



State Money Transmitter License Form

Prepared For: TRUE WEALTH GROUP

Filing Platform: Nationwide Multistate Licensing System (NMLS)

SECTION 1: APPLICANT INFORMATION

Field	Details
Legal Entity Name	TRUE WEALTH GROUP
Fictitious / Trade Name (DBA)	TRUE WEALTH GROUP / True Wealth Vest
Jurisdiction of Formation	Switzerland
Date of Incorporation	March 24, 1998
Principal Business Address	Bahnhofstrasse 10, 8001 Zürich, Switzerland <i>and</i> Volodymyrska St, 4, 02000 Kyiv, Ukraine
Business Email	compliance@truewealthvest.com
Website	www.truewealthvest.com
Tax ID / EIN	58-9897720

SECTION 2: OWNERSHIP & CONTROL

Name	Title	Ownership %	SSN / ITIN (last 4)	Date of Birth
Randy L. Taylor	CEO / Director	40%	XXX-XX-7742	01/15/1980
William V. Delaney	CFO / Director	30%	XXX-XX-9742	05/22/1985

SECTION 3: MSB ACTIVITIES & SCOPE

3.1 Money Services Business (MSB) Activities

- Money transmitting
- Check cashing
- Currency exchange or dealing
- Prepaid access (stored value)
- Money order / traveler's check issuer
- Bill payment service

3.2 Trading Agency Activities

- Securities trading (on behalf of clients)
- Foreign exchange (FX) trading
- Commodities trading
- Derivatives and futures trading
- Cryptocurrency / digital asset trading

3.3 Investment Agency Activities

- Investment advisory services
- Portfolio management
- Brokerage services
- Retirement planning products
- Private placement / alternative investments

3.4 Asset Management Agency Activities

- Discretionary asset management
- Wealth management services
- Custodial services for client assets
- Fund administration (if applicable)
- Real estate investment management

3.5 Description of Integrated Services Provided

TRUE WEALTH GROUP is an **integrated financial services provider** offering:

1. **Money transmission and payment services** (domestic and international)
2. **Trading services** (securities, FX, commodities, derivatives, and digital assets)

3. **Investment advisory services** (portfolio management, retirement planning, private placements)
4. **Asset management** (discretionary management, wealth management, custodial services)

Clients access these services through online/ mobile channels. The entity operates as a unified financial platform, requiring compliance with multiple regulatory frameworks.

3.3 Estimated Transaction Volume (Monthly)

Activity Type	Monthly Volume
Money Transmission	\$100,000,000
Trading (client-executed)	\$50,000,000
Investment Advisory (AUM)	\$300,000,000 (assets under management)
Asset Management (discretionary)	\$250,000,000 (assets under management)

SECTION 4: AUTHORIZED DELEGATES

Do you use sub-agents or authorized delegates? ☒ Yes ☐ No

Agent Name	Address	Primary Contact	Services Provided
Speedy Cash Inc.	6 Main St, Houston, TX	Maria Lopez	Money Transmission, Check Cashing
RemitWorld LLC	96 Oak Ave, Miami, FL	Raj Patel	Money Transmission only

SECTION 5: COMPLIANCE PROGRAM SUMMARY

5.1 BSA/AML Compliance Officer

Field	Details
Name	Sarah Johnson, CAMS
Email	sarah.johnson@blackshieldcorporation.com

5.2 Additional Compliance Roles (for Trading, Investment, Asset Management)

Role	Name	Credentials
Chief Compliance Officer (SEC/FINRA/Securities)	William H. Lavigne	Series 24
Asset Management Compliance Lead	Terry L. Brito	UCITS
Trading Supervision Officer	George S. Riley	Series 7

5.3 Key Compliance Program Elements

For MSB / Money Transmission:

- Written AML/BSA policies & procedures
- Independent testing (Semi-Annual)
- Designated BSA compliance officer
- Employee training (Semi-Annual)
- Customer due diligence / KYC
- Suspicious activity monitoring & SAR filing

For Trading Activities:

- Best execution policies
- Trade surveillance and market abuse monitoring
- Client suitability assessments
- Conflict of interest disclosure
- Order handling and routing procedure

For Investment Advisory Activities:

- Form ADV (if SEC or state-registered)
- Code of ethics / personal trading policy
- Proxy voting policies
- Fee disclosure and billing compliance
- Fiduciary duty procedures

For Asset Management Activities:

- Discretionary trading authority documentation
- Asset segregation and custody procedures
- Valuation policies (fair value)
- Risk management framework
- Client reporting and performance presentation (GIPS compliance if applicable)

