

Part 2A of Form ADV: Firm Brochure

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This brochure (“**Brochure**”) provides information about the qualifications and business practices of Domain Money Advisors, LLC (“**Domain**”, the “**Adviser**”, “**we**”, “**us**” or “**our**”). If you have any questions about the contents of this Brochure, please contact us at (646) 970-6926. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “**SEC**”) or by any state securities authority.

Domain may refer to itself as SEC registered or as a registered investment adviser with the SEC pursuant to the Investment Advisers Act of 1940, as amended (the “**Advisers Act**”). These references do not imply a certain level of skill or training.

Additional information about Domain is also available on the SEC’s website at: www.adviserinfo.sec.gov.

Item 2 – Material Changes

There are no matters to note in this Item 2 since this is Domain’s initial Brochure filing with the SEC in connection with its initial registration as an investment adviser.

In the future, this Item 2 will discuss specific material changes that are made to this Brochure and provide a summary of such changes.

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Item 4 – Advisory Business

This Brochure has been prepared in connection with Domain’s initial registration as an investment adviser with the SEC under the Advisers Act. We are registering with the SEC as an “investment adviser expecting to be eligible for SEC registration within 120 days” under Rule 203A-2(c) of Advisers Act, but ultimately intend to register as a “multi-state investment adviser” under Rule 203A-2(d) of Advisers Act on or before the expiration of such 120 day period.

As of the date of this Brochure, Domain does not currently have any investment advisory clients, does not currently provide any investment advisory services to clients and does not have any regulatory assets under management. This Brochure has been drafted to describe Domain’s business as it is expected to operate on or after the effective date of its SEC registration. Registration does not imply a certain level of skill or training.

Domain, founded in 2021, is a private investment management firm that will provide discretionary, web-based, investment advisory and portfolio management services with respect to separately managed accounts (each an “**Account**”, and collectively, “**Accounts**”) of advisory clients (each a “**Client**”, and collectively, “**Clients**”). Domain is a privately held company headquartered in New York, New York. Domain is principally owned, indirectly, by Adam Dell. Information about Domain’s organizational and ownership structure is provided in Part 1 of Domain’s Form ADV, which is available online at <http://www.adviserinfo.sec.gov>.

Subject to the terms and conditions set forth in the applicable Account documents of each Client, which include an Advisory Agreement and certain third-party documents related to the Client’s account(s) (collectively, “**Account Documents**”), Domain expects to provide or make available to Clients, via a web-based (the “**Domain Website**”) and mobile application (the “**Domain App**”), various investment portfolios based on Domain’s proprietary equity and cryptocurrency strategies (collectively, the “**Domain Strategies**”), as described herein. The Domain Strategies will be actively managed by Domain and may be rebalanced from time to time in the discretion of Domain, which may be influenced by algorithmic triggers and other factors. Each Client must invest in at least one Domain Strategy and may invest in more than one.

Initially, the Domain Strategies will consist of four strategies: (i) Growth Strategy, (ii) Crypto Opportunities, (iii) Earn and Grow, and (iv) Core Strategy.

Growth Strategy. The Growth Strategy will consist of approximately fifty percent (50%) equity securities and approximately fifty percent (50%) cryptocurrencies. The Growth Strategy will contain a mix of equity securities, including equity securities generally regarded as “blue chip” securities. This strategy will also include some of the largest and most established cryptocurrencies.

Crypto Opportunities. The Crypto Opportunities strategy will consist of approximately one hundred percent (100%) cryptocurrencies. The Crypto Opportunities strategy will contain some of the largest and most established cryptocurrencies as well as emerging cryptocurrencies that Domain believes have achieved product market fit, provide a fundamental financial function and are led by credible development and management teams.

Earn and Grow. The Earn and Grow strategy will consist of approximately seventy percent (70%) equity securities and approximately thirty percent (30%) cryptocurrencies. The Earn and Grow strategy will contain a mix of equity securities, including equity securities generally regarded as “blue chip” securities. This strategy will also include some of the largest and most established cryptocurrencies.

Core Strategy. The Core Strategy will consist of approximately one hundred percent (100%) equity securities. The Core Strategy will contain a mix of equity securities, including equity securities generally regarded as “blue chip” securities.

The descriptions of the Domain Strategies summarized above are not intended to be comprehensive. The Domain Strategies are not diversified portfolios and generally invest in fewer securities and cryptocurrencies at any one time than diversified portfolios. All Domain Strategies are subject to market movement and rebalancing. For more information regarding the Domain Strategies, please see the Domain Website and/or the Domain App and, as applicable, the Account Documents.

Other Domain Strategies may be added from time to time as shown on the Domain Website and Domain App, and other types of securities and cryptocurrencies may be added such as Exchange Traded Funds and digital assets that are considered securities. In some instances, certain assets may be included in multiple Domain Strategies available to a Client.

Clients will be able to choose between one or more Domain Strategies. Clients will decide their own investment amount for each Domain Strategy as Domain does not give advice to clients about how much to invest in any Domain Strategy. Domain will have a minimum account size of \$100, which is waivable in Domain’s discretion.

Depending upon the investment amount for a particular Domain Strategy or in certain other circumstances (such as the initial set-up or ramping up of the portfolio investments constituting a Domain Strategy), the equity shares and/or cryptocurrencies purchased or sold on behalf of a Client and/or held in Client accounts may be fractional shares or units. Fractional shares or units, however, are typically not transferrable outside of a Client’s account (for example to another brokerage account) because there is no formal system to freely transfer or make marketable between financial institutions. In the event of a liquidation or transfer of the assets in a Client’s account to another account, Domain may convert such fractional shares or units to cash.

Through the Domain Strategies, Domain intends to provide Clients with a relatively low-cost, “low-friction,” user-friendly entry point to investing in equity securities and digital assets. The Domain Strategies will not be a complete or diversified investment program and Clients should not use the Domain Strategies as the sole or primary component of their investment plan. Domain’s recommendations and the Domain Strategies do not take into account any Self-Directed Trading (as defined herein).

Prior to opening an Account, each Client will need to provide personal information about themselves, including financial resources, investment goals and objectives by answering a questionnaire. Domain will utilize the information from the questionnaire to recommend the Domain Strategy (or Domain Strategies) appropriate for the Client’s risk tolerance, financial parameters and investment objectives and will or may consider, among other things, the Client’s employment status, income, investment goals and reasons to invest, time horizon and net assets. The Domain Strategy recommendation created by Domain for each Client will be based solely upon the information provided by the Client through the questionnaire. Domain will not tailor the Domain Strategies to each Client. Domain will not make recommendations as to Client allocations across Domain Strategies. The suitability of the Domain Strategies recommendation is limited by the number and type of Domain Strategies made available by Domain. The suitability of the Domain Strategies recommendation is also limited by and relies upon the accuracy and completeness of the information provided by the Client. A Domain Strategy is not suitable for all investors.

