

Prepared for Sravan · FTH Trading LLC · 5655 Peachtree Pkwy Ste 212, Norcross, GA 30092 · GA SOS Control 20235065 (Active/Compliance, formed 11/19/2020)

FTH GOLD PPM — Blanks Sheet (every [[FILL]] in the full PPM draft)

Companion to FTH-GOLD-PPM-DRAFT-FULL.md · working draft 27 Oct 2026 (ET) · **127 unique blanks** · **265 [[FILL]] markers in PPM** · all Status **ABSENT**.

Legend for Why needed: GA = Georgia law (blue sky, money transmission, LLC Act, unclaimed property, tax); federal = SEC/CFTC/FinCEN/OFAC/IRS; GENIUS = GENIUS Act / OCC payment-stablecoin regime; securities; AML; custody.

P0 — Counsel blockers (must close before any offer, mint, or sale) (60)

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-001	Cover; 1. Important Notices and Legends; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×5)	[[FILL: Securities Act exemption selected by counsel (Rule 506(b), Rule 506(c), Section 4(a)(2), and/or Regulation S) or determination that FTH GOLD is not a security]]	Securities (federal §5; GA blue sky)	Outside counsel	ABSENT
P0-002	Cover; 3. The Company; Annex D (×3)	[[FILL: Correct principal-office suite (GA SOS string shows both 'Suite 212' and 'SUITE 200')]]	GA SOS accuracy; disclosure	Issuer	ABSENT
P0-003	1. Important Notices and Legends; 12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×3)	[[FILL: Georgia securities treatment: Rule 506 notice filing with GA Commissioner of Securities (Secretary of State), fee, timing — or other GA exemption]]	GA blue sky (Georgia Uniform Securities Act of 2008)	Outside counsel	ABSENT
P0-004	1. Important Notices and Legends; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×4)	[[FILL: Counsel confirmation that FTH GOLD is not a 'payment stablecoin' under the GENIUS Act (not redeemable for a fixed monetary value)]]	GENIUS / OCC	Outside counsel	ABSENT
P0-005	1. Important Notices and Legends; 2. Summary of the Offering; 10. Reserves and Custody; 14. Risk Factors (×4)	[[FILL: Name of custodian / vault operator and vault location(s)]]	Custody; securities disclosure; reserve claims	Issuer / Custodian	ABSENT
P0-006	1. Important Notices and Legends; 10. Reserves and Custody (×2)	[[FILL: Public bar list: refiner, serial, weight, fineness; publication URL and cadence]]	Custody; reserve representation	Custodian	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-007	1. Important Notices and Legends; 2. Summary of the Offering; 11. Attestation and Proof of Reserves; 14. Risk Factors; 24. Experts; 26. Exhibits (×6)	[[FILL: Independent attestation firm (name, standard, scope)]]	Attestation; securities disclosure	Auditor	ABSENT
P0-008	2. Summary of the Offering; 3. The Company (×2)	[[FILL: FTH Trading LLC EIN (IRS CP575 or 147C letter)]]	Federal tax; AML/ KYB; Form D	Issuer	ABSENT
P0-009	2. Summary of the Offering; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×3)	[[FILL: Outside counsel's classification conclusion for FTH GOLD (security / note / investment contract / commodity / warehouse receipt / other)]]	Securities; CFTC/ CEA; GENIUS	Outside counsel	ABSENT
P0-010	2. Summary of the Offering; 14. Risk Factors; 20. Transfer Restrictions; Annex D (×4)	[[FILL: Counsel resolution of 'fully transferable' locked term vs restricted-security status (allowlist, transfer agent, ATS, Rule 144 holding period)]]	Securities (Rule 144 / Reg S)	Outside counsel	ABSENT
P0-011	2. Summary of the Offering; 5. Description of FTH GOLD; 9. Redemption and Issuer Call; 14. Risk Factors (×4)	[[FILL: Start of 5-year holder-redemption clock (per-token mint date / program launch / purchase date)]]	Securities (term; Reves note analysis)	Issuer / Outside counsel	ABSENT
