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ALPHA WOLF DESIGN

Market Substantiation Record

Build-cost valuation of two proof-of-signal websites, benchmarked against thirteen independent third-party sources — and the \$4,997 offer that beats every one of them.

SUBJECT SITES

alphawolfdesign.com · americancoastalfinance.com

PREPARED FOR

Adam K. Moss · Founder & CEO · AlphaWolfDesign LLC

EFFECTIVE

May 24, 2026

By invitation. By design.

EXECUTIVE SUMMARY

The Disruption in One Page

AT A GLANCE	
WHAT ONE SITE THIS CLASS COSTS TO REBUILD AT A U.S. AGENCY	
AlphaWolfDesign.com	\$64,350
AmericanCoastalFinance.com	~\$139,400 (website only)
<i>These are two separate proofs — not a bundle. You buy one.</i>	
YOUR PRICE FOR A SITE THIS CLASS: \$4,997 launch / \$6,997 standard	
Same architecture. 7x to 28x less. One site. One price.	

AlphaWolfDesign LLC delivers fully custom, enterprise-grade websites in 72 hours for a fixed launch price of **\$4,997** — locked until the launch window closes, at which point standard pricing transitions to **\$6,997**. The market rate for an equivalent six-page custom website built on the same production stack — Next.js on Vercel edge infrastructure, Sanity headless CMS, MUX video, Cloudflare DNS & security, with full schema markup, Open Graph metadata, an integrated AI conversational presence, and compliance-native architecture — ranges from **\$36,500 at the agency median** to **\$132,480 for comparable custom software builds**, per Clutch 2026 pricing data. Regulated-industry overhead (healthcare, finance, insurance) adds an additional **15–25%** on top of base build cost.

This document substantiates that delta with two production-deployed proof-of-signal sites built by Alpha Wolf Design — **alphawolfdesign.com** (the firm's own brand presence, six pages, AI executive interface) and **americancoastalfinance.com** (a Medicare planning site with 159 video documents in a structured Sanity CMS, 24/7 AI scheduling agent, full 42 CFR §§ 422 / 423 TPMO compliance posture, NAIC Model Regulation #275 disclosure, and Date-Aware Eligibility tooling). Both sites operate on the same enterprise stack delivered to Alpha Wolf Design clients.

\$4,997	\$6,997	\$36.5K	\$50K+
ALPHA WOLF LAUNCH	STANDARD	AGENCY MEDIAN	ENTERPRISE TIER

At the agency median, Alpha Wolf Design delivers the same architectural class at **~7.3x less than market cost**. Against enterprise-tier delivery, the differential widens to **10x–20x**. The \$6,997 standard price still represents a **5.2x** discount against the median.

How This Valuation Was Built

Three independent valuation methodologies were applied to each subject site. Each pass anchors against a different industry data source to triangulate fair market value and replacement build cost. No single data source was relied upon. Where ranges exist, conservative midpoints were used.

Pass 1 — Replacement Build Cost

Direct cost to rebuild the existing stack with an independent U.S. agency. Anchored to **Clutch.co 2026 Web Design Company Pricing Guide** and **Clutch.co 2026 Web Development Company Pricing Guide**, which aggregate hourly rates and project costs across thousands of verified agency engagements. Cross-referenced with **DesignRush** agency rate cards, **GoodFirms** directory data, and the **Webflow / Next.js custom-build benchmarks** compiled by independent industry publications.

Pass 2 — Stack & Capability Valuation

Component-level pricing for each platform service in the production stack: **Vercel** edge delivery, **Cloudflare** DNS/security, **Sanity** headless CMS, **MUX** video infrastructure, **Formspree** form handler, and the integrated **AI conversational presence**. Anchored to vendor-published 2026 pricing and to independent AI integration cost guides (Crescendo.ai, Tidio, Famulor 2026 voice-agent benchmarks).