In connection with opening an Account, each Client will also need to open a securities brokerage account and provide discretionary authority over that account to Domain. Brokerage accounts, agreements, and order processing will be conducted through Apex Clearing Corporation (“*Apex*”), an SEC registered and FINRA member broker-dealer that provides brokerage and brokerage related services to Domain and

Clients. Using Apex's application program interface ("**API**"), Domain will allow Clients to create a securities brokerage account on the Domain Website and on any mobile device through the Domain App. All securities brokerage account opening functionalities, including identity verification and approval, will be handled digitally and quickly by Apex. Apex will also provide custody, clearing, and settlement services for Domain and Clients. Domain does not and will not open or maintain securities brokerage accounts on behalf of Clients. Securities brokerage accounts and the underlying investments therein will be opened, maintained and held, as applicable, by Apex in the name of the Client. Apex is not affiliated with Domain.

If and to the extent a Client desires to and elects to invest in a Domain Strategy involving cryptocurrencies, such Client will also need to open a cryptocurrency account with Gemini Trust Company, LLC ("**Gemini**") and provide discretionary authority over that account to Domain. Cryptocurrency accounts, agreements, and transaction processing will be conducted through Gemini. Using Gemini's API, Domain will allow Clients to create a cryptocurrency account with Gemini on the Domain Website and any mobile device through the Domain App. All cryptocurrency account opening functionalities, including identity verification and approval, will be handled digitally and quickly by Gemini. Gemini will buy and sell supported cryptocurrencies, store cryptocurrencies acquired by Clients, and track cryptocurrencies transactions via the Domain Website and/or the Domain App. Domain does not and will not open or maintain cryptocurrency accounts on behalf of Clients. Cryptocurrency accounts and the underlying investments therein will be opened, maintained and held, as applicable, by Gemini in the name of the Client. Advisory fees based on cryptocurrencies held in a Domain Strategy will be paid separately by the Client or deducted from the Client's Apex account. Gemini is not affiliated with Domain.

Domain will not participate as a sponsor or participant in any wrap fee programs.

While not part of its advice and advisory business, as an accommodation to Clients, Domain may permit Clients to make their own investment decisions and direct their own trades to Apex through the Domain Website or Domain App ("**Self-Directed Trading**"). In such cases, Domain will not be providing investment advice, any recommendations or advisory services and is therefore not acting as an investment adviser with respect to such trading. Such Clients will be solely responsible for any Self-Directed Trading. Clients who are no longer invested in at least one Domain Strategy will not be permitted to engage in Self-Directed Trading.

Item 5 – Fees and Compensation

In consideration of our investment advisory and portfolio management services, Domain will charge Accounts a one percent (1%) per annum management fee (the "**Management Fee**"). The Management Fee will be charged monthly in arrears and prorated for any period other than a complete calendar month. The Management Fee will be calculated based on the daily average market values of an Account's portfolio over the month prior to the Management Fee being assessed.

Domain's Management Fee is in addition to transaction expenses and other amounts charged by Apex and Gemini. Clients should carefully review the applicable Account Documents for a description and details regarding the fees and expenses associated with the services offered by Apex and Gemini, as well as Domain. As permitted by applicable law, Domain may share certain fees and/or compensation with its affiliates.

Domain's equity investment strategies generally are expected to involve the purchase or sale of publicly offered securities, and as such, typically will entail expenses related to brokerage commissions. In addition, each Client generally will be responsible for and will bear any of its custodial fees and expenses. **See also Item 12 below.**

The foregoing description is not intended to be exhaustive and is qualified in its entirety by the applicable Account Documents of each Client.

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

Domain will not charge any performance based fees to any Client in respect of any Account. **See also Item 5 above.**

Item 7 – Types of Clients

We expect to provide discretionary investment advisory and portfolio management services via the Domain Website and/or the Domain App with respect to separately managed accounts of individuals, entities, trusts and individual retirement accounts (“**IRAs**”) We may also from time to time in the future perform investment management, advisory and other services for and with respect to other types of clients.

Generally, we will only provide investment advice to individuals, entities, trusts and IRAs who are, as applicable, U.S. citizens, or lawful residents of the U.S. who have a social security number or individual taxpayer identification number, are located in the U.S., have a valid U.S. residential mailing address, and maintain a U.S. banking account.

Domain will require a minimum Account size of \$100. If funds are withdrawn and an Account is reduced below this size, Domain reserves the right to close the Account. Domain reserves the right to change its minimum Account size, or impose a maximum account size, in the future at its discretion. Domain further reserves the right to require additional disclosure information from Clients at its discretion.

Recipients of this Brochure should be aware that while this Brochure may include information about our Accounts, as necessary or appropriate, this Brochure should not be considered to represent a complete discussion of the features, risks or conflicts associated with an Account. Additional information is included in the applicable Account Documents. In no event should this Brochure be relied upon in any determination to invest in an Account. It is also not an offer of, or agreement to provide, advisory services directly to any recipient of this Brochure. Rather, this Brochure is designed to provide information about Domain for the purpose of compliance with Domain’s obligations under the Advisers Act. Accordingly, this Brochure responds to relevant regulatory requirements under the Advisers Act, which may differ from the information provided in Account Documents or public filings. To the extent that there is any conflict between discussions herein and similar or related discussions in any Account Document or public filing, the relevant Account Document or public filing shall govern.

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

Methods of Analysis and Investment Strategies

Domain will offer Clients several investment strategies designed for investors with different financial goals, investment horizons and risk tolerances. Domain will design its strategies with both equity securities and cryptocurrencies in order to offer Clients the return potential of these distinct asset classes in line with their investment goals and risk appetite.

Domain will look for investments in companies and assets that are positioned to benefit from meaningful secular growth trends and that are led by exceptional management teams. In addition, Domain will seek assets that we believe will or may possess competitive advantages that have the potential to yield pricing power in the market. Over the next decade, Domain believes that investing in innovation areas like financial technology, blockchain, cloud computing, big data, artificial intelligence, autonomous technologies and the

continued digitization of the economy can lead to superior investment returns, when coupled with robust investment and risk management processes.

Domain's cryptocurrency investment selection process will involve deep, fundamental analysis. Domain will attempt to identify blockchain protocols and applications that serve important economic functions, have displayed a material product market fit, defensible market share, a robust developer community and strong token economics. Domain's equity security selection process will also involve deep fundamental analysis. Domain will attempt to identify strong business franchises with attractive growth prospects, durable competitive advantages, strong unit economics and reasonable current valuations.

