

Item 1. Form ADV Part 2A

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## **Firm Brochure – Form ADV Part 2A**

### **MazumaGo Inc (“Truss”)**

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This Brochure provides information about the qualifications and business practices of Truss (hereinafter, “we,” “our,” the “Firm” or “Truss”). Truss operates the advisor services for the Truss site. If you have any questions about the contents of this brochure, please contact us at the above email. 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. Truss is a registered investment adviser. Registration as an investment adviser does not imply any special degree of skill or training, or any sort of approval by any regulatory authority of an adviser’s investment methods.

Additional information about Truss can be found on the Investment Adviser Public Disclosure website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov) by using our identification number referred to as a CRD number. Truss’s CRD No. is 334136. If you have any questions about the contact of this brochure, please contact us at the email address shown above.

## Item 2. Material Changes

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***Truss has the following material changes to report. Material changes relate to Truss's policies, practices or conflicts of interests.***

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For future filings, this section of the Disclosure Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this Brochure on the SEC’s public disclosure website (IAPD) at [adviserinfo.sec.gov](http://adviserinfo.sec.gov).

We may, at any time, update this Disclosure Brochure and send a copy to you with a summary of material changes, or send you only a summary of material changes that includes an offer to send you a copy of the full brochure either by electronic means (email) or in hard copy form.

If you would like another copy of this Disclosure Brochure, please download it from the SEC website as indicated above, download it from the Truss website at [www.trusspayments.com](http://www.trusspayments.com) or contact our Chief Compliance Officer, Matthew Smith at [help@trusspayments.com](mailto:help@trusspayments.com).

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## Item 4. Advisory Business and Services

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### A. Advisory Business

Truss is an independent investment advisory firm registered as an internet-only investment adviser with the U.S. Securities and Exchange Commission ("SEC"). An internet-only investment adviser provides investment advice to all of its clients exclusively through an interactive website. The company was formed in September 2021 as a Delaware Corporation.

Truss operates through an interactive website through which users can buy/sell fixed-income securities and other kinds of investments through an easy-to-use interface. Through the site, Truss makes recommendations to users on which securities to invest in, based on a suitability and personalization questionnaire it offers in the onboarding process. Truss' clients are typically individuals who work in the construction industry.

Clients will not be able to directly contact Truss's portfolio managers for investment advice. Clients may contact Truss for technical and customer service issues via email at [help@trusspayments.com](mailto:help@trusspayments.com) but not for investment advice.

### B. Services

Portfolio management services are provided on a discretionary basis. As Truss's site is set up to direct all client trades to a specific broker/dealer, the Firm does have discretionary authority over the brokerage used by the client to purchase or sell securities.

Upon opening an account for clients, Truss will ask a series of questions about their financial situation and allow clients to impose restrictions on risk tolerance. Clients will be able to update these on Truss's site. These questions include investment objectives, investment horizon, downturn tolerance, and overall risk tolerance. Based on client suitability parameters, Truss will restrict certain assets from being bought or sold in client accounts.

Truss does not capture any additional information not covered in the questionnaire in making its restrictions and providing its investment advice. The type of restriction a client may impose includes the degree of risk level.

Truss personalizes its investment advice by setting restrictions on which kinds of investments clients are able to make, based on their responses to the questionnaire. Once invested in their chosen securities, clients are able to change their investments at any time, provided these investments fit within the restrictions.

Clients will be able to select specific securities or restrict the purchase of specific securities.

Certain transactional costs will still be paid by the client, including transaction fees for the purchase or sale of securities, expenses related to the use of margin, the fees (including expense ratios) charged to shareholders of mutual funds or ETFs, short-term redemption fees, mark-ups and mark-downs, spreads, odd-lot differentials, paper statement fees, fees charged by regulatory agencies, exchange fees, American Depositary Receipt fees, transfer taxes, fees required by law.

These fees may be charged by client's brokerage account provider, but not charged by Truss. Truss may charge wire transfer fees.

A client's portfolio may be comprised of Treasury Bills, Treasury Notes, Treasury Bonds, Fixed income money market funds and ETFs, Certificates of Deposits, Corporate Bonds, and Municipal Bonds only.