Pass 3 — Marketplace Comparable Multiples

Resale value benchmarked against transaction multiples published by the two largest digital-asset marketplaces: **Empire Flippers** (lifetime closed deals exceeding \$300M, multiples of 20–60x monthly profit) and **Flippa** (\$500M+ in transactions since 2009, \$11B in cumulative valuations across 29,000+ assessments). Compliance-moated lead-generation sites in regulated verticals (Medicare, insurance, financial services) consistently transact at the upper end of the content/service range — 30–50x monthly profit — due to the regulatory barrier to entry.

Compliance Verification

Every advertising claim, comparative pricing reference, and regulated-industry disclosure was cross-checked against current authoritative sources: **16 CFR Part 323** (Made in USA Labeling Rule), **16 CFR Part 233** (Guides Against Deceptive Pricing), **16 CFR Part 251** (Free claim rule), **FTC Policy Statement on Advertising Substantiation**, **Executive Order 14392** (March 13, 2026 — Ensuring Truthful Advertising of Products Claiming to be Made in America), **42 CFR §§ 422.2260, 422.2267, 422.2274** (Medicare Advantage TPMO requirements), and the **NAIC Suitability in Annuity Transactions Model Regulation #275**.

alphawolfdesign.com

By invitation. By design. — Six-page enterprise presence for the firm.

Architectural Profile

Layer	Configuration	Evidence
Framework	Next.js (React, server components)	_next/image artifacts in DOM
Hosting	Vercel Edge Network	dpl_ deployment identifiers; X-Vercel-Cache headers
DNS / Security	Cloudflare (Zone + Account verified)	Zone ID ecd43e93... / Account f22941...
CMS	Sanity headless (Project m3gbhmhj)	Token-verified Sanity org
Video	MUX (Token 1eb69966...)	image.mux.com asset paths in DOM
Forms	Formspree (xaqanezn)	Verified endpoint integration
AI Layer	Victoria — Executive Intelligence	MUX-hosted intro reel; per-page placement
Analytics	Google Tag Manager (GTM-MBSSPPJ3)	GTM noscript embed in DOM
Domain	Cloudflare Registrar	Owner-confirmed registrar

Content & Page Inventory

Page	URL Path	Schema / SEO Posture
Home	/	OG + Twitter Cards + canonical
About	/about	OG + canonical
Process	/process	OG + canonical
Contact	/contact	OG + canonical
Pricing	/website-design-pricing	Full meta + Twitter site handle
Enterprise-Grade	/enterprise-grade-website	Full meta + comparison schema
USA-Built	/us-based-web-design-company	Full meta + comparison schema
Affordable / SMB	/affordable-website-design-small-business	Full meta
Builder vs Custom	/website-builder-vs-custom-website	Full meta + comparison schema
Founder Bio	/about/adam-moss	OG profile type + author meta
Substantiation	/substantiation	Internal disclosure surface

Page	URL Path	Schema / SEO Posture
Privacy	/privacy	Standard
Terms	/terms	Standard

Total: **13 indexable pages** live (six core marketing + supporting SEO clusters + legal). Every page carries canonical tags, Open Graph metadata, Twitter Card metadata, and viewport directives. All page bodies include schema markup hooks; comparison pages include structured-data tables that target AI Overview citation surfaces.

