Affiniti Ventures, Inc. dba Noble Mobile – Pro Forma Transfer of Control Filing

Attachment 1

Question 25:

When Affiniti Ventures, Inc. dba Noble Mobile was formed in April 2024, Andrew Yang and Zachary Graumann were the sole members of the Board of Directors and owned the majority of the equity interest of the entity and the entirety of the voting interest of the entity. The Company raised its Series Seed fundraising round in May 2025. Following the Seed round, the entity added two new 10% or more equity interest holders, however Mr. Yang retained 57% of the voting interest and Mr. Graumann retained 16% of the voting interest. Mr. Yang (along with Mr. Graumann) retains the power to appoint more than 50% of the Board of Directors and retains control of over 50% of the Board seats. The transaction conforms with statutory guidelines and is in the public interest, as it increased the working capital of Affiniti Ventures, Inc. dba Noble Mobile allowing it to better serve its customers.

Question 20.a:

Owners/Percentage of Equity Owned (the principal business for the shareholders below is the operation of Affiniti Ventures, Inc. dba Noble Mobile)

Owner Information – Affiniti Ventures, Inc. dba Noble Mobile	Ownership Percentage - Equity Interest	Ownership Percentage - Voting Interest
Andrew Yang 262 W 38th St Rm 1002, New York, NY 10018 An Individual and a United States Citizen	23.29%	57%
Zachary Graumann 262 W 38th St Rm 1002, New York, NY 10018 An Individual and a United States Citizen	6.73%	16%
Corazon Capital III LP 262 W 38th St Rm 1002, New York, NY 10018 A Delaware Corporation	11.32%	0.03%
Emigrant Capital Corp 262 W 38th St Rm 1002, New York, NY 10018 A Delaware Corporation	10.34%	0%

Question 22:

Affiniti Ventures, Inc. dba Noble Mobile certifies that: (1) it is neither a foreign carrier nor affiliated with a foreign carrier; (2) it does not seek to provide international telecommunications services to any destination country in which it is or controls a foreign carrier; (3) no entity owning more than 25 percent of Affiniti Ventures, Inc. dba Noble Mobile, or that controls Affiniti Ventures, Inc. dba Noble Mobile, controls a foreign carrier in any such destination country; and (4) no two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Affiniti Ventures, Inc. dba Noble

Mobile and are parties to or beneficiaries of any contractual arrangement affecting the provision or marketing of international basic telecommunications services in the United States.

Question 28:

Affiniti Ventures, Inc. dba Noble Mobile qualifies for non-dominant classification under section 47 CFR § 63.10 of the Commission's rules. It is a U.S. carrier that has no affiliation with, and itself is not, a foreign carrier in any country to which it provides service (i.e., a destination country) and is therefore presumptively non-dominant for the provision of international communications services.

Question 29:

This change of control is pro forma as defined in Section 47 CFR § 63.24 of the Commission's rules. Following the seed round in May of 2025, Affiniti Ventures, Inc. dba Noble Mobile added two new 10% or more equity interest holders, **however** Mr. Yang retained 57% of the voting interest and Mr. Graumann retained 16% of the voting interest. Mr. Yang retained the power to appoint more than 50% of the Board of Directors and retains control of over 50% of the Board seats.

Question 30:

Affiniti Ventures, Inc. dba Noble Mobile failed to provide a pro forma notification to the Commission no later than thirty days (30) after the consummation of the change of control in accordance with section 47 CFR § 63.24(f) of the Commission's rules as it was unaware that a pro forma notification was required due to a majority voting interest having been retained post-Series Seed fundraising round and therefore there was no substantive change of control. Affiniti Ventures, Inc. dba Noble Mobile was made aware of this requirement by legal counsel upon reengaging said counsel in light of an upcoming asset purchase and is now providing notice to the Commission.

Question 31:

This application qualifies for exclusion from referral to the Executive Branch under 47 CFR § 1.40001(a)(2) of the Commission's rules as the applicant has no reportable foreign ownership.

Question 32:

The application qualifies for streamlined processing under section 47 CFR § 63.12 of the Commission's rules as the applicant (ii) is unaffiliated with foreign carriers in destination countries; (ii) has no affiliation with any dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell; (iii) has no individual or entity that is not a U.S. citizen holding a ten percent or greater direct or indirect equity or voting interest, or a controlling interest, in applicant; and (iv) the Commission has not informed applicant that the application is not eligible for streamlined processing.