

Regulatory Status Disclosure

AI Trade Flow — Advanced Education and Trading

Effective Date: [DATE] · Last Updated: [DATE]

1. Purpose

This Disclosure explains, in plain language, what AI Trade Flow LLC ("AI Trade Flow," "we") is and is not from a regulatory standpoint, so that members can make informed decisions about using the Services. It should be read together with the Terms of Service, Risk Disclosure Statement, and No Investment Advice Disclaimer.

2. What AI Trade Flow Is

AI Trade Flow is a U.S.-based **education and software company**. We sell memberships that provide access to trading education, livestream sessions, professional speaker events, community features, and software tools that connect — at the member's election and under the member's own API credentials — to an exchange account the member owns and controls.

3. What AI Trade Flow Is Not

AI Trade Flow is **not** registered as, and does not act as, any of the following: a broker-dealer or member of FINRA; an investment adviser registered with the SEC or any state; a commodity trading advisor, commodity pool operator, or futures commission merchant registered with the CFTC or member of the NFA; a national securities or derivatives exchange; a bank, trust company, or credit union; or a money services business or money transmitter registered with FinCEN or any state banking regulator.

4. Why Registration Is Not Required for Our Model

Our Services are structured so that activities that trigger those registrations do not occur on our platform: we do not hold, pool, transmit, or manage customer funds or digital assets; we do not act as counterparty to any trade; we do not provide individualized investment advice; we do not receive transaction-based compensation; and we do not operate a marketplace that matches buyers and sellers. All custody, execution, margin, and settlement occur at the member's own third-party exchange under that exchange's regulatory framework. Where we accept supported digital assets as payment, we receive them for our own services, and where we pay program obligations in digital assets, we pay our own debts — merchant ("user") activity under FinCEN guidance, not money transmission. Where the platform's base currency and payment rails use a U.S. dollar payment stablecoin, we intend to use only stablecoins issued in compliance with the GENIUS Act, which classifies compliant payment stablecoins as neither securities nor commodities; the platform does not issue any stablecoin, holds no member stablecoin balances, and pays no yield or interest on any digital asset. This structural analysis has been reviewed by [COUNSEL NAME]; members should not treat it as legal advice to them.

5. Rules That Do Apply to Us

Although the registrations above do not apply to our model, AI Trade Flow remains subject to — and takes seriously — laws of general application, including: Federal Trade Commission rules on truthful advertising, endorsements, and testimonials; state consumer-protection and auto-renewal statutes; U.S. sanctions administered by OFAC; data-privacy laws described in our Privacy Policy; and intellectual-property law.

6. Your Exchange Is Your Regulated Counterparty

Leverage, order execution, custody, and asset listings are provided by the exchange you link, under its own licenses and rules. Whether a particular venue, product, or leverage level (including 20×) is available to you depends on that exchange's registrations and your eligibility under applicable U.S. law. Review your exchange's own regulatory disclosures before trading.

6A. The Instrument Class — Margined Spot, Not Futures

For members in the United States, the trading the Services support is **margined spot trading**: you buy and sell the actual digital asset in your own account at your licensed exchange, and any margin (leverage) is extended to you by that exchange under its own rules and eligibility requirements. The assets you trade are really delivered to and held in your account — which is what makes this spot trading rather than a derivative. AI Trade Flow does not offer, route, or support futures contracts, perpetual contracts, options, or any other derivative product for U.S. members, and no description of the Services as "futures," "perps," or "contracts" is accurate. If derivative products are ever added in the future, that will happen only under the registrations the law requires for them, and this Disclosure will be updated before any such feature is available.

7. International Availability — Phased

The Services are operated from the United States. At launch, the Services are available in the United States and in select international markets where our jurisdiction-by-jurisdiction compliance review has been completed; the current list of supported countries, and the venues supported in each, is shown inside the member portal. Further international expansion is planned and the platform is designed for it — most international members' exchanges already offer leverage, and the non-custodial, execution-only structure travels well — but availability outside the U.S. is phased: we do not actively market into any jurisdiction before confirming its local requirements, and specific features (including automated Model Following, which some jurisdictions regulate as a licensed activity) may be limited or unavailable in some countries. We have not sought authorization under regimes such as the EU's Markets in Crypto-Assets Regulation (MiCA) because we do not perform custody, exchange, execution-as-counterparty, or advice; that analysis will be confirmed per jurisdiction before each expansion, and this Disclosure will be updated as availability changes. Members accessing the Services from outside the United States are responsible for compliance with their local law.

8. No Endorsement

No regulator has passed upon the merits of the Services, reviewed our educational content, or endorsed AI Trade Flow. Any statement to the contrary by any person is unauthorized and false.

8A. Platform Registration Status

[RESERVED — upon counsel's determination of the platform's registration or exemption posture for automated trading features, a single plain-language statement of that status will appear here, and nowhere else will the platform characterize its own registration status.]

9. Changes

Regulation of digital assets is evolving — including pending federal market-structure legislation and the SEC's proposed Regulation Crypto Assets, an issuer-side offering regime that does not apply to AI Trade Flow because we issue no tokens, raise no capital from members, and sell no crypto assets. We monitor developments and will update this Disclosure — and, where necessary, change or restrict features of the Services — to remain consistent with applicable law. Our member rewards (Flow points) are non-transferable, are not tokens, and are not offered or sold.

10. Questions

compliance@[DOMAIN] · AI Trade Flow LLC, [ADDRESS]

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