VALUATION

alphawolfdesign.com — Build-Cost Replacement

Pass 1 — What an Independent Agency Would Charge

Line Item	Low	Mid	High	Source
Discovery / strategy (6-page scope)	\$2,500	\$5,000	\$8,000	Clutch 2026
Custom UI/UX design (6 pages)	\$3,000	\$9,000	\$15,000	Naturally 2026
Next.js development (100–200 hr)	\$8,000	\$14,000	\$30,000	Naturally 2026
Sanity CMS schema + content modeling	\$2,500	\$5,000	\$10,000	FocusReactive 2026
MUX video integration + pipeline	\$1,500	\$3,000	\$6,000	BuildMVPFast 2026
Cloudflare DNS / security hardening	\$500	\$1,500	\$3,000	Industry
Schema + Open Graph + SEO baseline	\$1,500	\$3,000	\$6,000	SearchScale 2026
AI conversational presence integration	\$5,000	\$15,000	\$50,000	Crescendo 2026
QA, deployment, performance	\$1,500	\$3,000	\$6,000	Industry
Project management overhead (10–15%)	\$2,600	\$5,850	\$13,400	Clutch 2026
REPLACEMENT BUILD TOTAL	\$28,600	\$64,350	\$147,400	

Pass 1 conclusion: Conservative midpoint replacement cost for alphawolfdesign.com against the open U.S. agency market is **\$64,350**. Even at the low-end estimate the floor is **\$28,600** — already 5.7x the Alpha Wolf launch price of \$4,997 and 4.1x the going-forward \$6,997.

Pass 2 — Stack & Capability Stack-Up

Stack Layer	2026 Market Reference	Replacement Value
Vercel Pro edge delivery (annualized)	\$20+/mo Pro tier; enterprise from \$3,000/mo	\$1,500 – \$3,000
Cloudflare zone (DNS + SSL + WAF baseline)	Standard plan free; Pro \$25/mo	\$300 – \$600
Sanity headless CMS implementation	Pay-as-you-go \$99–\$499/mo for mid-sized sites	\$3,000 – \$8,000
MUX video infra setup & first-year delivery	\$0.07/min encode + \$0.025/min delivery	\$1,800 – \$5,000
Formspree production endpoint	\$10–\$40/mo plans	\$120 – \$480
AI conversational presence (Victoria)	Custom voice/chat: \$25K–\$100K (Crescendo 2026)	\$25,000 – \$100,000
Schema architecture + AI Overview targeting	One-time setup fee \$1.5K–\$6K (SearchScale 2026)	\$1,500 – \$6,000
TOTAL STACK REPLACEMENT		\$33,220 – \$123,080

Pass 2 conclusion: The integrated stack alone — before any custom design, copy, or build labor — carries a replacement value of **\$33,220 to \$123,080**. The AI conversational presence is the largest single line; even a stripped-down chat-tier implementation runs \$5K+, and a true voice-capable executive-class agent is \$25K floor.

Pass 3 — Marketplace Asset Multiples

Empire Flippers and Flippa transaction data benchmark digital service business asset value at **20x to 60x monthly net profit**, with service / lead-gen businesses typically transacting in the **30x to 40x** band. Empire Flippers rejects ~91% of submissions; accepted listings imply institutional-grade diligence. alphawolfdesign.com is positioned as a productized agency funnel — comparable to lead-gen asset class, with the added moat of fixed-spec fixed-price offer architecture.

Marketplace valuation methodology yields, on a forward earnings basis at \$4,997 per close x even a single deal per month:

Closes / Month	Net (assume 70% margin)	30x Multiple	40x Multiple
1	\$3,498	\$104,937	\$139,916
2	\$6,996	\$209,874	\$279,832
4	\$13,992	\$419,748	\$559,664
8	\$27,984	\$839,496	\$1,119,328

Pass 3 conclusion: At the minimum operating tempo of one close per month, the brand asset alone supports a marketplace valuation north of **\$100,000**. This figure is independent of build-cost-to-rebuild; it reflects what an acquirer would pay to take over the going concern.

AlphaWolfDesign.com — Fair Market Value: ~\$88,000

Triangulated Valuation — alphawolfdesign.com

Methodology	Conservative	Midpoint	Aggressive
Pass 1: Replacement build cost	\$28,600	\$64,350	\$147,400
Pass 2: Stack replacement only	\$33,220	\$78,150	\$123,080
Pass 3: Marketplace multiple (1 close/mo)	\$104,937	\$122,427	\$139,916
TRIANGULATED VALUE	\$28,600	\$88,309	\$147,400

Triangulated fair-market value for alphawolfdesign.com: **\$28.6K floor, ~\$88K midpoint, \$147K ceiling.**

americancoastalfinance.com

Compliance-built, trust-driven Medicare guidance — with a 24/7 AI scheduling executive and a 159-episode Medicare video library.

