginia State Taxes will show the reporting of earnings and taxes, etc.

61. Again on Schedule E Mills deliberately left off Positions he holds in 4 different companies that he lists on Official State Corporation registrations sites in Florida See **Exhibit 18**) and in Virginia (See **Exhibit 19**).

62. Cory Mills has not revealed the sources of his cash he loaned to his campaign on January 9, 2022 for his 2021 and 2022 filing periods on his Federally mandated Financial Disclosure Report Cory Mills has failed to report all his assets, reported incorrectly his assets, failed to report liabilities, failed to report income from his companies, and he failed to report his positions with 4 LLCs and a Incorporation he is part owner of. Mills has deliberately filed another report knowing that the information submitted was wrong. The filing and reporting in the Financial Disclosure Report leads to more questions in the other complaints that follow.

COUNT II

MILLS ILLEGALLY USED CAMPAIGN FUNDS TO PAY FOR PERSONAL EXPENSES, INCLUDING “ROOM MATE RENT” DISGUISED AS MEMO ITEMS

63. Mills and his campaign appear to have illegally spent campaign funds on personal expenses, including paying rent for the use of a room in a home in order to pretend he lived in Florida, in clear violation of FECA’s prohibition at 52 U.S.C. § 30114(b) and Commission regulations.

64. Mills’ campaign appears to have spent \$7,103.93 on rent payments for Mills’s personal room in blatant violation of the law. (see **Exhibit 20**). The disbursements are each described as “Memo items” address associated with each of these expenditures — 973 Wilma Ave., Winter Park, Florida — is the location of a single-family house in Winter Park, Florida. This was done while

Mills continually maintained his residence in Virginia during the 2022 campaign.

65. In March 2021 Mills went to a DMV in Jacksonville, Fl to get a Florida Driver's license and while he was there, he signed up to register to vote using a "employees" 1,000 square foot house, 3 bedroom, 1.5 bath bungalow, which was 120 miles away in Winter Park, Florida, where 3 voting age adults were already living in at the time as his new Florida residence (see **Exhibit 21**). During the campaign Mills paid the owner, Dereck Agustin, of the home several times for "Memo items" from his campaign funds for visits, he made. Mills started using another address in a undisclosed unit in a high rise in Orlando, Florida where he donated money to another candidate using that location without a specific address. Mills also used the location to sign a candidate petition which the Orange County, Florida Elections office rejected and then sent Mills a notice to verify the address Mills used and it came back to the Elections office as undeliverable. Mills also used the fake address as his location to file his Florida Federal Candidate Oath from (June 10, 2022). Mills then within a few days after using that location, on June 27, 2022, Mills moved into a fully furnished Vacation Beach Rental from a Beach Rental Property Management company in New Smyrna Beach, Fl. This was done while Mills continued to live in Virginia.

66. Commission regulations specify that using campaign funds to pay mortgage, rent, or utility payments on the personal residence of a candidate or candidate's family member is per se personal use. Particularly when viewed in light of the Mills campaign's numerous fraudulent disclosures to the Clerk of Congress and the FEC and to the public, it is not only plausible but likely that the campaign falsely reported paying rent — which itself might constitute the personal use of campaign funds for an expense that would exist irrespective of the campaign — on a property that was the candidate's "employee".

67. As such, there is sufficient information to find reason to believe Mills was using that house while the campaign was paying \$7,103.03 to rent it, such that Mills and the Mills

campaign knowingly and willfully violated FECA's statutory ban on the conversion of campaign funds to personal use at 52 U.S.C. § 30114(b).

PRAYER FOR RELIEF

68. Wherefore, the Commission should find reason to believe that Respondents have violated 52 U.S.C. § 30101 et seq., and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

69. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations, injunctive relief to remedy these violations and prohibit any and all future violations, and such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,
Michael Johnson


Altamonte Springs, FL 32701

Verification

I swear or affirm that the information attached is true and correct to the best of my knowledge.

Michael Don Johnson
Michael Don Johnson



Altamonte Springs, Florida 32701

Signed and sworn to before me this 03 day of
February 20 23



Jenny Stapleton
Signature of officer Authorized to Administer Oaths or Notary Public

Jenny Stapleton
Name of Notary Public

Personally known ___ Or produced identification

Type of Identification Produced Florida Drivers License

Exhibits for Complaint follow

EXHIBIT 1 Federal Elections Commission report for Cory Mills Campaign showing that Mills personally loaned his campaign \$1,848,900. According to his FEC Form 3 reporting Cory Mills loaned \$1,848,900 to his campaign. But on his Financial Disclosure Report he lists much less than that in available assets. Where did he get the money? He did not report the cash asset or borrowing of the money on his Financial Disclosure Report.

fec.gov/data/candidate/H2FL07156/?cycle=2022&election_full=true

TOTAL RECEIPTS	\$2,628,511.90
TOTAL CONTRIBUTIONS	\$689,211.22
Total individual contributions	\$528,473.72
Itemized individual contributions	\$299,867.00
Unitemized individual contributions	\$228,606.72
Party committee contributions	\$10,000.00
Other committee contributions	\$150,737.50
Candidate contributions	\$0.00
TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	\$85,240.85
TOTAL LOANS RECEIVED	\$1,848,900.00
Loans made by candidate	\$1,848,900.00
Other loans	\$0.00
OFFSETS TO OPERATING EXPENDITURES	\$5,159.83
OTHER RECEIPTS	

Activate Windows
Go to Settings to activate Windows

Feedback

EXHIBIT 2 (page 1 of 2) Cory Mills Financial Disclosure Report submitted 05 May 2021



FINANCIAL DISCLOSURE REPORT

Filing ID #10040264

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Cory Mills
Status: Congressional Candidate
State/District: FL07

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2021
Filing Date: 05/7/2021

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
1198 Windrock Dr (RP)		\$1,000,001 - \$5,000,000	None		
Location: McLean, VA, US					
4700 Providence Rd (RP)		\$5,000,001 - \$25,000,000	Rent	\$100,001 - \$1,000,000	\$100,001 - \$1,000,000
Location: Perry, FL, US					
Bank of America (BA)		\$15,001 - \$50,000	None		
Pacem Defense, 100% Interest (OI)		\$1,000,001 - \$5,000,000	None		
Location: Perry, FL, US Description: manufacturer of defense products					
Pacem Solution International, 98% Interest (OI)		\$1,000,001 - \$5,000,000	salary	\$100,001 - \$1,000,000	\$100,001 - \$1,000,000
Location: Falls Church, VA, US Description: security and risk management services					
PNC Bank (BA)		\$100,001 - \$250,000	None		

EXHIBIT 2 (page 2 of 2) Cory Mills Financial Disclosure Report submitted 05 May 2021

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
-------	-------	----------------	----------------	-------------------------------	-----------------------

* For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
Pacem Solution International	Salary	\$500,000.00	\$500,000.00
Pacem Solution International	Spouse Salary	\$300,000.00	\$300,000.00

SCHEDULE D: LIABILITIES

None disclosed.

