



FORM ADV 2A BROCHURE

ADVISORS CRYPTO, INC.
6500 RIVER PLACE BLVD
BUILDING 7, SUITE 250
AUSTIN, TX 78730
www.advisorscrypto.com

February 13, 2024

This brochure provides information about the qualifications and business practices of Advisors Crypto, Inc. (CRD# 109201). If you have any questions about the contents of this brochure, please contact us at 800.542.4916. 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 is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 – MATERIAL CHANGES

We have made the following material changes since the last annual update to this brochure on March 31, 2023:

Item 4 and Item 18 – removed mention of CFP. Eric Kendrick chose not to renew his license.
Item 9 – added discussion about the firm’s disciplinary information policy.

.....

We will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business’ fiscal year.

ITEM 3 - TABLE OF CONTENTS

ITEM 2 - MATERIAL CHANGES	ii
ITEM 3 - TABLE OF CONTENTS	1
ITEM 4 - ADVISORY BUSINESS.....	2
Ownership	2
Our Advisory Services.....	2
Limited Financial Planning Services	3
Tailored Services	3
Assets under Management	3
ITEM 5 - FEES AND COMPENSATION	3
Compensation	3
Investment Management	4
Limited Financial Planning	4
Tax & Administration Services	5
Third-Party Expenses	5
Termination	5
Investment Management	5
Limited Financial Planning	5
Other Compensation	5
ITEM 6 - PERFORMANCE-BASED FEES SIDE-BY-SIDE MANAGEMENT	5
ITEM 7 - TYPES OF CLIENTS	6
Investment Management	6
Limited Financial Planning	6
ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS.....	6
Analysis and Strategies	6
Risk of Loss.....	7
ITEM 9 - DISCIPLINARY INFORMATION	10
ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	10
Accounting Firms	10
ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING	11
Code of Ethics	11
Material Financial Interest	11
Concurrent, Same Securities Transactions	11
ITEM 12 - BROKERAGE PRACTICES.....	11
Selecting and Recommending Broker-Dealers	11
Trade Aggregation.....	12
ITEM 13 - REVIEW OF ACCOUNTS.....	13
Account Review	13
Investment Management	13
Limited Financial Planning	13
Reporting	13
ITEM 14 - CLIENT REFERRAL AND OTHER COMPENSATION	13
ITEM 15 - CUSTODY	13
ITEM 16 - INVESTMENT DISCRETION	14
ITEM 17 - VOTING CLIENT SECURITIES.....	14
ITEM 18 - FINANCIAL INFORMATION	14



ITEM 4 - ADVISORY BUSINESS

Ownership

Advisors Crypto, Inc., hereinafter referred to as "AC", the "firm" or "we", is an SEC registered investment advisory firm, wholly owned by KG Advisors IV, LP, which is majority owned by KG, Inc. Eric Kendrick is KG, Inc.'s majority owner.

Our Advisory Services

AC provides discretionary investment advisory services to clients separately managed accounts primarily over the internet via its interactive online platforms. Our programs seek to provide personalized, long-term oriented investment portfolios that are invested in our proprietary equity, balanced and cryptocurrency model strategies. Each model strategy is comprised primarily of a concentrated basket of equities (long) along with possible hedging to protect against market downturns (short). The cryptocurrency model strategy is comprised of large-cap cryptocurrency assets ("crypto assets").

AC aims to grow clients' capital over a multi-year time horizon and full market cycle. Clients are invested in a personalized blend of our strategies based on personal information, including investment risk and financial parameters. An algorithm is used to then monitor portfolios and the respective mix in each strategy.

AC uses the information from a suitability questionnaire to tailor its investment recommendations in accordance with each client's investment risk and financial parameters and objectives.

For each Client's portfolio plan, AC considers the client's employment status, income, investment goals and reasons to invest, time horizon and net assets. AC evaluates each client's responses and proposes a portfolio plan from among conservative, moderate to aggressive growth portfolios.

