Leaving Pulley: a records checklist for your 409A and cap table

Pulley has said it will cease all operations and services on 8 December 2026. Its FAQ says that if you have not started a migration by 30 November 2026, your data stays available only in a limited capacity until 31 January 2027. **Work to 30 November; Pulley closes 8 December.**

A 409A valuation does not lose its standing because the vendor that delivered it closes; it still has to meet the tests in the last section below. What a company can lose is the file behind it.

1 Decide where the cap table goes

- ☐ **Moving to Carta?** Opt in to sharing your details with Carta by 30 November 2026. If you have not opted in by then, Pulley offers no assurance on timing, pricing or disruption to service. Opting in is not a contract: Pulley's FAQ says you lose access to your cap table unless a new agreement, with Carta or another provider, is in place before 8 December.
- ☐ **Moving anywhere else?** Pulley's FAQ says it cannot assist a migration to another provider, so plan your own export.
- ☐ **Reconcile before access narrows.** Check the new platform's import against Pulley's records: shares by holder and class, every option grant (date, number, exercise price, vesting), and every SAFE, note and warrant.

2 Download the 409A file for every valuation

- ☐ The final report, showing the valuation date and who signed it.
- ☐ The engagement letter or order confirmation.
- ☐ The inputs you submitted, with their dates: financial statements, forecast, term sheets.
- ☐ The cap table as of each valuation date. The live ledger has moved on since.
- ☐ The valuation model or allocation workbook, if the provider will release it.
- ☐ The board consent that adopted each value and priced each grant.
- ☐ The grant agreement for each option issued against each value.
- ☐ Any ASC 718 expense reports Pulley produced for you.

Whichever route you take, download each 409A report yourself.

3 File by grant

For each grant date, the file should show the valuation relied on, its date and anything that changed in between. Your auditor, your next investor's counsel and any future acquirer are likely to ask that.

4 Check whether the next grant needs a new 409A

- ☐ A value set by a qualifying independent appraisal is presumed reasonable when its valuation date is no more than 12 months before the grant. The IRS can still rebut that presumption if the method, or the way it was applied, was grossly unreasonable.
- ☐ A value stops being reasonable once its valuation date is more than 12 months before the grant, or if it misses later information that may materially affect value. The regulation's own examples are the resolution of material litigation and the issuance of a patent. A priced round, a term sheet or a material change in the forecast should prompt the same check.
- ☐ Changing cap-table software does not change what the company is worth, so on its own it should not be such an event.
- ☐ If you migrate to Carta, Pulley's FAQ says Carta can accept an existing Pulley 409A as-is, provided you supply a copy, and will support the defense of Pulley's prior 409A work.

Prepared by FairValueX as general information, not tax or legal advice. Sources: Treasury Regulation section 1.409A-1(b)(5)(iv)(B); Pulley, shutdown notice on pulley.com; Pulley, "FAQ: What is happening with Pulley's shutdown" (15 September 2026), pulley2025.pulley.com. Pulley's dates can move: check its notice before relying on them.