Domain will monitor the Domain Strategies in consideration of its methodologies and rebalance each Domain Strategy to account for, among other things, new investment opportunities, changes in our investment theses, outsized risk exposures, and changes in the broader economic environment.

Certain Risk Factors

There can be no assurance that a Client will achieve their investment objectives or that investments in an Account will be profitable. Each Domain Strategy will involve a substantial degree of risk, including risk of complete loss. Investments in cryptocurrencies present unique risks, which should be considered carefully, including that they may have a history of high volatility, they may be subject to new or restrictive governmental regulation, they may present security concerns, they do not have protections similar to insured securities, and they are considered a new and developing instrument. Please see below for additional risk information. Nothing in this Brochure is intended to imply, and no one is or will be authorized to represent, that the Domain Strategies will be low risk or risk free. The Domain Strategies will be appropriate only for sophisticated persons who fully understand and are capable of bearing the risks of investment. The various risks outlined below will not be the only risks associated or that may be associated with the Domain Strategies and processes and will not necessarily apply to each Account or each Domain Strategy. Clients are urged to consult with their own personal financial, legal and tax advisors before making any investment decisions.

General Economic and Market Conditions. Account activities will be affected by and subject to general economic and market conditions, such as changes in interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws (including laws relating to taxation of an Account's investments), trade barriers, trade wars, tariffs, protectionist regulatory policies, currency exchange controls, national and international political circumstances and developments, and other circumstances (including wars, epidemics and pandemics, terrorist acts, security operations and natural disasters), as well as changes in government policy precipitated by the foregoing. These and other factors may affect the level and volatility of securities prices, the correlations and relationships between the prices of various securities and the liquidity of a Account's investments in ways that impair a Account's profitability or result in losses. Unpredictable or unstable market conditions may also result in reduced opportunities to find suitable investments to deploy capital or make it more difficult to exit and realize value from a Account's investments. From time to time, including during the COVID-19 global pandemic and during 2008 and 2009, various markets around the world have experienced extreme periods of volatility, illiquidity, correlation with other markets, negative (or positive) performance and other disruptions and conditions that would previously have been viewed as extremely unlikely or even impossible. Such market developments have led to large losses and insolvencies soon thereafter. For example, during the second half of 2008, the state of the worldwide economy deteriorated into a severe recession. A similar or even more severe economic recession (or depression) could result or occur from the global response to, and as a result of, the COVID-19 global pandemic. If so, or if a similar economic situation were to occur in the future, an Account could experience a reduction in attractive investment opportunities and an Account's investments could be materially impaired in many ways that cannot be predicted.

Force Majeure Risks. Force majeure is the term generally used to refer to an event beyond the control of the party claiming that the event has occurred, including acts of God, fire, flood, weather, earthquakes, war, terrorism, labor strikes, outbreaks of disease and potentially other events or occurrences. Force majeure events in the United States and elsewhere in the world may adversely affect the ability of Domain, its affiliates or agents or the parties with whom they do business to perform their respective obligations, under a contract or otherwise. In addition, dealing with any force majeure event will divert Domain's time and effort, and the cost of repairing or replacing damaged assets could be considerable. Repeated or prolonged service interruptions may result in permanent loss of customers, substantial litigation, or penalties for regulatory or contractual non-compliance. In some cases, agreements can be terminated if the force majeure event is so catastrophic so as to render it incapable of remedy within a reasonable, pre-agreed time period. Force majeure events that are impossible or costly to cure may also have a permanent adverse effect on an Account and its investments, and a Client's potential returns would be diminished as a result.

Epidemics, Pandemics, Outbreaks of Disease and Public Health Issues. Accounts and the operations and business activities of Domain and its affiliates could be materially adversely affected or impacted in the future by the continuation or worsening of the COVID-19 global pandemic and other outbreaks of disease, epidemics, pandemics and public health issues, whether globally or limited to particular regions of the world, such as diseases or public health issues caused by other novel coronaviruses (including as a result of the emergence of new coronaviruses), Ebola virus disease, H1N1 flu, H7N9 flu, H5N1 flu (and other types or subtypes of influenza viruses), Severe Acute Respiratory Syndrome, or SARS, or other epidemics, pandemics, outbreaks of disease or public health issues. In particular, coronavirus disease 2019 (or COVID-19), an infectious disease caused by Severe Acute Respiratory Syndrome coronavirus 2 (SARS-CoV-2), was first identified in December 2019 and has since spread rapidly globally, resulting in an ongoing global pandemic. The COVID-19 global pandemic has severely and materially affected (and may continue to negatively affect and materially impact) the global economy, global equity markets and supply chains (including as a result of quarantines, shelter-in-place orders, social-distancing measures and other government-directed or mandated measures or actions to stop or slow the spread of SARS-CoV-2 and COVID-19). Although the short-term and long-term effects and consequences of COVID-19 (and the actions and measures taken or mandated by governments around the world to halt or slow down the spread of SARS-CoV-2 and COVID-19) cannot currently be predicted, previous occurrences of other epidemics, pandemics and outbreaks of disease, such as the 1918 influenza pandemic (also referred to as the Spanish flu pandemic) and the 2002-2004 SARS outbreak in Asia, had material adverse effects on the economies, capital markets and basic day-to-day operations of (and activities in) those countries and jurisdictions in which they were most prevalent. Recent efforts, actions and measures undertaken by governments, businesses and communities to protect the public health in the face of the COVID-19 pandemic (including measures designed or intended to "flatten the curve" and protect the healthcare systems in such applicable countries and jurisdictions from collapse or undergoing significant breakdowns) have resulted in partial or complete shutdowns of many sectors of the economy generally as well as severe restrictions, limitations and consequences on the means by which Domain operates its business (*e.g.*, travel restrictions or bans, mandatory quarantines, shelter-in-place orders and social distancing measures and rules), which could adversely affect or negatively impact the business, activities, financial condition, and operations of Domain and Accounts indefinitely. If and to the extent the economy and businesses begin to reopen and are allowed to resume operations or activities and people begin to return to more frequent personal or social interactions, there is a risk of recurrence of an outbreak of COVID-19, and such a recurrence or emergence of any kind of epidemic, pandemic, outbreak of disease or major public health issue could cause another slowdown or shutdown in the levels of economic activity and business activities and operations generally, or push the world or local economies into recession or depression, which could adversely affect and materially impact Domain and Accounts.