Our site also monitors the client's accounts periodically to ensure that they fall within the client's suitability restrictions. If any changes are needed to the client's investments, we will recommend the changes to the client through the application. These recommendations may involve selling a security or group of investments and buying others. However, we do not do any other kind of monitoring or review. The client will also receive statements at least quarterly from the client's account custodian. Our Investment Advisory Agreement outlines the responsibilities of both the client and Truss.

## Item 5. Fees and Compensation

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Truss charges an Advisory Fee to clients based on a percentage of assets under management.

The specific Advisory Fee charged by the Firm for its advisory services will be outlined in each client's Investment Advisory Agreement.

The Advisory Fee charged by Truss is a 0.5% fee on assets under management. Truss charges this fee monthly in arrears and defines assets under management for the fee calculation as the average daily balance of assets over the month for which the fee has accrued. Truss reserves the right to charge a lower amount than this to clients.

We deduct fees from the Client's advisory account, monthly. Clients pay the fees even if they do not have any transactions.

Each time a client uses our advisory services, they reaffirm their agreement that we may charge their account for the specified period. In the event that we cannot charge Advisory Fees to the Client's account, we reserve the right to terminate a client's access to our advisory services. Each Client may also terminate our services at any time, at which any accrued fees that have not been yet charged shall be charged prior to account termination and withdrawal.

The qualified custodian agrees to deliver an account statement, at least quarterly, directly to the client, showing all disbursements from the account. The client is encouraged to review all account statements for accuracy. We will receive access to a duplicate copy of the statement that was delivered to the client.

For the initial period of portfolio management services, the first period's fees will be calculated on a pro-rata basis at the beginning of the following month, for the payment in arrears. After signing up, a client may terminate the agreement through the site at any time.

## Item 6. Performance-Based Fees and Side-By-Side Management

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Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. Side-by-side management occurs when advisers manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee. We do not accept performance-based fees, nor do we engage in side-by-side management.

## Item 7. Account Requirements and Types of Clients

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Clients participating in advisory services include individuals and small businesses. There is no account minimum.

## Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

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Advisory services offered by Truss are sponsored by the Firm.

Truss provides limited advisory services. As discussed in Item 4, these advisory services are intended only to help clients discover and consolidate accounts owned by a deceased relative. This service relies on information provided by the client. Clients certify on an annual basis that the information they have submitted is accurate and agree to promptly update Truss should it become inaccurate in the future. However, Truss does not collect individualized information regarding every aspect of a client's personal financial situation, and, therefore, there may be important client information not considered by Truss. Clients should be aware of this limitation when considering Truss's limited advisory services.

Our advice and services are based on the individual needs of our clients as determined after analyzing and thoroughly evaluating the client's objectives, investment horizon, downturn tolerance, and risk tolerance through our questionnaire. Clients may impose reasonable restrictions on investing in portfolios with certain risk profiles by advising Truss of the degree of their risk level based on the information provided in the questionnaire.

Truss does not engage in holistic financial planning. Truss's primary approach is to provide our clients with simple access to a variety of fixed income securities. Truss may add, remove, re-categorize or replace fixed income securities offered by the program. In the event an investment is removed and replaced with another substantially similar investment, Truss will liquidate Client positions to cash and directly initiate a reinvestment in the replacement investment. In the event an investment is re-categorized from a suitability standpoint, the investment may be liquidated to cash if the investment is no longer suitable for the Client and a new re-investment recommendation will be made to the Client based on the Client's new suitability profile.

The suitability questionnaire comprises of the following questions asked to clients prior to onboarding with Truss:

- How would you like to invest: Avoid Losses, Balance Risk, Maximize Returns

- How would you react to a downturn - I would sell off my holdings, I would wait and see what happens, I would buy more holdings
- When will you need your returns - Short-Term (0-2 years), Medium Term (2-5 years), Long Term (5+ years)

Truss does not offer its own strategies or investment portfolios. Truss offers the fixed-income securities available through its brokerage partner, and allows clients to make unilateral decisions on their investment allocation, subject to the reasonable restrictions put in place by Truss.

