

# Guidelines for CPIN Members Inviting People to Join the Closed Private Investment Network (CPIN)

The Closed Private Investment Network (CPIN) operates under Section 4(a)(2) of the Securities Act of 1933, which means **general solicitation is strictly prohibited** when offering investment opportunities. These guidelines ensure that CPIN members invite people to join **without violating SEC regulations**, while also maintaining the exclusivity and integrity of the network.

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## 1. Who Can You Invite?

**ONLY invite individuals with whom you have a substantive pre-existing relationship.**

- This means people you personally know, such as:
  - Friends, family, or business associates you have interacted with.
  - Individuals with whom you have discussed financial matters before.
  - People whose financial experience or sophistication you are aware of.

**DO NOT** invite strangers, social media followers you do not personally know, or use mass outreach strategies.

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## 2. How Can You Invite People?

**Personal & Direct Invitations Only**

- Invite people **one-on-one** through direct messages, emails, or personal conversations.
- Ensure they understand that CPIN is **not publicly accessible** and is an **exclusive, invitation-only network**.
- Focus on the **educational and networking benefits** of CPIN, rather than investment opportunities.

**DO NOT**

- Post investment-related invitations on public forums, social media, or websites.
  - Use phrases like “investment opportunities available” or “guaranteed returns.”
  - Send mass emails or advertisements encouraging people to join.
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### 3. What Can You Say?

#### ✔ Compliant Language Examples

💬 *“I’m part of a private investment network focused on education and wealth-building. If you’re interested in learning more, let’s talk.”*

💬 *“I’m expanding my private investment circle and looking for like-minded individuals I personally know to join. If we’ve talked about investing before, let’s connect.”*

💬 *“I have access to an exclusive private investment network. It’s not open to the public, but if you’re interested, I can share more details privately.”*

#### ❌ Non-Compliant Language (DO NOT USE)

❌ *“Sign up now for this investment opportunity!”*

❌ *“Earn high returns through this private investment group.”*

❌ *“Join this exclusive network and access guaranteed investments.”*

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### 4. Where Can You Share Information?

#### ✔ Private & Controlled Channels

- Direct messages (email, text, or WhatsApp).
- In-person conversations or phone calls.
- Invitation-only private groups with controlled membership.

#### ❌ DO NOT Share in Public Spaces

- Public Facebook groups, LinkedIn posts, Reddit, Twitter, etc.
  - Unrestricted online forums or investment websites.
  - Any platform where people outside your trusted circle can see your invitation.
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### 5. What Happens After They Apply?

- They must complete both an application and an intake form, which allows CPIN to establish a substantive pre-existing relationship.
- If they are not accredited investors, they must complete three educational modules to be designated as sophisticated investors before they can invest.
- If they do not submit the required KYC and AML documents, they may still view investment opportunities—but they cannot invest until those documents are approved.

Their membership will be reviewed and approved based on CPIN's internal guidelines, including compliance with KYC/AML and investor sophistication requirements.

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By following these **SEC-compliant guidelines**, CPIN members can **legally and ethically** expand the network while maintaining its exclusivity and **avoiding general solicitation**. If you have any questions, contact **CPIN support for clarification**.

Here is **social media marketing material** for **CPIN members** to use when inviting people they personally know. These materials are **compliant with Section 4(a)(2) regulations**, ensuring that posts do **not** constitute **general solicitation**. Here is the logo of the CPIN to use with social media posts:



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◆ **Post #1: Exclusive Investment Community Invitation**

🔒 **INVITATION ONLY – NOT OPEN TO THE PUBLIC**

💡 Are you looking to build wealth and take control of your financial future? I'm part of an **exclusive, invitation-only investment network** that brings together like-minded individuals to **collaborate, learn, and grow**.

👥 If we've **previously discussed investments** or you're **serious about exploring opportunities**, reach out to me privately so I can share more details. This is **not a sales pitch**—just a chance for us to **build together**.

✉️ DM me or comment "**More Info**" if we know each other and you're interested in learning more.

⚠️ *This is not an offer to invest. Membership is by private invitation only and subject to approval.*

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◆ **Post #2: Join My Private Investment Circle**

🔒 **I'm Expanding My Private Investment Circle!**

👥 **Looking for people I personally know who are serious about wealth-building and cooperative group economics.**

If we've **talked about investments before** and you're looking for a **private, structured way to grow your financial knowledge and access exclusive opportunities**, reach out to me directly.

👛 This is **NOT a public offer**—I can only invite people I personally know and who share a **vision for financial empowerment**.

✉️ DM me if we have a **pre-existing relationship** and you'd like to explore this further.

⚠️ *No public solicitations. Private network only.*

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### ◆ **Post #3: Financial Freedom Through Private Networks**

🚀 **Wealth is Built in Private Circles!**

💡 The most successful investors don't find opportunities in public ads—they're part of **exclusive, private networks**.

I'm inviting **a few select people I personally know** to apply to a **private investment community** focused on financial education, strategic investing, and long-term wealth-building.

🔑 **Interested?** If we've **already discussed investments before**, send me a private message.

✉️ DM me for more info—this is an **invite-only** opportunity.

⚠️ *This is not an offer to invest. Membership is selective and by private referral only.*

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### ◆ **Post #4: Let's Build Together!**

💰 **Looking for like-minded people I KNOW to build wealth with!**

If we've **talked about investing before** and you're **serious about leveling up financially**, let's connect. I'm part of a **private, invitation-only investment group** focused on **cooperative group economics and financial education**.

🚫 **No public access, no spam, no sales pitches.** If we know each other and you're interested, let's talk.

✉️ Message me directly if you're interested.

⚠️ *This is a private community—membership is subject to approval.*

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These **compliant social media materials** will allow CPIN members to **privately invite people they know** without engaging in **general solicitation**.