

MEMORANDUM

To: Crypto Task Force Meeting Log
From: Crypto Task Force Staff
Re: Meeting with Representatives of StratX LLC

On April 28, 2026, Crypto Task Force Staff met with representatives from StratX LLC.

The topic discussed was approaches to addressing issues related to regulation of crypto assets. StratX LLC representatives provided the attached documents, which were discussed during the meeting.

StratX — Meeting Agenda

SEC Crypto Task Force | April 2026 | Structured Discussion Agenda

MEETING OBJECTIVE

This meeting is intended as a focused discussion on a central question:

How can regulatory rules be applied, observed, and verified in real time across digital asset systems, without requiring regulators to directly control or operate those systems?

StratX is presented as a working, independently validated example of a supervisory architecture designed to address this challenge.

This is not a product demonstration. It is a technical and policy discussion intended to explore whether a neutral supervisory layer could support the Task Force's regulatory objectives.

PROPOSED FORMAT

- Duration: 60 minutes
- Format: Virtual or in-person
- Participants: Abel Justin Oliveira (Inventor & System Architect), Steven Tavares (Co-Founder & Co-CEO)

AGENDA OVERVIEW

0:00–0:05 | Introductions

Context:

- Background of StratX and current validation status
- Purpose of discussion and engagement objectives

0:05–0:15 | Block 1: Infrastructure Classification

Goal:

To establish what StratX is and what it is not, and to seek the Task Force's confirmation or correction of StratX's proposed classification as neutral software infrastructure.

Discussion Points:

- Non-custodial, non-executing architecture
 - No key management module, wallet interface, or settlement execution endpoint by architectural design

- Separation from transaction execution and asset custody
- Role as a supervisory validation layer, not an intermediary

Proposed Classification Position:

StratX proposes that its architecture fits the profile of a neutral software infrastructure provider: non-custodial, non-executing, and structurally external to transaction settlement. We seek the Task Force's confirmation or correction of that framing, and any guidance on where such a classification intersects with existing or emerging registration requirements.

Key Question:

1. StratX proposes classification as a neutral software infrastructure provider outside broker-dealer, exchange, or ATS registration requirements. Does the Task Force concur with that framing, or does any component of the architecture require registration or recognition under existing frameworks?

0:15–0:30 | Block 2: Supervisory Layer Architecture (Core Focus)**Goal:**

To explain how compliance can be enforced before execution, not after and to demonstrate that this model produces a more reliable regulatory environment than post-hoc enforcement.

Discussion Points:

- Pre-execution validation of policy conditions
- Fail-closed behavior: in the absence of a valid compliance decision, whether due to policy violation, system error, or ambiguous state, the default outcome is non-execution. The system does not proceed on assumption.
- Policy governance model: institutional policy overlays are authored by the deploying institution against a canonical compliance schema. StratX enforces the policy as authored. Institutional accountability for policy correctness is preserved by design.
- Consistent, reproducible compliance decisions
- Independent verification through deterministic audit artifacts

Framing:

Instead of relying on enforcement after violations occur, this model ensures that actions only proceed if they meet defined regulatory conditions. The supervisory layer acts as a pre-execution gate, not a post-hoc flag.

Key Questions:

2. Does a pre-execution supervision model align with the Task Force's direction away from enforcement-first approaches?
3. What evidentiary standard would the Task Force apply to audit artifacts generated by a pre-execution supervisory system and does independent academic validation (currently

underway at Montclair State University's CESAC Lab under the CSIT Catalyst R&D Voucher Program) satisfy any part of that standard?

0:30–0:40 | Block 3: Regulatory Visibility & Reporting

Goal:

To demonstrate how regulators can observe and verify compliance without direct system control, and to confirm that StratX's output standards align with Commission-level reporting expectations.

Discussion Points:

- Machine-readable audit outputs structured for direct regulatory ingestion
- Proposed output standards: ISO 20022 messaging structures, ISO 8601 timestamps, ISO 4217 currency codes, GLEIF LEI identifiers, XBRL-compatible output and seek Task Force confirmation or correction
- Verifiable records tied to versioned policy states
- Read-only audit surface structurally separated from execution

Framing:

Regulators gain visibility into what happened and why, without needing to reconstruct events or access sensitive internal systems. The audit surface is read-only and cannot be used to influence or reverse execution.