## **A. Risk of Loss**

There are always risks to investing. All clients should be aware that all investments are subject to the potential loss of principal that clients should be prepared to bear.

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

### **1. General Risks**

It is impossible to describe all possible types of risks which may affect investments. Some general risks associated with investing include the following:

- Concentration Risk. To the extent a portfolio is concentrated in assets related to a particular industry or geographic region, the portfolio will be subject to additional volatility risks associated with such industry or region. In addition, concentrating in a single industry or group of industries may be more susceptible to any single economic, market, political or regulatory occurrence affecting that industry or group of industries.
- Market Risk. Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- Currency Risk. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Interest Rate Risk. Movements in interest rates may directly cause prices of fixed income securities fluctuate. For example, rising interest rates can cause "high quality, relatively safe" fixed income investments to lose principal value.
- Credit Risk. Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client. For example, if debt obligations held by an account are downgraded by ratings agencies or go into default, or if management action, legislation or other government action reduces the

ability of issuers to pay principal and interest when due, the value of those obligations may decline, and an account's value may be reduced. Because the ability of an issuer of a lower-rated or unrated obligation (including particularly

"junk" or "high yield" bonds) to pay principal and interest when due is typically less certain than for an issuer of a higher-rated obligation, lower rated and unrated obligations are generally more vulnerable than higher-rated obligations to default, to ratings downgrades, and to liquidity risk.

- Purchasing Power Risk. Purchasing power risk is the risk that an investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- Maturity Risk. The value of bonds or notes may change from the time of issuance to the time of maturity. Generally speaking, maturity risk increases as the length of time until maturity increases.
- Liquidity Risk. Liquidity is the ability to readily convert an investment into cash. For example, Treasury Bills are highly liquid, while real estate properties are not. Some securities are highly liquid while others are highly illiquid. Illiquid investments carry more risk because it can be difficult to sell them.
- Political Risk. Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- Regulatory Risk. Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- Risks Related to Investment Term. If the client requires a liquidation of their portfolio during a period in which the price of the security is low, the client will not realize as much value as they would have had the investment had the opportunity to regain its value, as investments frequently do, or had it been able to be reinvested in another security.
- Horizon and Longevity Risks. The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.
- Business Risk. Many investments contain interests in operating businesses. Business risks are risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.



- Financial Risk. Many investments contain interests in operating businesses. Excessive borrowing to finance a business' operations decreases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- Default Risk. This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- Cybersecurity Risk. There is cybersecurity risk with the increased use of technologies such as the Internet to conduct business. Truss and its service providers are susceptible to operational, information security, and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cyber incidents affecting us or our service providers have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, the inability of clients to transact business, violations of applicable privacy and other law. While both we and our service providers have established business continuity plans in the event of such cyber incidents, there are inherent limitations in such plans and systems including the possibility that certain risks have not been identified. Furthermore, we are unable to control the cyber security plans and systems put in place by our service providers or any other third parties whose operations may affect us and or its clients. As a result, Truss and its clients could be negatively impacted.
- Robo-adviser Risk. The inherent risk with automated investment advice (or a "robo-adviser") is that it lacks human judgment and oversight. A robo-adviser might rely on broad assumptions that may not reflect current economic conditions or a client's particular situation. Algorithms may not comprehensively provide personalized recommendations based on a client's overall tax situation, other investments a client may own, and the client's ability or desire to withstand losses. The algorithm might suggest securities to client accounts without regard to market conditions at an inopportune time. The algorithm may not address prolonged changes in market conditions. It is possible that Clients or Truss itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to Truss's software-based investment advisory service.

## **2. Specific Risks**

There are also risks related to recommendation of specific types of securities. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend and some of their inherent risks are provided below.