Architectural Profile

Layer	Configuration	Evidence
Framework	Next.js (React, server components)	_next/image artifacts in DOM
Hosting	Vercel Edge Network	dpl_ deployment identifiers
DNS / Security	Cloudflare	Owner-verified
CMS	Sanity (159 video documents, 7 categories)	d2xsxph8kpxj0f.cloudfront.net = Sanity asset CDN
Video	Sanity-hosted .mp4 streaming + MUX overflow	Direct CloudFront paths in DOM
AI Voice Agent	Victoria — Medicare Scheduling Executive	(757) 300-5177 — 24/7 inbound
Compliance	TPMO disclosure + Scope of Appointment + 42 CFR 422/423	Compliance page audited
State Licensing	11+ states (life/annuity per NAIC Model Reg #275)	Disclosed on /insurance
Eligibility Tool	Date-aware multi-step IEP/AEP/OEP/SEP checker	/eligibility step flow audited
Domain	Cloudflare Registrar	Owner-confirmed registrar

Content Inventory

Surface	Detail	Documented Count
Marketing pages	Home, About, Library, Insurance, Eligibility, Compliance	6 core
Medicare Library categories	ACF-GS, ACF-PO, ACF-CP, ACF-PT, ACF-EC, ACF-AR, ACF-OE	7 categories
Library video documents	Compliance-reviewed Medicare education	159 episodes
· ACF-AR Annual Review & Extra Help	AEP / LIS / MSP	30 episodes
· ACF-CP Costs, Premiums & IRMAA	Premiums / deductibles / IRMAA	13 episodes
· ACF-EC Employer Coverage	Coordination of benefits	27 episodes
· ACF-GS Getting Started	IEP / SEP / Disability	28 episodes
· ACF-OE OEP & Enrollment Windows	Plan switching / life changes	33 episodes
· ACF-PO Plan Options	A/B/C/D / MA / Medigap / HMO/PPO	11 episodes

Surface	Detail	Documented Count
· ACF-PT Penalties & Timing Risks	Late penalty / Part B/D	5 episodes
Carrier appointments	Cigna, UnitedHealthcare, WellCare, Humana, Aetna, DeVita , Anthem	
Plan inventory disclosed	MA + Part D plans across service area	40–60 plans
Eligibility checker steps	Multi-step branching logic	5 steps
Compliance disclosure surfaces	TPMO + SOA + 42 CFR 422/423 + carrier disclosures	Documented

VALUATION

americancoastalfinance.com — Build-Cost Replacement

American Coastal Finance is the higher-complexity build of the two proof-of-signal sites. It carries a video library of 159 documents, structured taxonomy, multi-step eligibility logic, a 24/7 AI voice agent, and complete TPMO compliance architecture against 42 CFR Parts 422 & 423. The replacement build cost scales accordingly.

Pass 1 — What an Independent Agency Would Charge

Line Item	Low	Mid	High	Source
Discovery / IA / strategy (regulated)	\$5,000	\$10,000	\$18,000	Clutch 2026
Custom UI/UX design	\$5,000	\$12,000	\$22,000	Clutch 2026
Next.js development (200–400 hr)	\$16,000	\$28,000	\$60,000	Naturally 2026
Sanity CMS — 159-document taxonomy	\$8,000	\$15,000	\$28,000	FocusReactive 2026
Video pipeline (Sanity + MUX)	\$3,000	\$6,000	\$12,000	BuildMVPFast 2026
Multi-step Date-Aware Eligibility tool	\$4,000	\$9,000	\$18,000	Custom dev
Carrier integrations + disclosures	\$2,000	\$4,500	\$9,000	Industry
CMS / TPMO compliance (42 CFR 422/423)	\$8,000	\$15,000	\$25,000	Healthcare reg.
NAIC Model #275 disclosure architecture	\$1,500	\$3,500	\$7,000	NAIC framework
Schema + OG + AI Overview SEO	\$2,000	\$4,000	\$8,000	SearchScale 2026
QA, perf, accessibility (WCAG 2.1 AA)	\$3,000	\$6,000	\$12,000	HHS May 2026
PM overhead + regulated surcharge	\$12,200	\$26,400	\$57,000	Industry
REPLACEMENT BUILD TOTAL	\$69,700	\$139,400	\$276,000	

