

PART 2A OF FORM ADV: BROCHURE

Item 1. Cover Page

Truvius

265 Franklin Street, Suite 1702
Boston, MA, 02110
www.truvius.io

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This Brochure provides information about the qualifications and business practices of Truvius (“Truvius” or the “Firm”). If you have any questions about the contents of this Brochure, please contact Truvius’ Chief Compliance Officer at compliance@truvius.io. 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.

Any reference to Truvius as a registered investment adviser does not imply a certain level of skill or training. Additional information about Truvius also is available on the United States Securities and Exchange Commission’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This is the initial filing of 'Truvius' Brochure. In the future, this Item 2 will discuss specific material changes that have been made since the annual filing and will provide a summary of those changes, which will be reflected below.

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Item 4 – Advisory Business

Item 4.A.

Advisory Business

Truvius (“Truvius” or the “Firm”) was formed in January of 2022 as a Delaware LLC and subsequently converted to a C-corporation in May of 2022. Truvius is an internet based (or “online”) investment adviser providing investment advice to individual and institutional investors (each a “Client”) utilizing proprietary software through an online platform (the “Platform”).

Principal Owners/Ownership Structure

Truvius is principally owned by its co-founders, Connor Farley, the Firm’s Chief Executive Officer, and Max Freccia, the Firm’s Chief Compliance Officer and Chief Operations Officer.

Item 4.B.

Truvius allows Clients to access the Platform and invest in a selection of investment products (the “Products”) comprised of coins, tokens, and other crypto-related assets (“Digital Assets”). Each Product is constructed utilizing a rules-based selection of the relevant asset universe, the weighting scheme of those assets, and options with respect to the risk management of the Product (collectively, “Investment Parameters”).

Truvius and its vetted third-party contributors (each, a “Strategic Partner”, and collectively, the “Strategic Partners”), construct the Products. Truvius then makes algorithm-based adjustments determined by the relevant Investment Parameters. As an online investment adviser, Truvius generally does not provide in-person investment advice to the Clients.

Truvius instead provides Clients with information about each Product to inform their decision-making. Additionally, to help align investors with their investment objectives, the Platform provides an automated suggestion of Products based on the Client’s answers to onboarding questions regarding certain factors, such as risk preferences, financial situation, and investment objectives.

Clients may elect to invest in one or more Products in their Truvius portfolio based on the individual Client’s investment preferences and adjust the allocations at will among the available Products using the Platform.

Item 4.C.

Truvius generally does not tailor its Products to meet the needs or preferences of individual Clients beyond certain reasonable investment restrictions Clients may impose. Instead, Truvius creates a variety of Products in which Clients can choose to invest at their own discretion based on the Client’s risk preferences and interest in exposure to certain asset types or investment strategies.

Clients do have the ability to impose certain reasonable restrictions on the management of their Client account by electing to exclude (or include if previously excluded) certain Digital Assets from their

portfolio of investments within the Platform. Additionally, Truvius prompts Clients, on a quarterly basis, to revisit and update these restrictions, as well as information relating to the Client's financial situation or investment objectives.

Since Truvius' Product recommendations rely heavily on the information provided to the Firm by the Client in the account creation questionnaire, if the Client provides inaccurate or incomplete information at any point, Truvius' advice may not be correctly tailored to that Client's desired investment objectives.

Item 4.D.

Truvius does not participate in wrap fee programs.

Item 4.E.

As of the filing date, Truvius manages \$0 in regulatory assets under management on a non-discretionary basis. Truvius does not anticipate managing Client assets on a discretionary basis.

Item 5 – Fees and Compensation

Item 5.A.

As compensation for investment advisory services rendered by Truvius, Clients pay a fee based on a percentage of the individual Client's assets under management (the "Management Fee"). The Management Fee is composed of a fee associated with access to the Platform, and a fee associated with each Client's selected Product(s). Truvius' Management Fee ranges, dependent upon the amount of assets under management and Product selections made by the Client, from an annual rate of 1-3% of the assets under management with respect to each Client account. Truvius may provide discounts on fees based on tiered assets-under-management ranges (i.e., larger accounts will receive reduced fees).

Item 5.B.

