

## 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 Money**”, 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 Money 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 Money is also available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2 – Material Changes**

Domain Money’s initial registration with the SEC, which became effective on December 7, 2021, is being materially amended to reflect changes to its business. As part of this amendment, Domain Money is changing all Items to reflect the material changes. This Amendment reflects Domain Money’s decision to change its business from actively managed strategies to interactive and automated (or “robo”) advisory services. As a result of these changes, once fully implemented, Domain Money will be amending its eligibility for SEC registration from being a “multi-state adviser” to a registration based upon its qualification as an “Internet adviser” relying on SEC Rule 203A-2(e).

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## **Item 4 – Advisory Business**

Domain Money is in the process of materially changing its business and, as a result, has temporarily halted its prior primary advisory services, which consisted of providing various Domain Portfolios, as of August 12, 2022 and during a transition period (“**Transition Period**”) is actively building a new advisory platform that will provide automated, algorithmic allocations of client assets (“**Domain Allocations**”, as discussed further below). Domain Money anticipates that it will launch its new advisory services in the next approximately 30 to 60 days, which launch may be in stages. During the Transition Period, Domain Money is not taking any new clients or permitting any new accounts to be opened. Existing holdings and accounts are subject to client instruction as to their disposition. Domain Money will make amendments to this Brochure to provide additional information prior to or as of the initial date of such launch.

To the extent applicable, the information in this Brochure is supplemented by the Terms of Services contained on the Domain Website and Domain App.

### **Domain Money - General Information**

Domain Money, founded in 2021, is a private investment management firm that will provide discretionary, web-based, automated investment advisory services with respect to separately managed accounts (each an “**Account**”, and collectively, “**Accounts**”) of advisory clients (each a “**Client**”, and collectively, “**Clients**”). Domain Money is a privately held company headquartered in New York, New York. Domain Money is principally owned, indirectly, by Adam Dell. Information about Domain Money’s organizational and ownership structure, as well as information about its advisory business, is provided in Part 1 of Domain Money’s Form ADV, which is available online at <http://www.adviserinfo.sec.gov>. Domain Money’s eligibility for SEC registration will change and after the launch of its new advisory services will be based on it qualifying as an “Internet adviser” relying on SEC Rule 203A-2(e).

### **New Business - Domain Allocations**

During the Transition Period, Domain Money is preparing to launch the Domain Allocations platform. As currently expected, the services (“**Services**”) associated with the Domain Allocations will primarily consist of the following:

- Algorithmically Formulating asset allocation models
- Make recommendations as to Domain Allocations based on Client input
- Managing Clients Accounts with discretion based on the selected Domain Allocations; and
- Taking actions incidental to and in furtherance thereof.

Domain Money is currently developing algorithms that will generate the asset allocation models and make recommendations to each Client based on the information furnished by each Client. Once the Domain Allocations services are launched, Domain Money will provide or make the automated investment advice available to Clients via its website (the “**Domain Website**”) and/or mobile application (the “**Domain App**”). This investment advice will be in the form of an automated allocation of assets on an interactive basis. The allocation is expected to consist of an allocation of assets across a basket of exchange traded funds (“**ETFs**”) deemed suitable for each Client. Domain Allocations may be rebalanced from time to time in the discretion of Domain Money based on algorithmic triggers designed to respond to certain market conditions. As part of the Domain Allocations, Domain Money will communicate trading instructions regarding Accounts to Apex, Gemini and WebBank, as applicable.

In addition, the Domain Allocations will be subject to the revised terms and conditions set forth in the

applicable Account documents of each Client, which include a revised Advisory Agreement (revised in connection with the launch) and certain third-party documents related to the Client's account(s) (collectively, "**Account Documents**"), Information about the Domain Allocations also will be set forth on the Domain Website and the Domain App. Such additional information supplements this Brochure (and any amended future Brochure) and should be reviewed prior to investing through Domain Allocations. A Client's automated allocation will be based on the Client's investment objectives and other relevant information as provided to us by each client. This Brochure discusses future plans and events and such plans and events are subject to change. The following discussions are generally written in the present tense for ease of reading but no advisory business will begin until launched.

Recipients of this Brochure should be aware that while this Brochure includes 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 solely relied upon in any determination to invest in or through 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 Money for the purpose of compliance with Domain Money'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.

