

PCIDX GROUP, LLC

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ADV Part 2A – Disclosure Brochure

Effective: August 21, 2023

This Part 2A of Form ADV (“Disclosure Brochure”) provides information about the qualifications and business practices of PCIDX Group, LLC (referred to as “we,” “our,” “us,” the “Firm,” “Advisor,” or “PCIDX Group”). If you have any questions about the contents of this Brochure, please contact us at (908) 312-1437 or cyrill@pcidx.io.

The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration with the SEC or state regulatory authority does not imply any specific level of skill or training. This Disclosure Brochure provides information about PCIDX Group, LLC to assist you in determining whether to retain the Advisor.

Additional information about our Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. Our Firm’s CRD number is 324662.

ITEM 2: MATERIAL CHANGES

This Disclosure Brochure, dated January 17, 2023, is our initial registration brochure. It contains information regarding our qualifications, business practices, nature of the advisory services we provide, as well as a description of potential conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with the Advisor. Should you have any additional questions regarding our Firm or the contents of this Firm Brochure, please contact us by emailing cyrill@pcidx.io.

MATERIAL CHANGES

This Disclosure Brochure is the Firm's initial filing; therefore, there are no material changes to disclose.

FULL BROCHURE AVAILABLE

From time to time, we will amend this Disclosure Brochure to reflect changes in business practices, regulations, and other routine updates as required by the respective regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you annually and/or if a material change occurs.

To request a complete copy of our Brochure, please contact us by telephone at (908) 312-1437 or by email cyrill@pcidx.io. Alternatively, you can view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our Firm name or our CRD No. 324662.

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ITEM 4: ADVISORY BUSINESS

A. FIRM DESCRIPTION

PCIDX Group, LLC (“PCIDX Group” or the “Firm”), is a Delaware Limited Liability Company, founded in October 2022, and based in Raleigh, North Carolina.. The Firm is currently registered with the Securities and Exchange Commission (“SEC”) however is currently pending approval with the state securities department in North Carolina. The firm will provide investment management services to pooled investment vehicles (each a “Client” or “Fund”). PCIDX Group is 50% owned by JAJ Associates, LLC and 50% by Mythen GP, LLC (controlled by Mythen Ventures LLC, a company owned 100% by Cyrill Wiget who is also running PCIDX Group in the capacity of Managing Member and President). All material conflicts of interest are disclosed in this Disclosure Brochure.

B. TYPES OF ADVISORY SERVICES

PCIDX will provide services to investment funds that invest in mid-to late- stage privately-held technology companies from different geographical regions that are backed by top-tier venture capital firms and institutional investors. The Funds allow investors to participate through a tradeable investible fund (also known as a certificate), which tracks an index or indexes of different diversified baskets of late-stage private companies (i.e., Top 25 Latam Unicorns, Top 50 European Unicorns, Top 50 Global FinTech Unicorns). The investment opportunities are acquired in the secondary market, i.e. purchases of shares or limited partnership rights from existing investors (Venture capital firms, founders, C-suite Executives and employees). Although the Funds source their portfolios mainly from the secondary market, a participation in primary financing is not categorically excluded.

Interests in the Funds are offered to certain sophisticated, qualified investors, including high net worth individuals, retirement plans, trusts, partnerships, corporations, or other businesses. The Firm tailors its advisory services specific to each Client, based on the Client’s outlined investment objectives as described in the applicable Client’s (i) confidential offering memorandum and (ii) governing documents (referred to collectively as “offering documents”).

Each Client has a specific investment objective and may invest across different asset classes, different geographies, or different industries. The Firm’s focus is on providing advisory services to Clients investing in the secondary market. Clients primarily engage the Firm for its advisory services on investment allocation, investment sizing, investment structure, fee sizing, decisions around capital calls and distributions, and investment exit considerations.