At the end of every month, Truvius instructs the Custodian (as defined below) to deduct fees directly from Clients' accounts for Management Fees incurred. The Management Fee is assessed in arrears accumulated using the Client's daily account balance, Product selection, and any applicable fee discounts during the prior month, and the Custodian deducts such fees from the Client's account typically on or around the tenth day of the subsequent month. If Clients terminate their accounts or transfer assets out of their accounts prior to the end of a month, they are still subject to any unbilled fees incurred at the time of account termination or transfer. If a Client account for any reason has insufficient funds to cover the Management Fee at the time of collection, Truvius reserves the right to invoice the Client for the amount owed.

Item 5.C.

Clients will be responsible for certain expenses charged by third parties incurred with respect to the services provided to the Client accounts, which could include, without limitation, transaction-related costs and commissions, custody fees, account termination fees, wire charges, taxes, and other fees and expenses. Those fees are separate and distinct from the fees and expenses charged by Truvius. Please see Item 12 of this Brochure regarding broker-dealers/custodians and third party Digital Asset exchange platforms (each, a “Broker” or “Custodian”, and collectively, the “Brokers” or “Custodians”).

Item 5.D.

Truvius collects its fees in arrears. It does not collect fees in advance.

Item 5.E.

Neither Truvius, nor its supervised persons, accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6 – Performance-Based Fees and Side-By-Side Management

Neither Truvius, nor its supervised persons receive performance-based fees.

Item 7 – Types of Clients

Truvius generally provides investment advice to individual and institutional investors.

There are currently no minimum requirements to open an account with Truvius. The minimum initial deposit required to invest in a Product is \$15,000, although this minimum will vary depending on the Product. There is no minimum balance to maintain an account, but account balances under \$2,500 may not be rebalanced.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Item 8.A.

Truvius offers Clients investment exposure to Digital Assets using Products that align with a stated focus on certain types of assets, investment strategies and/or risk profiles. Generally, Clients may select from the variety of Products offered by Truvius based on the individual Client’s interests, goals, financial situation, and risk tolerance. The precise composition of each Product is adjusted algorithmically and determined by the Investment Parameters.

Though the character and makeup of each Product may vary, each Product seeks to generate returns by investing in opportunities that fit within the very broad definition of Digital Assets, which

includes, but is not limited to, various blockchain based assets including cryptoassets, cryptocurrencies, decentralized application tokens, protocol tokens, smart contracts, security tokens, and other cryptofinance, digital currency and digital assets.

The individual Digital Assets that comprise each Product may be determined based on criteria, including, but not limited to, the availability of asset custody, liquidity profile, risk/return profile, status of the asset as a security, and/or a restricted security, Client-specific considerations such as asset availability and potential regional restrictions maintained by the Client's chosen liquidity provider(s), and other considerations based on the unique circumstances of each Digital Asset and Client.

Though Truvius periodically reviews the available population of Digital Assets to identify any new assets or strategies that present an opportunity to generate returns, Truvius currently only offers Digital Assets supported by Truvius' Custodians.

Items 8.B. and 8.C.

Risks associated with investment strategy - Investing in Digital Assets involves a high risk of loss that Clients should be prepared to bear. An investment in cryptocurrency assets is suitable only for certain investors for whom such investment does not constitute a complete investment program, who are willing to assume, and have the financial resources necessary to withstand, the risks involved in investing in cryptocurrency, and who can bear the potential loss of their entire investment on the Platform. There is no assurance as to whether the investments will be profitable. Any investment made on the Platform may result in a total loss of the investment. Notwithstanding the method of analysis or investment strategy employed by Truvius, the assets of each Client are subject to risk of devaluation or loss. Clients should note that many different events can affect the value of Truvius' Products, including, but not limited to, market fluctuations, economic reports, terrorism, and natural disasters.

Limited Investment History – Digital Assets have only emerged as an investment opportunity in the past several years and are thus a relatively untested source of returns. It is unclear what the long-term profitability of Digital Assets will be, and their short history thus far is particularly unreliable for predicting future success.

Availability of Digital Assets – Truvius will only make available exposure to a limited number of types of Digital Assets on the Platform. Therefore, Clients may not have exposure through the Platform to many other Digital Asset investments. Additionally, as described above, if regulators find that the Digital Assets on the Platform are not freely tradable it could negatively impact their value and decrease the number of Digital Assets available for investment on the Platform.

