

**FORM ADV PART 2A  
BROCHURE**

# **DIGITAL FINANCE LLC**

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*This brochure provides information about the qualifications and business practices of Digital Finance LLC. If you have any questions about the contents of this brochure, please contact us at [info@digit.finance](mailto:info@digit.finance). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Digital Finance LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Digital Finance LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.*

September 1, 2019

**ITEM 2. MATERIAL CHANGES**

Digital Finance LLC has no material changes to report.

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#### **ITEM 4. ADVISORY BUSINESS**

Digital Finance LLC is a registered investment advisor located and registered in the District of Columbia. Maxim Nurov, MBA, is the owner of the firm. Digital Finance LLC was incorporated in 2016.

Digital Finance LLC does not manage clients' assets, but rather provides investment advice for clients to manage their investments on their own. Digital Finance LLC provides investment advice in the area of digital assets investments. Digital Finance LLC helps its clients to invest in digital assets, leveraging its financial expertise and strong knowledge of market trends.

Digital Finance LLC shall deliver Form ADV Part 2 to its clients or prospective clients not less than forty-eight (48) hours prior to entering into an investment advisory contract. Digital Finance LLC will provide each client the right to terminate the investment advisory contract within five (5) days of entering such contract.

Digital Finance LLC shall deliver Part 2 of Form ADV to each of its advisory clients, within 120 days of the end of its fiscal year. Digital Finance LLC shall deliver Part 2 of Form ADV to each of its advisory clients without charge, upon written request. Part 2 of Form ADV will be delivered to Digital Finance LLC clients either in the form of the hard copy via mail or in the form of the scanned copy via email. Digital Finance LLC will document the delivery of Part 2 of Form ADV to each of its advisory clients in the register.

#### **ITEM 5. FEES AND COMPENSATION**

Digital Finance LLC provides investment advisory services for a flat fee that depends on the complexity of the specific project or for an hourly rate. The fees are generally billed in advance.

#### **ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE**

Not applicable to Digital Finance LLC. Digital Finance LLC does not charge performance-based fees.

#### **ITEM 7. TYPES OF CLIENTS**

Digital Finance LLC's clients are generally institutional investors and high net worth individuals who are seeking to diversify their investment portfolio by investing in digital assets.

#### **ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

Digital Finance LLC generally utilizes a combination of fundamental and technical methods of analysis.

An investment recommendation by Digital Finance LLC cannot be interpreted as a guarantee of future performance. Investing in digital assets involves risk of loss that clients should be prepared to bear. The digital assets market is highly volatile and investors can lose money by investing in digital assets. For a full description of the risks inherent in any specific digital asset, clients should read the prospectus or other relevant disclosure document of the particular digital asset recommended.

Digital Finance LLC considers its client investment goals, financial situation, time horizon, risk tolerance and other factors to develop an appropriate investment strategy. Client participation in this process, including full and accurate disclosure of requested information is essential for the analysis of a client's account. Digital Finance LLC relies on the financial and other information provided by the client without the duty or obligation to validate the accuracy and completeness of the provided information.

In making investment recommendations there are a number of factors that Digital Finance LLC does not consider, including but not limited to tax implications: Digital Finance LLC does not consider the client specific tax implications with respect to the recommendations that it makes.

#### **ITEM 9. DISCIPLINARY INFORMATION**

As of the date of this Brochure, there are no legal, regulatory or disciplinary events or proceedings involving Digital Finance LLC or any of its employees.

#### **ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

As of the date of this Brochure, Digital Finance LLC and/or its management persons do not have any other financial industry activities or affiliations.

#### **ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

Digital Finance LLC has adopted a Code of Ethics, which is designed to meet the requirements of the Investment Advisers Act of 1940. Digital Finance LLC will provide a copy of its Code of Ethics to any client or prospective client in the electronic format within five business days upon request.

Neither Digital Finance LLC, nor any of its related persons, recommends to clients securities, in which Digital Finance LLC or a related person has a direct material financial interest. Digital Finance LLC does not purchase or sell securities on behalf of clients. However, Digital Finance LLC's related persons may purchase securities for their own accounts which may, in certain instances, be the same securities as those recommended to clients. The Code of Ethics requires access persons of Digital Finance LLC to place the interests of clients over their own or those of Digital Finance LLC, and all access persons are required to acknowledge their receipt and understanding of the Code.

#### **ITEM 12. BROKERAGE PRACTICES**

As of the date of this Brochure, Digital Finance LLC is not affiliated with and does not maintain an ongoing agreement with a "service provider" (e.g. broker-dealer, custodian). When engaged to provide investment consultation services, the recommendations will be based on the client's needs and ease of administration. Factors, which Digital Finance LLC considers in recommending a specific broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service.

All compensation paid to the firm is paid directly by the client, and therefore the firm does not receive any additional compensation when a client engages a recommended service provider. Digital Finance LLC does not engage in a directed brokerage involving its accounts. Digital Finance LLC does not conduct independent due diligence or obtain better execution services or prices from these service providers.

Digital Finance LLC does not receive research and other soft dollar benefits in connection with clients' securities transactions. Digital Finance LLC does not consider, in selecting or recommending broker-dealers, whether it or a related person receives client referrals from a broker-dealer or third party.

#### **ITEM 13. CLIENT REFERRALS AND OTHER COMPENSATION**

Digital Finance LLC does not pay any person directly or indirectly for the introduction or acquisition of clients.

#### **ITEM 14. CUSTODY**

Digital Finance LLC does not have custody of client's funds or securities. All clients' assets are held by a qualified and independent custodian (e.g. bank, broker). Digital Finance LLC urges clients to maintain the records and statements provided by the service providers that maintain custody of their assets.

#### **ITEM 15. INVESTMENT DISCRETION**

Digital Finance LLC does not have discretionary authority and does not engage in discretionary trading within a client's account.

#### **ITEM 16. VOTING CLIENT SECURITIES**

Digital Finance LLC does not vote proxies on behalf of its clients. Digital Finance LLC does not have the authority to vote client securities. Digital Finance LLC provides investment advice in the area of digital asset investments and its clients will invest directly in digital assets, without transferring their funds to Digital Finance LLC.

#### **ITEM 17. FINANCIAL INFORMATION**

Digital Finance LLC has not filed for bankruptcy at any time. Digital Finance LLC is not currently aware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments to its clients.