P0-012	2. Summary of the Offering; 5. Description of FTH GOLD; 9. Redemption and Issuer Call; 14. Risk Factors (×4)	[[FILL: Issuer call price floor (draft: $\geq$ spot NAV = 2 oz × reference price) – confirm]]	Securities (call asymmetry); investor protection	Issuer / Outside counsel	ABSENT
P0-013	2. Summary of the Offering; 9. Redemption and Issuer Call; 14. Risk Factors (×3)	[[FILL: Issuer call notice period and notice methods]]	Securities (holder protection)	Issuer / Outside counsel	ABSENT
P0-014	2. Summary of the Offering; 9. Redemption and Issuer Call; 14. Risk Factors (×3)	[[FILL: Call settlement form (cash USD/USDC vs metal; holder election) and timing]]	Securities; MSB/ MTL	Issuer	ABSENT
P0-015	2. Summary of the Offering; 11. Attestation and Proof of Reserves (×2)	[[FILL: Attestation cadence (e.g., monthly) and first attestation date]]	Attestation	Auditor	ABSENT
P0-016	3. The Company; 26. Exhibits (×2)	[[FILL: Articles of Organization of FTH Trading LLC (certified GA SOS copy)]]	GA SOS; authority	Issuer	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-017	3. The Company; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 26. Exhibits (×3)	[[FILL: Executed Operating Agreement of FTH Trading LLC (date, version)]]	GA LLC Act; authority to issue	Issuer	ABSENT
P0-018	3. The Company; 14. Risk Factors (×2)	[[FILL: Members of FTH Trading LLC and percentage interests (per Operating Agreement)]]	Securities disclosure; FinCEN BOI; GA LLC Act	Issuer	ABSENT
P0-019	3. The Company; 14. Risk Factors; 16. Management (×3)	[[FILL: Managers / management structure (member-managed or manager-managed) of FTH Trading LLC]]	Securities disclosure; GA LLC Act	Issuer	ABSENT
P0-020	3. The Company; 14. Risk Factors (×2)	[[FILL: Beneficial owners (≥25%) and control person(s) of FTH Trading LLC]]	AML (CDD rule); bad-actor; securities	Issuer	ABSENT
P0-021	3. The Company; 26. Exhibits (×2)	[[FILL: Dated GA Certificate of Existence / good standing (ordered from GA SOS)]]	GA SOS; closing deliverable	Issuer	ABSENT
P0-022	3. The Company; 26. Exhibits (×3)	[[FILL: Manager/member resolutions authorizing FTH GOLD issuance and this offering]]	GA LLC Act; securities	Issuer / Outside counsel	ABSENT
P0-023	3. The Company; 14. Risk Factors; Annex D (×3)	[[FILL: Verify or remove public 'SEC Registered Broker-Dealer · FINRA · SIPC' claim in FTHTrading/Broker-Dealer repo (no BrokerCheck/CRD evidence found)]]	Securities (anti-fraud; FINRA)	Issuer / Outside counsel	ABSENT
P0-024	4. Related Parties and Affiliates (×1)	[[FILL: FutureTech Holding Company legal name, state of formation, and filing number]]	Securities (related parties)	Issuer	ABSENT
P0-025	4. Related Parties and Affiliates; 17. Certain Relationships and Related-Party Transactions (×2)	[[FILL: Ownership / control relationship between FutureTech Holding Company and FTH Trading LLC (org chart, cap table)]]	Securities (related parties, control persons); bad-actor	Issuer	ABSENT
P0-026	4. Related Parties and Affiliates; 17. Certain Relationships and Related-Party Transactions (×2)	[[FILL: Sravan Vellanki's title, ownership, and role at FTH Trading LLC (if any)]]	Securities (management, control persons); bad-actor	Issuer	ABSENT
P0-027	4. Related Parties and Affiliates; Annex D (×2)	[[FILL: Resolve UnyKorn LLC EIN conflict: 42-3536633 (published) vs 93-4359160 (unsigned OA; Nevada origin) — IRS letter]]	Securities (related-party accuracy); AML/ KYB	Issuer / UnyKorn	ABSENT
