

Attachment B

Form FP-NMA

Application Contact Information

Provide the following information for the person who will be the primary contact for the Funding Portal (“FP”) Applicant during FINRA’s review of the Funding Portal - New Member Application (“FP-NMA”). Note that this is the person to whom FINRA will direct application-related questions and correspondence.

Contact person

First name	<input type="text"/>
Last name	<input type="text"/>
Email address	<input type="text"/>
Phone number	<input type="text"/>
Fax number	<input type="text"/>

Mailing address

Company name	<input type="text"/>
Street address, line 1	<input type="text"/>
Street address, line 2	<input type="text"/>
City	<input type="text"/>
State	<input type="text"/>
Country	<input type="text"/>
Postal Code	<input type="text"/>

I. General Information

Provide the following business information regarding the FP Applicant:

- a. Full Name of FP Applicant;
- b. SEC File Number or IRS Tax Number;
- c. Any Other Name(s) Under Which Business Is or Will Be Conducted;
- d. Business Address;
- e. All Website Addresses Where Business Is or Will Be Conducted;
- f. Legal Status of FP Applicant (e.g., Corporation, Limited Liability Company (“LLC”), Partnership, Sole Proprietorship, or Other);
- g. State/Country of Formation;
- h. Date of Formation; and
- i. [Attach](#) corporate or analogous formation documents of the FP Applicant, and any amendments thereto.

II. Ownership

- a. [Attach](#) a current copy of the FP Applicant’s completed SEC Form Funding Portal including all schedules and, as applicable, disclosure reporting pages.
- b. Is the copy of the FP Applicant’s completed SEC Form Funding Portal accurate?

Yes No

If ‘No’ is selected above, provide a detailed explanation of any changes.

- c. [Attach](#) an organizational chart depicting: (i) the direct and indirect ownership structure and percentage interests in the FP Applicant held by entities and individuals; and (ii) any subsidiaries of the FP Applicant.

III. Associated Persons

- a. Executive Officers
Provide the names and CRD numbers (if applicable) of the individuals performing the following roles or their functional equivalents:
 - i. Chief Executive Officer;
 - ii. Chief Financial Officer;
 - iii. Chief Operations Officer; and
 - iv. Chief Compliance Officer.

- b. Supervisory Personnel
Attach an organizational chart depicting the FP Applicant’s supervisory personnel and reporting lines.

IV. Activities, Procedures, and Controls

- a. Business Model and Activities
Provide a detailed written description of the FP Applicant’s business model. Include, at a minimum, a description of:
 - i. the forms of compensation that will be paid to the FP or its associated persons;
 - ii. any referral fees or transaction based compensation that the FP or associated persons will pay to others;
 - iii. the types of securities to be presented to investors;
 - iv. any limitations on the types of issuers that will be presented;
 - v. how issuers will be presented to investors (e.g., website, social media platform); and
 - vi. the type and scope of any other business activities the FP Applicant intends to conduct.

- b. Recordkeeping
Describe in detail the recordkeeping policies, procedures and systems to be used by the FP Applicant.

- c. Attach the FP Applicant’s written procedures. The written procedures must address, at a minimum, the following subjects:
 - i. Anti-money laundering;
 - ii. Communications with the public;
 - iii. Collection, retention, protection and review of investors’ information;
 - iv. Disclosure requirements;
 - v. Due diligence;
 - vi. Investor education and affirmation; and
 - vii. Supervision.

Please ensure that the written procedures clearly state:

- i. Who: the identification of the person responsible for conducting the subject procedure;
- ii. What: a description of the specific procedure that is to be conducted by the person responsible;
- iii. When: a statement as to when or how often the specific procedure is to be conducted; and
- iv. How evidenced: a statement as to how the FP Applicant will evidence the fact that the procedure has been conducted.

- d. **Restricted or Prohibited Activities**
 The federal securities laws prohibit FPs from certain conduct, including: offering investment advice or recommendations; soliciting purchases, sales, or offers to buy the securities offered or displayed on its website or portal; compensating employees, agents, or other persons for such solicitation or based on the sale of securities displayed or referenced on its website or portal; holding, managing, possessing, or otherwise handling investor funds or securities; and any other activities prohibited by the SEC.
 - i. **Attach** a signed statement, executed by an FP Applicant’s officer (or functional equivalent) that procedures are in place to adhere to such prohibitions and that the FP Applicant’s officers (or functional equivalents) are responsible for and maintain a system of controls and supervision to ensure compliance.
 - ii. **Attach** written procedures addressing how the FP Applicant will comply with the prohibitions (the written procedures must clearly provide the information outlined above regarding who, what, when, and how evidenced).