### **Prior Business - Domain Portfolios**

Prior to this Amendment, Domain Money provided investment advice in the form of various, actively managed portfolios based on Domain Money's proprietary equity and cryptocurrency research (each a "**Domain Portfolio**" and collectively, the "**Domain Portfolios**"). As part of this prior service, Domain Money offered five different Domain Portfolios (Domain Core, Domain Edge, Domain Metaverse, Domain Balanced, and Domain Access), each of which had specific objectives and could be actively managed within Clients' individual accounts. As described above, Domain Money no longer actively manages the Domain Portfolios. This change in business was communicated to Clients via email on multiple dates and is reflected in the Domain App.

### **Customer Information and Continuing Services**

After the Transition Period, once the new advisory services are launched, Domain Money will permit new Clients to be onboarded and accounts to be opened. 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 ("**Questionnaire**"). Domain Money's automated allocation model will utilize the information from the Questionnaire to recommend a Domain Allocation appropriate for the Client's risk tolerance, financial parameters and investment objectives and considers, among other things, in Domain Money's discretion, the Client's employment status, income, investment goals and risk appetite, time horizon and net assets. The Domain Allocation recommendation created by Domain Money for each Client is based upon the algorithmic model that considers information provided by the Client through the Questionnaire. Client's must promptly inform Domain Money of changes in their financial situation or investment objectives and if there are any securities from which they are or may become legally restricted from buying or selling. Domain Money shall have no liability for Client's failure to promptly inform Domain Money of changes in Client's financial situation or investment objectives, or any reasonable restrictions Client wishes to impose that may affect the management of the securities in the Account, as applicable. The suitability of the Domain Allocation recommendation is also limited by and relies upon the accuracy and completeness of the information provided by the Client.

In connection with opening an Account, each Client will need to open an account with WebBank, a Utah-chartered industrial bank (“**WebBank**”). Client’s may deposit U.S. dollars in their WebBank deposit account. Such amounts will be displayed through the Domain App and may be used to fund investments through Domain Allocations. Any purchases for a Domain Allocation are made through the purchase of equity securities from Apex (as defined herein) and cryptocurrencies from Gemini (as defined herein). To deposit U.S. dollars into the WebBank account, Client’s must link at least one (1) deposit account held by a U.S. depository institution through the Domain App. WebBank will only accept deposits from valid bank accounts located in the United States. To link a deposit account, Clients are required to provide Domain Money (through the Domain App) or its service providers the routing number and account number for the deposit account. Once a Client has linked a deposit account through the Domain App, the Client can provide instructions to Domain Money through the Domain Website or Domain App, and Domain Money will pass such instructions to WebBank, so that WebBank can initiate an automated clearing house (“**ACH**”) transaction to debit the relevant amount of U.S. dollars from Client’s third-party deposit account and have such amount deposited to Client’s WebBank deposit account. Clients ACH deposits, or a portions thereof, may be made available for investment immediately at Domain Money’s discretion; however, Clients may be prohibited or limited in their ability to withdraw funds or purchase equity securities or cryptocurrencies until the funds underlying a ACH deposit have successfully settled (“**Settlement Date**”). When Clients execute a transaction for the purchase of equity securities or cryptocurrencies, a hold may be placed on funds in their WebBank deposit account with respect to such purchase until the Settlement Date. The amount of any such hold may exceed the expected purchase price based on Domain Money’s assessment of potential fluctuations of the price of such equity securities or cryptocurrencies. When Clients sell an equity security or cryptocurrency, the proceeds of the sale will be deposited into their WebBank account. Clients will be able to withdraw these funds only after the Settlement Date. Clients may withdraw U.S. dollar amounts from their WebBank accounts by instructing Domain Money to instruct WebBank to initiate a transaction to send such amounts back to the Client’s linked deposit account. The ability to withdraw amounts from WebBank may be limited in the discretion of WebBank or Domain Money (e.g., Clients may not be able to withdraw U.S. dollar amounts until all scheduled trades have settled or for other reasons). ACH deposit settlement times are subject to bank holidays, the internal processes and jurisdiction of the applicable external bank, and the internal processes of WebBank.