P0-028	4. Related Parties and Affiliates; 14. Risk Factors; 26. Exhibits (×3)	[[FILL: Executed FTHT-UnyKorn rails/services agreement (scope, fees, key control, liability, termination)]]	Securities (related-party); custody/ops	Issuer / Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-029	4. Related Parties and Affiliates (×1)	[[FILL: Evidence of any common ownership between UnyKorn LLC and FTH Trading LLC (cap tables)]]	Securities (conflicts)	Issuer	ABSENT
P0-030	4. Related Parties and Affiliates; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors; Annex D (×4)	[[FILL: Relationship of FTH GOLD to USDF / FTHX / FTHG (no cross-collateral or rehypothecation — confirm)]]	GENIUS firewall; securities; custody	Issuer / Outside counsel	ABSENT
P0-031	5. Description of FTH GOLD; 10. Reserves and Custody; 14. Risk Factors (×3)	[[FILL: Holders' legal claim to metal (bailment / warehouse receipt / title vs unsecured creditor) and bankruptcy-remoteness analysis]]	Securities; custody; bankruptcy	Outside counsel	ABSENT
P0-032	7. Use of Proceeds (×1)	[[FILL: Confirmation that 100% of metal per token is purchased and allocated before mint (funding mechanics)]]	Custody; reserve representation	Issuer / Custodian	ABSENT
P0-033	9. Redemption and Issuer Call; 13. Plan of Distribution; 14. Risk Factors; Annex D (×4)	[[FILL: Disposition of public staging site (fth.genesis402.com) for general-solicitation analysis; reconcile 'anytime after' vs 'only after' 5 years copy]]	Securities (Rule 502(c) general solicitation)	Issuer / Outside counsel	ABSENT
P0-034	10. Reserves and Custody; 26. Exhibits (×2)	[[FILL: Executed custody / bailment agreement (allocated, segregated, title in holders or issuer)]]	Custody; bankruptcy remoteness	Custodian / Outside counsel	ABSENT
P0-035	10. Reserves and Custody (×1)	[[FILL: Good-delivery / assay standard for bars (e.g., LBMA) and minimum fineness for '24k']]	Custody; product definition	Issuer / Custodian	ABSENT
P0-036	10. Reserves and Custody; 14. Risk Factors (×2)	[[FILL: Insurer, policy type, and coverage limits for vaulted metal]]	Custody; disclosure	Custodian	ABSENT
P0-037	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 26. Exhibits (×2)	[[FILL: Rule 506(d) bad-actor questionnaires/certifications for all covered persons]]	Securities (Rule 506(d))	Outside counsel / Issuer	ABSENT
P0-038	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×2)	[[FILL: Investment Company Act of 1940 analysis for the Issuer / any reserve vehicle]]	Federal securities (1940 Act)	Outside counsel	ABSENT
P0-039	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 13. Plan of Distribution (×2)	[[FILL: Broker-dealer / placement-agent analysis; registration status of any person receiving transaction-based compensation]]	Securities (Exchange Act §15; GA dealer/agent registration)	Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-040	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×2)	[[FILL: CEA / CFTC analysis (retail commodity transaction, actual delivery, anti-fraud) for gold token sales]]	Federal commodities (CFTC)	Outside counsel	ABSENT
P0-041	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×2)	[[FILL: FinCEN MSB registration status / counsel determination under FIN-2019-G001]]	Federal AML (BSA)	Outside counsel / Issuer	ABSENT
P0-042	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors; 16. Management (×3)	[[FILL: Name of designated BSA/ AML Compliance Officer]]	AML (BSA)	Issuer	ABSENT