V. Systems, Facilities, and Contractual Relationships

- a. **Systems**
 Describe the operational systems the FP Applicant will use to conduct its business and the controls (e.g., change management, limitations on access to underlying data) to be utilized for such systems.

- b. **Business and Contractual Relationships**
 Describe the business and contractual relationships the FP Applicant will maintain to conduct its business activities. This should include, without limitation and as applicable, descriptions of the following relationships:

- i. Banks;
- ii. Broker-Dealers;
- iii. Clearing corporations;
- iv. Service bureaus;
- v. Escrow agents;
- vi. Transfer agents; and
- vii. Technology service providers.

- c. **Attach** copies of any contracts or agreements relating to the relationships described above.
- d. **Attach** copies of any other contracts or agreements entered into by the FP Applicant for the performance by another party of any functions identified as prohibited activities in the SEA definition of “funding portal” as enumerated in SEA Section 3(a)(80)(A) through (E) (e.g., offering investment advice or recommendations; soliciting purchases, sales or offers to buy the securities offered or displayed on the FP Applicant’s website or portal; holding, managing, possessing, or otherwise handling investor funds or securities).

- e. Will the FP Applicant use pre-dispute arbitration agreements?

Yes No

- f. Insurance/Fidelity Bond
Attach a copy of the FP Applicant's fidelity bond.

VI. Funding

- a. Source of Funding
 - i. Use the spreadsheet below to identify all persons or entities that have contributed equity capital or debt financing to the FP Applicant's business and provide information regarding the type of capital or financing.

Date	Name of Funding Source	Funding Type (e.g., debt, equity)	Amount	Transfer Instrument (e.g., wire, check)

(If additional space is needed, please submit a separate document as an additional attachment containing the information and identifying the question to which the information pertains.)

- ii. **Attach** documentation reflecting all funding/capitalization of the FP Applicant. The documentation provided to reflect funding/ capitalization should include:
 1. For each source of funding: bank statements, checks, wire instructions (or the equivalent), audited financial statements, or other evidence demonstrating the funding source's ability to make such contribution.
 2. For the FP Applicant: bank statements, checks, or wire instructions (or the equivalent) covering each month that funds were deposited into the Applicant's account(s).
- b. Ongoing Operations
 - i. **Attach** a copy of any expense sharing agreement to be utilized by the FP Applicant.
 - ii. Describe plans for the FP Applicant's additional funding, should such funding become necessary in the future.

VII. Disclosure Information

- a. Identify whether the FP Applicant or any persons associated with the FP Applicant are the subject of a pending, adjudicated, or settled regulatory action or investigation by the SEC, the Commodity Futures Trading Commission, a federal, state, or foreign regulatory agency, or a self-regulatory organization; an adjudicated, or settled investment-related private civil action for damages or an injunction; or a criminal action (other than a minor traffic violation) that is pending, adjudicated, or that has resulted in a guilty or no contest plea. For each associated person, provide below the name, CRD number (if applicable), brief description of the action or investigation (including date of action or investigation), and role with the FP Applicant.

Name	CRD # (if applicable)	Event	Date of Event	Role with FP Applicant

- b. **Attach** a completed FP-SD Schedule.

- c. For any person identified above or in the attached FP–SD Schedule, provide a detailed description of the FP Applicant’s plan for heightened supervision of that person’s activities. In the alternative, [attach](#) a copy of the applicable heightened supervisory procedures.

Designated Signatory

I hereby certify under penalty of perjury under the laws of the United States of America, 18 U.S.C. § 1746, that the foregoing information provided by me on behalf of the FP Applicant is true and correct to the best of my knowledge, information, and belief and that I am legally authorized to make the foregoing certification on behalf of the FP Applicant.

Executed on: _____, 20____.

Executive Officer Signature: _____

Print Name: _____