The impact of a health crisis such as the COVID-19 pandemic, and other epidemics, pandemics and outbreaks of disease that may arise in the future, depends on the duration and spread of the outbreak, the severity, the actions to contain, slow down or halt the spread of the virus or treat its impact, and how quickly and to what extent normal or semi-normal economic and operating conditions can resume, which could affect the global economy in ways that cannot necessarily be foreseen at the present time. A health crisis may exacerbate other pre-existing political, social and economic risks. Any such impact could adversely affect an Account's performance, resulting in losses to the Account and the Client.

The COVID-19 pandemic and actions, measures and steps taken by governments around the world in response to such pandemic may cause material disruptions to (or otherwise materially impact or affect) the business operations and activities of service providers on which Domain and Accounts rely (including, among others, broker-dealers, custodians and counterparties). It may also adversely impact an Account's investments, the ability of Domain to access markets or implement an Account's investment strategies in the manner originally contemplated, an Account's net asset value and therefore the Client.

Government Intervention. In 2008 and thereafter, the global financial markets underwent significant disruptions that led to certain significant governmental interventions and actions. The COVID-19 global pandemic has recently lead to, and is likely to continue to result in or lead to, substantial (and in certain cases unprecedented) governmental intervention both in the United States and abroad. Such intervention, in certain cases, was (or may be) implemented on an "emergency" basis, suddenly and substantially eliminating market participants' ability to continue to implement certain strategies or manage the risk of their outstanding positions. In addition, these interventions were and are typically unclear in scope and application, resulting in confusion and uncertainty which in itself can be materially detrimental to the efficient functioning of the markets or the economy as well as previously successful investment strategies. If governmental intervention programs or actions are unwound, there could likewise be uncertainty and adverse effects on the markets and economy. In the case of any future market disruptions, significant economic events or other events or circumstances, it is impossible to predict what interim or permanent governmental restrictions (or easing of restrictions) or measures may be imposed on the markets or the economy or the effect of such restrictions on Domain's activities and investment strategies and the activities and operations of an Account's investments.

Investment and Trading Risks Generally. All investments risk the loss of capital. No guarantee or representation is made that the Domain Strategies will be successful. The Domain Strategies may involve, without limitation, risks associated with limited diversification, equity risks, volatility, tracking risks, credit deterioration or default risks, systems risks and other risks inherent in an Account's activities. Certain investment techniques of Domain may, in certain circumstances, substantially increase the impact of adverse market movements to which an Account may be subject. In addition, an Account's investments may be materially affected by conditions in the financial markets and overall economic conditions occurring globally. Domain's methods of minimizing such risks may not accurately predict future risk exposures. Risk management techniques are based in part on the observation of historical market behavior, which may not predict market divergences that are larger than historical indicators. Also, information used to manage risks may not be accurate, complete or current, and such information may be misinterpreted.

Limited Diversification and Risk Management Failures. At any given time, an Account's portfolio may not be diversified to any material extent and, as a result, the Account could experience significant losses if general economic conditions, and, in particular, those relevant to the issuers whose securities are owned by the Account, change. In addition, an Account's portfolio may be significantly concentrated in a limited number of issuers, types of financial instruments, industries, strategies or geographic regions, and such concentration of risk may increase losses suffered by the Account. Although Domain attempts to identify, monitor and manage certain significant risks related to specific investments, these efforts cannot take all risks into account, including systematic market risk, and there can be no

assurance that these efforts will be effective. Many risk management techniques are based on observed historical market behavior, but future market behavior may be entirely different. Any inadequacy or failure in Domain's risk management efforts could result in material losses for an Account.

Highly Volatile Markets. The prices of financial instruments in which an Account invests can be volatile. Price movements of the financial instruments in which the Account's assets may be invested will be influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments and national and international political and economic events and policies. Accounts will be subject to the risk of failure of any of the exchanges on which its positions trade or of its clearinghouses. In addition, governments from time to time intervene in certain markets, directly, by regulation and otherwise, particularly in currencies, futures and options. Such intervention is often intended to directly influence prices and may, together with other factors, cause some or all of these markets to move rapidly in the same direction. The effect of such intervention is often heightened by a group of governments acting in concert.

Flaws in Domain Strategies. Any of the investment strategies, analytical models, algorithms or trading techniques used by Domain may not be successful, may have inherent limitations, may not have a tested track record, and may have operational, theoretical or other flaws or shortcomings, which could result in unsuccessful investments and increased risk and, ultimately, losses to Accounts. Adjustments by Domain to the foregoing may not be successful.

Relative Value and Directional Investments. An Account's investment in Domain Strategies will depend on Domain's ability to accurately predict future price movements of securities or the convergence of market prices toward the theoretical values expected by Domain. Any such attempt to predict future price movements is inherently risky and inaccurate. Often, price movements will be determined by unanticipated factors, and Domain's analysis of known factors may prove incorrect, in each case potentially leading to substantial losses to an Account.

Fundamental Analysis. Fundamental analysis is premised on the assumption that markets are not perfectly efficient, that informational advantages and mispricings do occur and that econometric analysis can identify trading opportunities. Fundamental analysis may incur substantial losses if such economic factors are not correctly analyzed, not all relevant factors are identified and/or market forces cause mispricings to continue despite Domain having correctly identified such mispricings. Fundamental analysis may also be more subject to human error and emotional factors than technical analysis.

"Widening" Risk. For reasons not necessarily attributable to any of the risks set forth herein (for example, supply/demand imbalances or other market forces), the prices of the financial instruments in which an Account invests may decline substantially. In particular, purchasing assets at what may appear to be "undervalued" levels is no guarantee that these assets will not be trading at even more "undervalued" levels at a time of valuation or at the time of sale. It may not be possible to predict such "spread widening" risk.

Equity Risks. Accounts will invest in equity securities. The market price of securities owned by the Account may go up or down, sometimes rapidly or unpredictably. A risk of investing in an Account is that the equity securities in its portfolio will decline in value due to factors affecting equity securities markets generally or the sectors in which the Account invests. The value of equity securities may decline due to general market conditions which are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the general outlook for corporate earnings, changes in interest or currency rates or adverse investor sentiment generally. They may also decline due to factors which affect a particular industry or industries, such as labor shortages or increased production costs and competitive conditions within an industry.

Investment in Small- and Medium-Capitalization Companies. Accounts may invest across all market capitalizations, including in small- and mid-cap issuers. Smaller capitalization stocks involve higher risks in some respects than do investments in stocks of larger companies. For example, prices of small-capitalization and even medium-capitalization stocks are often more volatile than prices of large-capitalization stocks, and the risk of bankruptcy or insolvency of many smaller companies is higher than for larger, “blue-chip” companies. In addition, due to thin trading in some small-capitalization stocks, an investment in those stocks may be highly illiquid. Some small companies have limited distribution channels and financial and managerial resources. Such companies may also be dependent on personnel (including key personnel) with limited experience.