P0-043	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors; 16. Management (×3)	[[FILL: Name of designated Sanctions Officer and written OFAC program]]	OFAC	Issuer	ABSENT
P0-044	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 13. Plan of Distribution; 14. Risk Factors (×3)	[[FILL: Counsel-approved list of geo-blocked / excluded jurisdictions]]	OFAC; securities (Reg S); state law	Outside counsel	ABSENT
P0-045	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: Counsel: whether the PPM may mention USDF at all beyond a negative firewall statement (not offered; not settlement) (Annex C U2)]]	GENIUS firewall	Outside counsel	ABSENT
P0-046	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: Inter-entity firewall documents: separate schedules, ledgers, fees for FTHT / UnyKorn / any future USDF issuer (Annex C U5)]]	GENIUS firewall; custody	Issuer / Outside counsel	ABSENT
P0-047	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×2)	[[FILL: Georgia DBF money-transmitter license status / counsel determination under O.C.G.A. § 7-1-680 et seq.]]	GA money transmission	Outside counsel	ABSENT
P0-048	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×3)	[[FILL: Other state MTL analysis (NMLS/MTMA) and states where the offering is permitted]]	State money transmission	Outside counsel	ABSENT
P0-049	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×3)	[[FILL: New York path: BitLicense / trust charter / geo-block decision]]	NY DFS	Outside counsel	ABSENT
P0-050	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: Counsel: does issuing and/or redeeming a gold-denominated token (5y holder lock + issuer call) fall within Georgia DBF money-transmitter scope? (Annex C G1)]]	GA money transmission	Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-051	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: Counsel: approved PPM wording for FTHT ↔ UnyKorn rails split (UnyKorn not issuer, custodian, or obligor) – agreement ABSENT (Annex C G5)]]	Securities (affiliate disclosure)	Outside counsel / Issuer	ABSENT
P0-052	14. Risk Factors (×1)	[[FILL: Counsel: whether the 5-year holder lock + issuer call changes the MSB and securities analysis vs anytime-redeem gold tokens (PAXG/XAUT) (Annex C F3)]]	Federal AML (BSA); securities	Outside counsel	ABSENT
P0-053	14. Risk Factors (×1)	[[FILL: Written blacklist / freeze / destroy procedure for TRC20 admin roles (OFAC and court-order handling) and holder disclosure (Annex C O4)]]	OFAC; securities disclosure	Issuer / Outside counsel	ABSENT
P0-054	Annex D (×1)	[[FILL: counsel – Annex D #1: SOS principal-office string shows 'Suite 212' and 'SUITE 200'; do not pick a winner without GA SOS amendment or certified record]]	GA SOS accuracy; disclosure	Outside counsel	ABSENT
P0-055	Annex D (×1)	[[FILL: counsel – Annex D #2: UnyKorn EIN 42-3536633 (published) vs 93-4359160 (unsigned OA, Nevada origin); determine which entity is the rails counterparty]]	Related-party accuracy; AML/ KYB	Outside counsel	ABSENT
P0-056	Annex D (×1)	[[FILL: counsel – Annex D #3: redeem wording 'anytime after 5 years' (staging copy) vs 'only after 5 years' (locked term); confirm operative wording and corrective-disclosure need]]	Securities (anti-fraud; terms)	Outside counsel	ABSENT
P0-057	Annex D (×1)	[[FILL: counsel – Annex D #4: sources conflict on whether mint function is BUILT vs not built; token NOT ISSUED either way – confirm code state and disclosure]]	Technology disclosure; securities	Outside counsel / Issuer	ABSENT