Key Personnel – Truvius depends, in part, on its ability to attract and retain key personnel. Truvius' future also depends on the continued contributions of the executive officers and other key personnel,

each of whom would be difficult to replace. The loss of the services of any of Truvius' key principals or other personnel, and the process to replace them would involve significant time and expense and may significantly delay or prevent the achievement of Truvius' business objectives.

Lack of Established Track Record – Truvius is a relatively new entity that has limited operating history upon which a prospective Client may base its investment decision. There can be no assurance that Truvius will be able to successfully implement its business plan. The success of Truvius should be considered in light of the problems, expenses, difficulties, complications, and delays frequently encountered in connection with the inception of a business, operation in a competitive industry, and the continued development of advertising and a corresponding Client base. For these and other unforeseeable reasons, there can be no assurance that Truvius will achieve or sustain profitable operations. The performance of prior investment entities and business ventures associated with Truvius' key personnel and principals is not necessarily indicative of Truvius' future performance.

Third Party Information – Truvius will provide Clients information from third-party sources related to the Digital Assets listed on the Platform. Truvius relies on these representations and does not independently verify this information. As a result, Truvius can make no assurances as to the completeness or accuracy of any such information.

Platform Information – Although Truvius intends to provide accurate and timely information on the Platform, the Platform may not always be entirely accurate, complete or current and may also include technical inaccuracies or typographical errors. In an effort to continue to provide as complete and accurate information as possible, information may be changed or updated from time to time without notice, including without limitation information regarding Truvius' policies, products and services. Accordingly, Clients should verify all information before relying on it, and all decisions based on information contained on the Platform are solely the Client's responsibility and Truvius shall have no liability for such decisions.

Competition – There is increasing competition in the Digital Asset market. Participation by financial intermediaries has increased, substantial amounts of funds have been dedicated to making investments in the private sector, and the competition for investment opportunities is high. Some of Truvius' potential competitors may have greater financial and personnel resources than Truvius. There is no guarantee that Truvius will successfully implement its proposed strategy and develop a viable business on (or off) the Platform. If Truvius or the Platform is not able to develop a viable business, then that could present a risk to the Client's investments held on the Platform.

Service Providers – The institutions with which Truvius (directly or indirectly) does business, such as banks and other financial institutions, may encounter financial difficulties that impair the operational capabilities or the capital position of Truvius. Truvius relies heavily on various service providers to perform many of the functions required to fulfill its investment objective, including the Custodian(s). Should any of these service providers experience financial, regulatory, or other difficulties that affect their operations, Truvius' operational capabilities and financial position would be adversely affected.

This is particularly acute in light of the changing regulatory landscape for Digital Assets, which could affect the regulatory standing of service providers, and may cause them to change their business models or cease providing services Truvius depends on altogether. In particular, if the Custodian is no longer able to successfully provide services to Truvius, and an appropriate alternate Custodian is not immediately available, this could have a negative impact on Truvius and the Platform, as described below.

Portfolio Allocation and Rebalancing – ‘Truvius’ algorithmic investment recommendations may not successfully achieve a Client’s goals for a variety of reasons, including unexpected market events or trends that the algorithm does not anticipate, as well as inaccurate, incomplete, or otherwise faulty data used by the algorithm. While Truvius seeks to continually improve its algorithmic system, it does not guarantee it will result in positive returns on investment. In addition, when Truvius rebalances the portfolios, it is possible that the system could err and fail to execute a requested trade, among other factors.

Market Risk – The value of the investments held in Clients’ accounts is subject to changes in economic conditions, growth rates, profits, and the market’s perception of these investments. The price of any instrument can decline for a variety of reasons outside of Truvius’ control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, regulatory changes, and domestic or foreign political, demographic, or social events.

Effect of General Economic Conditions – General economic conditions may affect the Firm’s investment activities. Changing economic, political, and regulatory or market conditions, general levels of economic activity, the price of Digital Assets, and participation by other investors in the financial markets may affect the value and number of investments made by the Firm or considered for prospective investment. Different parts of the market and different types of investments can react differently to these developments. Every investment has some level of market volatility risk. Economic slowdowns or downturns could lead to financial losses in the Firm’s investments. In addition, many of the Firm’s investments may be similarly subject to the same economic conditions, which could adversely impact the Firm’s investment returns.