Each Client that engages Domain Money for Domain Allocations will be required to open a securities brokerage account and provide discretionary authority over that account to Domain Money. Brokerage accounts, agreements, and order processing are conducted through Apex Clearing Corporation (“**Apex**”), an SEC-registered and FINRA member broker-dealer that provides brokerage and brokerage related services to Domain Money and Clients. Using Apex’s application program interface (“**API**”), Domain Money allows Clients to create a securities brokerage account on any mobile device through the Domain App. All securities brokerage account opening functionalities, including identity verification and approval, are handled digitally and quickly by Apex. Apex also provides custody, clearing, and settlement services for Domain Money and Clients’ securities. Clients (or Domain Money on Clients behalf) will provide instructions related to the brokerage account and transactions to be conducted through the Domain App, and Domain Money will pass those instructions to Apex. Domain Money does not and will not open or maintain securities brokerage accounts on behalf of Clients. Securities brokerage accounts and the underlying investments therein are opened, maintained and held, as applicable, by Apex in the name of the Client. Apex is not affiliated with Domain Money.

Domain Money may determine to offer cryptocurrencies as part of certain Domain Allocations. If and to the extent a Client desires to and elects to include cryptocurrencies as part of their investment objectives, such Client also needs to open a cryptocurrency account with Gemini Trust Company, LLC (“**Gemini**”) and provide discretionary authority over that account to Domain Money. Cryptocurrency accounts, agreements, and transaction processing are conducted through Gemini. Using Gemini’s API, Domain

Money allows Clients to create a cryptocurrency account with Gemini on any mobile device through the Domain App. All cryptocurrency account opening functionalities, including identity verification and approval, are handled digitally and quickly by Gemini. Client order instructions are submitted to Gemini via the Domain App and Gemini buys and sells supported cryptocurrencies, stores cryptocurrencies acquired by Clients, and tracks cryptocurrencies transactions. Clients (or Domain Money on Clients' behalf) will provide instructions related to the cryptocurrency account and transactions to be conducted through the Domain App, and Domain Money will pass those instructions to Gemini. Domain Money does not and will not open or maintain cryptocurrency accounts on behalf of Clients. Cryptocurrency accounts and the underlying investments therein are opened, maintained and held, as applicable, by Gemini in the name of the Client. Advisory fees based on cryptocurrencies held in a Domain Allocation are paid separately by the Client or deducted from the Client's Apex account. Gemini is not affiliated with Domain Money.

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

### **Self-Elected Trading**

Domain Money may permit Clients outside of the Domain Allocations Portfolios to make their own investment decisions and direct their own trades through the Domain App or Domain Website. This is referred to as “***Self-Elected Trading***.” With Self-Elected Trading, Domain Money provides participating Clients with access to a list of securities (“***Self-Elected Trading List***”) that has been limited by Domain Money to reasonably match a Client's suitability level or category based on the information provided by the Client. Domain Money will not be providing any specific recommendations or investment advice about the securities on the Self-Elected Trading List and providing the Self-Elected Trading List does not mean that Domain Money is recommending that Client purchase, hold or sell any of the securities on the Self-Elected Trading List. Domain Money is only providing advisory services to the extent that it has pre-selected the Self-Elected Trading List. As a result, Domain Money is only acting as an investment adviser with respect to selecting the Self-Elected Trading List, and not in connection with transactions which are made by Clients that choose to conduct Self-Elected Trading in Client's own discretion. If a Client purchases a security under Self-Elected Trading, Domain Money does not provide specific recommendations or advice as to the amount of the security or whether the specific security or transaction or amount to be traded is appropriate for the individual beyond its inclusion in the Self-Elected Trading List. Similarly, Domain Money does not provide monitoring or advice as to when or if the Client should sell, buy more or continue to hold such security, whether such trading or security is overly concentrated or volatile, or whether the amount purchased or held is suitable for the client. A security suitable for investment may become unsuitable based on market events, volatility or an excessive concentration in such security. Domain Money will not consider investments and assets outside of Domain Money. Clients choosing to purchase individual securities on the Self-Elected Trading List may create an excessive concentration in one or more securities, sectors, or asset classes without the client's knowledge, inconsistent with their risk profile and contra indicated to Domain Money's recommendation. Domain Money does not monitor Self-Elected Trading for such events or considerations. Each Client shall be solely responsible for the trading decisions of such Client's Self-Elected Trading.