P0-058	Annex D (×1)	[[FILL: counsel – Annex D #5: public 'Earn'/yield references vs no-yield token term; confirm whether any yield product touches FTH GOLD (Howey / integration)]]	Securities (Howey; integration)	Outside counsel	ABSENT
P0-059	Annex D (×1)	[[FILL: counsel – Annex D #6: 'transferable' locked term vs Reg D restricted-security resale limits (Rule 144 / allowlist)]]	Securities (Rule 144 / Reg D)	Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P0-060	Annex D (×1)	[[FILL: counsel — Annex D #7: GitHub 'SEC Registered Broker-Dealer · FINRA · SIPC' claim with no BrokerCheck/CRD evidence; removal / corrective action]]	Securities (anti-fraud; FINRA)	Outside counsel	ABSENT

P1 — Offering mechanics (48)

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P1-061	Cover; 2. Summary of the Offering; 7. Use of Proceeds; 8. Capitalization (×4)	[[FILL: Maximum offering size (number of tokens and USD)]]	Securities (Form D; cover)	Issuer	ABSENT
P1-062	Cover; 2. Summary of the Offering; 14. Risk Factors (×3)	[[FILL: Price per token and pricing formula (spot + disclosed premium?)]]	Securities (cover; Form D)	Issuer	ABSENT
P1-063	Cover; 2. Summary of the Offering (×2)	[[FILL: Minimum subscription per investor]]	Securities; suitability	Issuer	ABSENT
P1-064	1. Important Notices and Legends; 13. Plan of Distribution; 19. Subscription Procedures; Annex A (×4)	[[FILL: Accredited-investor verification method/vendor (required if Rule 506(c))]]	Securities (Rule 506(c))	Issuer / Outside counsel	ABSENT
P1-065	1. Important Notices and Legends (×1)	[[FILL: Georgia-specific restrictive legend text required/ recommended by counsel]]	GA blue sky	Outside counsel	ABSENT
P1-066	2. Summary of the Offering; 5. Description of FTH GOLD (×2)	[[FILL: Token decimals / fractionalization decision]]	Product; securities (unit size, investor base)	Issuer	ABSENT
P1-067	2. Summary of the Offering (×1)	[[FILL: Offering period, initial closing, and termination date]]	Securities (Form D timing)	Issuer / Outside counsel	ABSENT
P1-068	2. Summary of the Offering; 14. Risk Factors (×2)	[[FILL: Minimum offering / escrow conditions (if any) and escrow agent]]	Securities; investor protection	Issuer / Outside counsel	ABSENT
P1-069	2. Summary of the Offering; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 19. Subscription Procedures (×3)	[[FILL: Accepted subscription currencies (draft: USD wire / USDC KYC'd; screened USDT- TRON only after clearance; not USDF/FTHX/FTHG) — confirm]]	GENIUS firewall; AML	Issuer / Outside counsel	ABSENT
P1-070	2. Summary of the Offering; 12. Regulatory Framework (Federal, Georgia, GENIUS Act); 13. Plan of Distribution; Annex A (×4)	[[FILL: Regulation S target jurisdictions and local-law analysis (e.g., EU MiCA, HK, SG)]]	Securities (Reg S); foreign law	Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P1-071	2. Summary of the Offering; 7. Use of Proceeds; 14. Risk Factors (×3)	[[FILL: Use of proceeds table (gold purchase %, custody/ insurance, attestation, legal, technology/UnyKorn fees, working capital, offering expenses)]]	Securities disclosure; 1:1 reserve	Issuer	ABSENT
P1-072	2. Summary of the Offering; 5. Description of FTH GOLD; 9. Redemption and Issuer Call (×3)	[[FILL: Final fee schedule: mint, cash redemption, physical delivery, storage, transfer (draft comps 0.125-0.25%; not final)]]	Disclosure; securities	Issuer	ABSENT
P1-073	2. Summary of the Offering; 14. Risk Factors; Annex A (×3)	[[FILL: Governing law, forum, arbitration, class-action waiver (GA law presumed? — counsel)]]	Securities; enforceability	Outside counsel	ABSENT