PCIDX Group has discretion and authority to manage and direct the investment of capital for the Funds, pursuant to, and as limited by, an investment management agreement executed between PCIDX Group and the Managed Funds. PCIDX Group follows a rule-based investment policy which is described for each Managed Fund in its fund offering documents. The investment advice focuses primarily on mid- to late-stage privately-held technology companies from different geographical regions that are backed by top-tier venture capital firms and institutional investors.

The Funds are not registered as an investment company under the Investment Company Act of 1940 and only offer interests in private placements. Further, such interests in private placements are only offered to accredited investors (as defined in Rule 501(a) of Regulation D of the Securities Act that are also qualified clients (as defined in Rule 205-3(d) of the Investment Advisers Act and qualified purchasers (as defined in Section 2(a)(51) of the Investment Advisers Act). Investors who reside in certain states are required to meet standards different from or in addition to those described above. Investors will be required to represent in writing that they meet any such standards that may be applicable to them. The managing member of a fund can, without the consent of the existing members, admit new members to a fund. The managing member may reject a subscription from an investor for any reason in its sole and absolute discretion. If a subscription is rejected, the payment remitted by the investor will be returned without interest.

C. TAILORED RELATIONSHIPS

PCIDX Group offers the same suite of services to all our clients. The advisory services and recommendations offered by the Firm are based on the individual needs of our clients and their investment goals.

D. WRAP FEE PROGRAMS

Our Firm does not participate in and is not a sponsor of wrap fee programs.

E. ASSETS UNDER MANAGEMENT

When calculating regulatory assets under management, an investment adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services. The Firm has a pending registration with the States of New Jersey and Florida and does not yet have any assets to report.

ITEM 5: FEES AND COMPENSATION

The following disclosures outline how PCIDX Group is generally compensated. However, PCIDX Group enters into different fee arrangements on a fund-by-fund basis, based on the size of the offering and number of investors. Specific disclosure of PCIDX Group's compensation is discussed in each special purpose vehicle's offering document. PCIDX Group's compensation with each Client is negotiable.

A. FEE SCHEDULE

Investment Management Services

PCIDX Group charges the diversified Funds a 3% annual fee of the Assets under Management. Further detailed description of each of the Funds and their terms are provided in a Confidential Offering Memorandum, Limited Partnership Agreement or Limited Liability Company Operating Agreement, and/or other governing documents, as applicable, for such Fund (collectively, the "Operating Documents"). The valuation of each investment in a Fund is ordinarily determined

based upon valuations calculated by PCIDX Group and its administrators on a regular basis, but at least quarterly, and by their auditors on an annual basis.

A potential investor should read and review all Offering Documents in their entirety before making any investment decisions. PCIDX Group may, in its sole discretion, enter into arrangements with investors under which the management fee is reduced, waived or calculated differently with respect to such investors, including and without limitation, investors that are members, affiliates, or employees of PCIDX Group or any affiliates or investors that make a substantial investment or otherwise are determined to represent a strategic relationship. Additionally, the general partner can earn compensation and there are additional costs and expenses associated with the Fund that are paid directly and indirectly by the investors. The offering memorandum contains disclosures of the costs, expense, carried interest calculations, withdrawal options, and return on investment payments

B. PAYMENT OF FEES

Investment Management Services

The Funds are charged each quarter on a pro rata basis in advance, based on the amount of assets under management at the date of payment. The fees are deducted from the clients' assets in the Fund.

C. OTHER FEES AND PAYMENTS

Organizational Expenses: The Funds will bear the expenses of the organization of the entities (including legal, accounting, administrative, tax, audit, printing, marketing, and other comparable expenses).

Operating Expenses: The Funds will bear the expenses for ordinary operating expenses as applicable, including, but not limited to, administration, accounting, and legal fees and disbursements (including legal fees related to the protection of the Managed Fund's investments); audit and tax preparation expenses, custodial fees, bank service fees: fund formation expenses; investment-related travel & entertainment expenses; expenses in connection with proposed transactions (including, without limitation, travel and other due diligence expenses and expenses relating to investments that fail to close); research fees, including business data, pricing, and analytics costs; liability insurance premiums with respect to the manager; trustee and related fees, and any other reasonable expenses (as determined by the Managing Member in its sole discretion) related to the purchase, sale, holding, or transmittal of Fund assets or Fund liabilities. Expenses paid on behalf of a client by PCIDX Group are reimbursed by such client.