The model portfolio recommendation created by AC for each client is based solely upon the information provided in the suitability questionnaire. As such, the investment plan recommendations are limited by and relies on the accuracy and completeness of the information provided by the Client. AC does not capture any additional information not covered in the questionnaire in making its risk assessment and providing its investment advice. The only type of restrictions a client may impose are the risk level (conservative, moderate and aggressive growth) associated with their client accounts, and the amount of assets invested, if assets may be hedged, and if assets will be invested in crypto assets.

Each client is able to change his/her risk profile or select (switch to) a portfolio with a different risk profile. Clients are obligated to update their information through the AC website or app promptly if there are changes to their financial situation, goals, objectives, personal circumstances, time horizon or if other relevant information changes or becomes available.



AC monitors and manages client accounts, including but not limited to security and crypto asset selection, rebalancing, and other investment considerations. As the value of a client's investments fluctuate, the portfolio could diverge from a Client's desired risk preferences. Rebalancing, the practice of adjusting a client's portfolio back to its original desired risk preference, typically occurs during the course of AC's research processes, may occur opportunistically or on a chronological cadence. AC seeks to ensure that client assets are managed in a manner consistent with their individual investment objectives and risk tolerance, securities and crypto asset transactions effected pursuant to a model investment strategy are usually done without regard to a client's individual tax ramifications or market conditions.

Limited Financial Planning Services

Financial planning services are offered on a limited focus basis to 15 or fewer clients per year. Financial plans may encompass the following areas of financial concern to the client: Retirement Planning; Education Planning; Risk Management; Investments; Estate Planning.

A written financial plan may be prepared and provided, although in many cases there is no written comprehensive document. The implementation of financial planning recommendations is entirely at client's discretion. Financial plans are not limited in any way to products or services provided by any company and implementation may be done with any appropriately licensed firm or individual.

Tailored Services

Appropriate information will be obtained through personal interviews including a discussion of client's current financial status, future goals and attitude towards risk and the review of related documents and data provided by client.

In performing its services, AC shall rely on the information provided by clients for making, reviewing, evaluating or revising AC recommendations and/or services. Clients are responsible for advising AC if there is a change in the financial situation or investing objectives.

Assets under Management

As of March 31, 2023, the firm has \$35,485,668 in discretionary regulatory assets under management.

ITEM 5 - FEES AND COMPENSATION

Compensation

AC charges fees for investment management and our limited financial planning. The fees may be negotiated.



Investment Management

Our base fee schedule is as follows:

<i>Assets Under Management</i>	<i>Quarterly Fee</i>	<i>Equivalent Annual Fee</i>
First \$1 million of Assets	0.25%	1.0%
Next \$1 million of Assets	0.1875%	0.75%
Assets over \$2 million	0.125%	0.5%

Some clients may pay more or less in investment advisory fees than others depending on certain factors, including but not limited to the number, type and size of the accounts(s); the transaction activity; the amount of client relationship assets under management; and the managed account strategies in which the client participates.

Investment management fees could range from a minimum of $\frac{1}{4}$ of 1% to 1.75% annually, depending on the factors described above. For example, smaller accounts will generally be charged a higher percentage asset-based fee as well as accounts with a more active trading strategy or model holdings requiring more monitoring and research. Fixed income portfolios will generally be charged a lower percentage asset-based fee than an equity-based portfolio. Before services begin, each client will receive a fee quote and will be given the opportunity to agree to the fee before any charges are incurred.

At inception, fees are billed from the date the account is opened through the end of the calendar quarter in advance. Thereafter, fees are billed in advance for the next calendar quarter. With a client's written authorization, fees are deducted from the client's account. Clients should verify the fee calculation and compare with the amount of the fee deducted from their account(s) as reflected on the statement provided by the account custodian.