P1-074	3. The Company; 22. Certain Tax Considerations (Questions for Counsel) (×2)	[[FILL: FTH Trading LLC tax classification (partnership / disregarded / corporation election)]]	Tax	Tax / Issuer	ABSENT
P1-075	3. The Company; 14. Risk Factors; 26. Exhibits (×3)	[[FILL: Financial statements of FTH Trading LLC (periods; audited/reviewed)]]	Securities (Rule 502(b) if non-accredited)	Issuer / Auditor	ABSENT
P1-076	5. Description of FTH GOLD; 14. Risk Factors (×2)	[[FILL: Upgradeability decision (proxy with ≥48h timelock + multisig, or immutable)]]	Technology; holder protection	Issuer	ABSENT
P1-077	5. Description of FTH GOLD; 14. Risk Factors (×2)	[[FILL: Admin / minter / pauser / blacklist role holders, multisig thresholds, and key custody provider]]	Technology; custody; conflicts	Issuer	ABSENT
P1-078	5. Description of FTH GOLD; 14. Risk Factors; 24. Experts; 26. Exhibits (×4)	[[FILL: Smart-contract auditors (two independent) and audit report dates]]	Technology; disclosure	Issuer	ABSENT
P1-079	8. Capitalization (×1)	[[FILL: Capitalization table of FTH Trading LLC (pre- and post-offering)]]	Securities disclosure	Issuer	ABSENT
P1-080	8. Capitalization (×1)	[[FILL: Outstanding indebtedness, guarantees, and liens of FTH Trading LLC]]	Securities disclosure; holder priority	Issuer	ABSENT
P1-081	9. Redemption and Issuer Call; 14. Risk Factors (×2)	[[FILL: Minimum redemption size (tokens / whole bars)]]	Ops; custody	Issuer / Custodian	ABSENT
P1-082	9. Redemption and Issuer Call; 14. Risk Factors (×2)	[[FILL: Gold reference price source and fixing time (e.g., LBMA Gold Price PM) used for call, cash redemption, and NAV]]	Disclosure; valuation	Issuer	ABSENT
P1-083	9. Redemption and Issuer Call; 14. Risk Factors (×2)	[[FILL: Physical delivery locations and eligible delivery methods]]	Custody; tax (sales/use)	Issuer / Custodian	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P1-084	9. Redemption and Issuer Call; 14. Risk Factors (×2)	[[FILL: Redemption / call settlement SLA (business days)]]	Ops; disclosure	Issuer	ABSENT
P1-085	9. Redemption and Issuer Call; 14. Risk Factors (×3)	[[FILL: Partial call selection method (pro rata vs lottery) and anti-selective-targeting covenant]]	Securities (fairness)	Issuer / Outside counsel	ABSENT
P1-086	9. Redemption and Issuer Call; 12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×2)	[[FILL: Treatment of unclaimed call/redemption proceeds (escheat under GA Disposition of Unclaimed Property Act / other states)]]	GA unclaimed property; ops	Outside counsel	ABSENT
P1-087	10. Reserves and Custody; 14. Risk Factors (×2)	[[FILL: Source of metal / refiner relationships and responsible-sourcing (LBMA RGG policy)]]	Custody; AML (gold sourcing)	Issuer / Custodian	ABSENT
P1-088	11. Attestation and Proof of Reserves; 24. Experts (×2)	[[FILL: Independent financial-statement auditor of FTH Trading LLC (if any) and audited period]]	Securities disclosure (506(b) non-accredited info rules)	Auditor	ABSENT
P1-089	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 19. Subscription Procedures (×2)	[[FILL: Form D filing plan (CIK, filer, timing ≤15 days after first sale)]]	Securities (Reg D)	Outside counsel	ABSENT
P1-090	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: Analysis of BSA dealer-in-precious-metals rule (31 CFR 1027) applicability]]	Federal AML (BSA)	Outside counsel	ABSENT
P1-091	13. Plan of Distribution (×1)	[[FILL: Plan of distribution: issuer-direct vs placement agent (name, CRD, compensation)]]	Securities (broker-dealer)	Issuer / Outside counsel	ABSENT