D. PREPAYMENT OF FEES

Investment Management Services

PCIDX Group collects fees in advance on a quarterly basis.

E. OTHER COMPENSATION

Neither our Firm nor our representatives receive additional compensation from the sale of securities or other investment products.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

A. Performance Based Compensation

PCIDX Group does not assess Performance Fees. Affiliated general partners to the Funds may receive a performance-based incentive fee as further detailed in the Funds specific offering memorandum and as stated above.

Performance-Based Fees (“Performance Fees”) are based on a share of the capital gains or capital appreciation of the assets of a client. Our fees are calculated as described in Item 5 above.

B. Side-By-Side Management

PCIDX Group does not provide Side-By-Side Management.

ITEM 7: TYPES OF CLIENTS & ACCOUNT REQUIREMENTS

PCIDX Group generally provides investment advice to pooled investment vehicles. While PCIDX Group has no stated minimum investment size for investors in the Funds, the Funds typically require a minimum investment amount. A typical minimum investment is \$100,000. The investment minimum is disclosed in the Fund’s offering documents and may be waived at the discretion of the Firm.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

INVESTING IN SECURITIES INVOLVES A RISK OF LOSS THAT YOU, AS A CLIENT, SHOULD BE PREPARED TO BEAR. THERE IS NO GUARANTEE THAT ANY SPECIFIC INVESTMENT OR STRATEGY WILL BE PROFITABLE FOR A PARTICULAR CLIENT.

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

PCIDX Group applies a rule-based investment strategy in each different Fund. These rules are described in detail in the Offering Documents. PCIDX Group intends to manage various Funds that invest in mid-to late- stage privately-held technology and other venture backed companies from different geographical regions that are backed by top-tier venture capital firms and institutional investors. The Funds allow investors to participate through a tradeable investible private fund (also known as a certificate), which tracks an index or indexes of different diversified

baskets of late-stage private companies (i.e., Top 25 Latam Unicorns, Top 50 European Unicorns, Top 20 Global FinTech Unicorns).

The Funds typically purchase shares from company insiders or other venture funds who have invested in these companies at an early stage or in primary capital financings. PCIDX Group selects and ranks in each geographic region the target companies in descending order and selects the 25 or 50 (or any other number defined in the offering documentation) largest companies that meet the screening criteria for the fund. The minimum criteria to be considered are as follows: The company has an operating history of more than five years, is backed by top-tier Venture Capital firms or institutional investors, had primary financing rounds in the last 2 rounds (equity or debt financings), is revenue generating, at least Series D stage or later.

PCIDX Group is not applying a full due diligence process as applied by venture capital firms or investment banks in the early stage of their life cycles, because the investments are vetted by the top-tier venture capital firms and institutional investors who have already invested. Despite this reliance on due diligence conducted in large measure by third party companies, PCIDX Group applies its own due diligence process that includes reviews of publicly available information, information available through specialized databases, information available through PCIDX Group or any of its affiliated entities proprietary resources and may undertake analysis which may include calls or meetings with the founders, current management and if possible, with existing investors and Board of Directors to check the health status of current revenues, market developments and if any compliance or legal issues are pending.

Therefore, the Advisor has the discretion to disqualify a company that fulfills above selection criteria if substantial or material concerns are raised. If an eligible company doesn't allow trading of any shares, it will also be disqualified and the next company in the ranking will be selected. This process is also helpful to determine with our proprietary valuation models what the fair market value of the companies' stake would be and at what price level PCIDX Group is willing to invest. The objective of the investment strategy is to keep the companies in the portfolio until they are going public and are listed at a public stock exchange. It's common practice that such pre-IPO shares have a lock-up period of 180 days after being listed. In this case, the shares are sold as soon as they are unblocked.