5.4 Third-Party Compliance Software

Activity	Software Name
MSB / AML Monitoring	Chainalysis
Trade Surveillance	Scila, Nasdaq Trade Surveillance
Investment Compliance	ACA Compliance

SECTION 6: FINANCIAL INFORMATION

6.1 Capital / Net Worth Requirements

License / Activity	Minimum Net Worth Requirement	Applicant's Status
Money Transmitter (Texas)	Greater of \$100,000 or 3% of assets	Certified by CPA
Money Transmitter (Florida)	\$100,000 + \$10,000 per location	Certified by CPA
SEC-Registered Investment Adviser (if AUM $\geq$ \$100M)	No fixed minimum, but positive net worth required	\$350M AUM $\Rightarrow$ SEC registration required
Broker-Dealer (if trading securities)	Minimum net capital: \$50,000 – \$250,000 (SEC Rule 15c3-1)	TBD

6.2 Required Financial Statements

Document	Status
Audited financial statements (most recent fiscal year)	Find Attached
Audited financial statements (preceding 2 years)	Find Attached
Certified unaudited financial statements (most recent quarter)	Find Attached
Net capital computation (for broker-dealer, if applicable)	Find Attached

6.3 Clearing Bank and Custodian Information

Field	Details
Primary clearing bank (MSB)	Lombard Odier
Custodian for client investment assets	Swiss Life Asset Managers
Trading counterparty banks	Lombard Odier, Swiss Life Asset Managers, Rothschild & Co

SECTION 7: REGULATORY REGISTRATIONS & LICENSES REQUIRED

To be attached to this form

7.1 Securities & Investment Registrations

Registration / License	Trigger	Status
SEC Registration as Investment Adviser	AUM $\geq$ \$100 million (currently \$350M)	REGISTERED
FINRA / Broker-Dealer Registration	Trading securities for clients	REGISTERED
FINRA Series 65 / 66	Investment adviser representatives	REGISTERED

7.2 Asset Management Registrations

Registration / License	Trigger	Status
Commodity Pool Operator (CPO) – CFTC / NFA	Managing commodity interests	ACTIVE
Commodity Trading Advisor (CTA) – CFTC / NFA	Advising on commodity trading	ACTIVE
FinCEN MSB Registration	Money transmission, currency exchange, prepaid access	DONE
State-Level Asset Management License	Some states require separate fiduciary licenses	Varies by state

7.3 International Registrations (if servicing non-US clients from Switzerland/Ukraine)

Registration	Jurisdiction	Status
FINMA (Swiss Financial Market Supervisory Authority)	Switzerland	Active
National Securities and Stock Market Commission	Ukraine	Active

SECTION 8: DISCLOSURES (10-Year History)

8.1 Criminal Convictions – Applicant

☐ Yes ☒ No

8.2 Criminal Convictions – Key Individuals & Persons in Control

Name	Conviction Date	Offense	Disposition
Randy L. Taylor	[None]	N/A	N/A
William V. Delaney	[None]	N/A	N/A

8.3 Material Litigation (excluding routine collections)

If any investment, trading, or asset-management-related litigation exists, it must be disclosed here.

Name	Case Title	Court	Nature of Action	Status
[If none]	N/A	N/A	N/A	N/A

8.4 Regulatory Disciplinary History (including SEC, FINRA, CFTC, state securities regulators)

Regulator	Action	Year	Status
[None]	N/A	N/A	N/A

8.5 Bankruptcy or Receivership Proceedings

☐ Yes ☒ No

SECTION 9: APPLICATION FEES (ESTIMATED, VARY BY STATE)

License / Activity	Fee	Notes
Texas Money Transmission License	\$10,000	Through NMLS
Texas Currency Exchange License	\$5,000	Separate application
California Money Transmitter License	\$5,000	Plus pre-filing meeting
Florida Money Transmitter License	\$375	Through FL OFR Portal
SEC Investment Adviser Registration	\$225 (federal) + state fees	Form ADV
FINRA / Broker-Dealer Registration	Varies (often \$5,000+)	Form BD + CRD fees

SECTION 10: REGISTRATION CERTIFICATION

I certify under penalty of perjury that all information provided in this application and accompanying documents is true, correct, and complete. I am authorized to act on behalf of TRUE WEALTH GROUP. I agree to promptly notify the State Department of Financial Institutions and all other applicable regulators of any material changes to the information provided.



Randy L. Taylor
CEO