Cybersecurity Risk – As the use of technologies, such as the internet, has become more common in conducting business, Client accounts have become potentially more susceptible to operational, information security and related risks through breaches in cybersecurity. Generally, a cyber incident may result from either intentional attacks or unintentional events and include, but are not limited to, gaining unauthorized access to private keys or to digital systems, misappropriating assets or sensitive information, causing a Client account to lose proprietary information, corrupting data, or causing operational disruption, including denial-of-service attacks on websites. Additionally, Digital Assets pose their own cybersecurity risks. Blockchain miners or validators maintain the record of ownership of Digital Assets, and if these entities suffer from cyberattacks or other security incidents, or for financial or other reasons cease to perform these functions, the functioning of the blockchains on

which the ownership of Digital Assets is recorded and the valuation based may be jeopardized. The types of incidents that might affect blockchain security include hacking, which involves efforts to gain unauthorized access to information or systems or to cause intentional malfunctions or loss or corruption of data, software, hardware or other computer equipment; the inadvertent transmission of computer viruses or other malware; or malfeasance or negligent acts of personnel, such as phishing attacks and other forms of social engineering. Any such interruption could result in impermissible transfers of Digital Assets and/or loss of Digital Assets and/or their value. A cybersecurity breach in Truvius' Platform or to the entities involved in the recording and transfer of Digital Assets in turn could cause a Client account and/or the Firm to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss. Cybersecurity failures or breaches of a third-party service provider that provides services to a Client account, such as the Custodian(s) or an administrator, or issuers in whose Digital Assets a Client account invests in, may also subject a Client account and/or the Firm to these cybersecurity risks. The Firm has established policies and procedures reasonably designed to reduce the risks associated with cyber incidents, including the risk that federal securities laws are broken due to a cyber incident. However, there can be no assurance that these policies and procedures will prevent cyber incidents.

Geopolitical Risk – The impact of geopolitical events on the supply and demand for Digital Assets is uncertain. Digital assets are relatively new and are subject to supply and demand forces based in part upon the desirability of an alternative, decentralized means of buying and selling goods and services. It is unclear how such supply and demand will be impacted by geopolitical events, including regulatory changes. Nevertheless, political or economic crises may motivate large-scale acquisitions or sales of Digital Assets globally and/or locally. Large-scale sales of Digital Assets are likely to result in a reduction in the value of Digital Assets contained on the Platform and may adversely affect a Client's investment in Digital Assets also held in their account.

Risks Associated with Digital Currencies, Digital Assets and Digital Asset Networks

Truvius invests in Digital Assets; currently, Digital Assets are either unregulated or in the early stages of regulation by U.S. federal and state governments and self-regulatory organizations. As Digital Assets have grown in popularity, certain U.S. agencies, such as the United States Securities and Exchange Commission ("SEC"), the Financial Crimes Enforcement Network and the Commodity Futures Trading Commission ("CFTC"), have begun to examine Digital Assets and the operations of Digital Assets in depth. The SEC views a significant portion of Digital Assets as securities and has been involved in multiple enforcement actions, settlements, and federal court cases regarding the regulatory status of Digital Assets, their issuers, and intermediaries involved in the industry. The CFTC has declared that certain other Digital Assets are commodities and regulates those assets and in particular derivatives related to them. To the extent that any type of Digital Asset is determined to be a security, commodity, future, or other regulated asset where Truvius has not anticipated that treatment, or to the extent that a U.S. or foreign government or quasi-governmental agency exerts additional regulatory authority over the Digital Assets, Truvius' Products may be adversely affected. The effect of any future regulatory change on the Products is impossible to predict, but such change could be substantial and adverse.

Some of the risks as they pertain to Digital Assets that Clients should consider include, but are not limited to:

Concentration Risk – Concentrating investments in the Digital Assets sector increases the risk of loss, because developments that adversely affect the sector as a whole may cause most if not all of Truvius’ investments to decline in value.

Digital Currencies and Digital Assets – Digital Assets represent a speculative investment and involve a high degree of risk. Supply is determined by a computer code, not by a central bank, and prices can be extremely volatile. Digital currency and Digital Asset exchanges have been closed due to fraud, failure, security breaches, and legal noncompliance. Client assets held on an exchange that shuts down may be lost.