For investment management clients who maintain accounts with a custodian other than our primary custodian, we use ByAllAccounts and will bill on the asset value of the managed account. Thus, clients may be billed on the combined asset value for all of their accounts, Schwab and Non-Schwab.

Limited Financial Planning

Fixed fees refer to the preparation of financial plans, with a minimum fee of \$500 and may range up to \$3,000 or above calculated on an hourly fee basis (generally, \$300/hour) which is paid after the consultations. Again, clients with complex situations involving multiple accounts or entities, multiple goals, various areas for review, research required, and number of meetings will generally be charged more, as these plans will take more time to prepare, than those with less complex financial situations to be evaluated. Clients will be provided with a fee quote prior to AC beginning any services. The fee quoted to the client will be calculated based on AC's hourly rate and taking into consideration the factors described above.



Tax & Administration Services

Fees for tax return preparation and family office administration services may be charged separately and will generally be billed at an hourly rate of \$150 and may be negotiated based on the complexity of the task.

Third-Party Expenses

Clients will also incur certain charges imposed by third parties (custodians, broker-dealers, platforms, and others) regarding investments made or recommended. These commissions, fees and charges may include but are not limited to the following: brokerage commissions; transaction, exchange, trade away and clearing fees; account, wire, and electronic fund transfer fees; margin interest; custodial fees; administration and termination fees; and other costs and expenses. We do not receive any portion of these commissions, fees, and charges.

We may also invest in mutual funds and exchange traded funds. Retail investors bear the costs and expenses charged by these fund(s) to their shareholders, such as management and administrative fees, in addition to our advisory fees. These costs and expenses are set forth in the prospectuses for these investment funds. These investment funds will be included in calculating the value of the account(s) for purposes of computing our asset-based fee.

Termination

Investment Management

If the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering any written advisory contract with us, then the client has the right to terminate the contract without penalty within five business days after entering the contract. For the purposes of this provision, a contract is considered entered when all parties to the contract have signed the contract, any other provisions of this contract notwithstanding.

If a client cancels the contract, any pre-paid fees will be refunded on a prorated basis. Client may cancel at any time.

Limited Financial Planning

Our financial planning services may be billed in advance, and/or in arrears, and will be negotiated with client. Any unearned prepaid fees will be returned to client.

Other Compensation

Neither AC nor its employees receive commission compensation for the sale of securities.

ITEM 6 - PERFORMANCE-BASED FEES SIDE-BY-SIDE MANAGEMENT

AC does not charge performance-based fees. Performance-based fees are fees based on a share of capital gains or capital appreciation of the assets of a client.



ITEM 7 - TYPES OF CLIENTS

AC generally provides investment advice to individuals and high net worth individuals and the entities they may have.

Investment Management

There are no minimum account requirements for a client to participate in the advisory services offered by AC. However, the independent money managers that may be selected generally do have account minimums. Please see their disclosure document.

Limited Financial Planning

We do have a minimum fee for our financial planning services of \$500.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

Analysis and Strategies

We offer discretionary investment advisory services to retail investors with separately managed accounts primarily over the internet. As part of our regular services, our software provides ongoing monitoring and periodic rebalancing of investment in the accounts that are managed. We use information you provide from a suitability questionnaire to tailor investment recommendations in accordance with risk, financial parameters and objectives. We seek to provide personalized, long-term oriented investment portfolios that are invested in proprietary equity, bond and cryptocurrency strategies. The information we gather about you is limited in scope and may not consider all relevant factors of your personal financial situation. The service is provided with limited, if any, human interaction. Because of these limitations, automated investing might not be the best way for you to invest.

Providing discretionary services means, our programs will determine the following without consulting you, in advance: the assets to be bought or sold; the amount of assets to be bought or sold; and the broker or dealer to be used for a purchase or sale of securities. You grant us discretionary authority, which means we can buy and sell investments on your behalf when we determine it is appropriate to do so. We trade in response to your actions (such as asset allocation changes, deposits, or withdrawals), to rebalance your accounts, or to otherwise further your investment goals.