SCHEDULE E: POSITIONS

None disclosed.

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

Source (Name and Address)	Brief Description of Duties
Pacem Solution International (FALLS CHURCH, VA, US)	CEO and Executive Chairman

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

Yes No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

Yes No

CERTIFICATION AND SIGNATURE

I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Cory Mills , 05/7/2021

EXHIBIT 3 (page 1 of 2) Cory Mills Financial Disclosure Report submitted on 09 January 2023 for the period of 01/01/2021 thru 12/31/2023



Filing ID #10050712

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Cory Mills
Status: Congressional Candidate
State/District: FL07

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2022
Filing Date: 01/9/2023
Period Covered: 01/01/2021 - 12/31/2022

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
1198 Windrock Dr [RF]		\$1,000,001 - \$5,000,000	None		
Location: McClain / Fairfax, VA, US					
4700 Providence Rd [RF]		\$5,000,001 - \$25,000,000	Rent	\$100,001 - \$1,000,000	\$100,001 - \$1,000,000
Location: Perry / Taylor, FL, US					
Bank of America Checking [BA]		\$50,001 - \$100,000	None		
Pacem Defense, 100% Interest [DI]		\$1,000,001 - \$5,000,000	None		
Location: Perry / Taylor, FL, US Description: manufacturer of defense products					
Pacem Solution International, 98% Interest [DI]		\$1,000,001 - \$5,000,000	salary	\$100,001 - \$1,000,000	\$100,001 - \$1,000,000
Location: Falls Church / Fairfax, VA, US Description: security and risk management services					
PNC Bank Checking [BA]		\$50,001 -	None		

EXHIBIT 3 (page 2 of 2) Cory Mills Financial Disclosure Report submitted on 09 January 2023 for the period of 01/01/2021 thru 12/31/2023

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
		\$100,000			

* For the complete list of asset type abbreviations, please visit <https://fd.house.gov/disclosure-asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
Pacem Solution International	salary	\$587,238.00	\$310,271.00
Pacem Solution International	spouse salary	N/A	\$231,469.00

SCHEDULE D: LIABILITIES

None disclosed.

SCHEDULE E: POSITIONS

None disclosed.

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

Source (Name and Address)	Brief Description of Duties
Pacem Solution International (Falls Church, VA, US)	Executive Chairman

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

Yes No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

Yes No

CERTIFICATION AND SIGNATURE

I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Cory Mills, 01/09/2023

EXHIBIT 4 (page 1 of 3) 1198 Windrock Dr asset is a residence. Deed and Fairfax County, Virginia Property Tax records

BK 25175 0541

Consideration \$4,175,000.00
Assessed Value: \$2,315,690.00
Tax Map No: 019-4-21-0010
Grantee Address:
1198 Windrock Drive
McLean, VA 22102

Document Prepared By:
Leggett, Simon, Freemyers & Lyon PLC
Marcus Simon VSB# 44548
Bowman House
11718 Bowman Green Drive, Suite 110A
Reston, Virginia 20190
File No. M1708014

Underwriter: Commonwealth Land Title Insurance Company

This Deed, made this September 05, 2017, by and between Behnaz K. JOUBIN, Trustee of the BEHNAZ K. JOUBIN REVOCABLE TRUST dated June 26, 2012, Grantor, and Cory MILLS and Rana AL SAADI, Grantees.

Witnesseth.

That for and in consideration of the sum of Ten Dollars (\$10.00), cash in hand paid, and other good and valuable consideration, receipt of which is hereby acknowledged, the Grantor does hereby grant, bargain, sell and convey, in fee simple, with GENERAL WARRANTY and English Covenants of title, unto the Grantees, as tenants by the entirety with common law right of survivorship, all the following-described lot or parcel of land together with improvements thereon, situate, lying and being in the County of Fairfax, Commonwealth of Virginia:

Lot 10, Section 1, THE COURTS, as the same is duly dedicated, platted and recorded in Deed Book 5495 at Page 1098, among the Land Records of Fairfax County, Virginia.

AND BEING the same property conveyed to Behnaz K. Joubin, as Trustee of THE BEHNAZ K. JOUBIN REVOCABLE TRUST DATED JUNE 26, 2012, by virtue of a Deed from Behnaz Joubin, dated June 26, 2012 and recorded July 11, 2012 in Deed Book 22422 at Page 586, among the aforesaid Land Records.

TCT
236

EXHIBIT 4 (page 2 of 3) 1198 Windrock Dr asset is a residence. Deed and Fairfax County, Virginia Property Tax records

BK 25175 0542

AND ALSO BEING the same property conveyed to Jahan Joubin and Behnaz Joubin, husband and wife, as joint tenants by the entirety with the full common law right of survivorship, by virtue of a Deed dated October 6, 1986 and recorded October 10, 1986 in Deed Book 6516 at page 583, among the aforesaid Land Records. Jahan Joubin, having departed this life on May 4, 2011, leaving Behnaz Joubin as sole surviving tenant.

This conveyance is made expressly subject to the easements, conditions, restrictions, and rights-of-way of record contained in the instruments forming the chain of title to the property conveyed herein and to matters visible upon inspection.


The Grantor covenants that it is seized in fee simple of the property herein conveyed, has the right to convey the said land to the Grantees and has done no act to encumber the lands. The Grantor covenants that the Grantees shall have quiet possession of the land free from all encumbrances, except as mentioned herein, and that it, the Grantor, will execute such further assurances of the lands as may be requisite.

Witness the following signature and seal.



BEHNAZ K. JOUBIN, Trustee

Commonwealth of Virginia)
County of Fairfax) to wit:

The foregoing deed was acknowledged before me on August 25, 2017, by Behnaz K. JOUBIN, Trustee of THE BEHNAZ K. JOUBIN REVOCABLE TRUST DATED JUNE 26, 2012, on behalf of the corporation.


Notary Public:
My commission expires _____



A COPY TESTE:
JOHN T. FREY, CLERK
BY: 
Deputy Clerk

09/08/2017.