Key Questions:

4. StratX currently generates outputs compatible with ISO 20022, XBRL, and GLEIF LEI standards. Do these formats align with Commission-level ingestion and analysis requirements, or does the Task Force consider additional standards authoritative?
5. StratX's audit surface is read-only and structurally separated from execution. Is this separation sufficient for Task Force purposes, or would additional access controls, data minimization requirements, or third-party attestation be expected?

0:40–0:50 | Block 4: Market Structure Implications

Goal:

To connect the supervisory architecture to concrete regulatory outcomes such as, reduced compliance friction, support for tokenized securities, and cross-regulatory coordination.

Discussion Points:

- Reduced compliance friction through proportional controls
- Support for tokenized securities issuance and digital asset operations within compliant frameworks
- Dual-classification handling: asset classification changes are implemented through versioned policy updates. Prior audit records remain tied to the policy state active at time

of execution, preserving temporal audit continuity across SEC / CFTC jurisdictional transitions.

Framing:

The architecture is not purely technical; it directly impacts how markets can operate efficiently while remaining compliant. Pre-execution enforcement reduces audit reconstruction costs and lowers compliance overhead barriers for digital asset issuers.

Key Questions:

6. Could a pre-execution supervisory architecture support sandbox environments or innovation exemption pilot programs under the Task Force’s current framework?
7. StratX does not seek registration as a broker-dealer, exchange, or ATS. Does the Task Force’s view support treating a pre-execution supervisory infrastructure layer as neutral software infrastructure, or does any aspect of the architecture require registration or recognition under existing or emerging frameworks?

0:50–1:00 | Open Discussion & Feedback

Goal:

Gather direct input from the Task Force on architectural alignment, policy gaps, and recommended next steps.

Topics:

- Alignment with current regulatory direction
- Gaps or concerns from a policy or technical perspective
- Recommendations for further evaluation, pilot engagement, or standards contribution

SUPPORTING MATERIALS

Technical supporting materials, including a supervisory architecture overview, compliance output standards mapping, and policy domain reference, are available for presentation and discussion at the meeting. These materials contain implementation-adjacent detail protected under U.S. Patent Application No. 19/280,077 and are withheld from public submission accordingly. StratX is prepared to provide these materials directly to Task Force staff under appropriate confidentiality arrangements prior to or during the meeting.

StratX | U.S. Patent Application No. 19/280,077

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DISCLOSURE NOTE

StratX is not seeking registration, exemption, or no-action relief. We are seeking technical and policy dialogue to determine whether a neutral supervisory infrastructure layer is appropriately categorized as outside SEC registration frameworks, and if so, how it might inform voluntary industry standards or pilot program design.

This submission is prepared for public posting in accordance with Task Force transparency requirements. Implementation details protected under U.S. Patent Application No. 19/280,077 are not disclosed herein.

StratX Governance-Gated Compliance Infrastructure

Meeting Request Summary | SEC Crypto Task Force | April 2026

SUBMITTED BY

Abel Justin Oliveira — Inventor & System Architect

Steven Tavares — Co-Attendee

Organization: StratX (U.S. Patent Application No. 19/280,077)

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REGULATORY FRAMING

The SEC's current digital asset initiative, including the Crypto Task Force's ongoing engagement and the Commission's exploration of innovation exemption frameworks, is laying the foundation for how tokenized markets will be defined and regulated.

At the same time, a practical challenge remains unresolved: how can regulatory rules be applied consistently across different systems (on-chain and off-chain) in real time, without requiring regulators to directly operate or control those systems?

Today, there is no standardized supervisory layer that allows regulators to observe, verify, and rely on compliance decisions as they happen. Most oversight still depends on after the fact review, fragmented data, or institution-specific reporting.

StratX is presented as a candidate reference architecture designed to address this gap, not by replacing existing systems, but by introducing a neutral supervisory layer that sits above them. This layer is intended to make compliance decisions visible, verifiable, and consistent, without introducing custody, control, or intermediary risk.