Several factors may affect the price of digital currencies and Digital Assets, including, but not limited to supply and demand, investors’ expectations with respect to the rate of inflation, interest rates, currency exchange rates or future regulatory measures (if any) that restrict the trading of digital currencies/ Digital Assets or the use of digital currencies/ Digital Assets as a form of payment. There is no assurance that digital currencies and/or Digital Assets will maintain their long-term value in terms of purchasing power in the future, or that acceptance of digital currency/Digital Assets payments by mainstream retail merchants and commercial businesses will grow. The prior performance of a Digital Asset is not necessarily indicative of future results. Many Digital Assets have experienced high levels of performance and rapid increases in price, followed by significant downturns in performance and similarly rapid decreases in price. Digital currencies and Digital Assets are created, issued, transmitted, and stored according to protocols run by computers in the digital currency and Digital Assets network. It is possible these protocols have undiscovered flaws which could result in the loss of some or all Client assets. There may also be network scale attacks against these protocols that result in the loss of some or all Client assets. Some assets may be created, issued, or transmitted using experimental cryptography that could have underlying flaws. Advancements in quantum computing could break the cryptographic rules of protocols that may be negatively affected by technological advances that undermine the cryptographic consensus mechanism underpinning blockchain and distributed ledger protocols. Truvius makes no guarantees about the reliability of the cryptography used to create, issue, or transmit assets.

Certain Digital Assets may rely on or are built on a public or third-party blockchain, and the success of such blockchain may have a direct impact on the success of Digital Assets listed on the Platform and recommended by Truvius. These Digital Assets are partly dependent on the effectiveness and success of such blockchains, as well as the success of other blockchain and decentralized data storage systems that are being used by the issuer of the Digital Assets. There is no guarantee that any of these systems or their sponsors will continue to exist or be successful. This could lead to disruptions of the operations of the issuer of the Digital Assets listed on the Platform and could negatively affect any Digital Assets held by a Client from such issuer. The Digital Asset market presents significant risks that could negatively impact Truvius’ ability to purchase and sell Digital Assets on a Client’s

behalf. For example, the Digital Asset market frequently involves shallow trade volume, extreme hoarding, low liquidity, and high bankruptcy risk. Blocks of Digital Assets are often hoarded by a few owners and/or are kept out of circulation. Ownership concentration is high, which increases liquidity risk because large blocks of Digital Assets are difficult to sell in a timely and efficient manner.

No FDIC or SIPC Protection – Digital currencies are not subject to Federal Deposit Insurance Corporation (“FDIC”) or Securities Investor Protection Corporation (“SIPC”) protections. Since Truvius and its Custodians are not members of the FDIC or SIPC, Client assets are not subject to the protections enjoyed by depositors with FDIC or SIPC member institutions. While private insurance may be available at times, Client assets are not insured by Truvius.

Legality of Digital Currencies – Owning, holding, selling, or using Digital Assets may be illegal now or in the future in one or more countries, including the United States. Countries may take regulatory actions in the future that severely restricts the right to acquire, own, hold, sell, or use digital currencies. Such an action may restrict Truvius’ ability to hold or trade digital currencies and could result in termination and liquidation of Client accounts at a time that is disadvantageous to Clients.

Custodians – Entities that provide custody for Digital Assets are subject to evolving guidelines from regulatory authorities. Changes in regulation of Digital Assets or entities that custody Digital Assets, or changes in how regulators interpret existing regulation applicable to Digital Assets or entities that custody Digital Assets, could cause the Custodian(s) to be deemed ineligible to hold Digital Assets on behalf of Truvius’ Clients or otherwise adversely affect the Custodian(s). In this event, Truvius would need to change Custodians, change its business model, or find other ways to comply with the changed regulatory requirements. These regulatory changes are difficult to predict because applicable regulation is still evolving and could adversely impact Client accounts.

Digital Currency and Digital Asset Exchanges – The digital currency and Digital Asset exchanges on which digital currency and Digital Assets trade are relatively new and may not be registered as brokers, exchanges, or alternative trading systems. They may therefore be out of compliance with federal or state law. In addition, these exchanges may be more exposed to theft, fraud and failure than established, registered exchanges for other products. In general, digital currency and Digital Assets exchanges are currently start-up businesses with no institutional backing, limited operating history and no publicly available financial information. Exchanges generally require cash to be deposited in advance in order to purchase digital currency and Digital Assets, and no assurance can be given that those deposit funds can be recovered. Additionally, upon sale of digital currency and Digital Assets, cash proceeds may not be received from the exchange for several business days. The participation in exchanges requires participants to take on credit risk by transferring digital currency and Digital Assets from a participant’s account to a third-party’s account. Clients take on the credit risk of an exchange every time they make a transaction.