EXHIBIT 4 (page 3 of 3) 1198 Windrock Dr asset is a residence. Deed and Fairfax County, Virginia Property Tax records



MAP #: 0194 21 0010
MILLS CORY

1198 WINDROCK DR

Owner

Name	MILLS CORY,
Mailing Address	1198 WINDROCK DR MCLEAN VA 22102 1553
Book	25175
Page	0540

Co-Owners

AL SAADI RANA

Parcel

Property Location	1198 WINDROCK DR MCLEAN VA 22102 1553
Map #	0194 21 0010
Tax District	20101
District Name	DRANESVILLE DIST. #1A
Land Use Code	Single-family, Detached
Land Area (acreage)	
Land Area (SQFT)	64,412
Zoning Description	RE(Res Estate 1DU/2AC)
Utilities	WATER CONNECTED SEWER NOT AVAILABLE GAS NOT AVAILABLE
County Inventory of Historic Sites	NO
County Historic Overlay District	NO
	For further information about the Fairfax County Historic Overlay Districts, CLICK HERE
	For properties within the towns of Herndon, Vienna or Clifton please contact the town to determine if the property is within a town historic district.
Street/Road	PAVED
Site Description	BUILDABLE-AVERAGE LOT

Legal Description

Legal Description	COURTS THE LT 10 SEC 1
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Last Refresh

Date
Data last refreshed: 08/Nov/2022 DB:PORA34CUR

General Information

EXHIBIT 5 Filing of Florida Limited Liability Company of Pacem Estate Holdings LLC in July 30, 2018 by Cory Mills and Michael Quesenberry. (Note principal address?)

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L18000182702
FILED 8:00 AM
July 30, 2018
Sec. Of State
cmwood

Article I

The name of the Limited Liability Company is:
PACEM ESTATE HOLDINGS LLC

Article II

The street address of the principal office of the Limited Liability Company is:
115A DREW ST
PERRY, FL US 32347

The mailing address of the Limited Liability Company is:
2941 FAIRVIEW PARK DR
STE 550
FALLS CHURCH, VA 22042

Article III

The name and Florida street address of the registered agent is:
MICHAEL QUESENBERRY
115A DREW ST
PERRY, FL 32347

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: MICHAEL QUESENBERRY

Article IV

The name and address of person(s) authorized to manage LLC:
Title: MGR
CORY L MILLS
2941 FAIRVIEW PARK DR STE 550
FALLS CHURCH, VA 22042

L18000182702
FILED 8:00 AM
July 30, 2018
Sec. Of State
cmwood

Signature of member or an authorized representative
Electronic Signature: CORY L MILLS

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

EXHIBIT 6 PACEM Estate Holdings LLC Florida filing March 25, 2021**2021 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT**

DOCUMENT# L18000182702

Entity Name: PACEM ESTATE HOLDINGS LLC

Current Principal Place of Business:

4700 PROVIDENCE ROAD
PERRY, FL 32347

Current Mailing Address:

2941 FAIRVIEW PARK DR
STE 350
FALLS CHURCH, VA 22042 US

FEI Number: 83-1399953

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

REGISTERED AGENTS INC
7901 4TH ST N STE 300
ST PETERSBURG, FL 33702 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*SIGNATURE: BILL HAVRE03/25/2021

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGR	Title	CFO
Name	MILLS, CORY L	Name	DOYLE, SHANNON
Address	2941 FAIRVIEW PARK DR STE 350	Address	2941 FAIRVIEW PARK DR STE 350
City-State-Zip:	FALLS CHURCH VA 22042	City-State-Zip:	FALLS CHURCH VA 22042

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company, or the receiver or trustee empowered to execute this report as required by Chapter 803, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*SIGNATURE: SHANNON D DOYLECFO03/25/2021

Electronic Signature of Signing Authorized Person(s) Detail

Date

EXHIBIT 7 (page 02) Loan Agreement signed by Mills for Mortgage Pacem Estate Holdings LLC

OFFICIAL RECORDS: 2 of 32
Book: 787 Page: 324

MORTGAGE, ASSIGNMENT, SECURITY AGREEMENT AND FIXTURE FILING

This document serves as a Fixture Filing under the Florida Uniform Commercial Code.

Mortgagor's Organizational Identification Number is 83-1399953.

THIS MORTGAGE, ASSIGNMENT, SECURITY AGREEMENT AND FIXTURE FILING is made this 16th day of October, 2018, by PACEM ESTATE HOLDINGS LLC, a Florida limited liability company having an office address at 115A Drew Street, Perry Florida 32348 (herein referred to as "Mortgagor"), to ACCESS NATIONAL BANK, a national banking association, having an office address at 1800 Robert Fulton Drive, Suite 310, Reston, Virginia 20191 (herein referred to as "Lender" or "Mortgagee").

RECITALS

A. The Mortgagor has requested that Lender make a term loan in the original principal amount of \$4,000,000 (herein referred to as the "Loan") to Mortgagor. The Loan will be evidenced by Mortgagor's Promissory Note of even date hereof (herein referred to as the "Note").

B. As a condition precedent to making the Loan to Mortgagor, Lender required that Mortgagor secure the payment and performance of all obligations of Mortgagor arising out of, or in connection with, the Loan by the execution of this Mortgage, Assignment, Security Agreement and Fixture Filing.

NOW THEREFORE, in order to induce Lender to make the Loan to Mortgagor, Mortgagor agrees as follows:

ARTICLE I

DEFINITIONS, RULES OF CONSTRUCTION.

Section 1.1 Definitions.

As used in this Mortgage, Assignment, Security Agreement and Fixture Filing, the terms defined in the Preamble and Recitals hereto shall have the respective meanings specified therein, and the following terms shall have the meanings indicated:

"Accounts" means all accounts of Mortgagor within the meaning of the Uniform Commercial Code of the State derived from or arising out of the use, occupancy or enjoyment of the Property or for services rendered therein or thereon.

"Additions" means any and all alterations, additions, accessions and improvements to property, substitutions therefor, and renewals and replacements thereof.

"Casualty" means any act or occurrence of any kind or nature that results in damage, loss or destruction to the Property.

"Claim" means any liability, suit, action, claim, demand, loss, expense, penalty, fine, judgment or other cost of any kind or nature whatsoever, including without limitation, fees, costs and expenses of attorneys, consultants, contractors and experts.

EXHIBIT 7 (page 2 of 2) Loan Agreement signed by Mills for Mortgage Pacem Estate Holdings LLC

OFFICIAL RECORDS 28 of 32
Book 787 Page 350

IN WITNESS WHEREOF, Mortgagor has caused this Mortgage to be executed under seal as of the day and year first written above.

WITNESS:

PACEM ESTATE HOLDINGS LLC

[Signature]

By [Signature] (SEAL)
Cory L. Mills
Member

Address:

Federal Tax Identification Number:

83-1399953

The address of Mortgagee is:
Access National Bank
1800 Robert Fulton Drive, Suite 310
Reston, Virginia 20191
Attn: David A. Talebian, Executive Vice President

STATE/Commonwealth of Virginia, CITY/COUNTY OF Fairfax
TO WIT:

I HEREBY CERTIFY, that on this 16 day of October, 2018, before me, the undersigned Notary Public of said State, personally appeared Cory L. Mills, who acknowledged himself to be a Member of PACEM ESTATE HOLDINGS LLC, a limited liability company, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he/she executed the same for the purposes therein contained as the duly authorized member of said limited liability company by signing the name of the corporation by himself as member.