### **Item 5 – Fees and Compensation**

During the Transition Period, Domain Money will not charge a management fee (the “***Management Fee***”). Domain Money is actively considering an appropriate fee model for the pending Domain Allocation services and will communicate any such fees as part of the amended documentation and disclosures associated with the Domain Allocations.

Domain Money does not charge any Management Fee for Self-Elected Trading since it is not offering any

advisory services in connection with such actual trading and such trading is done solely by the Client. Domain Money's parent entity, Domain Money, Inc., in consideration of it providing (with Domain Money) the access to trade cryptocurrencies with Gemini through Self-Elected Trading, shares in the per trade fees and receives a fee (generally ranging from 0.5% to 1.5%) of each trade effected by Gemini involving cryptocurrencies traded through Self-Elected Trading. In that regard, Domain Money, Inc. (and Domain Money because of its affiliation) has a financial incentive to promote Self-Elected Trading even though it is not part of Domain Money's advisory business. If applicable, Clients whose trading of cryptocurrencies through Gemini is pursuant to Domain Money's advisory services and included in a Domain Allocation (for which Domain Money may receive a Management Fee) may pay a reduced per trade charge, which is not shared by Domain Money, Inc.

The foregoing description is not intended to be exhaustive and is qualified in its entirety by the applicable Account Documents of each Client and disclosures set forth on the Domain Website and Domain App.

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

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

## **Item 7 – Types of Clients**

Domain Money uses algorithmic allocations 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 primarily individuals but which may also include entities and trusts. 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, including individual retirement accounts ("**IRAs**") and custodial accounts.

Generally, we only provide investment advice to Clients 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 Money may require a minimum Account size, but has not yet made that determination in connection with Domain Allocations. To the extent that a minimum Account size is required, Domain Money reserves the right to close the Account in circumstances where funds are withdrawn and an Account is reduced below the applicable minimum account size. Domain Money reserves the right to include or change its minimum Account sizes, or impose a maximum account sizes, in the future at its discretion. Domain Money further reserves the right to require additional disclosure information from Clients at its discretion.

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

### **Methods of Analysis and Investment Strategies**

Domain Money is developing the Domain Allocations based on asset allocation models and proprietary algorithms. Domain Money will monitor the Domain Allocations for Clients in consideration of the algorithmic allocation model underlying an Account. During the Transition Period, Domain Money will not be managing any Client assets or Accounts. The following discussion is for after the launch of Domain Allocations as described above.



## **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. Domain Allocations will involve certain degrees of risk, including risk of complete loss of invested capital.

Investments in cryptocurrencies present unique risks, which should be considered carefully, including that they 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 Allocations are low risk or risk free. The various risks outlined below are not the only risks associated with the Domain Allocations and processes and are not necessarily applicable to each Account. Clients are urged to consult with their own personal financial, legal and tax advisors before making any investment decisions.

***General Economic and Market Conditions.*** Changes in general global, regional and U.S. economic and geopolitical conditions and 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, may affect Domain Money's and Accounts' activities. For example, the recent outbreak of hostilities and disputes between Russia and Ukraine could destabilize the worldwide economy and equity markets in various respects. Interest rates, general levels of economic activity, the price of securities and participation by other investors in the financial markets may affect the value and number of investments made by an Account or considered for prospective investment. Material changes and fluctuations in the economic environment, particularly of the type experienced since 2008 that caused significant dislocations, illiquidity and volatility in the wider global economy, and the market changes that have resulted and may continue to result from the COVID-19 global pandemic, may affect the Accounts' ability to make investments and the value of investments held by the Accounts or the Accounts' ability to dispose of investments. The short-term and the longer-term impact of these events are uncertain, but they could continue to have a material effect on general economic conditions, consumer and business confidence and market liquidity. Any economic downturn resulting from a recurrence of such marketplace events and/or continued volatility in the financial markets could adversely affect the financial resources of entities owned by the Accounts. Additionally, during, and following, the U.S. presidential elections in 2016 and 2020, there has been discussion and dialogue regarding potential significant changes to U.S. trade policies, legislation, treaties and tariffs, including vis-à-vis replacing the North American Free Trade Agreement ("*NAFTA*") with the United States-Mexico-Canada Agreement, as well as trade policies and tariffs affecting Canada, China, the European Union and other countries. Tariffs and other trade restrictions recently imposed by the U.S. government and any further similar changes in U.S. trade policy have triggered some, and could trigger additional, retaliatory actions by affected countries, possibly resulting in "trade wars". The impact of subsequent or anticipated further changes by the Biden administration are unclear at this point. At this time, it is unknown whether and to what extent new legislation will be passed into law, pending or new regulatory proposals will be adopted, international trade agreements will be negotiated, or the effect that any such action would have, either positively or negatively, on the Accounts or their investments. Investments can be expected to be sensitive to the performance of the overall economy. Moreover, a serious pandemic, natural disaster, armed conflict, threats of terrorism, terrorist attacks, global pandemics or outbreaks of disease and the impact of military or other action could severely disrupt global, national and/or regional economies. A resulting negative impact on economic fundamentals and consumer and business confidence may negatively impact market value, increase market volatility and reduce liquidity, all or any of which could have an adverse effect on