Pass 1 conclusion: americancoastalfinance.com is a higher-complexity engagement. Conservative midpoint replacement cost from an independent U.S. agency: **\$139,400**. The healthcare/regulated compliance overhead (15–25% per industry standard), the 159-document Sanity taxonomy, and the carrier disclosure architecture are the dominant line items.

American Coastal Finance integrates a proprietary AI scheduling system, held separately and not included in this website valuation.

Pass 2 — Stack & Capability Stack-Up

Stack Component	2026 Reference	Replacement Value
Vercel edge (regulated-traffic posture)	\$20+/mo Pro; enterprise from \$3,000/mo	\$1,500 – \$5,000
Cloudflare zone + security tier	Pro \$25/mo; Business \$200/mo	\$300 – \$2,400
Sanity 7-category taxonomy + 159 documents	Growth tier ~\$99–\$499/mo + content modeling	\$8,000 – \$20,000
MUX / Sanity-CDN video delivery (159 assets)	Encoding \$0.07/min + delivery \$0.025/min	\$3,000 – \$10,000
Date-Aware Eligibility multi-step logic	Custom React state machine, 5+ steps	\$4,000 – \$15,000
TPMO compliance architecture (42 CFR)	Healthcare-regulated +15–25% surcharge	\$15,000 – \$40,000
NAIC Model Reg #275 disclosure surfaces	Annuity best-interest disclosure framework	\$2,500 – \$8,000
Schema + meta + AI Overview architecture	SearchScale 2026 enterprise tier	\$2,500 – \$8,000
TOTAL STACK REPLACEMENT		\$36,800 – \$108,400

Pass 2 conclusion: The integrated stack alone for americancoastalfinance.com carries replacement value of **\$36,800 to \$108,400**. TPMO compliance architecture and the 159-document Sanity taxonomy are the largest line items in this website-only valuation.

Pass 3 — Marketplace Asset Multiples

Medicare lead-generation assets are regularly traded on Flippa and Empire Flippers. Empire Flippers rarely accepts content sites below \$25,000 listed value; service / lead-gen businesses in regulated verticals routinely transact at 30x–50x monthly profit due to the compliance moat and the high cost of earning CMS-compliant inbound traffic. Medicare leads alone cost \$35–\$75 per lead on Google Ads in 2026 (PSM Brokerage, Quotit, Applied General Agency). A site that converts inbound traffic without paid acquisition is materially more valuable than the per-lead cost would suggest.

Inbound Leads / Month	Avoided Paid Cost (\$55/lead)	30x Multiple Asset Value	40x Multiple Asset Value
20	\$1,100	\$33,000	\$44,000
50	\$2,750	\$82,500	\$110,000
100	\$5,500	\$165,000	\$220,000
200	\$11,000	\$330,000	\$440,000

Pass 3 conclusion: Even at 20 inbound leads per month — a modest operating tempo for a Medicare lead-gen asset — the marketplace multiple value sits at \$33K–\$44K. At 100 inbound leads per month, \$165K–\$220K. The asset's standalone value as a productized Medicare lead funnel grows quickly with tempo.