Investments in Undervalued Equity Securities. Accounts may invest in what Domain believes to be undervalued equity securities. The identification of investment opportunities in undervalued securities is a difficult task, and there are no assurances that such opportunities will be successfully recognized or acquired. While investments in undervalued securities offer the opportunities for above-average capital appreciation, these investments involve a high degree of financial risk and can result in substantial losses. Returns generated from an Account’s investments may not adequately compensate for the financial risks assumed. An Account may make certain speculative investments in securities which the Domain believes to be undervalued; however, there are no assurances that the securities purchased will in fact be undervalued. In addition, an Account may be required to hold such securities for a substantial period of time before realizing their anticipated value. During this period, a portion of an Account’s assets may be committed to the securities purchased, thus possibly preventing the Account from investing in other opportunities.

Portfolio Turnover. Accounts will not be restricted in effecting transactions by any specific limitations with regard to their portfolio turnover rate. A Client’s investment decisions might result in substantial portfolio turnover. Investments may be sold for a variety of reasons, such as a more favorable investment opportunity or other circumstances bearing on the desirability of a continued position in such investments.

Execution Risks. An Account’s investment strategy will depend on its ability to establish and maintain an overall market position in a combination of financial instruments recommended by Domain and selected by the Client. Should an Account’s trading orders and a Client’s investment decisions not be executed in a timely and efficient manner, the Account might be able to acquire only some, but not all, of the components of such position, or if the overall position were to need adjustment, the Account might not be able to make such adjustment. In such an event, the Account would not be able to achieve the market position recommended by Domain and selected by the Client and might incur a loss in liquidating its position.

Systems and Facilities Risks. Accounts will rely extensively on computer programs and systems to recommend, trade, clear and settle securities transactions, to evaluate certain securities based on real-time trading information, to monitor its portfolio and net capital, and to generate risk management and other reports that are critical to oversight of the Account’s activities. In addition, certain Account activities may interface with or depend on systems operated by third parties, including brokers, custodians and market counterparties. Accounts will also rely on the ongoing services of Domain, which depends on access to their facilities. Although Domain attempts to develop appropriate contingency plans, there can be no assurance that such plans will be effective. For example, a natural catastrophe or terrorist incident could temporarily or permanently interfere with the availability or efficient functioning of such resources. Given the potential for extremely rapid price movements in the markets in which Accounts invest, any defect or failure in computer programs or systems or any interruption in access to facilities, however brief, could have a material adverse effect on the Account.

Soft Dollars. Domain may enter into “soft dollar” arrangements with one or more broker-dealers whereby Domain directs securities transactions to the broker dealer in return for research products and brokerage services from the broker-dealer. An Account generally pays more than the lowest available commissions for execution of these transactions. The use of “soft dollars” for eligible research, research-related and brokerage services will come within the safe harbor for the use of soft dollars provided under Section 28(e) of the U.S. Securities Exchange Act of 1934, as amended (the “***Exchange Act***”). **See also Item 12.**

Digital Assets. At the election of a Client, such Client’s Account may be invested in cryptocurrencies (“***Cryptocurrencies***”). In the future, Domain may make other digital assets available for investment, including, without limitation, decentralized application tokens, protocol tokens and other cryptofinance coins, tokens and digital assets and instruments that are based on block chain, distributed ledger or similar technologies (together with Cryptocurrencies, collectively, “***Digital Assets***”). Investments in Digital Assets are subject to many specialized risks and considerations, including risks relating to technology, security, regulation, user/market acceptance, volatility and timing. Regulation of Digital Assets and associated exchanges and enterprises is currently being developed and likely to continue to rapidly evolve. The promulgation of any additional U.S. or international laws or rules, a material change in applicable legal or regulatory requirements, or an adverse review by an applicable judicial authority of any such law or regulation, could have a material (and potentially adverse) effect of the price of any such Digital Assets and on the operations and/or financial performance of investments with exposure to any such Digital Assets, and may severely impact the development and growth of the Digital Asset market. Further, any such additional regulation or change in existing regulation, and the uncertainty surrounding Digital Asset regulation more generally, will or may, to the extent of the Account’s investment in such Digital Assets, subject the Account to increased costs to comply with new or developing requirements or regulations as well as to monitor for compliance with any new requirements or regulations going forward.

Digital Assets are loosely regulated and there is no central marketplace for currency exchange. Supply is determined by a computer code, not by a central bank, and prices have been extremely volatile. Digital Asset exchanges have been closed due to fraud, failure or security breaches. Any of Account’s funds that reside on an exchange that shuts down may be lost.

A potential investor in an Account should note that the prices of Digital Assets, and other instruments in which an Account invests may be unavailable. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument and currency markets, and such intervention (as well as other factors) may cause these markets and related investments to move rapidly.

Several factors may affect the price of 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 Assets or the use of Digital Assets as a form of payment. There is no assurance that Digital Assets will maintain their long-term value in terms of purchasing power in the future, or that acceptance of Digital Asset payments by mainstream retail merchants and commercial businesses will continue to grow.

Custody of Digital Assets. Gemini and/or an affiliate thereof will maintain or may maintain custody of some or all applicable Digital Assets, by generating the private keys that control movement of the various Digital Assets. In addition to maintaining custody of the Digital Assets in a “cold wallet,” Gemini may store certain Digital Assets on various Digital Asset exchanges. Digital Asset exchanges may also require Gemini to provide control of the private keys when the exchange is utilized by an Account. Gemini is responsible for taking such steps as it determines, in its sole judgment, to be required to maintain access to these keys, and prevent their exposure from hacking, malware and general security threats.

Digital Asset Trading is Volatile and Speculative. Digital Assets represent a speculative investment and involve a high degree of risk. As relatively new products and technologies, Digital Assets have not been widely adopted as a means of payment for goods and services by major retail and commercial outlets. Conversely, a significant portion of the demand for Digital Assets is generated by speculators and investors seeking to profit from the short or long-term holding of Digital Assets. The relative lack of acceptance of Digital Assets in the retail and commercial marketplace limits the ability of end-users to pay for goods and services with Digital Assets. A lack of expansion by Digital Assets into retail and commercial markets, or a contraction of such use, may result in increased volatility.

