



## **SUPPLEMENTAL REPORT**

### **CHANGE IN SHELL STATUS**

Effective January 23, 2020 RGGI has changed its status from “shell” to “non-shell”

On January 23, 2020 the Company announced the acquisition of the Intellectual Property (IP) for an Automated Mobile Robot (an “AMR”) and shifted its business plan to production and marketing of “Pull Buddy” an AMR for use in warehouses. The Company is now also developing “Wanda,” a disinfecting AMR. Wanda uses UVC lights to disinfect everything from plants and warehouses to hotels, office buildings and airplanes. Wanda will be equipped with dual 50-Watt UVC lights in the 254 – 270 nm range that kill 99 percent of harmful pathogens.

The definition of a shell company as defined in Rule 405 under the Securities Act of 1933 as well as Release 33-8587, is whether the entity has no or nominal operations and no or nominal assets. Neither the release nor the Act requires that a company meet both requirements of Rule 405 so as not to be considered a shell. The Rule states:

The term *shell* company means a registrant . . . that has:

1. No or nominal operations; and
2. Either:
  - i. No or nominal assets;
  - ii. Assets consisting solely of cash and cash equivalents; or
  - iii. Assets consisting of any amount of cash and cash equivalents and nominal other assets.

Thus, in order to be considered a shell, a company must have “no or nominal operations” *and* one of the other qualifications listed in part 2, such as “no or nominal assets.” The Securities and Exchange Commission has made itself clear within footnote 172 of Release No. 33-8869 “indicating that Rule 144 (i)(1)(i) is not intended to capture a ‘startup company,’ or, in other words, a company with limited operating history, in the definition of a reporting

or non-reporting shell company” because the Company does not meet the conditions of having “no or nominal operations.”

In the Company’s filing with OTC Markets and in certain company documents, the Company indicates its operations since January 2020 include:

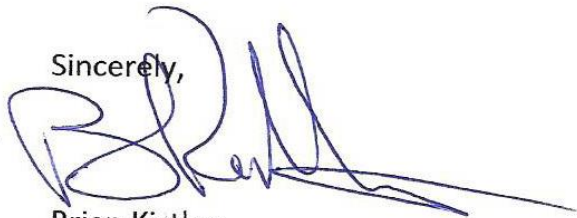
- Engaging Automated Guided Vehicle (“AGV”) Specialists to build the Company’s first Automated Mobile Robot on March 9, 2020.
- Development of the “Pull Buddy” and “Wanda” AMRs.
- Leasing commercial space in Clinton Township Michigan for its operations as of June 18, 2020.
- Continued research into optimizing the design and build of the Company’s Automated Mobile Robot with the use of 3D printers, more efficient gearmotors, and HMI touchscreens to improve customer equipment costs.

The Company’s assets include:


- Cash and cash equivalents in the amount of \$20,056 as of June 30, 2020 and \$63,671 as of December 31, 2019.
- Trade secrets.

As the Company has both operations and assets it is not a “shell company” as the term is defined in Item 405

Sincerely,



Brian Kistler  
Chief Compliance Officer



Signed 10/15/2020

Notary



Melanie Spalding, Notary Public  
Wells County, State of Indiana  
Commission No: NP0722350  
My Commission Expires 09/11/2027