WITNESS my hand and Notarial Seal.

[Signature]
Notary Public

My Commission Expires: 2/28/21



EXHIBIT 8 (page 1 of 2) 4700 Providence Road, Perry, Florida owners. Deed of address of property shows that multiple properties were acquired by Pacem Estate Holdings LLC in October 19, 2018. (For approximately \$5.5 million according to Doc Stamps calculation)

TAYLOR COUNTY FLORIDA ANNIE MAE MURPHY
Document: 180004837 Recorded: 10/19/2018 4:20 PM

OFFICIAL RECORDS: 1 of 7
Book: 787 Page: 316

Recording Fee: \$61.00
Doc Stamps: \$38,500.00

Prepared by and Return to

First International Title
Pensacola Branch
4300 Bayou Blvd., Suite 7
Pensacola, FL 32503
Tax ID: 26-4217217

SPECIAL WARRANTY DEED

STATE OF FLORIDA
COUNTY OF TAYLOR

KNOW ALL MEN BY THESE PRESENTS, that AMTEC Less Lethal Systems, Inc., a Wisconsin corporation authorized to do business in Florida, whose address is 3925 N. Hastings Way, Eau Claire, WI 54703, hereinafter referred to as "Grantor", for and in consideration of TEN DOLLARS (\$10.00), the receipt whereof is hereby acknowledged, has GRANTED, BARGAINED, SOLD, AND CONVEYED, and by these presents does hereby GRANT, BARGAIN, SELL, ALIEN, CONVEY AND CONFIRM unto **Pacem Estate Holdings, LLC**, a Florida limited liability company, whose address is 2941 Fairview Park Drive, Suite 550, Falls Church, VA 22042, hereinafter referred to as "Grantee" and its successors and assigns, forever, that certain real property being more particularly described in Exhibit A attached hereto and made a part hereof for all purposes, together with all improvements and fixtures situated thereon (collectively, the "Property").

TO HAVE AND TO HOLD the property, together with all and singular the rights and appurtenances thereto in any wise belonging, unto Grantee, its successors, and Grantor hereby agrees to WARRANTY AND FOREVER DEFEND all and singular the Property unto Grantee, its successors and assigns, against every person whomsoever lawfully claiming, or claim the same, or any part thereof, by, through or under Grantor but not otherwise.

IN WITNESS WHEREOF, they have hereunto set their hands and seals this 16th day of October 2018.

Signed, sealed and delivered
in the presence of:

Witness Signature

Print Name Chris M... ..

Witness Signature

Print Name Rana ALSABDI

AMTEC LESS LETHAL SYSTEMS, INC.

By:

Joseph E. Schmitz

EXHIBIT 8 (page 2 of 2) 4700 Providence Road, Perry, Florida owners. Deed of address of property shows that multiple properties were acquired by Pacem Estate Holdings LLC in October 19, 2018. (For approximately \$5.5 million according to Doc Stamps calculation)

OFFICIAL RECORDS: 2 of 7
Book: 787 Page: 317

STATE OF Virginia §

COUNTY OF Fairfax §

The foregoing instrument was acknowledged before me this 16 day of October 2018, by Joseph E Schmitz, the Secretary of AMTEC Less Lethal Systems, Inc., a Wisconsin corporation, on behalf of the corporation, who is: personally known to me or, provided _____ as identification.

(AFFIX NOTARIAL SEAL)

Noorah Z Hayes
(Official Notary Signature)

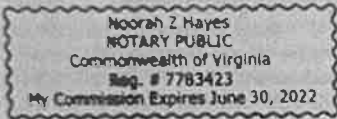


EXHIBIT 9 Taylor County, FL Tax Collector Property records of Pacem Estate Holdings LLC (Note: Shows the mailing address of the Pacem Solutions International LLC office in Virginia).

← → ↻ ⚠ Not secure | fl-taylor-taxcollector.governmax.com/collectmax/collect30.asp?sid=9DB725670BB14682BC5E3FBD22A... ☆ □ 👤 Update

Searches		
Account Number	R01956-900 - PACEM ESTATE HOLDINGS LLC	
GEO Number		
Owner Name	<i>Address:</i>	
<small>Printable List</small>	PACEM ESTATE HOLDINGS LLC	<i>Assessed Year:</i> 2022
Property Address	2941 FAIRVIEW PKWY	<i>Legal:</i>
Mailing Address	SUITE 350	19-03-07 5600/ LEG 0058.65 ACRES THAT PART OF LAND DESC IN OR 687-42 LYING IN SECT 19 SUBJ TO & TOGETHER WITH ESMTS IN OR 687-50-82 OR 687-42 OR 787-316
	FALLS CHURCH VA 22042	<i>GEO Number:</i> 190307-01956900
<hr/>		
Site Functions		
Disclaimer		
Tax Search		
Business Tax Search	R01957-500 - PACEM ESTATE HOLDINGS LLC	
Contact Us	<i>Address:</i>	
County Login	PACEM ESTATE HOLDINGS LLC	<i>Assessed Year:</i> 2022
Home	2941 FAIRVIEW PKWY	<i>Legal:</i>
	SUITE 350	6000 US 19 20-03-07 4100/ LEG 0330.35 ACRES THAT PART OF LAND DESC IN OR 687-42 LYING IN SECT 20 ALSO LYING IN SECT 29 SUBJ TO & TOGETHER WITH ESMTS IN OR 687-50-82 OR 687-42 OR
	FALLS CHURCH VA 22042	<i>GEO Number:</i> 200307-01957500
<hr/>		
	R01954-500 - PACEM ESTATE HOLDINGS LLC	
	<i>Address:</i>	
		<i>Assessed Year:</i> 2022
		<i>Legal:</i>

EXHIBIT 10 (page 1 of 4) Florida Parcels (note “no physical address” But this is 4700 Providence Rd, Perry, FL) Note 3 parcels owned by Pacem Estate Holdings LLC

floridaparcel.com/search/owner/?s_ownn_co_no=72&s_ownn=Pacem

Florida Parcels About Search Terms Redaction

Property ID	Physical Address	Owner Address	Property Type
01956-900	None Perry, FL 32348	PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PKWY SUITE 350 FALLS CHURCH, VA 22042	<u>Agricultural</u>
01957-500	6000 US 19 N Perry, FL 32348	PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PKWY SUITE 350 FALLS CHURCH, VA 22042	<u>Commercial</u>
01954-500	None Perry, FL 32348	PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PKWY SUITE 350 FALLS CHURCH, VA 22042	<u>Agricultural</u>

Search By Address

Search in Which County?
All Counties

Property Address
100 Main St, Tallahassee, 32399

Search Addresses Clear

For best results, use the standard abbreviations for street types, or omit them completely. For example, "100 Main" or "100 Main St" is preferred to "100 Main Street". The search is case-insensitive.

