

LEGAL & POLICY REVIEW • SAFE LAUNCH PLAN

Cleared.

Six expert reviews, eight hard gates, one 60-day path to the App Store.

ClientGen, LLC • Synthesis of App Store • State Privacy • Financial Services • TCPA/DNC • Marketing • Documentation reviews

THE BOTTOM LINE

Launchable. Not in 30 days. Here's what it takes.

ClientGen Enrich passes legal review for App Store launch — but not against the current clientgen.ai policies, and not on the originally-scoped budget. Six weeks of disciplined work + \$30-50K of outside counsel + one planned rejection cycle.

HARD GATES

8

block App Store submission

DOCS

20

to publish or revise

TIMELINE

6 wks

to Apple submission ready

COUNSEL

\$30-
50K

outside-counsel realistic
budget

Plan on one Apple rejection cycle even with perfect prep — App Store reviewers default to suspicion on anything that returns data about non-users.

Six specialist reviews, run in parallel.

APP STORE

Apple App Review Guidelines, IAP, Privacy Nutrition Label, ATT. Two hard gates: subscription restructure + B2B framing.

STATE PRIVACY

CCPA / CPRA / 25+ state privacy laws + data-broker registries. ClientGen is a data broker in CA / VT / TX / OR.

FINANCIAL SERVICES

FINRA Rule 2210 / SEC Marketing Rule / GLBA / FCRA. Pinnacle related-person disclosure is the most under-addressed item.

TCPA / DNC

TCPA + state mini-TCPAs + CAN-SPAM + CASL. FL FTSA is the largest plaintiffs'-bar exposure for a FL LLC.

MARKETING LAW

FTC §5 + ROSCA + state ARLs + 16 CFR Part 255 + FINRA 2210 overlay. 9 PO fixes needed on clientgen.ai today.

DOCUMENTATION

20-document inventory, sequenced publishing plan, in-product touchpoint map, user-rights operational workflow.

Eight items block App Store submission.

#	Hard gate	Owner	Estimated effort
HG-1	Subscription Terms split — Enterprise/Web + Mobile/Consumer	Outside counsel	3 days drafting
HG-2	Privacy Policy rewrite + Enrich Privacy Notice	Outside counsel	5 days drafting
HG-3	FCRA permissible-purpose opinion memo	Consumer-finance counsel	1-2 weeks
HG-4	In-App Professional-Use Attestation (deployed + logged)	Counsel + Engineering	4 days
HG-5	Data broker registrations — CA / VT / TX / OR	In-house + counsel	1 day per state
HG-6	California DROP integration	Engineering	2-4 weeks
HG-7	Apple submission package (Privacy Manifest, Nutrition Label, Review Notes)	In-house + Eng	1 week
HG-8	Operational policy artifacts (AUP, Data Rights, Pinnacle Disclosure, Report Footer, etc.)	In-house + counsel	3-5 days total

All eight must clear before App Store submission. HG-6 has a hard August 1, 2026 deadline — \$200 per deletion request per day if missed.

THE NUMBERS

Six exposures sized — what we're insuring against.

CA DROP

\$200

/request/day

Per-request penalty under CA Delete Act DROP system. Live Aug 1, 2026.

FCC TCPA

\$57,527

/call

2025 federal forfeiture cap per prerecorded/AI-voice call without PEWC.

FL FTSA

\$500-\$1,500

/text

Private right of action. FL LLC = venue-convenient target for plaintiffs.

FTC ROSCA

\$51,744

/violation

Per-violation cap. Recent \$2.5B Amazon Prime negative-option settlement.

CA AB 2863

\$2,500

/violation

Plus UCL/FAL private right of action and class-action exposure.

WA CEMA

\$100

/message

Per-message + per se CPA violation (treble damages).

Cyber liability \$5M + Tech E&O \$2-5M + TCPA-specific rider (most policies exclude TCPA by default) — required before launch.