AmericanCoastalFinance.com — Fair Market Value: ~\$103,000

Triangulated Valuation — americancoastalfinance.com (website only)

Methodology	Conservative	Midpoint	Aggressive
Pass 1: Replacement build cost	\$69,700	\$139,400	\$276,000
Pass 2: Stack replacement only	\$36,800	\$72,600	\$108,400
Pass 3: Marketplace multiple (50 leads/mo)	\$82,500	\$96,250	\$110,000
TRIANGULATED VALUE	\$36,800	\$102,750	\$276,000

Triangulated fair-market value for americancoastalfinance.com (website only): **\$36.8K floor**, **~\$103K midpoint**, **\$276K ceiling**. The higher complexity, compliance posture, and 159-document video library drive a substantially higher valuation than the AWD brand site. The proprietary AI scheduling system is held separately and is not part of this website valuation.

THE DISRUPTION

Market Cost vs. Alpha Wolf Offer

The two proof-of-signal websites — built by Alpha Wolf Design — establish independent triangulated fair-market values of ~**\$88,000** for alphawolfdesign.com and ~**\$103,000** for americancoastalfinance.com (website only). Independent U.S. agency replacement begins at **\$64,350** for AWD and ~**\$139,400** for ACF. These are two separate proofs of signal — not a bundle. A client buys one site at a time. Alpha Wolf Design delivers the same architectural class at:

\$4,997 LAUNCH PRICE	\$6,997 STANDARD	7-28x LESS THAN MARKET	72 hrs DELIVERY
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The Math, Spelled Out

Comparison Anchor	Market Cost	Alpha Wolf \$4,997	Alpha Wolf \$6,997
Agency median (Clutch 2026 marketing site)	\$36,500	7.3x less	5.2x less
Mid-size agency (Clutch 2026)	\$15K–\$75K	3x–15x less	2.1x–10.7x less
Enterprise tier (Clutch 2026 / DesignRush)	\$50K–\$300K+	10x–60x less	7.1x–43x less
Alpha Wolf comparable build (this report, AWD)	\$64,350	12.9x less	9.2x less
Alpha Wolf comparable build (this report, ACF)	\$139,400	27.9x less	19.9x less

Why the Spread Exists

The market spread between \$36,500 (Clutch median) and \$4,997 (Alpha Wolf launch) is not a quality differential — it is a **delivery model differential**. Traditional agencies sell hours; Alpha Wolf Design sells a fixed-spec product. The same Vercel + Cloudflare + Sanity + MUX stack, the same schema-first SEO architecture, the same AI presence integration, the same USA-built labor model — delivered without proposal theatre, without change orders, without scope creep.

Ford does not negotiate the price of a Shelby GT500. The machine is the machine. Alpha Wolf operates on the same principle.

Substantiation Framework & Risk Posture

This document is itself a substantiation record under **Section 5 of the FTC Act (15 U.S.C. § 45)** and the **FTC Policy Statement on Advertising Substantiation**. Every comparative price claim, every build-cost reference, and every product-class characterization made in Alpha Wolf Design marketing is anchored to a citable third-party source. The structure below maps each material claim to the rule that governs it and the evidence in the file.

Claim 1 — "100% USA-Built"

Governing rule: 16 CFR Part 323 — Made in USA Labeling Rule. Standard: "all or virtually all" of the product must originate in the United States. **Current penalty:** \$53,088 per violation (FTC, civil penalty inflation adjustment effective February 2025). **Heightened enforcement posture:** Executive Order 14392, signed March 13, 2026 — "Ensuring Truthful Advertising of Products Claiming to be Made in America" — directs FTC to prioritize enforcement, shifting from complaint-driven to proactive scrutiny.

Alpha Wolf posture: Per the published Substantiation Record at /substantiation, "USA-Built" is defined to mean all *human labor* producing the deliverable — design, development, copy, QA, project management — is performed by US-based personnel. Infrastructure providers (Vercel, Cloudflare, MUX, Sanity, OpenAI, Anthropic) are all US-based companies; their globally distributed server networks are expressly excluded from the labor-origin claim. AI tooling is disclosed.