If a company is sold, the proceeds will be used to make a distribution to its limited partners to cover their tax obligations, the remaining amount is invested into a new company that will be accepted into the index portfolio, in order to make sure that there are always the same amount of companies in the index.

B. RISK OF LOSS

Clients must be aware that investing in securities involves risk of loss of the principal.

Every method of analysis has its own inherent risks.

Fund Investment Risks

Limited Independent Due Diligence. The Fund is relying on the investment of institutional investors in the Fund and their own independent third party due diligence. The Firm will not have access to the third party due diligence but will conduct its own limited due diligence. The Fund has not independently verified the data obtained from these sources and it cannot give any assurance of the accuracy or completeness of the data.

Dependence on Key Persons. The Fund is highly dependent on the skills of certain key persons whose departure may cause the investment to suffer significantly. There can be no assurances that any key person will remain associated with the company in which the Fund is invested.

Economic Risks. The investment is exposed to the inherent risks of global and regional adverse political, economic and financial market developments, including recession, inflation, availability of affordable credit and currency fluctuations that could lower revenues and reduce income. This may result in deterioration of results of operations and potentially reducing the value of the investments.

General Risks

No Assurance of Profit or Distributions. There is no assurance that the Fund's investments will be profitable or that any distributions will be made to the Members. Any return on investment to the Members will depend on successful investments. The marketability and value of any such investment will depend on many factors beyond the control of the Fund. The expenses of the Fund may exceed its income and the Members could lose the entire amount of their contributed capital.

Reliance on the Managing Member and no Authority by Members. All decisions regarding the management and affairs of the Fund will be made exclusively by the Managing Member. Accordingly, no person should invest in the Fund unless such person is willing to entrust all aspects of management of the Fund to the Managing Member. Members will have no right or power to take part in the management of the Fund. As a result, the success of the Fund for the foreseeable future depends solely on the abilities of the Managing Member.

Risk of Loss. A Member could incur substantial, or even total, losses on an investment in the Fund. An investment in the Fund is only suitable for persons willing to accept this high level of risk.

Effect of Carried Interest. The Managing Member will receive a Carried Interest based on a percentage of any net profits, as a priority distribution after return of investors' contributed capital. Under certain circumstances, the Managing Member may receive amounts of Carried Interest which are disproportionate to the amounts of total cumulative profits received by the Fund.

Tax Considerations. It is not possible to provide here a description of all potential tax risks to a person considering investing in the Fund. Prospective investors are urged to consult their own legal counsel and tax advisors with respect thereto. The Fund may not make periodic distributions of its net income or gains, if any, to Members. The amount and timing of any distributions will be determined in the sole discretion of the Managing Member.

Restrictions on Transfer. The Fund's investments are subject to certain restrictions on transfer, including a requirement that the Managing Member consent to any such transfer. There is no present market for the Fund's investments, and no market is likely to develop in the future. Accordingly, Members may not be able to liquidate their investment in the event of an emergency or for any other reason. Investors should only purchase interests in the Fund if they can bear the economic risk of their investment, who can afford to have their funds committed to an illiquid investment and who, if necessary, can afford a complete loss of their investment.

Lack of Insurance. The assets of the Fund are not insured by any government or private insurer except to the extent portions may be deposited in bank accounts insured by the Federal Deposit Insurance Corporation and such deposits are subject to such insurance coverage. Therefore, in the event of the insolvency of a depository or custodian, the Fund may be unable to recover all of its funds so deposited.

Revised Regulatory Interpretations Could Make Certain Strategies Obsolete. In addition to proposed and actual accounting changes, there have recently been certain well-publicized incidents of regulators unexpectedly taking positions which prohibited investment strategies which had been implemented in a variety of formats for many years. In the current unsettled regulatory environment, it is impossible to predict if future regulatory developments might adversely affect the Fund.

Importance of General Economic Conditions. Overall market, industry or economic conditions will have a material effect on performance.