Risk of Loss of Private Key. Various Digital Assets are controllable only by the possessor of unique private keys relating to the addresses in which the Digital Assets are held. The theft, loss or destructions of a private key required to access a Digital Asset is irreversible, and such private keys would not be capable of being restored by Domain. Any loss of private keys relating to digital wallets used to store an Account’s Digital Assets could result in the loss of the Digital Assets and an Account could incur a substantial, or even total, loss of capital.

Initial Coin Offerings Risk. In the future, Accounts may invest in initial coin offerings (“*ICOs*”). ICOs allow for investors to purchase certain Digital Assets offered or created by blockchain based companies on various platforms in exchange for dollars or already established Digital Assets which can then be converted to dollars on a Digital Asset exchange. Prior to an ICO, many blockchain based companies offer presale tokens or Digital Assets. Presale tokens or currencies may be sold or used to buy additional tokens or currencies at a later point in time for a potentially higher value than originally purchased for. In the future, Accounts may invest in all stages, including presale rounds of ICOs. ICOs and various token presales are currently unregulated and are subject to fraud, security breaches, regulatory developments, enforcement actions, and technological developments. There is no guarantee that the token or currency purchased will have any value or worth. ICOs can at any point become subject to federal and state securities laws, federal commodity laws, and various international regulations, among other restrictions. The SEC has issued a release stating that, depending on the specific facts and circumstances of the Digital Asset in question, some ICOs may fall under securities regulation. Such future restrictions may have an adverse impact on an Account’s assets or on an Account’s ability to sell its assets. As investors may be able to purchase new tokens with already existing Digital Assets, investments in ICOs and presales subject an Account to all risks associated with Digital Assets in general.

Market Manipulation. The Digital Asset markets are new and unregulated. In the past, such markets have been targets of market manipulation, which could adversely affect holders of the underlying assets, and thus an Account. Digital Asset transaction validators or other syndicates could collude to raise and lower prices artificially. Individuals, entities, or groups could conspire to manipulate prices through “pump and dump” strategies, or other tactics. Other schemes, syndicates, groups, or individuals could play a part in manipulating markets to the detriment of an Account.

Exchange Issues. The online and offline exchanges on which Digital Assets trade are relatively new and largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for other products. To the extent that the exchanges representing a substantial portion of the volume in Digital Asset trading are involved in fraud or experience security failures or other operational issues, such exchanges' failures may result in a reduction in the value of Digital Assets and can adversely affect an investment in an Account. Errors in pricing, communication, recording transactions, or other errors may occur frequently.

Some Digital Asset exchanges have been closed due to fraud, failure (lack of sufficient capitalization or low profit margins), security breaches or operational difficulties. In many of these instances, the customers of such exchanges were not compensated or made whole for the partial or complete losses of their account balances in such exchanges. While smaller exchanges are less likely to have the infrastructure and capitalization that make larger exchanges more stable, larger exchanges are more likely to be appealing targets for hackers and "malware" (*i.e.*, software used or programmed by attackers to disrupt computer operation, gather sensitive information or gain access to private computer systems).

A lack of stability in the Digital Asset exchanges and the closure or temporary shutdown of exchanges due to fraud, business failure, or hackers or malware may reduce confidence in Digital Assets and result in greater volatility in the value of Digital Assets. These potential consequences of an exchange's failure could adversely affect an investment in an Account.

Errors in Execution of Transactions. Digital Asset transactions are generally irrevocable, and stolen or incorrectly transferred Digital Assets are likely irretrievable. As a result, any incorrectly executed Digital Assets transactions could adversely affect an investment in an Account. Digital Asset transactions are not normally, from an administrative perspective, reversible. Once a transaction has been verified and recorded, an incorrect transfer of Digital Assets or a theft of Digital Assets generally will not be reversible and an Account will normally not be capable of seeking compensation for any such transfer or theft. Although an Account's transfers of Digital Assets may be regularly made to or from an Account's cryptocurrency account, it is possible that, through computer or human error, or through theft or criminal action, an Account's Digital Assets could be transferred from an Account's cryptocurrency account in incorrect quantities or to unauthorized third parties. To the extent that an Account is unable to seek a corrective transaction with such third party or is incapable of identifying the third party which has received an Account's Digital Assets through error or theft, an Account will be unable to revert or otherwise recover incorrectly transferred Digital Assets. It is more likely than not that an Account will be unable to seek redress for such error or theft, and such loss could adversely affect an investment in an Account.

Effect of Inability to Effectively Monitor, Maintain, or Update Digital Assets Protocols, Software, or other Technology. The software, protocols, or other technology associated with a Digital Asset can sometimes prove insufficient to handle the volume, speed, or type of transactions demanded by users of that Digital Asset. In these cases, a change or upgrade in the network's protocol, software or technology may be required. If there is no centralized authority to determine the required changes, the peers in the network (transaction validators), or other actors, must determine what change is to occur and how that change will be handled. If one group of transaction validators does not agree with another on the type of protocol/software change/upgrade that should occur, a fork can occur. If a disagreement occurs, this can negatively affect the value of one or more Digital Assets. There may also be a lack of incentive for transaction validators to work on solutions for network protocol, software, or other issues. If transaction validators are not compensated sufficiently for their work on such solutions, they may not attempt to create a solution. It is also possible that groups of transaction validators could collude to create a solution that would negatively affect the value of one or more Digital Assets. It is also possible that a new update is successfully launched, but the new update turns out to negatively affect the value of one or more Digital Assets. It is also possible that protocol or software upgrades fail due to limitations inherent in a specific

Digital Asset's underlying technology or structure. Regardless of whether a Digital Asset's governance and/or ledgering is centralized or decentralized, it may encounter similar or different difficulties in monitoring, maintaining, or updating their protocols, software, or other technology.

Cybersecurity Breaches and Identity Theft. An Account, the Client, Domain, and their respective service providers will depend on information technology systems and, notwithstanding the diligence that Domain may perform on its or an Account's service providers, it may not be in a position to verify the risks or reliability of such information technology systems. An Account, the Client, Domain, and their service providers will be subject to risks associated with a breach in cybersecurity. "***Cybersecurity***" is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from both intentional cyber-attacks and hacking by other computer users as well as unintentional damage or interruption that, in either case, can result in damage and disruption to hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. Domain's, the Client's and their information and technology systems will be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Although Domain and its affiliates expect to implement various measures to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, Domain may have to make a significant investment to fix or replace them. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in Domain's and the Accounts' operations and result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information relating to Clients (and the beneficial owners of Clients). Such a failure could harm Domain's reputation, subject Domain and its respective affiliates to legal claims and otherwise affect its business and financial performance. Such damage or interruptions to information technology systems may cause losses to Accounts by interfering with the operations of Domain and its affiliates. Domain may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, adverse investor reaction, the dissemination of confidential and proprietary information and reputational damage. Any such breach could expose Domain to civil, legal or regulatory liability as well as regulatory inquiry and/or action, and the Accounts may be required to indemnify Domain against any losses incurred in connection therewith. Cybersecurity issues and risks are currently a major focus area of the SEC and other regulatory authorities.