DOCUMENTATION INVENTORY

Twenty documents to publish, revise, or stand up.

P0 — BLOCK LAUNCH

11 docs

Privacy Policy (revise) · Enrich Privacy Notice (new) · CA Notice at Collection (new) · Subscription Terms — Mobile/Consumer (new) · Acceptable Use Policy (new) · In-App Professional-Use Attestation (new) · Data Subject Rights / Opt-Out (new) · Pinnacle Related-Person Disclosure (new) · Report Footer Disclaimer (new — literal) · Apple App Store Review Notes (new — private) · Apple Privacy Nutrition Label + Manifest

P1 — WITHIN 60 DAYS

6 docs

App Security One-Pager · Services Agreement minor revisions · Subscription Terms — Enterprise/Web (rename) · Cookie & Tracking Notice · Refund Policy (Mobile + Web reconciled) · Pricing & Auto-Renewal pre-purchase disclosure (literal)

P2 — OPERATIONAL HYGIENE

3 docs

DMCA / Copyright Agent Notice · Subprocessor List (standalone) · Buckler Cyber Program (minor revisions)

Master hub: clientgen.ai/legal/ · Plus internal-only artifacts: WealthFeed DPA, Privacy Operations Manual, Data Retention Schedule, Incident Response Runbook, insurance binders.

Nine FTC §5 fixes that don't wait for the App Store.

These are live now on the marketing site. Each is independently FTC §5-actionable or state-ARL-actionable regardless of whether Enrich ever ships.

- 1 Strike "SOC 2 Type 2 (in progress)" unless an audit engagement letter with a named firm is signed.
- 2 Strike "We do not sell personal information" — likely false under CPRA's broad sale/share definitions.
- 3 Delete the 90-day post-trial cancellation lockup — violates ROSCA + CA §17602 + 25+ state ARLs.
- 4 Add pre-purchase clear-and-conspicuous subscription disclosure on every checkout path.
- 5 Add separate affirmative-consent toggle for auto-renewal (required by CA AB 2863).
- 6 Reconcile credits-vs-unlocks pricing — Kickstart 50/2 vs Enrich \$5/\$3 reads as bait-or-confusion.
- 7 Strike "verified insights" and "rigorously checked for accuracy" — overclaim absent a QA SOP.
- 8 Strip CIPA pixel exposure on clientgen.ai — *Camplisson v. Adidas* revived pixel class-action viability.
- 9 Replace obfuscated email links with plain `privacy@clientgen.ai` for parseable DSAR intake.

Full before/after copy in `ClientGen_Enrich_Marketing_Claims_Audit.md`. Approximately one engineering-week + counsel review of policy language.

60-DAY TIMELINE

Sequenced critical path from engagement to App Store submission.

Wk 1	Wk 2	Wk 3	Wk 4	Wk 5	Wk 6
ENGAGE Counsel engaged. WealthFeed DPA signed. Privacy Officer named. Apple Small Biz Program enrolled. Insurance binders.	DRAFT Counsel returns first drafts: Mobile Terms, Privacy Policy, AUP, Attestation, Pinnacle disclosure. CA DROP build starts.	REVISE Counsel revisions. Engineering builds in-app attestation modal, account-deletion flow, Report Footer disclaimer.	PUBLISH All legal pages soft-publish to clientgen.ai/legal/. Internal E2E test. App Store Connect entries staged.	SUBMIT FCRA opinion received. Counsel sign-off letter. Apple build submitted. First reviewer feedback addressed.	APPROVE Apple approval (or second cycle). Soft GA — invite-only. Pinnacle endorsement email goes out.

Weeks 7–8: full GA, broader Pinnacle network, first case study collection. Day 90 decision gate per strategy doc.

What's needed. What it costs. Why the original \$3-5K estimate was naive.