While this information provides a synopsis of the events that may affect an investor's investments, this listing is not exhaustive. Although our methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Prospective investors should read the entire private placement memorandum for the Fund and consult with their own advisers before deciding whether to invest in the Fund. Investors should understand that there are inherent risks associated with investing and depending on the risk occurrence; clients may suffer *loss of all or part of the client's principal investment.*

C. RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES

PCIDX Group does not primarily recommend a particular type of security as our recommendations are unique to each client based on their needs, goals, and risk capacity.

ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisors are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of the management of our Firm. **Neither the Firm nor any of its management persons have been involved in legal or disciplinary events that are related to past or present investment clients.**

Our backgrounds are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching our Firm name or our CRD number 324662.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As a registered investment advisor, we are required to disclose when we, or any of our principals, have any other financial industry affiliations.

A. FINANCIAL INDUSTRY ACTIVITIES

Neither PCIDX Group nor its representatives are a registered broker/dealer and does not have an application pending to register as a broker/dealer.

B. FINANCIAL INDUSTRY AFFILIATIONS

PCIDX Group is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, the Firm's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

The Firm does not have any arrangements that are material to its business or its clients with a related person who is a investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading advisor or futures commission merchant, banking or thrift institution, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein. The Firm does have a relationship with Hedgebay Securities, LLC, who will be engaged as a placement agent for the Funds and provide the Firm data and information related to the Funds.

D. SELECTION OF OTHER ADVISORS

Our Firm does not recommend or select other investment advisors for our clients, nor do we have any other business relationships with other investment advisors that creates a material conflict of interest.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION OF CODE OF ETHICS

All employees of PCIDX Group must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, PCIDX Group has adopted a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures relating to personal trading by PCIDX Group personnel. PCIDX Groups' Code of Ethics and Employee Policies and Procedures Manual, which specifically deal with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Neither our Firm, nor its representatives, recommend or effect transactions in securities in which any related person may have material financial interest.

C. PROPRIETARY / SIMULTANEOUS TRADING

Our Firm, or its related persons, may buy interests in the same funds that are recommended to clients at or around the same time they invest. However, any purchase of an interest in a fund by the Firm or its related person will be subject to the Firm's fiduciary duty to its clients. The Firm will always document any transactions that could be construed as a conflict of interest.

To mitigate or remedy any conflict of interest or perceived conflict of interest, the Firm will monitor the purchase of interests in a fund to ensure adherence to its Code of Ethics. All related persons are expected to adhere strictly to these guidelines.

ITEM 12: BROKERAGE PRACTICES

A. SELECTION AND RECOMMENDATION

For more information about the custodial relationships of the Funds, refer to the private placement memorandum of the Fund.

The Funds may engage a third-party administrator and accountant to prepare investor statements and to calculate and determine the value of the Fund. Further, each of the Funds may be subject to an annual audit by an accounting firm registered with the Public Company Accounting Oversight Board ("PCAOB"). As outlined under Item 8 above, private placements, alternative investments, and special purpose vehicles often have no liquidity provisions and a secondary market in which to sell your investment may not be available. Because private placements and special purpose vehicles are not regulated, they are not subject to reporting requirements. Please refer to the offering memorandum for guidance on reporting, if any.

B. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

PCIDX Group does not receive "soft dollars."

C. BROKERAGE FOR CLIENT REFERRALS

Our Firm does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

D. DIRECTED BROKERAGE

Our Firm does not allow clients to direct brokerage outside our recommendation.

E. ORDER AGGREGATION

PCIDX Group does not engage in the trading of traditional securities and therefore does not aggregate orders.

F. TRADE ERROR POLICY

The Firm does not engage in the trading of securities and therefore does not have trade errors.

ITEM 13: REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

PCIDX Group reviews the Funds, periodically conducts due diligence on the investments, reviews the status, financials, and progress of development of the investments, and communicates with owners, officers, and directors of the investments in the Funds. As deemed necessary, the Firm will provide communications to investors about the status of the Fund. Additionally, investors may be provided audited annual financial statements on the Fund in which they are invested.