AC utilizes model portfolios as a starting point in designing an investment strategy tailored to each client's investment objectives. Each model has a predetermined investment objective and risk profile. Some models have asset allocation and rebalancing criteria. For each model, our software runs applicable quantitative screens to create a manageable opportunity set which can be analyzed further. AC may partner with third parties for independent research and analysis of capital markets activity and events, asset allocation and style allocation advisories.



AC utilizes several different methods of analysis including charting, fundamental, technical, and cyclical. AC has developed a research process, which includes both qualitative and quantitative factors, and long-term price momentum indicators used primarily to recognize major downturns and upturns in asset classes, while providing buy, sell and/or hedging signals. These methods, among others, are used to monitor and manage each client's portfolio. The equity and bond strategies consist primarily of a concentrated basket of exchange traded funds (long) along with possible hedging to protect against market downturns (short). The cryptocurrency strategy consists of large-cap cryptocurrency assets ("crypto assets"). AC presents to the client recommendations which in our professional judgement will best serve their investment needs.

Risk of Loss

General: Investing in securities involves risks of loss that clients should be prepared to bear. Both equity and fixed income investments may lose value due to market fluctuations, interest rate pressures, corporate changes, political changes, or other outside factors. High concentrations in individual equities carry additional risk associated with the performance of a single company's stock. The performance of any investment is not guaranteed.

Equity Investments: Equity investments carry a relatively high degree of risk, including market, liquidity, counterparty credit, legal and operational risk, as well as risks owing to the business and financial uncertainties facing individual issuers. Changes in economic conditions, including interest rates, trends, tax laws and innumerable other factors can affect substantially and adversely the prospects of any issuer.

Fixed Income Investments: Investment in fixed income securities (including preferred securities) may offer opportunities for income and capital appreciation, and also may be used for temporary defensive purposes and to maintain liquidity. Fixed income securities are obligations of the issuer to make payments of principal and/or interest on future dates, and include, among other securities: bonds, notes, and debentures issued by corporations; debt securities issued or guaranteed by the U.S. government or one of its agencies or instrumentalities or by a foreign government; and municipalities.

These securities may pay fixed, variable, or floating rates of interest, and may include zero coupon obligations. Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations (*i.e.*, credit risk) and are subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer, and general market liquidity (*i.e.*, market risk).

Mutual Funds: Mutual funds and exchange traded funds/trusts are managed independently of a client's account and incur additional fees and/or expenses which would, therefore, be borne indirectly by the client's account in connection with any such investment. These investments are subject to the same risks as the underlying investments.



Short Selling: Short selling involves selling securities which may or may not be owned and borrowing the same securities for delivery to the purchaser, with an obligation to replace the borrowed securities at a later date. Short selling allows an investor to profit from declines in securities. A short sale creates the risk of a theoretically unlimited loss, in that the price of the underlying security could theoretically increase without limit, thus increasing the cost of buying those securities to cover the short position. There can be no assurance that the security necessary to cover a short position will be available for purchase. Purchasing securities to close out a short position can itself cause the price of the securities to rise further, thereby exacerbating the loss. In addition, regulation modifying, preventing and/or limiting short sales may adversely affect the ability of certain Alternative Investment funds to meet their investment objectives.

Margin Transactions: Trading securities on margin results in interest charges and, depending on the amount of trading, these charges could be substantial. Interest rate levels at which we borrow can affect results. Further, fluctuations in the value of the collateral may cause a margin call requiring additional money or securities to meet the maintenance requirements.