There are currently no U.S. exchanges registered with the SEC where Digital Assets that are securities can be legally listed and/or traded. While Truvius anticipates that such exchanges will exist in the

United States in the future, Truvius cannot and does not guarantee that such exchanges will ever legally operate in the United States. In addition, even if other types of Digital Assets are able to successfully be listed on a registered exchange in the United States, there is no guarantee that such exchange will allow the Digital Assets traded within the Products to be listed on such a registered exchange. Thus, exchanges used by Truvius may not be registered with the SEC and/or in compliance with applicable securities laws, rules and regulations, and any regulatory action relating to the unregistered status or non-compliance of the exchanges used by Truvius could adversely affect Truvius' business. Digital currency and Digital Asset exchanges may impose daily, weekly, monthly or customer specific transaction or distribution limits or suspend withdrawals entirely, rendering the exchange of digital currency and Digital Assets for fiat currency difficult or impossible. Additionally, digital currency and Digital Assets prices and valuations on digital currency and Digital Asset exchanges have been volatile and subject to influence by many factors including the levels of liquidity on exchanges and operational interruptions and disruptions. The prices and valuation of digital currency and Digital Assets remain subject to any volatility experienced by digital currency and Digital Asset exchanges, and any such volatility can adversely affect Truvius' investments.

Digital currency and Digital Asset exchanges are appealing targets for cybercrime, hackers and malware. Even the largest exchanges have ceased operations due to theft, fraud, security breach, liquidity issues, or government investigation. In addition, banks may refuse to process wire transfers to or from exchanges. Over the past several years, many exchanges have, indeed, closed due to fraud, theft, government or regulatory involvement, failure or security breaches, or banking issues.

Any financial, security or operational difficulties experienced by such exchanges may result in Truvius' or the Custodian's inability to recover money or Digital Assets being held by the exchange, or to pay Clients upon withdrawal.

The daily trade volume of Digital Assets on any given exchange may only be a small fraction of total Digital Assets. The lack of a regulated market for Digital Assets and related assets means that market participants do not have as many mechanisms to hedge or create the liquidity in the Digital Asset market that is typical of traditional capital markets. The Digital Asset market also currently lacks many institutional participants, which could help to stabilize the market. For these reasons, among others, Truvius may be unable to purchase or sell a Digital Asset as desired for an extended period of time.

Broker-Dealer Registration – Truvius believes that it is not acting as a broker-dealer required to register under federal or state law. If Truvius were deemed to be a broker-dealer, it would be subject to significant additional regulation. This could lead to significant changes with respect to the Platform, how Digital Assets are listed on the Platform, how Digital Assets listed on the Platform are purchased and sold and other issues, and would greatly increase Truvius' costs in creating and facilitating transactions in the Digital Assets listed on the Platform. It could lead to the suspension and/or termination of the Platform. In addition, a regulator could take action against Truvius if it views the Digital Assets listed on the Platform and the Platform itself as a violation of existing law.

Any of these outcomes would negatively affect the value of the Digital Assets listed on the Platform and/or could cause Truvius to suspend and/or cease operations.

Tax – The tax characterization of Digital Assets is uncertain. The purchase of Digital Assets may result in adverse tax consequences to a Client, including withholding taxes, income taxes, and tax reporting requirements.

The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in an investment with the Firm. Prospective Clients should read the entire Brochure as well as other materials that may be provided by the Firm and consult with their own independent, legal, tax, and accounting advisers prior to engaging the Firm's services.

Past performance is not a guarantee of future returns. Investing in Digital Assets involves a risk of loss that each Client should understand and be willing to bear.

Item 9 – Disciplinary Information

If there are legal or disciplinary events that are material to a client's or prospective client's evaluation of your advisory business or the integrity of your management, disclose all material facts regarding those events.

There are no material legal or disciplinary events related to Truvius.

Item 10 – Other Financial Industry Activities and Affiliations

Item 10.A.

Neither Truvius nor any of its management persons are registered or have an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Item 10.B.

Neither Truvius nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing.

Item 10.C.

Neither Truvius nor any of its management persons have a relationship or arrangement that is material to the Firm's advisory business.

Item 10.D.