P1-092	13. Plan of Distribution; 20. Transfer Restrictions (×2)	[[FILL: Regulation S category and distribution-compliance period]]	Securities (Reg S)	Outside counsel	ABSENT
P1-093	14. Risk Factors (×1)	[[FILL: Counsel: adequacy of CIP/KYC at mint/redeem only, with secondary reliance on blacklist + KYT at redeem (Annex C F5)]]	Federal AML (BSA)	Outside counsel / Issuer	ABSENT
P1-094	14. Risk Factors (×1)	[[FILL: OFAC Virtual Currency Industry guidance (Oct 2021) gap analysis vs FTH controls (Annex C O5)]]	OFAC	Outside counsel / Issuer	ABSENT
P1-095	14. Risk Factors; 16. Management (×2)	[[FILL: Management names, titles, 5-year biographies, and compensation]]	Securities disclosure	Issuer	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P1-096	14. Risk Factors; 22. Certain Tax Considerations (Questions for Counsel) (×2)	[[FILL: Federal income-tax characterization of FTH GOLD (grantor-trust/direct metal ownership vs note) and collectibles treatment]]	Tax	Tax	ABSENT
P1-097	14. Risk Factors; 22. Certain Tax Considerations (Questions for Counsel); Annex A (×3)	[[FILL: Information-reporting position (Form 1099-DA / 1099-B, broker status) and backup withholding]]	Tax	Tax	ABSENT
P1-098	14. Risk Factors; 21. ERISA Considerations (×2)	[[FILL: ERISA / plan-asset analysis (whether tokens are 'equity interests'; 25% test; IRA collectibles rule)]]	ERISA; tax	Outside counsel	ABSENT
P1-099	15. Conflicts of Interest (×1)	[[FILL: Written conflicts-of-interest policy (related-party approval, call-decision governance)]]	Securities (conflicts)	Issuer / Outside counsel	ABSENT
P1-100	16. Management; 27. Signature Pages (×2)	[[FILL: Authorized signatory name and title for FTH Trading LLC]]	GA LLC Act; execution	Issuer	ABSENT
P1-101	17. Certain Relationships and Related-Party Transactions (×2)	[[FILL: Related-party transactions (amounts, terms) with FutureTech, UnyKorn, and insiders]]	Securities disclosure; conflicts	Issuer	ABSENT
P1-102	18. Description of LLC Interests (×1)	[[FILL: Whether any LLC membership interests are offered alongside tokens; if so, class, rights, and OA provisions]]	Securities; GA LLC Act	Issuer / Outside counsel	ABSENT
P1-103	19. Subscription Procedures; Annex A (×2)	[[FILL: Subscription funding account / bank and escrow details (provide only in executed documents)]]	AML; ops	Issuer	ABSENT
P1-104	19. Subscription Procedures (×1)	[[FILL: Subscription procedures: delivery of documents, funding instructions, acceptance, closing mechanics]]	Securities	Outside counsel	ABSENT
P1-105	19. Subscription Procedures (×1)	[[FILL: Other state notice filings (by investor residence) and fees]]	State blue sky	Outside counsel	ABSENT
P1-106	23. Legal Matters (×1)	[[FILL: Issuer's outside securities counsel (firm, contact)]]	Legal matters	Issuer	ABSENT
P1-107	23. Legal Matters; 26. Exhibits (×2)	[[FILL: Legal opinions to be delivered (classification, exemption, enforceability, custody true-bailment)]]	Securities; custody	Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P1-108	Annex D (×1)	[[FILL: counsel — Annex D #8: industry code mismatch (city license NAICS 423450 medical/dental wholesale vs gold-token issuer activity); Form D industry code and license updates]]	Form D; GA/local licensing	Outside counsel / Issuer	ABSENT

P2 — Operations (19)

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P2-109	Cover (×1)	[[FILL: PPM copy number / control log]]	Securities (distribution control)	Issuer	ABSENT