The purpose of this meeting request is to evaluate whether such an architecture could support the Commission's objectives in:

- Market structure modernization
- Cross-regulatory coordination
- Machine-readable compliance and reporting
- Investor protection through pre-execution enforcement
- Real-time supervisory visibility without intermediary control

WHO WE ARE

StratX is a governance-gated compliance infrastructure platform designed as a domain-agnostic supervisory control plane for regulated environments.

StratX is not a trading platform, exchange, broker-dealer, or custodian. By architectural design, StratX has no key management, wallet interface, or settlement execution module. It does not hold private keys, initiate transactions, or custody assets. Execution authority is structurally delegated to external systems. StratX functions solely as a supervisory validation layer, generating deterministic audit artifacts before and during financial operations.

The financial compliance implementation is StratX's reference deployment. The architecture is designed for portability across regulated sectors including finance, AI governance, healthcare, data infrastructure, and public sector systems.

StratX is currently undergoing independent validation with Montclair State University's CESAC Lab under the CSIT Catalyst R&D Voucher Program. Validation scope includes the orchestration engine, compliance decision logic, and audit artifact generation.

THE CORE REGULATORY GAP

Current digital asset regulation lacks a standardized mechanism for ensuring that compliance policies are enforced consistently across multiple execution environments.

As a result, regulatory oversight remains:

- Fragmented across systems
- Reactive rather than preventative
- Dependent on post-hoc reconstruction of events

This creates structural limitations for:

- Tokenized securities markets
- Cross-agency coordination (SEC / CFTC)
- Real-time supervision of digital asset activity

StratX implements a model consistent with the direction the Task Force has articulated: embedding compliance directly into infrastructure so that regulatory policies are enforced prior to execution.

HOW STRATX ALIGNS WITH TASK FORCE PRIORITIES

1. Non-Custodial, Non-Executing Infrastructure

By architectural design, StratX has no key management module, wallet interface, or settlement execution endpoint. StratX functions solely as a supervisory validation layer, supporting classification as a neutral software infrastructure provider.

2. Embedded Supervision

StratX is designed around a foundational principle: compliance should be enforced before something happens, not investigated after it has already occurred.

In practice, every transaction or action is evaluated against policy before it is allowed to proceed. If conditions are not met, execution is stopped at that point, not flagged for later review. This creates a more reliable environment for regulators: compliance decisions are made consistently, recorded clearly, and can be independently verified without post-hoc event reconstruction.

3. Machine-Readable Reporting

All compliance outcomes generate structured, machine-readable audit artifacts using open standards including ISO 8601 timestamps, ISO 4217 currency codes, and GLEIF LEI identifiers. Outputs are formatted for direct regulatory ingestion without manual processing, and are compatible with ISO 20022 and XBRL reporting structures.

4. Proportional Compliance

Compliance controls are applied proportionally based on transaction context and institutional policy overlays. Policy overlays are authored by the deploying institution and structured against a canonical compliance schema. StratX enforces the policy as authored and it does not independently interpret regulatory intent. This design preserves institutional accountability while providing a consistent and auditable enforcement mechanism. Reduced friction for low-risk activity is maintained while strict controls apply to higher-risk scenarios.

5. Capital Formation Enablement

Pre-execution compliance enforcement reduces the cost and complexity of post-hoc audit reconstruction for digital asset issuers. Regulatory inspection becomes immediate and independently verifiable, lowering compliance overhead barriers for institutions seeking to operate within registered or exempted digital asset frameworks.

6. Jurisdictional Coordination

Asset classification changes, such as a shift in regulatory treatment for a given instrument, can be implemented through versioned policy updates without requiring system redesign. Prior audit records remain tied to the policy state active at time of execution, preserving temporal audit continuity across jurisdictional transitions. This enables dynamic handling of cross-regulatory classification (SEC / CFTC) without manual system reconfiguration.

INSTITUTIONAL OBJECTIVE

StratX is not proposed as a mandated system, but as a neutral reference architecture that could inform regulatory guidance, pilot programs, or industry standards.

StratX's objectives for this engagement are:

- To present a working, independently validated model of pre-execution compliance infrastructure
- To obtain staff feedback on architectural alignment with existing disclosure and registration frameworks
- To contribute to the development of standardized supervisory architectures for digital asset markets

DISCLOSURE NOTE

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