the performance of the Accounts' investments, the Accounts' returns and the Accounts' ability to make and/or dispose of investments. No assurance can be given as to the effect of these events on the Funds or their investment objectives. Global economic and market conditions have recently been materially adversely affected by the ongoing conflict between Russia and Ukraine.

***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 Money, us, 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 our 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 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. In particular, the outbreak of hostilities between Russia and Ukraine, and the sanctions imposed or announced by the United States and various other countries in response to such hostilities, could adversely affect the worldwide economy and the investment activities of clients.

***Epidemics, Pandemics, Outbreaks of Disease and Public Health Issues.*** Accounts and the operations and business activities of Domain Money 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 Money 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 Money 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 Money 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 Money and Accounts rely (including, among others, broker-dealers, custodians and counterparties). It may also adversely impact an Account's investments, the ability of Domain Money 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 Money's activities and investment strategies and the activities and operations of an Account's investments.

***Terrorist Attacks, War and Natural Disasters.*** Terrorist activities, anti-terrorist efforts, armed conflicts involving the United States or its interests abroad and natural disasters may adversely affect the United States, its financial markets and global economies and markets and could prevent clients from meeting their respective investment objectives and other obligations. The potential for future terrorist attacks, the national and international response to terrorist attacks, other acts of war or hostility and recent natural disasters have created many economic and political uncertainties in the past and may do so in the future, which may adversely affect the United States and world financial markets and clients for the short or long-term in ways that cannot presently be predicted.

In February 2022, an armed conflict escalated between Russia and Ukraine and Russia invaded Ukraine. In response to such invasion, the United States, the European Union and many other countries

and organizations have announced various sanctions against Russia and various Russian persons and companies. The sanctions announced by the U.S. and other countries to date include restrictions on selling or importing goods, services, or technology in or from affected regions and travel bans and asset freezes impacting connected individuals and political, military, business and financial organizations in Russia. The U.S. and other countries could impose wider sanctions and take other actions should the conflict further escalate. It is not possible to predict the broader consequences of this conflict, which could include further sanctions, embargoes, regional instability, geopolitical shifts and adverse effects on macroeconomic conditions, currency exchange rates and financial markets, all of which could impact any Accounts' or its investment's business, financial condition and results of operations.

***Inflation Risk.*** The rate of inflation has increased significantly in recent months and there is some concern that the rate of inflation may continue to increase or stay elevated for the foreseeable future. Inflation and rapid fluctuations in inflation rates have recently and in the past led to (and may in the future lead to) negative effects on economies and financial markets. For example, wages and prices of inputs increase during periods of inflation, which can negatively impact returns on investments. In an attempt to stabilize inflation, governments may impose wage and price controls or otherwise intervene in the economy. Governmental efforts to curb inflation often have negative effects on the level of economic activity. For example, there may be instances where certain revenues related to an Accounts' investments may be fixed by contract for meaningful periods of time whereas related expenses may not be. As a result, an unexpected increase in the rate of inflation could have a material and adverse impact on the Accounts and their investments.