The county is required, however the address search can be helpful. You can't

EXHIBIT 10 (page 2 of 4)

floridaparcel.com/property/72/01957-500

Florida Parcels About Search Terms Redaction

Property Details

This property is classified as Commercial (Light manufacturing, small equipment manufacturing plants, small machine shops, instrument manufacturing printing plants).

The lot is 14390046 square feet, the land value of which is assessed at \$513,280.00.

There are 10 buildings on the property. This property has None residential units.

It was built in 2013.

This property is valued at **\$3,859,700.00**.

The legal description of this lot is: "LEG 0330.35 ACRES - THAT PART".

Sales and Assessment History

Date	Details
------	---------

floridaparcel.com/property/72/01957-500

Florida Parcels About Search Terms Redaction

2020 Assessment	<p>PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PKWY FALLS CHURCH, VA 22042</p> <p><i>changed from</i> PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PARK DR FALLS CHURCH, VA 22042</p>
2019 Assessment	<p>PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PARK DR FALLS CHURCH, VA 22042</p> <p><i>changed from</i> AMTEC LESS LETHAL SYSTEMS INC C/O AMTEC CORPORATION PERRY, FL 32348</p>
10 / 2018	<p>\$5,500,000.00 Light manufacturing, small equipment manufacturing plants, small machine shops, instrument manufacturing printing plants Book 787, Page 316</p>

floridaparcel.com/property/72/01957-500

Florida Parcels About Search Terms Redaction

6000 US 19 N

Owner PACEM ESTATE HOLDINGS LLC

Value \$3,859,700.00

[View Full Details](#)

EXHIBIT 10 (page 3 of 4)

floridaparcel.com/property/72/01956-900

Florida Parcels About Search Terms Redaction

Sales and Assessment History

Date	Details
2020 Assessment	<p>PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PKWY FALLS CHURCH, VA 22042</p> <p><i>changed from</i> PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PARK DR FALLS CHURCH, VA 22042</p>
2019 Assessment	<p>PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PARK DR FALLS CHURCH, VA 22042</p> <p><i>changed from</i> AMTEC LESS LETHAL SYSTEMS INC C/O AMTEC CORPORATION PERRY, FL 32348</p>

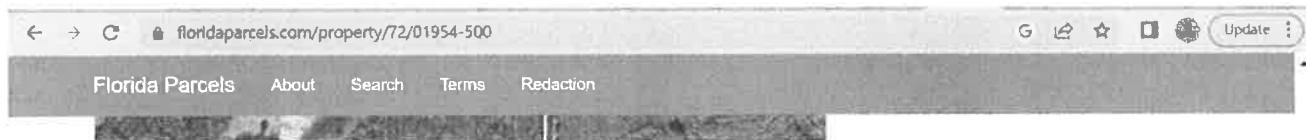
floridaparcel.com/property/72/01956-900

Florida Parcels About Search Terms Redaction

The image shows an aerial satellite view of a property. A white pop-up box is overlaid on the map, containing the following information:

- Unknown Address**
- Owner:** PACEM ESTATE HOLDINGS LLC
- Value:** \$170,090.00
- [View Full Details](#)

EXHIBIT 10 (page 4 of 4)



Property Details

This property is classified as Agricultural (Timberland - site index 70 to 79),
 The lot is 6768350 square feet, the land value of which is assessed at \$23,880,00.
 There are None buildings on the property. This property has None residential units,
 This property is valued at **\$450,600.00**.
 The legal description of this lot is: "LEG 0155,38 ACRES - THAT PT OF",

Sales and Assessment History

Date	Details
2020 Assessment	PACEM ESTATE HOLDINGS LLC



2020 Assessment	PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PKWY FALLS CHURCH, VA 22042 <i>changed from</i> PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PARK DR FALLS CHURCH, VA 22042
2019 Assessment	PACEM ESTATE HOLDINGS LLC 2941 FAIRVIEW PARK DR FALLS CHURCH, VA 22042 <i>changed from</i> AMTEC LESS LETHAL SYSTEMS INC C/O AMTEC CORPORATION PERRY, FL 32348
10 / 2018	\$5,500,000.00 Timberland - site index 70 to 79 Book 767, Page 316



EXHIBIT 11 – Name Change Filing with Florida AMTEC Less Lethal Systems to ALS, Inc. 2022. Note Pacem Defense LLC and address.

COVER LETTER

TO: Amendment Section Division of Corporations

SUBJECT: Name change of Amtec Less Lethal Systems, Inc. (WI), to ALS, Inc.
Name of Corporation

DOCUMENT NUMBER: F12000002201

The enclosed Amendment and fee are submitted for filing.

Please return all correspondence concerning this matter to the following:

Joseph E. Schmitz, Esq.

Name of Contact Person

ALS, Inc., c/o Pacem Defense LLC

Firm/Company

2941 Fairview Park Drive, Suite 350

Address

Falls Church, Virginia 22042

City/State and Zip Code

Joseph.schmitz@pacem-defense.com

E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

Joseph E. Schmitz

Name of Contact Person

at (

703)

992-3095

Area Code & Daytime Telephone Number

Enclosed is a check for the following amount:

\$35 Filing Fee

\$43.75 Filing Fee &
Certificate of Status

\$43.75 Filing Fee &
Certified Copy

\$52.50 Filing Fee,
Certificate of Status &
Certified Copy

Mailing Address:

Amendment Section
Division of Corporations
P.O. Box 6527
Tallahassee, FL 32314

Street Address:

Amendment Section
Division of Corporations
The Centre of Tallahassee
2415 N. Monroe Street, Suite 310
Tallahassee, FL 32303

EXHIBIT 12 - Press release Eau Claire, Wisconsin, October 18, 2018

“transaction valued at \$10 million dollars”

**EX-99-1 20181018 PressRelease_ALS
Sale**

FOR IMMEDIATE RELEASE

(715) 839-2164

NATIONAL PRESTO INDUSTRIES, INC. ANNOUNCES DIVESTITURE
OF AMTEC LESS LETHAL SYSTEMS, INC. TO PACEM DEFENSE LLC

Eau Claire, Wisconsin (October 18, 2018) -- National Presto Industries, Inc. (NYSE: NPK) announced today that its wholly-owned subsidiary AMTEC Corporation sold the stock of its wholly-owned subsidiary AMTEC Less Lethal Systems, Inc. (“ALS”) to PACEM Defense LLC (“PACEM”) After several months of negotiations, the transaction occurred on October 17, 2018. Originally formed to acquire the assets of a less lethal manufacturing business in 2011, ALS is currently a manufacturer of less lethal products serving law enforcement and correctional facilities.