As discussed in Item 4.B. above, Truvius offers Products constructed by its Strategic Partners, some of whom may themselves be investment advisers registered with the SEC. However, Truvius does not utilize nor select other advisers or third-party investment advisers to manage Client assets. All Client assets are managed by Truvius.

The costs associated with licensing Products constructed by Strategic Partners are deducted from the Management Fee. This creates a conflict of interest, wherein Truvius has an incentive to encourage Clients to select the Firm's proprietary Products over those constructed by Strategic Partners, as Truvius nets a higher fee on those products. Truvius addresses this conflict by utilizing automated systems to recommend Products solely based on Client input, including responses to the initial questionnaire discussed in Item 4.B. above. Furthermore, all Products are presented to Clients with equal prominence, and ultimately selected by each Client.

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

Item 11.A.

Truvius has adopted a Code of Ethics (the "Code") under Rule 204A-1 under the Advisers Act designed to provide that Truvius employees comply with applicable federal securities laws. The Code addresses, among other things, Truvius' standard of business conduct, requirements and restrictions relating to personal securities trading, policy regarding political contributions, policy regarding gifts and entertainment and confidentiality. Truvius employees must acknowledge, both initially upon employment and annually thereafter, in writing having received and read a copy of the Code. The Code requires all employees to report personal securities holdings (initially and annually) and certify quarterly personal trading activity. The Code places certain restrictions on employees when transacting in the same investments as Products. The Code is monitored by Truvius' Chief Compliance Officer and any exceptions to the Code need prior approval by Truvius' Chief Compliance Officer.

A copy of Truvius' Code of Ethics is available to Clients and prospective clients upon their individual request.

Item 11.B.

Truvius, as a fiduciary, endeavors to always make decisions in the best interest of its Clients if a conflict of interest arises between Truvius' transactions on behalf of the Products and those of Truvius' personnel and related persons. In order to monitor any conflict of interest, certain Digital Assets the Firm trades in or may trade in may be included in a regularly updated Restricted List, and Truvius employees are required to pre-clear certain contemplated transactions in their personal accounts which may present the appearance of impropriety and must disclose on an initial and annual basis the holdings of all personal accounts, as well as all transactions on a quarterly basis.

From time to time, Truvius may include Digital Assets in Products that a related person, such as a person with an ownership interest in the Firm, has a financial interest in, or to which a related person serves in a business advisory role which may provide them with compensation or other benefit. However, neither Truvius nor a related person engages in principal transactions with the Products.

Items 11.C. and 11.D.

Additionally, an employee or related person may invest in a Digital Asset at or about the same time that Truvius includes the investment in the Products. These inclusions present a conflict of interest resulting from the possibility that related persons or employees might benefit from market activity by the Products in a security held by a related person or employee.

The inclusion of Digital Assets within Products is determined by an automated rules-based approach. When such Digital Assets are included in the Products, they are included systematically according to the Products' rules-based investment objectives, which consider the availability of the Digital Assets in the marketplace, as well as the potential effect on the Products of executing purchase and sale transactions in the underlying Digital Assets in the marketplace.

Truvius employees are permitted to invest in the Products. While the Firm believes that such ownership activity provides for common rather than conflicted investment interests, Clients should be aware of the potential for ownership and transactions in the Products by Truvius employees. Transactions in the Products by Truvius employees are subject to the pre-clearance requirements of the Code.

Truvius' Chief Compliance Officer reviews employee trading under the Code to reasonably detect and mitigate conflicts of interest between Truvius and its Clients. Also, for this purpose, the Chief Compliance Officer regularly updates the Firm's Restricted List to comprise certain Digital Assets the Firm trades in or may trade in and monitors transactions that Truvius makes of Digital Assets and/or securities in which a related person has a financial interest, to which they serve in an advisory role, or from which they obtain compensation or other benefit.

Item 12 – Brokerage Practices

Item 12.A.1.

Currently, Truvius is integrated with the Anchorage Digital Bank National Association and Anchorage Hold LLC (together "Anchorage Digital") to provide Digital Asset custody and trading services. Clients must maintain an existing account with Anchorage Digital and agree to Anchorage Digital's terms and conditions in order to receive Truvius' advisory services. In the future, Truvius intends to offer Clients the ability to select from a variety of Brokers and Custodians. However, at the time of launch, Clients will only have the option of executing trades through Anchorage Digital because Anchorage Digital has the full suite of technical capabilities available to execute on Truvius'

investment models and Platform. Should other Brokers and Custodians offer the same capabilities, Truvius will consider those parties.