Options: We may purchase exchange-listed and over-the-counter put and call options on specific investments. In addition, we may write (or sell) covered or uncovered call and put option contracts. A call option gives the purchaser of the option the right to buy, and obligates the writer to sell, the underlying investment at a stated exercise price at any time prior to the expiration of the option. Similarly, a put option gives the purchaser of the option the right to sell, and obligates the writer to buy, the underlying investment at a stated exercise price at any time prior to the expiration of the option. Options written may be wholly or partially covered (meaning that the writer holds an offsetting position) or uncovered. Options on specific investments may be used to seek enhanced profits with respect to a particular investment. Alternatively, they may be used for various defensive or hedging purposes. For example, they may be used to protect against a future adverse change in the market price of particular portfolio investments held without requiring a sale of these investments.

The use of put and call options may result in losses, force the sale or purchase of investments at inopportune times or for prices higher than (in the case of put options) or lower than (in the case of call options) current market values, limit the amount of appreciation realizable on an investment, or cause the holder thereof to hold an investment it might otherwise sell.

Digital Assets and Cryptocurrencies: Cryptographically secured currencies and/or digital assets (collectively, “Cryptocurrencies”) present a high level of inherent risk and are not suitable for all investors. Cryptocurrencies (including, but not limited to, Bitcoin), often referred to as “virtual currency”, “digital currency,” or “digital assets,” operate as decentralized, peer-to-peer financial exchanges and value storages that can be used like money.



Cryptocurrencies are not currently considered legal tender in the United States. Federal, state or foreign governments may restrict the use and exchange of Cryptocurrencies, and regulation in the U.S. is still developing. The SEC has issued a public report stating U.S. federal securities laws require treating certain Cryptocurrencies as securities. Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to its relatively recent launch, Cryptocurrencies have a limited trading history, making it difficult for investors to evaluate the long-term track record of such investments.

Cryptocurrencies are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of Cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer Cryptocurrencies may affect investment performance.

Specifically with respect to Bitcoin, it is possible that a cryptocurrency other than Bitcoin could become materially popular, which could have a negative impact on the demand for and price of Bitcoin. It is possible that another entity could manipulate the blockchain in a manner that is detrimental to the Bitcoin network.

Inverse/Leveraged Funds: Advisors Crypto may also utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index); and/or (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market.

Although hedging strategies in general are usually intended to limit or reduce investment risk, they may not achieve the anticipated effect. In fact, they may result in poorer overall performance for the portfolio than it could have achieved had it not engaged in such hedging transactions. Furthermore, the portfolio will always be exposed to risks that cannot be hedged.

As a result of the risks associated with these product types, Advisors Crypto only utilizes Cryptocurrencies and inverse/leveraged funds as components of a broader investment strategy within its managed models. Of course, there can be no guarantee that this strategy will be effective or successful. Accordingly, clients may at any time restrict Advisors Crypto's use of Cryptocurrencies, leveraged funds, or inverse funds in their account(s) by providing written notice to Advisors Crypto.

In accordance with the client's wishes, AC implements the suggested financial strategies. At least once a year, AC requests client's financial situation be updated to reflect any significant changes in either lifestyle or investment goals.



Automated Investing: The use of automated investing will rely on static questionnaires consisting of a limited number of questions that form the sole basis for its investment recommendations. Such questionnaires are very limited in nature. The questions may not, or may not accurately, capture an individual client's needs. Although clients may change and update their responses, where AC does not, at this time, make investment advisory personnel available to clients to highlight and explain important concepts or clarify the details of a specific client's financial goals and needs. Online and electronic interactions risk being more limited compared to face-to-face individual advice.

ITEM 9 - DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Advisors Crypto or the integrity of its management. Neither Advisors Crypto nor its management persons have been the subject of legal or regulatory findings, or are the subject of any pending criminal proceedings that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our firm. (Additional information regarding pending litigation as provided in Part 1A of Form ADV is available to clients upon request.)

From time to time, our firm is involved in regulatory examinations or litigation that arise in the ordinary course of our business.