The transaction is valued at approximately \$10 million. PACEM will operate the business in Perry, Florida, out of the current ALS facility. It intends to continue current operations at ALS and begin manufacturing other items to serve its customers and markets.

In describing the transaction, Maryjo Cohen, President of National Presto, stated, “We recognized that to move ALS to the next level, the operation needed to further augment U.S. business with much greater focus on international customers. PACEM has the contacts needed to take ALS to that next level. The acquisition provides PACEM an instant manufacturing facility with an established customer base.” Although it occurred subsequent to the end of National Presto Industries, Inc.’s third quarter, the transaction will result in a third quarter impairment charge to earnings of approximately \$3 million.

National Presto Industries, Inc. operates in two business segments. The Housewares/Small Appliance segment designs and sells small household appliances and pressure cookers under the PRESTO® brand name. It also designs and markets the first self-service/self-reloadable fire extinguisher, the Rusoh® Eliminator® fire extinguisher. The segment is recognized as an innovator of new products. The Defense segment manufactures a variety of products, including medium caliber training and tactical ammunition, energetic ordnance items, fuzes, and cartridge cases.

This release contains “forward looking statements” made pursuant to the safe harbor provision of the Private Securities Litigation Reform Act of 1995 that are subject to certain risks and uncertainties, as well as assumptions, that could cause actual results to differ materially from historical results and those presently anticipated or projected. In addition to the factors discussed above, other important risk factors are delineated in the Company’s various SEC filings.

Exhibit 13 (page 1 of 2) Cory Mills signs Loan with WAYGAR Capital, Inc., Toronto, Canada in 2019 and again in 2021.

OFFICIAL RECORDS
Book: 836 Page: 324

**MORTGAGE AND SECURITY AGREEMENT
WITH ASSIGNMENT OF RENTS AND FIXTURE FILING**

This Mortgage and Security Agreement with Assignment of Rents and Fixture Filing (the "*Mortgage*") is dated as of May 28, 2021 from PACEM ESTATE HOLDINGS LLC, a Florida limited liability company with its principal place of business and mailing address at 4700 Providence Road, Perry, Florida 32347 (hereinafter referred to as "*Mortgagor*") to WAYGAR CAPITAL INC., as agent for Ninepoint Canadian Senior Debt Master Fund L.P. with its mailing address at 25 King Street West, Suite 1700, Toronto, Ontario, Canada M5L 2A1 (in such capacity, hereinafter referred to as "*Mortgagee*");

WITNESSETH THAT:

WHEREAS, PACEM Defense LLC and ALS, Inc. (hereinafter referred to collectively as the "*Borrowers*" and individually as a "*Borrower*") may from time to time borrow money or otherwise obtain credit from Mortgagee, including without limitation, loans afforded the Borrowers or one of them under the following credit facilities:

(a) Revolving working capital loan ("*Facility A*") in the principal amount of up to Twelve Million Canadian Dollars (Cdn\$22,000,000) (the "*Facility A Limit*");

(b) Non-revolving capital expenditure loan ("*Facility B*") in the principal amount of up to One Million Canadian Dollars (Cdn\$1,000,000) (the "*Facility B Limit*"); and

(c) Non-revolving Term Loan ("*Facility C*", and, together with Facility A and Facility B, the "*Loans*") in the principal amount of Ten Million Five Hundred Thirty-Eight Thousand Seven Hundred Fifty-Seven and 91/100 Canadian Dollars (Cdn\$10,538,757.91) (the "*Facility C Limit*");

and, in connection therewith, Mortgagor and/or the Borrowers may sign and deliver to Mortgagee such notes, agreements, guaranties, and/or applications evidencing such obligations or otherwise setting forth the terms and conditions related thereto, which indebtedness, obligations, and liabilities (together with all interest and fees thereon, and all costs and expenses related thereto), whether now existing or hereafter arising, are to be secured by this Mortgage;

NOW, THEREFORE, for and in consideration of the execution and delivery by Mortgagee of the Letter Agreement referred to below, to secure (i) the payment of the Loans made to or for the account of the Borrowers under that certain Letter Agreement dated as of May 28, 2021, among the Borrowers, Mortgagor and the other other guarantors party thereto, and Mortgagee, as the same may from time to time be amended, modified or restated (the "*Letter Agreement*"), in the aggregate principal amount of Cdn\$33,538,757.91 and which is expressed to mature no later than April 15, 2022, or such later date extended by Mortgagee in its sole discretion, the final maturity thereof, and all promissory note(s) issued thereunder (if any), including all promissory notes issued, in whole or in part, in extension or renewal thereof or in substitution or replacement thereof, as each of the foregoing may from time to time be amended or modified (collectively,

Exhibit 13 (page 2 of 2) Cory Mills signs Loan with WAYGAR Capital, Inc., Toronto, Canada in 2019 and again in 2021.

OFFICIAL RECORDS: 24 of 35
Book: 836 Page: 346

IN WITNESS WHEREOF, Mortgagor has caused these presents to be signed and sealed the day and year first above written.

PACEM ESTATE HOLDINGS LLC

By 
Name: Cory L. Mills
Title: Managing Member

[Signature Page to Mortgage and Security Agreement with Assignment of Rents and Fixture Filing]

Exhibit 14 (page 1 of 2) WAYGAR CAPITAL filing of Notice of Lien on Mills Pacem Defense LLC in 2019 and a copy of Patent rights transfer from AMTEC Less Lethal Systems, Inc to WAYGAR CAPTITAL (note use of Virginia address instead of Florida Address)



SCC-BLENDED NOTICE
GSA

2019 APR 17 PM 6:25

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional)
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address)
<input type="checkbox"/> Please Return To Tiana Fair CT CORPORATION 208 S. LaSalle Street Suite 814 Chicago, IL 60604

190417 6635 -3

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the Individual Debtor's name will not fit in line 1b, leave all of Item 1 blank, check here and provide the Individual Debtor Information in Item 10 of the Financing Statement Addendum (Form UCC-1Ad)

1a. ORGANIZATION'S NAME Pacem Defense LLC				
OR	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS 2941 Fairview Park Drive		CITY Falls Church	STATE VA	POSTAL CODE 22042
				COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the Individual Debtor's name will not fit in line 2b, leave all of Item 2 blank, check here and provide the Individual Debtor Information in Item 10 of the Financing Statement Addendum (Form UCC-1Ad)

2a. ORGANIZATION'S NAME				
OR	2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE
				COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME Waygar Capital Inc., as Agent				
OR	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS 372 Bay Street, Suite 901		CITY Toronto	STATE ON	POSTAL CODE M5H 2W9
				COUNTRY Canada

4. COLLATERAL: This financing statement covers the following collateral:

All right, title and interest in and to all personal property and fixtures of the Debtor, whether now owned or existing or hereafter created, acquired or arising.

