

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.

1. Who Can You Invite?

 **ONLY invite individuals with whom you have a 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.

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."*

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.

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**.