***Sanctions Compliance Considerations.*** Economic sanction laws in the United States and other jurisdictions may prohibit or otherwise restrict us and clients from engaging in transactions in or relating to certain countries and relating to certain individuals and entities. In the United States, the U.S. Department of the Treasury's Office of Foreign Asset Control ("**OFAC**") and U.S. Department of State administer and enforce laws, executive orders and regulations establishing U.S. economic and trade sanctions. Such sanctions prohibit, among other things, transactions with, and the provision of services to, certain foreign countries, territories, entities and individuals. These persons and entities include specially designated nationals and other persons and entities targeted by OFAC sanctions programs. The lists of OFAC restricted countries, territories, persons and entities, including the List of Specially Designated Nationals and Blocked Persons, as such list may be amended from time to time, can be found on the OFAC website at [www.treas.gov/ofac](http://www.treas.gov/ofac). In addition, certain programs administered by OFAC prohibit dealing with individuals or entities in certain countries regardless of whether such individuals or entities appear on the lists maintained by OFAC. These types of sanctions and similar laws and regulations in non-U.S. jurisdictions may significantly restrict direct or indirect investment activities in certain countries. The economic sanctions and related laws of different jurisdictions may conflict with one another, such that compliance with all applicable laws may be difficult. Failure to comply with OFAC or other relevant sanctions could have serious legal and reputational consequences, including civil and criminal penalties.

***Investment and Trading Risks Generally.*** All investments risk the loss of capital. No guarantee or representation is made that the Domain Allocations will be successful. The Domain Allocations may involve, without limitation, risks associated with limited diversification, equity risks, instrument liquidity and concentration risks, volatility, tracking risks, credit deterioration or default risks, systems risks and other risks inherent in an Account's activities. In addition, an Account's investments may be materially affected by conditions in the financial markets and overall economic conditions occurring globally. Domain Money'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. To

the extent applicable to an Account, cryptocurrencies are a relatively nascent asset class and therefore lack significant historical performance metrics on which traditional risk measuring, monitoring and hedging are based.

***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 Money 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 Money'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 may 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 are 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 Allocations.*** Any of the investment strategies, analytical models, or algorithms used by Domain Money 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 Money to the foregoing may not be successful.

***"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 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 may 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, the sectors in which the underlying companies operate, or the individual companies themselves 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, changes to industry regulation and competitive conditions within an industry.

***Investment in Small- and Medium-Capitalization Companies.*** Accounts can 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 and therefore single clients, individuals and events can have a disproportionate negative impact on the business, its finances, and its stock price. Such companies may also be dependent on personnel (including key personnel) with limited experience.

***Portfolio Turnover.*** Accounts are not 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 depends on its ability to establish and maintain an overall market position in a combination of financial instruments recommended by Domain Money 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 Money and selected by the Client and might incur a loss in liquidating its position and or lost opportunity in its acquisition of the new position

***Systems and Facilities Risks.*** Accounts 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 interface with or depend on systems operated by third parties, including brokers, custodians and market counterparties. Accounts also rely on the ongoing services of Domain Money, which depends on access to their facilities. Although Domain Money 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 Money may enter into “soft dollar” arrangements with one or more broker-dealers whereby Domain Money 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 will be invested in cryptocurrencies (“*Cryptocurrencies*”). In the future, Domain Money may make other digital assets available for investment, including, without limitation, decentralized application tokens, protocol tokens and other crypto-finance 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 an 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 maintain custody of all applicable Digital Assets in segregated accounts held as part of the services provided by Gemini to Clients. Gemini is responsible for taking such steps as it determines, in its sole judgment, to be required to maintain appropriate security policies and procedures, 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 Money. 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 Money, and their respective service providers depend on information technology systems and, notwithstanding the diligence that Domain Money 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 Money, and their service providers are 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 Money’s, the Client’s and their information and technology systems may 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 Money and its affiliates 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 Money 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 Money’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 Money’s reputation, subject Domain Money 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 Money and its affiliates. Domain Money 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 Money to civil, legal or regulatory liability as well as regulatory inquiry and/or action, and the Accounts may be required to indemnify Domain Money 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 Money and its affiliates 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, impose legal, operational and regulatory risks on Domain Money 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 Money 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 Money 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 Money’s expectations may adversely affect an Account. For example, the failure of Domain Money, 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 Money should they fail to comply with privacy and data protection laws. If Domain Money 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 Money’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 Money, Apex, Gemini and other third-party service providers 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**

Domain Money accepted an Offer of Settlement with the Securities Division of the Office of the Secretary of the Commonwealth of Massachusetts on August 22, 2022 involving late filing of a Notice filing and under which it agreed to be censured, pay a \$5,000 fine and agree to certain additional conditions. See Domain Money Form ADV Part 1A for more information. Other than reported above: There are no legal or disciplinary events to report regarding Domain Money or any of our directors, executive officers, or principals regarding any criminal or civil actions in a domestic, foreign, or military court.