Specialty	Work products	Estimated cost
Consumer finance / FCRA	FCRA permissible-purpose opinion memo + Attestation language	\$5-10K
Data privacy	Privacy Policy rewrite + WealthFeed classification + state filings + MODPA + MHMDA + CIPA	\$10-18K
Financial services regulatory	Pinnacle disclosure (SEC + FINRA + state insurance) + Reg S-P workflow + Two-tier DPA template	\$10-20K
SaaS / consumer contracts	Mobile/Consumer Sub Terms + AUP + Data Rights page + Refund Policy	\$6-12K
Insurance broker (not counsel)	Cyber liability \$5M + Tech E&O + TCPA-specific rider	Bundled w/ binding
TOTAL	All work products + sign-off letter for Apple submission	\$30-50K
<p><i>Engagement structure: Tier 1 (privacy + consumer contracts + FCRA) under one tech-startup-savvy firm; Tier 2 (financial services regulatory) under an SEC/FINRA-focused specialty firm. Counsel Escalation Brief is ready to forward.</i></p>		

Where each legal artifact appears in the user journey.

APP STORE LISTING	Privacy Policy URL · Terms of Use URL · Privacy Nutrition Label · App Review Notes (private)
WEB FOOTER (every page)	Privacy · Terms-Mobile · Terms-Enterprise · AUP · Security · Disclosures · Data Rights · Cookies · Subprocessors
SIGNUP — ACCOUNT	Mobile Terms + Privacy Policy + AUP combined-checkbox · CA Notice at Collection (CA users) · Pinnacle Disclosure modal
SIGNUP — CREDENTIAL	CRD# / IARD# / NPN capture · Professional-Use Attestation with 10 separately-checked items · Typed-name confirmation
PRE-PURCHASE	Clear-and-conspicuous subscription disclosure · Separate auto-renewal consent toggle (CA AB 2863) · Apple IAP sheet
EVERY UNLOCK	Pricing visibility on unlock button · One-click DNC acknowledgment (red badge on flagged numbers)
EVERY REPORT (PDF + screen)	Report Footer Disclaimer literal text · DNC red badges inline · REF + content hash · Pinnacle short-form
SETTINGS / ACCOUNT	Manage Subscription · Privacy Choices · Delete My Data · Download My Data · View Attestation · Legal Hub
EMAILS	Sub start · Renewal (CA reminder) · Cancel · Unlock receipt · Pre-trial-end day-4 reminder · Material legal change

Five moves that unblock everything else.

1

Engage outside counsel

The Counsel Escalation Brief is ready to forward. Privacy + financial services + consumer contracts. Day 1 of Week 1 is the gating event — every day's delay shifts launch a day.

2

Sign / confirm WealthFeed DPA

With deletion pass-through obligations + sub-processor commitments + 30-day breach notification. Without this, every compliance choice downstream is broken.

3

Fix the 9 P0 marketing claims on clientgen.ai

Independent of App Store. Each is FTC \$5- or state-ARL-actionable today. One engineering-week of work; counsel reviews only the policy-language pieces.

4

Designate Privacy Officer / GLBA Qualified Individual

By name. Required under GLBA Safeguards Rule §314.4(a). Person owns the DSAR queue, the breach response, and the vendor inventory.

5

Bind cyber + Tech E&O + TCPA-specific rider

\$5M cyber aggregate / \$2–5M Tech E&O / separate TCPA rider (most policies exclude). Required before launch; bind now to lock pricing.

NEXT STEPS

Engage counsel. Sign the DPA. Fix the site.

Everything else flows from those three moves.

01 Safe Launch Plan

Master plan, 60-day timeline, 8 hard gates, 20-doc inventory, counsel scope.

02 Marketing Claims Audit

Line-by-line FTC §5 fixes for clientgen.ai with literal before/after copy.

03 Counsel Escalation Brief

Forwardable to outside counsel firms. Scoping + draft language for review.

04 Legal Review Appendix

Six expert briefs summarized. Sources, citations, agent IDs for follow-up.