In the event that we become aware of any regulatory matters or litigation that we believe would be material to an evaluation of our advisory business, we promptly notify all clients or prospects affected by those events, subject to applicable law and regulation. It is conceivable that we could choose to disclose a regulatory matter or litigation to one client but not another based on the materiality of the matter relative to the services we provide to a particular client.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Accounting Firms

Suzie Blair, CPA, a member of our staff, is a certified public accountant. She offers accounting services, in her individual capacity. Most of her time is spent working with AC and its affiliated personnel. Her accounting activities pose a conflict of interest. The firm mitigates this conflict by providing you with these disclosures and maintaining a Code of Ethics.



ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

AC's Code of Ethics ("Code") has been designed to comply with the requirements of Rule 204A-1 of the Investment Advisers Act of 1940. Among other things, the Code (i) requires that all employees comply with applicable federal and state securities laws, (ii) requires that access persons submit to AC reports containing their personal securities holdings and transactions in reportable securities, and that AC review such reports, (iii) requires access persons to obtain pre-approval of certain personal investments; and (iv) contains policies and procedures designed to prevent the misuse of material, non-public information. All personnel of AC are required to certify their compliance with the Code of Ethics.

AC will provide a copy of its Code of Ethics to a client or prospective client upon request.

Material Financial Interest

AC does not have a material financial interest in the securities that it recommends, buys, or sells its clients.

Concurrent, Same Securities Transactions

Access persons are permitted to invest in their personal trading accounts, subject to certain restrictions, and may in certain circumstances invest in the same or related securities as the clients of AC, including in some instances doing so at or about the same time as a AC client transaction is entered.

AC manages the conflicts of interest inherent in employee personal trading by enforcement of its Code of Ethics, which contains pre-clearance and reporting guidelines. Specifically, AC's Code requires access persons to obtain prior written approval from the Chief Compliance Officer before engaging in certain transactions in their personal accounts. The Chief Compliance Officer may only approve the transaction if he concludes that the transaction would comply with the provisions of the Code and is not likely to have any adverse economic impact on clients.

The Chief Compliance Officer reviews each access person's personal transaction reports to make sure each access person is conducting his or her personal securities transactions in a manner that is consistent with the Code.

ITEM 12 - BROKERAGE PRACTICES

Selecting and Recommending Broker-Dealers

AC recommends clients establish brokerage accounts with certain FINRA-member broker-dealers/custodians. These custodians make services available to AC on an unsolicited basis, at no charge. These services include the execution of securities transactions, custody, research, and access to mutual funds and other investments.



Many of these products and services are used to service AC accounts, including software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of AC fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services maybe intended to help AC manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Broker dealer/custodians may make available, arrange and/or pay third-party vendors for the types of services rendered to AC, or may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to AC.

In evaluating whether to recommend clients custody their assets at a custodian/broker dealer, AC will consider the availability of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by custodian/broker dealer, which creates a conflict of interest.

AC does not have any formal soft dollar relationships.

Trade Aggregation

Commensurate with our duty of best execution and to secure certain efficiencies and results with respect to execution, clearance and settlement of orders, the firm will combine, aggregate or "bunch" (also known as a block trade) an order entered for clients with orders entered for the same security for other clients. Block trading for the purchase or sale of securities for various client accounts will be used where doing so may result in more equitable, timely and/or efficient execution of the transactions.

The custodian will use the average price at which a security is bought or sold for the clients involved in the transaction when a bunched order is executed in parts at different prices, or when two or more separate orders for the same security are entered at approximately the same time and are executed at different prices. If a bunched order is not executed in its entirety a client may buy or sell less of a security than if the order was not bunched. Similarly, when price averaging is used some clients will get a better price while others will get a worse price than they would have received if price averaging was not used.

The firm will strive to allocate in a manner that is fair and equitable for its clients over time when aggregating and price averaging. The overarching principle is that no client is intentionally favored over another client that is similarly situated.