RISK FLAG — ONGOING VIGILANCE

Any future engagement of a non-US contractor — even a one-off freelance designer, content writer, or code reviewer — breaks the "100% USA-Built" claim under 16 CFR §323 and triggers the heightened post-EO 14392 enforcement posture. Boss: maintain documented evidence of US-based labor for every engagement. Worker classification (W-2, 1099, or LLC) is irrelevant; what matters is physical location and citizenship/work-authorization status of the individual producing the work.

Claim 2 — Comparative Pricing ("10x" / \$4,997 vs. \$6,997)

Governing rule: 16 CFR Part 233 — Guides Against Deceptive Pricing. §233.1 prohibits fictitious former prices; §233.2 governs comparable-price advertising; §233.5 covers "miscellaneous price comparisons." **Standard:** a former price must be bona fide; a future price must reflect actual intended pricing posture.

Alpha Wolf posture: The \$4,997 ↔ \$6,997 framing is explicitly structured as **forward-looking launch pricing**, not a former-price comparison. The Substantiation Record at /substantiation Claim 6 documents: "\$4,997 is offered for a finite launch window. The \$6,997 figure is the going-forward price after the launch window closes... This is forward-looking framing — \$6,997 is not represented as a former or established present-tense price. Sales at \$4,997 are timestamped and logged." This posture avoids the §233.1 fictitious-former-price exposure entirely. The "10x" comparison claim is anchored to the documented agency-market range of \$40K–\$75K (Substantiation Record Claim 2) — and this document widens and re-anchors that range to the 2026 Clutch / DesignRush data.

REQUIREMENT — LOG & TRANSITION

When the launch window closes, the /pay surface must display \$6,997 as the standard price only. No back-room discounting at \$4,997 after that transition (per Substantiation Record Claim 6). Maintain timestamped sales logs at \$4,997 to evidence the bona-fide launch posture.

Claim 3 — "Operational AI Presence™"

Governing rule: common-law trademark protection under U.S. common law (use in commerce as a source identifier); Lanham Act for any future federal registration. **Standard:** the ™ symbol denotes an unregistered trademark claim; the ® symbol is reserved for federally registered marks. Misuse of ® before federal registration is a criminal offense under 18 U.S.C. § 2320 and a civil violation under 15 U.S.C. § 1125.

Alpha Wolf posture: Substantiation Record Claim 4 correctly identifies One Operational AI Presence™ and One Directional AI Presence™ as common-law trademarks with no USPTO registration filed as of the effective date. Use of ™ (not ®) is compliant. Continued use in commerce establishes common-law rights in the geographic area of use.

RECOMMENDATION — FEDERAL REGISTRATION

If Alpha Wolf Design intends to scale nationally and protect against confusingly similar marks, file USPTO trademark applications for "One Operational AI Presence" and "One Directional AI Presence" (both Class 042 — design and development of computer software). Filing fees: \$250–\$350 per class via TEAS Plus. Standard processing 10–14 months in 2026.

Claim 4 — americancoastalfinance.com CMS / TPMO Compliance

Governing rules: 42 CFR §§ 422.2260, 422.2267, 422.2274 (Medicare Advantage Marketing and Communications, including TPMO requirements); 42 CFR Part 423 Subpart V (Prescription Drug Plan parallel requirements); CY 2026 Medicare Marketing & Communications Guidelines.

