Rule 144 Sale Order Checklist

1. Verification of account holder’s identity.
2. Date account holder opened the account with Curvature.
3. How seller obtained the securities to be sold and when the securities were acquired.
4. Verification of the beneficial ownership of the securities to be sold or transferred.
5. Is the account holder an affiliate of the issuer?
6. Verification that holding period requirements have been met, including legal opinion.
7. Provide a summary of activity in the account holder’s account over the last 90 days.
8. Prior sales by the client in the issuer over the last three months?
9. Account holder’s assets under management at the Firm and summary of holdings.
10. Evidence of Seller’s total holdings in the issuer.
11. Are the issuer’s filings with the SEC or OTC markets current? When was the last filing made by the issuer?
12. Is there evidence of ongoing business of the issuer? Describe evidence reviewed.
13. Due diligence review and results of negative news search of issuer.
14. Due diligence review and results of negative news search of account holder.
15. Number of issuer’s shares and dollar value sold over the past four weeks.
16. Issuer’s total shares outstanding and percentage of proposed sale plus any sales listed in response to item 3 of total shares outstanding.

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| --- | --- |
| Completed By | Date |
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For the Designated Principal [Or Compliance] Supervisory Review

1. If applicable, description of red flags identified in course of the review and how the red flags were investigated.
2. If applicable, description of any additional documents or information the Designated Principal required regarding the account holder, securities, or issuer.
3. If applicable, description of any conditions imposed on the transaction.

By signing below, I verify that I (i) have reviewed this transaction, including the items set forth in this checklist and the associated documentation, (ii) sought to identify red flags in accordance with the Firm’s Written Supervisory Procedures at [pages], and (iii) approve this transaction.

|  |  |
| --- | --- |
| Designated Supervisor Signature | Date |
|  |  |

Addendum for Sale of Control Securities Under 144

1. Has the client made a filing with the SEC on Form 144 and, if so, provided a copy of the Form to Curvature?
2. If the client has not made a Form 144 filing, state the total amount of shares and dollar value sold by customer over the past three months.
3. Number of issuer’s shares and dollar value sold over the past four weeks.
4. Issuer’s total shares outstanding and percentage of proposed sale plus any sales listed in response to item 3 of total shares outstanding.
5. If selling debt, all sales of the same tranche over the previous three months.
6. Percentage of proposed sale plus all sales listed in response to item 5 of the total debt issued in the same tranche.
7. Has Curvature solicited any buyers for the sale of control securities?

|  |  |
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| Addendum Completed By | Date |
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By signing below, I verify that I (i) have reviewed this transaction, including the items set forth in this checklist and the associated documentation, (ii) consulted the Firm’s Written Supervisory Procedures at [pages], and (iii) approve this transaction.

|  |  |
| --- | --- |
| Addendum Reviewed By | Date |
|  |  |