Privacy and Data Protection Risk. Domain and its affiliates will process personal information, including by storing and maintaining personal data related to their respective investors, members, affiliates, employees and representatives, natural person investors, service provider representatives, customers and others. Such processing of personal information, which may also include the use of third-party processors and cloud-based services, will impose legal, operational and regulatory risks on Domain and its affiliates and agents. In recent years, there has been an increase in legal requirements relating to the collection, storage, use and transfer of personal information, and the legal framework around such matters is expected to continue to develop at both the international and state level. Certain activities of Domain and its affiliates may, for example, be subject to the California Consumer Privacy Act and other foreign, federal and state privacy laws such as the European Union's General Data Protection Regulation. Domain and/or its affiliates may not be able to accurately anticipate the ways in which regulators and courts will apply or interpret the law, and implementation, interpretation or application of privacy and data protection laws in a manner inconsistent with Domain's expectations may adversely affect an Account. For example, the failure of Domain, or one or more of its affiliates providing services to an Account, to comply with privacy and data protection laws could result in negative publicity and operational disruptions. The same risks will apply to any affiliates or agents of Domain should they fail to comply with privacy and data protection laws. If

Domain or its affiliates uses or discloses information improperly or suffers a security breach impacting personal information, it may be obligated to notify government authorities, stakeholders or individuals affected, which may divert Domain's and/or its affiliates time and effort and entail operational disruptions, loss of market confidence and goodwill and substantial expense, particularly if any litigation or enforcement action or mandatory remediation were to also arise out of such breach.

Risks Related to Electronic Communication. Domain, Apex and other third-party service providers will provide or furnish statements, reports and other communications relating to Accounts in electronic form, such as email or via a website ("***Electronic Communications***"). Electronic Communications may be modified, corrupted, or contain viruses or malicious code, and may not be compatible with an investor's electronic system. In addition, reliance on Electronic Communications involves the risk of inaccessibility, power outages or slowdowns for a variety of reasons. These periods of inaccessibility will delay or prevent receipt of reports or other information by the investors.

Item 9 – Disciplinary Information

There are no legal or disciplinary events to report regarding Domain or any of our directors, executive officers, or principals regarding any criminal or civil actions in a domestic, foreign, or military court.

Neither Domain nor any of our directors, executive officers, or principals has been involved in any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

Neither Domain nor any of our directors, executive officers, or principals has been involved in any self-regulatory organization proceedings.

Item 10 – Other Financial Industry Activities and Affiliations

Domain has no financial industry affiliations.

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

We will adopt and implement a Code of Ethics, which sets forth standards of business conduct for our supervised persons. Our Code of Ethics will primarily be designed to educate supervised persons about our professional ethics, emphasize our fiduciary duties to Clients, emphasize the obligations of supervised persons to comply with applicable laws, prevent the misuse of material non-public information and address conflicts of interest that could arise from personal trading by supervised persons. Among other things, we will impose certain requirements on supervised persons relating to the purchase or sale of certain securities for their own accounts and the accounts of certain affiliated persons. In addition, we will maintain a restricted list that contains issuers and securities in which supervised persons generally are not permitted to trade without the prior approval of the Chief Compliance Officer. The restricted list will include, for example, the limited circumstances when we and/or our affiliates may have acquired, or may otherwise be in possession of, material, non-public information about an issuer. Supervised persons generally will be required to disclose and report their personal securities transactions and personal securities holdings. We also will maintain certain policies and procedures designed to prevent supervised persons from misusing material non-public information. We will furnish a copy of our Code of Ethics to Clients upon request.

In addition to the Code of Ethics, we will also prepare and adopt a compliance manual which will set forth various additional compliance policies and procedures with respect to Domain, including various procedures and policies that are reasonably designed to ensure compliance by Domain and its personnel with the Advisers Act and other applicable securities laws.

Our supervised persons may on occasion offer or accept or provide gifts or invitations to entertainment but generally attempt to avoid any activity that would create a material conflict of interest or impropriety in the course of our business relationships. Our gifts and entertainment policy will implement internal controls to monitor such activity, including requiring supervised persons to report to, and/or obtain prior approval from, the Chief Compliance Officer before accepting or providing gifts and entertainment of significant value or that may otherwise be inappropriate under the circumstances.

Item 12 – Brokerage Practices

Domain will place all trade orders for securities transactions on behalf of Accounts solely with Apex. Clients must open brokerage accounts with Apex if they are to become Domain's advisory clients. Overall, weighing the factors described below and its duty of best execution, Domain believes that Apex generally satisfies an overall best qualitative execution service for securities transactions for Accounts.

In general, we have authority to select securities brokers to be used for Account transactions and negotiate commission rates and other payments by Clients. We have selected Apex on the basis of obtaining the best overall terms available, which we evaluated based on a variety of factors, including, without limitation: (i) financial stability of Apex; (ii) Apex's "commission" rates or spread; (iii) Apex's inventory and availability of the security in question; (iv) websites and other related services; (v) the size and type of the transaction; (vi) quality of execution; (vii) confidentiality; (viii) the operational facilities of Apex (including back office efficiency); and (ix) the ability to handle a block order for securities and distribution capabilities. Because commission rates in the United States as well as other jurisdictions are negotiable, selecting Apex on the basis of considerations which are not limited to applicable commission rates may at times result in higher transaction costs than would otherwise be obtainable.

In placing orders for the purchase and sale of securities, we seek best net execution, which includes both commissions and execution prices. Orders are placed with Apex which we believe to be responsible and provide effective execution of Account orders under conditions most favorable to Accounts. In any particular instance, based on single factors such as price alone or a specific security, there is no guarantee that Apex will offer the lowest commission price or otherwise be the most competitive. Domain will receive and review information from Apex about the quality of executions effected by Apex.

We may, but not will not be required, to aggregate orders or block trades for multiple Accounts when advantageous to Accounts, when not favoring certain Accounts over other Accounts and when consistent with the duty of best execution. Our primary consideration is fair and equitable treatment of all of our Accounts, and not simply lowering commissions. Whenever possible, the discretionary purchase or sale (execution) price of a security bought or sold during the same day effected by Apex will be equitably averaged and aggregated with similar discretionary purchases and sales for other clients, including for related persons.