P2-110	Cover (×1)	[[FILL: PPM date of final version]]	Securities	Outside counsel	ABSENT
P2-111	1. Important Notices and Legends (×1)	[[FILL: Other state legends (e.g., FL, NY, others by investor residence)]]	State blue sky	Outside counsel	ABSENT
P2-112	3. The Company; 23. Legal Matters (×2)	[[FILL: Confirm registered agent engagement (Joseph R. Delgado, Jr., Esq.) and whether he serves as offering counsel]]	GA LLC Act; legal matters	Issuer	ABSENT
P2-113	3. The Company (×1)	[[FILL: Corporate Transparency Act / FinCEN BOI reporting status for FTH Trading LLC]]	Federal (CTA)	Outside counsel / Issuer	ABSENT
P2-114	3. The Company (×1)	[[FILL: D&O / E&O / crime / cyber insurance of the Issuer]]	Ops; risk	Issuer	ABSENT
P2-115	5. Description of FTH GOLD (×1)	[[FILL: TRC20 contract address (none deployed; token NOT ISSUED)]]	Ops; disclosure	Issuer	ABSENT
P2-116	6. TRC20 Deployment and Multi-Chain Plan (×1)	[[FILL: Pilot cap on tokens outstanding before first clean attestation (Risk Capital proposed ≤ \$25k) — confirm]]	Ops; risk	Issuer	ABSENT
P2-117	6. TRC20 Deployment and Multi-Chain Plan (×1)	[[FILL: Second-chain selection, model (native multi-issue vs bridge), per-chain caps, and timing]]	Technology; reserve invariant	Issuer	ABSENT
P2-118	6. TRC20 Deployment and Multi-Chain Plan; 13. Plan of Distribution; 14. Risk Factors (×3)	[[FILL: Market maker / liquidity arrangements and listing venues (if any)]]	Securities (manipulation; ATS); liquidity	Issuer / Outside counsel	ABSENT

ID	Section(s)	[[FILL]] text	Why needed	Typical owner	Status
P2-119	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: Exchange Act §12(g) holder-of-record monitoring plan]]	Securities (Exchange Act)	Outside counsel	ABSENT
P2-120	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors (×2)	[[FILL: Travel Rule scope and vendor (31 CFR 1010.410)]]	AML (BSA)	Outside counsel / Issuer	ABSENT
P2-121	12. Regulatory Framework (Federal, Georgia, GENIUS Act) (×1)	[[FILL: KYC/KYB and KYT vendors (primary + secondary) under contract]]	AML; OFAC	Issuer	ABSENT
P2-122	12. Regulatory Framework (Federal, Georgia, GENIUS Act); 14. Risk Factors; 22. Certain Tax Considerations (Questions for Counsel) (×3)	[[FILL: Georgia and other state sales/use tax on physical delivery; GA income tax treatment]]	Tax (GA)	Tax	ABSENT
P2-123	25. Additional Information (×1)	[[FILL: Investor-relations contact for questions (name, email, phone)]]	Securities (Rule 502(b)(2)(iv) access)	Issuer	ABSENT
P2-124	25. Additional Information (×1)	[[FILL: Ongoing investor reporting (content, frequency, delivery)]]	Securities; investor relations	Issuer	ABSENT
P2-125	25. Additional Information (×1)	[[FILL: Privacy notice / data-retention policy (GLBA if applicable; 5-year BSA records)]]	AML; privacy	Outside counsel / Issuer	ABSENT
P2-126	Annex B; Annex D (×2)	[[FILL: CXAU SEC staff UPLOAD (2019-03-01) direct EDGAR URL — open per EDGAR comps memo]]	Securities (precedent citation)	Outside counsel	ABSENT
P2-127	Annex B; Annex D (×2)	[[FILL: EDGAR Form D lookups by issuer name for comparable gold-token offerings (open per EDGAR comps memo)]]	Securities (market practice)	Outside counsel	ABSENT

Totals: P0 60 · P1 48 · P2 19 · unique 127 · markers in PPM 265.

Hard rule: no "backed," "regulated," "audited," "insured," "MSB-registered," "licensed," or "GENIUS-compliant" language until the matching blank is closed and outside counsel signs off.

DRAFT FOR OUTSIDE COUNSEL · NOT LEGAL ADVICE · NOT AN OFFERING OR SOLICITATION · TOKEN NOT ISSUED · CONFIDENTIAL