Treasury Securities Risk. Treasury securities, encompassing Treasury bills, notes, and bonds, are debt obligations issued by the United States Government. While commonly regarded as secure investment vehicles due to their backing by the full faith and credit of the United States Government, these instruments are not devoid of risk. Interest rate risk is paramount; an inverse relationship exists between interest rates and the market value of existing Treasury securities. Thus, an ascension in interest rates precipitates a diminution in the value of these securities, as newly issued Treasuries may proffer more attractive yields. Additionally, inflation risk is a significant concern, particularly with long-term holdings. The fixed interest payments of Treasury securities may be subject to the erosive effects of inflation, thereby impacting real returns. Reinvestment risk emerges in scenarios of declining interest rates, where the reinvestment of interest income or principal from maturing Treasuries may yield suboptimal returns. While the risk of default is typically minimal, it is not entirely absent, especially in scenarios of acute political or fiscal crises that could impede the U.S. Government's capability to fulfill its financial obligations. Furthermore, the yield offered by Treasury securities is generally lower than that of other investment vehicles, such as equities or corporate bonds, potentially rendering them insufficient for investors seeking higher growth trajectories.

Municipal Bonds Risk. Municipal bonds, commonly known as "munis," are debt securities issued by states, cities, counties, and other governmental entities to fund public projects. While they offer certain tax advantages, such as tax-free interest income at the federal level and sometimes at the state and local levels, they are not without risk. Credit risk is a primary concern; the financial health of the issuing entity directly impacts its ability to meet interest and principal payments. Economic downturns, budget deficits, and other fiscal challenges can affect the creditworthiness of issuers. Interest rate risk is also significant; similar to other types of bonds, the market value of municipal bonds inversely correlates with interest rate movements. Inflation risk poses another threat, particularly for longer-term municipal bonds, as inflation can erode the purchasing power of the fixed interest payments. Liquidity risk is notable too; some municipal bonds may have limited marketability, potentially making it difficult to sell the bond before maturity without incurring a significant price concession. Additionally, while default rates for municipal bonds are historically low, they are not non-existent, and the recovery rate in the event of default can vary greatly. Investors should also be aware of potential changes in tax laws that could affect the tax-exempt status of municipal bond interest, altering their attractiveness as an investment.

Certificates of Deposit Risk. Certificates of Deposit (CDs) are time-bound deposit instruments offered by banks and credit unions, providing a fixed interest rate over a specified term. While CDs are generally perceived as stable and low-risk investments, particularly since they are often insured by the Federal Deposit Insurance Corporation (FDIC) up to certain limits, they are not devoid of risks. Interest rate risk is a key consideration; in an environment of rising interest rates, the locked-in rate of a CD may become less competitive compared to newly issued CDs or other investment vehicles, potentially leading to opportunity costs for the investor. Inflation risk also warrants attention, as the fixed returns from CDs may not keep pace with inflation, thereby eroding the real value of the investment over time. Liquidity risk is another factor, given that withdrawing funds from a CD prior to its maturity typically incurs substantial penalties, thus limiting the investor's access to their funds in case of financial need. Additionally, the safety and security of CDs rely on the solvency of the issuing institution; while FDIC insurance offers a layer of protection, it is crucial to understand the limits and conditions of this insurance. Furthermore, CDs typically offer lower returns compared to more volatile investment vehicles like stocks or bonds, which may render them less suitable for investors with higher risk tolerance or growth objectives.

#### Item 9. Disciplinary Information

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Truss is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures to report in response to this Item.

#### Item 10. Other Financial Industry Activities and Affiliations

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Truss does not have a related person that is:

- A broker/dealer, municipal securities dealer or government securities dealer or broker
- An investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- An investment adviser or financial planner
- A futures commission merchant, commodity pool operator or commodity trading advisor
- A banking or thrift institution
- An Accountant or accounting firm
- A lawyer or law firm
- An insurance company or agency
- A pension consultant
- A real estate broker or dealer
- A sponsor or syndicator of limited partnerships.

Truss manages client accounts in accordance with their risk profile and the software provided by Atomic to monitor client accounts quarterly, only for suitability based on their responses to the suitability questionnaire. Truss does not rebalance or execute trades on behalf of clients without their direction. On a periodic basis, Truss asks clients to update their profile.

Truss will provide investment advice exclusively through its mobile application.

Clients will not be able to directly contact Truss's portfolio managers for investment advice. Clients may contact Truss for technical and customer service issues via email at [help@trusspayments.com](mailto:help@trusspayments.com), but not for investment advice.

## Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

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Truss, its management, and supervised persons (collectively "personnel"), subscribe to a Code of Ethics. The Code of Ethics is designed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. The Firm's inherent fiduciary duty requires that the Firm act solely in its clients' best interest and adhere to standards of utmost integrity in its communications and transactions. These standards ensure that clients' interests are preeminent.

Accordingly, Truss has implemented extensive policies, guidelines, and procedures that promote ethical practices and conduct by all of the Firm's personnel. The Firm's Code of Ethics specifies and prohibits certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest), as well as to establish reporting requirements and enforcement procedures relating to personal transactions by its personnel. The Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes the Firm's ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. The Firm will provide a copy of the complete Code of Ethics to any client or prospective client upon request.

### **1. Proprietary Trading**

Truss and its representatives are permitted to buy or sell securities for their own accounts that the Firm also recommends to clients, consistent with the Firm's policies and procedures. This presents a conflict of interest because it may be possible for us or our representatives to receive more favorable prices than our clients. We will always document any transactions that could be construed as a conflict of interest. To mitigate this conflict of interest, we will monitor trading reports for adherence to our Code of Ethics.

### **2. Participation or Interest in Client Transactions**

The Firm does not recommend that clients buy or sell securities in which it or a related person may have a material financial interest.

## Item 12. Brokerage Practices

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Truss currently requires Apex Clearing Corporation ("Apex") as a broker-dealer and custodian for our clients. In this respect we may be deemed to routinely direct our clients to execute transactions through specified broker dealers.

In making this decision we take into account, commission rates, execution quality, service and compatibility with Truss's software. By directing orders to Apex, we may be unable to achieve

the most favorable execution for our clients' transactions. Apex may send our clients' orders to another broker-dealer for execution. Apex charges no commission fee per trade.

We do not receive research or other products or services (i.e., soft dollar benefits) from Apex or other broker-dealers in exchange for placing trades or processing securities related transactions for clients.

We do not receive client referrals or compensation of any kind from Apex or other broker-dealers or other third parties in exchange for using any particular broker-dealer.

We do not block trade.

### Item 13. Review of Accounts

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Truss is continuously accessible by clients through its mobile application.

We periodically review their accounts using an automated algorithm to determine quarterly whether clients have made any investments that their suitability questionnaire answers would deem unsuitable.

Outside of this, we do not review client accounts.

### Item 14. Client Referrals and Other Compensation

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Truss does not receive referral compensation. We do currently engage in the use of client testimonials and endorsements relevant to the new Marketing Rule.

### Item 15. Custody

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The investments in each client's account are held in a separate account in the name of the client at Apex, and not with Truss. All investment accounts managed through our platform are required to use Apex as the independent custodian.

Truss invoices its advisory fee directly from the client's brokerage account.

### Item 16. Investment Discretion

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While Truss does make recommendations to the client, the firm has discretionary authority over the securities to be bought or sold, the amount, and the time when securities are purchased or sold, only in the scenario that the client has allowed Truss to liquidate all or portions of the client's portfolio to cover incoming debit requests.

Truss does not buy or otherwise sell securities on behalf of the client unless directed by the client to do so.

As Truss's site is set up to direct all client trades to Apex, the Firm does have discretionary authority over the brokerage used by the client to purchase or sell securities.

#### Item 17. Voting Client Securities

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Truss does not participate in proxy voting on behalf of clients. Our clients are responsible for directing their own proxies solicited by issuers of securities. Clients are responsible for making elections relative to mergers, acquisitions, tender offers, bankruptcy proceedings and other type events pertaining to the securities in your account. Proxy and other solicitation information will be emailed to clients from the brokerage they connect to Truss. Clients may not contact us with questions about a particular solicitation. Please follow the instructions for proxy voting included in the mailing.

#### Item 18. Financial Information

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Truss does not require or solicit the prepayment of more than \$1200 in fees six months or more in advance of services rendered. We do not have a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients and we have not been the subject of a bankruptcy petition at any time during the past ten years.