Audit findings on americancoastalfinance.com:

- TPMO non-affiliation disclaimer present in footer of every page ("American Coastal Finance is not affiliated with nor endorsed by the U.S. government or the federal Medicare program. We do not offer every plan available in your area"). **Compliant per 42 CFR §422.2267(e)(43).**
- Carrier & plan inventory disclosure present ("We represent 7 organizations offering approximately 40–60 plans"). **Compliant per 42 CFR §422.2267(e)(43).**
- Scope of Appointment (SOA) framework disclosed at /compliance, with 48-hour pre-appointment window referenced. **Compliant per 42 CFR §422.2264(c).**
- 42 CFR §§ 422.503 / 423.504 expressly cited at /compliance. **Strong posture.**
- TPMO data-sharing disclosure language present. **Compliant per 42 CFR §422.2274(c) post-October 1, 2024 effective date.**
- Carriers disclosed by name: Cigna, UnitedHealthcare, WellCare, Humana, Aetna, Devoted Health, Anthem. **Transparent posture.**

VERIFY — CY 2026 LANGUAGE ASSISTANCE NOTICE

Effective for CY 2026 marketing and communications beginning September 30, 2025, MA organizations and their TPMOs must provide a notice of availability of language assistance services and auxiliary aids. Audit americancoastalfinance.com to confirm a visible language-assistance notice is present (typically in footer or accessibility surface). If not yet present, add before next CMS file review cycle.

Claim 5 — NAIC Model Regulation #275 (Annuity Best Interest)

Governing rule: NAIC Suitability in Annuity Transactions Model Regulation #275 (2020 best-interest revisions).

Adoption posture: 49 of 50 jurisdictions have adopted Model #275 revisions as of CY 2026. Standard: "reasonable diligence, care and skill" in any annuity recommendation; agent and carrier may not place financial interest ahead of consumer interest.

Alpha Wolf posture (ACF): /insurance page expressly states "American Coastal Finance complies with the National Association of Insurance Commissioners (NAIC) Model Regulation #275 — the best-interest standard for annuity and life insurance recommendations." Licensure stated as 11+ states. Compliant disclosure architecture.

Claim 6 — "Free" Revisions Round

Governing rule: 16 CFR §251.1 — Guide Concerning Use of the Word "Free" and Similar Representations.

Alpha Wolf posture: Substantiation Record Claim 5 properly discloses what is and is not included in the "free first-round revisions." Scope refinements are included; scope additions (new pages, new functionality, additional AI presence placements, complete vector redirection) are explicitly excluded and quoted separately. Disclosure surfaces are documented at three locations (/process §3.6, homepage §3.5, /pay §3.16). Compliant with §251.1(c) materially-conditioned-free disclosure requirements.

Claim 7 — Advertising Substantiation Doctrine

Governing standard: FTC Policy Statement on Advertising Substantiation. Any objective claim (performance, comparative, quantitative) must have a reasonable basis — competent and reliable evidence — at the time the claim is made. This document, together with the existing on-site /substantiation page, constitutes the prior-substantiation file.

Recommendation: retain this document and the contemporaneous on-site /substantiation record. Update on each material site change; preserve prior versions in version-controlled storage to evidence the substantiation file at the time any specific claim was published.

Sources & Citations

Build-Cost & Market-Rate Sources

- Clutch.co — Web Design Company Pricing Guide, May 2026 — <https://clutch.co/web-designers/pricing>
- Clutch.co — Web Development Company Pricing Guide, May 2026 — <https://clutch.co/web-developers/pricing>
- Clutch.co — Software Development Company Pricing Guide, May 2026 — <https://clutch.co/developers/pricing>
- Naturaily — Best Headless CMS for Next.js 2026 — <https://naturaily.com/blog/next-js-cms>
- RWIT — How Much Does It Cost to Build a Website with Headless CMS in 2026 — <https://www.rwit.io/blog/headless-cms-website-cost-2026>
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EFFECTIVE DATE: May 24, 2026. This Market Substantiation Record is prepared as a contemporaneous substantiation file under the FTC Policy Statement on Advertising Substantiation. AlphaWolfDesign LLC may rely on this document as the supporting basis for the comparative pricing, build-cost, and stack characterization claims published on alphawolfdesign.com and any derivative marketing collateral, until superseded by a subsequent dated revision.

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