

# Treasury Interactive Investment Advisers LLC

## Form CRS

March 29, 2024

Treasury Interactive Investment Advisers LLC (“we” or “us”) is registered with the Securities and Exchange Commission as an investment adviser. Services and fees for investment advisory and brokerage services differ and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

Throughout this document, you will see various “conversation starters” designed to help you better understand our services. The responses to these questions can be found at [www.treasury.app](https://www.treasury.app).

### What investment services and advice can you provide me?

We offer non-discretionary investment advisory services to clients that are referred to us by social media influencers who offer personal finance and investment content (“Influencer Partners”). We provide clients with access to a universe of exchange-traded funds (“ETFs”) and shares of stock of publicly traded companies that we select based on what is available through our custodian’s platform (together, “Eligible Investments”). You may select from among this universe of Eligible Investments to develop your own investment portfolio or you may invest in accordance with one or more model portfolios we develop (collectively, the “Model Portfolios”). The Model Portfolios, which are referred to as “collections” through the online interface, will be comprised solely of ETFs and stocks that are considered Eligible Investments.

We will recommend a suggested asset allocation for the ETFs and stocks within each Model Portfolio that will be based solely on your stated risk tolerance, age, and time horizon. You may accept or reject our asset allocation recommendations. In addition, you may customize the Model Portfolio you select by substituting different ETFs and stocks that qualify as Eligible Investments. You make the ultimate decision regarding the purchase or sale of investments in your account.

We will review your asset allocation periodically (currently, annually) to consider whether it aligns with your stated risk tolerance, age, and time horizon. However, we do not monitor your account or the related investments on an ongoing basis. Assets will be maintained in a brokerage account custodied with Apex Clearing Corporation (“Apex”).

Advisory services are offered exclusively through an online interface, which means that you must acknowledge your ability and willingness to conduct a relationship with us on an electronic basis and to receive all documentation related to the advisory services electronically. There is no minimum amount required to open or maintain an advisory account. Please refer to our [Form ADV, Part 2A Appendix 1](#) for more detailed information about our services.

*Conversation starters: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me?*

### What fees will I pay?

We do not charge an advisory fee to community members. The Influencer Partners separately charge members a subscription fee for services provided by the Influencer Partners through the Treasury Interactive platform. Members have the option to access our non-discretionary advisory services for no additional cost, however, they are not required to do so. We have separately entered into an agreement with the Influencer Partners, under which the Influencer Partners agree to compensate us for providing its members with financial related content and non-discretionary advisory services. We reserve the right to begin charging an advisory fee directly to clients upon ninety (90) days prior written notice. While clients do not pay for the execution of transactions, neither the fees paid by the Influencer Partners, nor any advisory fee that may be charged directly by Adviser cover certain charges imposed by the custodians, brokers, and other third parties. Each client will incur these expenses directly, and such expenses will have the effect of reducing investment returns. ETFs also charge internal management fees and other fees and expenses that are borne by each client as an investor in those ETFs. ETF fees and expenses may change at the sole discretion of the ETF issuer.

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.** Please refer to our [Form ADV, Part 2A Appendix 1](#), particularly Item 4, for more detailed information about our fees and your investment costs.

*Conversation starters: Help me understand how these fees and costs might affect my investments? If I give you \$1,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

We have an agreement with our Influencer Partners under which the Influencer Partner compensates us for providing its community members with access to general guidance, advice, and education relating to financial matters and non-discretionary advisory services. Our parent company, Treasury Interactive, owns and operates a platform that offers technology and administrative services to Influencer Partners. Each of Treasury Interactive and Adviser is paid by the Influencer Partner based upon a percentage of the subscription revenue that the Influencer Partner receives. This arrangement creates a conflict of interest as we have a financial incentive to focus on the growth of the online community. However, as a fiduciary, we are required to act in the best interest of our clients.

Our Influencer Partners will promote the advisory services we offer to their social media followers and members of their online communities. We do not pay the Influencer Partners cash or non-cash compensation for providing client referrals or otherwise generally promoting our advisory services. However, Influencer Partners, Treasury Interactive, and Adviser will benefit to the extent that our services lead to an increase in the number of followers and subscription revenues earned by the Influencer Partners.

In addition, our parent has entered into a referral agreement under which it pays an Influencer Partner a percentage of the compensation earned by Treasury Interactive in return for referring other influencers to the platform. Please refer to our [Form ADV, Part 2A Appendix 1](#), particularly Item 9, for more detailed information about our relationship with our Influencer Partners and related financial incentives and conflicts of interest.

*Conversation starters: How might your conflicts of interest affect me, and how will you address them?*

**How do your financial professionals make money?**

Our financial professionals are not paid by the investment adviser. They receive a salary and have an equity ownership interest in our parent company.

**Do you or your financial professionals have legal or disciplinary history?**

No, please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research our firm and your financial professional.

*Conversation starters: Does the firm have any disciplinary history? For what type of conduct?*

#### **Additional Information**

Please refer to our [Form ADV, Part 2A Appendix 1](#) for more information about our services. You may find a copy of our current Relationship Summary and any updated information on our website: [www.treasury.app](https://www.treasury.app) or by contacting us at [welcome@treasury.app](mailto:welcome@treasury.app).

Answers to the conversation starters we have encouraged you to consider are on our website under [www.treasury.app](https://www.treasury.app).

# Treasury Interactive Investment Advisers LLC

## Exhibit to Form CRS

March 29, 2024

Treasury Interactive Investment Advisers LLC (“Adviser”) is required to update its Client Relationship Summary (Form CRS) whenever information in the Form CRS becomes materially inaccurate. This Exhibit provides a summary of the material changes that have occurred since the last filing of the Form CRS dated November 1, 2023.

- We have updated the section ***What fees will I Pay?*** to clarify that we do not charge an advisory fee to community members. The Influencer Partners separately charge members a subscription fee for services provided by the Influencer Partners through the Treasury Interactive platform. Members have the option to access our non-discretionary advisory services for no additional cost, however, they are not required to do so. Additionally, we have separately entered into an agreement with the Influencer Partners, under which the Influencer Partners agree to compensate us for providing its members with financial related content and non-discretionary advisory services. We reserve the right to begin charging an advisory fee directly to clients upon ninety (90) days prior written notice. While clients do not pay for the execution of transactions, neither the fees paid by the Influencer Partners, nor any advisory fee that may be charged directly by Adviser cover certain charges imposed by the custodians, brokers, and other third parties.
- We have updated the section ***When we act as your investment adviser*** to disclose that we have an agreement with our Influencer Partners under which the Influencer Partner compensates us for providing its community members with access to general guidance, advice, and education relating to financial matters and non-discretionary advisory services. Our parent company, Treasury Interactive, owns and operates a platform that offers technology and administrative services to Influencer Partners. Each of Treasury Interactive and Adviser is paid by the influencer Partner based upon a percentage of the subscription revenue that the Influencer Partner receives. This arrangement creates a conflict of interest as we have a financial incentive to focus on the growth of the online community. However, as a fiduciary, we are required to act in the best interest of our clients.
- Additionally, we updated the section ***When we act as your investment adviser*** to clarify that we do not pay the Influencer Partners cash or non-cash compensation for providing client referrals or otherwise generally promoting our advisory services. However, Influencer Partners, Treasury Interactive, and Adviser will benefit to the extent that our services lead to an increase in the number of followers and subscription revenues earned by the Influencer Partners.