Exhibit 14 (page 2 of 2) WAYGAR CAPITAL filing of Notice of Lien on Mills Pacem Defense LLC in 2019 and a copy of Patent rights transfer from AMTEC Less Lethal Systems, Inc to WAYGAR CAPITAL (note use of Virginia address instead of legal one in Florida Address)

PATENT COLLATERAL AGREEMENT

This 15th day of April, 2019, AMTEC LESS LETHAL SYSTEMS, INC., a Wisconsin corporation ("Debtor") with its principal place of business and mailing address at 2941 Fairview Park Drive, Falls Church, Virginia 22042, in consideration of ten dollars (\$10.00) and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, assigns, mortgages and pledges to WAYGAR CAPITAL INC., AS AGENT FOR NINEPOINT CANADIAN SENIOR DEBT MASTER FUND L.P., with its mailing address at 372 Bay Street, Suite 901 Toronto, Ontario, M5H 2W9, and its successors and assigns ("Secured Party"), and grants to Secured Party a continuing security interest in and to all of the right, title and interest of such Debtor in, to and under the following property, wherever located, and whether now existing or hereafter arising or acquired from time to time (the "Patent Collateral"):

Exhibit 15 Cory Mills Virginia filing of Pacem Solutions International LLC in March 2014 and reinstated in 2015 as the Sole Manager of the LLC. Subsequent filings continue to show him as Manager and the Registered Agent for the company thru 2022.

APPLICATION FOR REINSTATEMENT
OF A VIRGINIA LIMITED LIABILITY COMPANY

251304000000

Date: 11/01/2015

To: State Corporation Commission
Office of the Clerk


Last Day for Reinstatement
June 30, 2020

From: Pacem Solution International LLC
SCC ID No. S495372 - 7

03

On behalf of Pacem Solution International LLC, the undersigned hereby requests the Commission to reinstate the limited liability company's existence. All required documents and fees are enclosed.

Sincerely,



(signature)

Cory Mills

(printed name)

CEO - Sole Mgr

(title (e.g., manager or member))

For Office Use Only

DCN: 151106 1488

Reinstatement Fee:	\$	<u>100</u>
Past Due Fees: (15-16)	\$	<u>125</u>
Total:	\$	<u>225</u>

RIA? Yes: No: N/C:

P/O? Yes: No: N/C:

Exam By: AM Date: 11/01/15

CHECK IF APPLICABLE:

The person signing this application on behalf of the limited liability company has been delegated the right and power to manage the company's business and affairs.

This application must be signed by a person who is a manager or member of the limited liability company, or by a person with some other title who has been delegated the right and power to manage the company's business and affairs (with the box checked). "Owner" is not an acceptable title. See § 13.1-1003 of the Code of Virginia.

Provide a name and mailing address to which correspondence regarding the filing of this document is to be sent. (If left blank, it will be sent to the address on a cover letter, if any, or to the registered agent at the registered office.)

Cory Mills (name) (703) 309-1891 (telephone number)

25541 Gwynneth Square, Chantilly, VA 20152 (mailing address)

LLRESTAX
CISEMM

15:08 AM 9--30/15101
STATE CORPORATION COMMISSION
OFFICE

LLC

Exhibit 16 Mills ALS Inc, 4700 Providence RD, Perry, Florida Taylor County Business Tax renewal 8/18/2022 paid by Brian Couch and notice mailing address.

← → ↻ Not secure | fl-taylor-taxcollector.governmax.com/collectmax/collect30.asp?sid=9DB725670BB14682BC5E3FBD22A... ☆ □ Update

Last Update: 12/15/2022 11:21:31 AM EST

Details

License Renewal
Print View
Tax Payment

Searches
Account Number
Business Name
Owner Name

Site Functions
Disclaimer
Tax Search
Business Tax Search
Contact Us
County Login
Home

Business Tax Renewal

Business Account Number	New Business Date	License Year	occllc_Transfer
1667	4/5/2013	2022	N

Business Address
ALS INC
4700 PRIVIDENCE RD
PERRY FL 32347

Units 0

Occupation
MANUFACTURING/OVER 40
EMPLOYEE

Mailing Address
ALS INC
ATTN: BRIAN CROUCH
4700 PROVIDENCE RD PERRY FL
32347

Status Proof of Professional License required. Cannot renew online.

License Fee : \$115.00

Date Paid	Receipt	Amount Paid
8/18/2022	2111984.0001	\$115.00

Activate Windows

EXHIBIT 17 June 1, 2021 \$4,290,000 line of Equity Credit on residence 1198 Windrock Dr, McLean, Virginia and notice private lender (WAYGAR CAPITAL) rerecorded Deed in August 11, 2021

Recording Date	Single Family Residence/Town-house Jun 1, 2021	Document Number	Situs Address Taken From Sales Transaction - Determined Owner Occupied
Residential Model Number	Based On Zip Code and Value Property is Residential	Overlaid Section Comments	Residential (Modeled)
Title Category	ATTORNEY ONLY	Owner	Cory Mills Rana A Saadi 1198 Windrock Dr, Mc Lean, Virginia, 22102
Color	Great Finl		
Mortgage Information			
Mortgage Date	Aug 11, 2021	Recording Date	Aug 11, 2021
Mortgage Due Date	Apr 15, 2022	Document Number	126917001
Mortgage Amount	\$10,538,757.00	Mortgage Term	1 Years
Mortgage Debt Type	Private Party Lender	Mortgage Debt Type	Rerecorded Deed
Mortgage Information			
Mortgage Date	May 28, 2021	Recording Date	Jun 1, 2021
Mortgage Due Date	Apr 15, 2022	Document Number	93172002
Mortgage Amount	\$4,290,000.00	Mortgage Term	1 Years
Mortgage Debt Type	Equity Or Credit Line		
Deed Information			
Document Type	Mechanic Liens	Request Entry Date	Oct 13, 2021
Document Number	000153478001	Transaction Type	Mechanic Lien / Release
Book ID	20211228	Block Number	00382

EXHIBIT 18 - Mills listed as having positions in Companies in Virginia per CIS.SCC.virginia.gov.