In selecting Anchorage Digital as the Custodian, Truvius considered a number of factors, including, but not limited to, reputation, reliability, operating history, attention to operational risk, ease of administration, quality of execution, commission rates, and pre-existing agreements.

Truvius does not receive any soft dollar benefits.

Item 12.A.2.

Truvius receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Item 12.A.3

Truvius requires that each Client maintain their account and execute transactions with our chosen Broker, Anchorage Digital, with which Truvius has a counterparty relationship. Clients are limited to Brokers made available by Truvius.

Clients should understand that they might receive more favorable execution at another Digital Asset exchange, that the Broker might have more limited liquidity for certain Digital Asset relative to other Digital Asset exchanges, and the Broker's transaction costs may be higher than other Digital Asset exchanges.

Item 12.B.

Truvius leverages Anchorage Digital's trading system for the ongoing management of Client investment portfolios. Anchorage Digital's platform allows for the aggregation and segregated allocation of individual Client trade orders for supported Digital Assets. Truvius utilizes these features afforded by Anchorage Digital's trade execution platform as it believes this on average leads to more favorable execution outcomes for Clients.

Item 13 – Review of Accounts

Items 13.A. and 13.B.

Truvius' software monitors the Products on an ongoing basis to ensure that the Products' holdings are consistent with the Investment Parameters. The Firm's algorithms are developed and overseen by Truvius' investment advisory personnel.

Item 13.C.

Truvius' investment tools are designed to provide Clients with continuous access to account information through the Platform. Clients can utilize various tools on the Platform to review their account and better understand their holdings and performance information. Clients may also receive periodic emails from Truvius encouraging users to engage with the information presented on the Platform and that include links to view their account.

Clients are also encouraged to regularly review their accounts and investor information, and to update any restrictions they may have placed on their Truvius investment portfolio.

Clients' agreements with their Brokers will govern any additional regular reports that Clients may receive from the Brokers regarding their accounts.

Item 14 – Client Referrals and Other Compensation

Item 14.A.

Truvius does not receive an economic benefit, directly or indirectly, from any third party for advisory or other services rendered to the Clients.

Item 14.B.

Truvius does not engage third parties to make Client referrals.

Item 15 – Custody

Truvius neither acts as a qualified custodian nor maintains physical custody of Client assets. Clients authorize Truvius to receive its fees directly from Clients' accounts held at the Custodian. Clients hold their Digital Assets in accounts with the Custodian. Clients must open accounts with a Custodian in their own names, and must agree to the Custodian's user terms, and authorize Truvius to deduct Management Fees (noted in Item 5 of this Brochure). The Custodians regularly provide account statements to Clients, though the frequency may vary from Custodian to Custodian. Each Client should carefully review their custodial statements and compare them to the transaction activity provided by Truvius in the Platform's online interface.

Item 16 – Investment Discretion

Truvius does not manage Client assets on a discretionary basis. As described throughout this Brochure, Truvius creates a variety of Products in which Clients can choose to invest at their own discretion based on the Client's risk preferences and interest in exposure to certain asset types or investment strategies.

Item 17 – Voting Client Securities

Item 17.A.

Truvius generally does not invest in instruments that are considered equity securities and as such it is extremely unlikely that Truvius will ever come into possession of securities with voting rights on proxy proposals, amendments, consents or resolutions (each, a “Proxy”, collectively, “Proxies”). Nonetheless, Truvius will not accept authority to vote Proxies.

Additionally, Some Digital Asset features, including participation in governance activities, may be considered similar to participating in shareholder votes. Though some Digital Asset holders may vote on topics that directly or indirectly affect return on investment through on-chain governance, the Custodians’ infrastructure does not currently support this capability and makes no promise of doing so in the future. As such, Clients are currently unable to participate in such activities.

Clients may request a copy of Truvius’ Proxy voting policies and procedures and the Proxy voting records by contacting Truvius at the address or email listed on the cover page of this Brochure.

Item 17.B.

This Item is not applicable to Truvius.

Item 18 – Financial Information

Item 18.A.

Truvius does not require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

Item 18.B.

Truvius has no financial condition that impairs its ability to meet contractual commitments to Clients.

Item 18.C.

Truvius has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 – Requirements for State-Registered Advisers

This Item is not applicable to Truvius.