Although Domain does not currently do so, we may in the future take into account and utilize research provided by securities brokers such as Apex. This may occur when we determine in good faith that the amount of commissions charged by a broker is reasonable in relation to the value of the overall service provided to our Clients, including research and other products and services provided by such broker. In such cases, Clients may pay commissions to such broker in an amount greater than the amount another broker might charge, and this is expected to occur regularly. We may use eligible research in such cases, in providing investment management services to all or some of our Clients based on the nature of the research, rather than just those Clients for which soft dollar transactions are executed.

The phrase “soft dollars” is commonly used to refer to the use of brokerage compensation (including commissions, spreads, mark-ups and mark-downs) to pay for research, brokerage services and other goods and services. Section 28(e) of the Exchange Act provides a safe harbor to investment advisers who use soft dollars generated by their advised accounts to obtain investment research and brokerage services that provide lawful and appropriate assistance to the adviser in the performance of investment decision-making responsibilities. Similar provisions apply in certain other jurisdictions. In general, the expectation is that in exchange for brokerage compensation, research and brokerage services are provided. For such purposes, research is interpreted to also include conferences, seminars, road shows and similar meetings sponsored or arranged by the brokerage firm. The mechanics or earned “credits” of a “soft dollar” arrangement may be used to pay expenses (like the cost of research) that would otherwise be properly chargeable to clients, when it is impossible, impractical or undesirable to pay such expense directly.

The use of brokerage commissions to obtain soft dollar items for an investment adviser presents a conflict of interest between the investment adviser and its clients, because a client that pays for such soft dollar items is the exclusive beneficiary and the investment adviser also receives the benefit. In certain cases, the investment adviser’s use of soft dollars can be deemed or may tend to increase the investment adviser’s profitability (where it is able to acquire them without expending its own resources) and may influence the investment adviser to select one broker rather than another to perform services for its clients.

Through aggregating orders or block trades Domain will be able to offer either whole or fractional shares. Domain may but not will not be required, to aggregate all dollar based purchases and places whole share orders for executions. It then may but not will not be required, to allocate any fractional shares to the individual Accounts. In the event of a liquidation or transfer of the assets in an Account to another brokerage account, Domain will convert such fractional shares to cash.

Item 13 – Review of Accounts

Domain will provide all Clients with continuous access to their Accounts via the Domain Website and/or the Domain App. All information relating to Accounts, including Account performance and Account balance, will be provided via the Domain Website and/or the Domain App in real-time. Clients may also receive periodic email communications or Domain Website or Domain App notifications or alerts describing portfolio performance, Account information or other features or information. Apex and Gemini will prepare statements showing all transactions and Account balances on a monthly basis. Domain urges Clients to compare Apex and Gemini account statements with the information available on the Domain Website and/or the Domain App.

We generally expect and intend to conduct periodic reviews and monitoring of Accounts and investments in a manner that is consistent with our fiduciary duty to each Client. To this end, Domain generally will conduct periodic reviews of Accounts, their investments and assets on at least a quarterly basis, or more frequently consisting of more narrow or targeted reviews or in response to certain events or circumstances that have or may have a material effect on an Account’s portfolio or all or a subset of investments. In connection with such reviews, we focus on changes in economic, political or market conditions as well as deviations from the Domain Strategies, and other reasons.

Item 14 – Client Referrals and Other Compensation

Neither we nor any of our affiliates generally receive any economic benefit from a non-Client for providing investment advice or other advisory services with respect to our Clients.

Item 15 – Custody

Domain will not maintain custody of Client assets that we manage. Client assets will be maintained in an account maintained by Apex which will act as a “qualified custodian.” Under Domain’s Account Documents, Clients will authorize Domain to instruct Apex to deduct Domain’s advisory fees directly from Accounts at Apex, which is considered a form of “custody.” For this reason, Domain will be deemed to have “custody” of Client assets for this limited purpose. While Domain will instruct Apex to withdraw its fees, Apex will maintain actual custody of Client assets. Gemini will not custody Digital Assets, but instead will rely on unaffiliated third parties to provide custody of Digital Assets.

Clients will receive account statements from Apex and Gemini on a monthly basis. Account statements will reflect the withdrawal of any fees. All Clients are advised to review their account statements promptly to confirm the accuracy of the information contained therein. Should discrepancies or errors be found, Clients should contact Domain, Apex or Gemini, as applicable, directly.

Domain will not be deemed to have custody for any Self-Directed Trading.

Item 16 – Investment Discretion

Subject to the applicable Account Documents and a Client’s selection of one or more Domain Strategies, we generally will have discretionary power and authority over the types of investments to be bought and sold, as well as the amount to be bought and sold, on behalf of each of our Accounts with respect to such Domain Strategies. In addition, we generally will have the authority to select, retain and engage the service providers, counterparties and vendors to perform and provide services with respect to each Account, and the negotiation of fees, commissions and compensation to be paid or payable to such persons by Accounts. Domain will not have any discretionary power or authority with respect to Self-Directed Trading.

Item 17 – Voting Client Securities

Domain will exercise voting authority over Client proxies pursuant to its proxy voting policies and procedures in accordance with Rule 206(4)-6 of the Advisers Act. Domain will vote such proxies in accordance with the proxy voting policies and procedures in our compliance manual. In general, proxy proposals, amendments, consents or resolutions will be required to be voted in a manner that we believe will serve the best interests of Clients, as determined in the discretion of Domain. One of the primary factors we will consider when determining the desirability of investing in the securities issued by a particular company is the quality and depth of its management. Accordingly, we believe that the recommendation of management on any issue should be given substantial weight in determining how proxy issues are resolved. As a matter of practice, we will vote on most issues presented in a proxy statement in accordance with the position of the company’s management, unless we determine that voting in accordance with management’s recommendation would adversely affect the investment merits of owning the stock. Domain will attempt to identify actual or potential conflicts of interest that could compromise the independence of voting decisions when voting a proxy on behalf of a Client. Where a material conflict of interest is identified, Domain generally will attempt to resolve the conflict before voting a proxy. Domain may determine not to vote proxies in respect of securities of an issuer if it determines that it would be in a Client’s overall best interest not to vote. Clients generally may not direct or otherwise influence votes with respect to any particular proxy solicitation. Clients may obtain copies of our proxy voting policy by contacting us.

Item 18 – Financial Information

Not applicable. Domain does not solicit prepayment of advisory fees six months or more in advance. Domain has not been the subject of a bankruptcy petition at any time during the past ten years and has no financial condition that is reasonably likely to impair its ability to meet any contractual commitments to Clients.