Neither Domain Money 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 Money 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 Money has no financial industry affiliations.

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

Domain Money has adopted and implemented a Code of Ethics, which sets forth standards of business conduct for our supervised persons. Our Code of Ethics is primarily 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 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 maintain a restricted list that contains issuers and securities in which supervised persons. The Chief Compliance Officer may impose a restricted list that may 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 are required to disclose and report their personal securities transactions and personal securities holdings. We also 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, Domain Money prepared and adopted a compliance manual which sets forth various additional compliance policies and procedures with respect to Domain Money, including various procedures and policies that are reasonably designed to ensure compliance by Domain Money 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 implements 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**

During the Transition Period, Domain Money will not be placing any orders. The following discussion is for after the launch of Domain Allocations as described above. Domain Money places 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 Money’s advisory clients. Overall, weighing the factors described below and its duty of best execution, Domain Money 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 experience and 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 Money 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 Money 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 be 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 Money will be able to offer either whole or fractional shares. Domain Money 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 Money will convert such fractional shares to cash.

### **Item 13 – Review of Accounts**

Domain Money provides all Clients with continuous access to their Accounts via the Domain App. All information relating to Accounts, including Account performance and Account balance, are 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, Gemini and WebBank are expected to prepare statements showing all transactions and Account balances on a monthly basis. Domain Money urges Clients to compare Apex and Gemini account statements with the information available on the Domain Website and/or the Domain App.

During the Transition Period, Domain Money will not be placing any orders. The following discussion is for after the launch of Domain Allocations as described above. Domain Money conducts 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 Money generally conducts 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 allocation models underlying the Domain Allocations, and other reasons. Domain Money conducts an annual review of each Client relationship.

## **Item 14 – Client Referrals and Other Compensation**

Domain Money may compensate certain third parties for making client referrals as part of their marketing efforts for Domain Money. Such arrangements will be in compliance with the Advisers Act. Domain Money does not receive compensation for services other than those described in this Brochure.

## **Item 15 – Custody**

During the Transition Period, Domain Money will not be managing any Accounts. The following discussion is for after the launch of Domain Allocations as described above. Domain Money does not maintain custody of Client assets that we manage. Client assets are maintained in Client accounts maintained by Apex (for securities) and Gemini (for cryptocurrencies), which each act as a “qualified custodian.” Under Domain Money’s Account Documents, Clients authorize Domain Money to deduct Domain Money’s advisory fees directly from Accounts at WebBank, which is considered a form of “custody.” For this reason, Domain Money is deemed to have “custody” of Client assets for this limited purpose. While Domain Money will instruct WebBank to withdraw its fees, Apex and Gemini maintain actual custody of Client assets. With disclosure to Clients, cash to be used to pay Domain Money’s Management Fee may also be custodied at Apex and/or Gemini.

Clients receive (have access to) account statements from Apex, Gemini and WebBank, as may be issued by each, on a monthly basis. Account statements 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 Money, Apex or Gemini, as applicable, directly.

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

## **Item 16 – Investment Discretion**

During the Transition Period, Domain Money will not have any investment discretion. The following discussion is for after the launch of Domain Allocations as described above. Subject to the applicable Account Documents and any investment through Domain Allocations, we generally 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 the Domain Allocations. In addition, we generally 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 Money does not have any discretionary power or authority with respect to Self-Elected Trading.

## **Item 17 – Voting Client Securities**

Domain Money does not vote proxies on behalf of Clients and their Accounts and does not take any action or render any advice with respect to voting of proxies or any corporate action, legal proceeding or other related matter in connection with the securities in the Account. Clients retain the right to vote proxies and take any such action. It is the Client’s sole responsibility on whether to vote and how to vote and whether to engage in any matter or legal proceeding. Proxies will be provided by Apex and may be made available to Client’s via the Domain App.

## **Item 18 – Financial Information**

Not applicable. Domain Money does not solicit prepayment of advisory fees six months or more in advance. Domain Money 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.