← → ↻ cis.scc.virginia.gov/EntitySearch/Index G ↗ ☆ □ 👤 Update ⋮

State Corporation Commission Clerk's Information System

Entity ID	Entity Name	Name Type	Entity Type	Series LLC	Principal Office Address	RA Name	Status
11461429	1198 WINDROCK LLC	Legal Name	Limited Liability Company	No	2941 Fairview Park Dr Ste 350, Falls Church, VA, 22042, USA	Cory Mills	Active
S4953727	PACEM SOLUTION INTERNATIONAL LLC	Legal Name	Limited Liability Company	No	2941 Fairview Park Dr Ste 350, Falls Church, VA, 22042 - 2924, USA	CORY MILLS	Active
11000466	PACEM Support Services LLC	Legal Name	Limited Liability Company	No	2941 Fairview Park Dr Ste 550, Falls Church, VA, 22042 - 2927, USA	Cory Mills	Inactive

Page 1 of 1, records 1 to 3 of 3

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EXHIBIT 19 - Mills listed as having positions with these Companies in Florida Sunbiz.org

Officer/Registered Agent Name List

Officer/RA Name	Entity Name	Entity Number
<u>MILLS, COREY</u>	GOODS & GRACE LLC	L21000275235
<u>MILLS, COREY E</u>	MILLS GAS AND DIESEL REPAIR LLC	L22000182039
<u>MILLS, COREY J</u>	JBC MEDIA GROUP LLC	L12000139028
<u>MILLS, COREY J</u>	MILLS DESIGN GROUP, INC.	P05000043050
<u>MILLS, COREY J</u>	MILLS DESIGN GROUP, INC.	P05000043050
<u>MILLS, CORMELIA G.</u>	GULF BUSINESS CORPORATION	K63985
<u>MILLS, CORMELIA G.</u>	GULF BUSINESS CORPORATION	K63985
<u>MILLS, CORRINA J</u>	TONY PROMOTIONS L.L.C.	L21000012640
<u>MILLS, CORY</u>	ALS, INC.	F12000002201
<u>MILLS, CORY</u>	PACEM DEFENSE LLC	M18000004912
<u>MILLS, CORY L</u>	PACEM ESTATE HOLDINGS LLC	L18000182702
<u>MILLS, COURTNEY</u>	EDIBLE DESIGNS LLC	L17000217024
<u>MILLS, COURTNEY</u>	C OF WIRES, LLC	L18000235956
<u>MILLS, COURTNEY</u>	DOC'S TRUCKING, LLC	L21000308058
<u>MILLS, COURTNEY</u>	BEAN UNLIMITED, LLC	L21000384320
<u>MILLS, COURTNEY</u>	MILLSTONE FOUNDATION INCORPORATED	N12000007931
<u>MILLS, COURTNEY A</u>	T&C BUSINESS CONSULTANTS, INC.	P14000092213
<u>MILLS, COURTNEY A</u>	T&C BUSINESS CONSULTANTS, INC.	P14000092213
<u>MILLS, COURTNEY A</u>	TNC CONSULTING, INC.	P18000093571
<u>MILLS, COURTNEY A</u>	TNC CONSULTING, INC.	P18000093571

Exhibit 20 FEC Excerpt showing payments to Derick Agustin, owner of Home where Mills claims he was a room mate and resident of Florida

3

to (print) name	res	base1	natid1	dist	discuss1	disbursement description	memo code	memo code full	disbursement date	disbursement amount
ADVANCED RESPONSE SYSTEMS	MN					STRATEGIC CAMPAIGN CONSULTING			4/6/2022 0:00	\$8,505.78
ADVANCED RESPONSE SYSTEMS	MN					STRATEGIC CAMPAIGN CONSULTING			4/20/2022 0:00	\$932.44
AGUSTIN, DERICK	FL					SEE MEMO ITEMS			10/13/2021 0:00	\$1,825.61
AGUSTIN, DERICK	FL					SEE MEMO ITEMS			10/21/2021 0:00	\$224.73
AGUSTIN, DERICK	FL					SEE MEMO ITEMS			1/25/2022 0:00	\$171.96
AGUSTIN, DERICK	FL					SEE MEMO ITEMS			2/28/2022 0:00	\$390.21
AGUSTIN, DERICK	FL					SEE MEMO ITEMS			4/6/2022 0:00	\$269.97
AGUSTIN, DERICK	FL					SEE MEMO ITEMS			5/25/2022 0:00	\$513.35
AL SAADI, RANA	VA		22Y			CONTRIBUTIOI REFUND: REFUND OF CONTRIBUTION			7/14/2022 0:00	\$5,800.00
ANEDOT	LA					E-MERCHANT FEES			4/20/2021 0:00	\$624.10

Exhibit 21 (page 1 of 2) 973 Wilma Ave address that Mills first claimed himself as a Florida Resident from March 23, 2021 to June 27, 2022 and his 1198 Windrock Dr, McClean Residence in Virginia at the same time.

Print Date: 01/30/2023 System Refresh Date: 01/29/2023

Navigation icons: Previous, Next, Print, Map, Street, Birdeye, Trim, Port, Estimate, Taxes, FEMA, Plat, Sketch, Share, Favorite.

973 Wilma Ave 01-22-29-8804-02-340

Name(s):

Agustin Vanesa
Agustin Derick

Physical Street Address:

973 Wilma Ave

Property Use:

0100 - Single Family

Mailing Address On File:

973 Wilma Ave
Winter Park, FL 32789-2311
Incorrect Mailing Address?

Postal City and Zip:

Winter Park, FL 32789

Municipality:

Winter Park



973 WILMA AVE 05/20/2014

Upload Photos

[View 2022 Property Record Card](#)

973 Wilma Ave - Parcel: 01-22-29-8804-02-340

Bldg #	Living Area	Gross Area	Act Year Built	Beds/Baths	Floors
1	1000 sqft	1300 sqft	1970	3/1.5	1

Building # 1 - Hover over image to enlarge

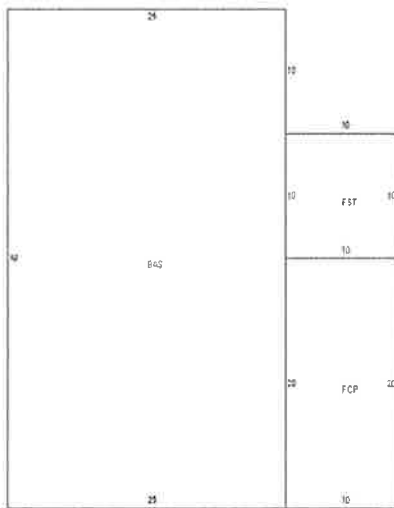


Exhibit 21 (page 2 of 2) Mills 1198 Windrock Dr, McClean Residence in Virginia at the same time that Mills first claimed himself as a Florida Resident from March 23, 2021 to June 27, 2022

1198 Windrock Drive Mclean, VA 22102