ITEM 13 - REVIEW OF ACCOUNTS

Account Review

Investment Management

AC software monitors client portfolios and underlying strategies on an ongoing basis, not less than quarterly, utilizing an algorithm, to identify situations that may warrant a more detailed review or a specific action on behalf of a client. Such reviews include, but are not necessarily limited to, inactivity, unusual funding behavior, and material changes in the economic or market environment. Additionally, AC will contact or remind clients on an annual basis to ask if there have been any changes to their financial situation and investment objectives, and to update their information. AC, as applicable, conducts reviews when material changes may have occurred to a client's portfolio or investment objectives.

Limited Financial Planning

Financial planning clients set the frequency of their reviews based upon necessity, hourly billing, and analysis or consulting required.

Reporting

Investment management clients receive brokerage statements and transaction reports from their individual custodians on at least a quarterly basis. Financial planning clients receive reviews and analysis, as requested.

ITEM 14 - CLIENT REFERRAL AND OTHER COMPENSATION

AC occasionally offers clients referrals for professional services that it does not provide such as legal services, banking services, etc. The firm does not receive any financial incentive for providing these referrals.

Other professionals or clients occasionally refer prospective clients to AC. We do not pay for these referrals.

ITEM 15 - CUSTODY

AC is deemed to have custody of client assets when we deduct our fee from your account. When we have custody for this reason, the firm is required to maintain client assets with qualified custodians and these custodians must directly send each client quarterly account statements. Clients should carefully review the statements received from the custodian. Clients should verify the fee calculation and compare with the amount of the fee deducted from their account(s) as reflected on the statement provided by the account custodian.

AC may be hired to manage accounts with custodians other than our primary custodian. In these circumstances, AC will utilize ByAllAccounts to enable us to provide reporting, financial analysis, and investment management on such outside assets. We do not



maintain client credentials. When ByAllAccounts is used, the credentials will be maintained by client, not AC. AC may decline to manage an account with a custodian that is not available on the ByAllAccounts platform.

ITEM 16 - INVESTMENT DISCRETION

AC provides discretionary services in the management of client investment accounts. Discretionary authority authorizes AC to buy, sell, and trade the investments in the client's account without prior consultation. AC discretionary management will be consistent with the client's goals, tolerance for risk, and investor profile, as updated by the client. Client may provide AC a limited power of attorney to implement and service investment accounts.

ITEM 17 - VOTING CLIENT SECURITIES

AC does not vote client proxies. Clients may contact AC for questions on proxies. However, the ultimate decision to vote and how to vote remains with the client.

ITEM 18 - FINANCIAL INFORMATION

Registered investment advisers are required to provide you with certain financial information or disclosures about the firm's financial condition. AC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.



PRIVACY POLICY

At Advisors Crypto, Inc. we respect client's personal financial privacy. We realize that clients have entrusted us with private personal financial information, and it is important to us that you know our policy concerning what we do with that information. These policies apply to our current and former customers.

We collect personal financial information about you from the following sources:

- Information you provide us in investment advisory agreements, brokerage account applications, and other documents you complete in connection with the opening and maintenance of your accounts with us; and
- Information you provide us orally; and
- Information we receive from third parties, such as brokerage firms, about your transactions with us or with others.

This personal information includes such things as your name, Social Security number, address and telephone numbers, net worth, annual income and account numbers.

We do not disclose any nonpublic personal financial information about you to any nonaffiliated third parties, except in the following circumstances:

- When required to execute transactions for your account or otherwise to provide services you have requested; or
- When you have specifically authorized us to do so in writing; or
- When permitted or required by law.

Within our firm, we restrict access to your personal financial information to the employees who need to know that information to provide services to you. To ensure security and confidentiality, we maintain physical, electronic, and procedural safeguards to protect your privacy including off-site backups of our computer information in a secure environment; anti-virus protection software; and password protected access to customer information.

These policies apply to both current and previous customers of AC in its role as a registered investment advisory firm. Information about our customers may be shared with its regulators.

For additional information, please feel free to contact Eric Kendrick; Compliance Supervisor at (800) 542-4916.



{PAGE BLANK}