B. INTERMITTENT REVIEWS

Events may arise that trigger a special review of a Fund. Such events might include unusual performance, change in investment restrictions, market volatility, change in investment strategy, changes in the tax code, or changes in the client's circumstances.

Clients should promptly notify the Firm of any material changes to their financial situation or if other circumstances occur that might affect our Firm's investment advice.

C. REPORTS

Investors in the Funds will receive communications from the Fund, which may include the status of the underlying investment as well as audited financial statements.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS FROM OTHERS

Hedgebay and PCIDX Group are affiliated with each other through mutual ownership and therefore client referrals from both sides are not excluded. PCIDX Group may engage placement agents to assist in marketing interests in or more of the Funds. The placement agents will generally be paid for such introduction on a negotiated basis as a percentage of the money raised and/or from the fees that PCIDX Group earns from such Funds. If such interests are acquired through a placement agent retained by PCIDX Group, one should not view any such recommendation of such agent as being disinterested, as the agent will generally be paid for the introduction as a percentage of money raised and/or out of the fees PCIDX Group receives from the Fund. As described above, Hedgebay may act as a placement agent for the Funds and also offer the secondary trading of such limited partnership interests.

B. COMPENSATION TO UNAFFILIATED THIRD PARTIES

Our Firm does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

ITEM 15: CUSTODY

A. CUSTODIAN OF ASSETS

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

PCIDX Group does not have custody of client assets. The Firm will hold funds from investors who wish to invest in Fund in an operating account until the total subscription amount is fulfilled. At that time, the investor funds will be transferred to the managing member of the Fund.

B. ACCOUNT STATEMENTS

Although the Firm is the client's advisor, the client's will receive financial statements from the company in which the Fund invests.

ITEM 16: INVESTMENT DISCRETION

PCIDX Group exercises discretion in managing the investments of the Funds based on the Fund's investment objectives, policies, and strategies disclosed in the offering documents.

ITEM 17: VOTING CLIENT SECURITIES

To the extent a proxy exists, PCIDX Group will vote proxies for the Funds. Proxies will be voted in a way that best serves the interests of the Funds and its investors.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET REQUIREMENT

Our Firm is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client and six months or more in advance.

B. FINANCIAL CONDITION

Our Firm does not have any financial impairment that will preclude the Firm from meeting contractual commitments to clients.

C. BANKRUPTCY PETITION

Our Firm meets all net capital requirements that it is subject to, and the Advisor has not been the subject of a bankruptcy petition in the last 10 years.

ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Please refer to the Form ADV Part 2B (“Brochure Supplement”) for background information about our Firm’s investment adviser representatives. Please refer to Item 10 of this Firm Brochure for information regarding our Firm’s outside business activities. Our Firm does not receive performance-based fees. Neither our Firm nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings. Neither our Firm nor its management persons have any relationships or arrangements with any issuers of securities.

A. BACKGROUNDS OF PRINCIPAL OFFICERS

The education and business background of Cyrill Wiget, the Firm’s investment adviser representative, can be found in his Form ADV Part 2B (“Brochure Supplement”).

B. OTHER ACTIVELY ENGAGED BUSINESSES BY FIRM OR ITS PERSONNEL

Other business activities for each relevant individual can be found on the ADV Part 2A Brochure Supplement for each such individual and set forth in Item 10 of this Disclosure Brochure.

C. PERFORMANCE-BASED FEES

PCIDX Group does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. MATERIAL DISCIPLINARY DISCLOSURES OF MANAGEMENT PERSONS

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. OTHER MATERIAL RELATIONSHIPS

There are no additional relationships or arrangements to report under this section.

PRIVACY POLICY

An important part of the relationship we have with our clients is the information they share with us. We want each client to know how we treat their private information. We keep personal information such as Social Security Numbers and account balances confidential. We take steps to safeguard this data from anyone who should not have access to it. We do not sell this information to anyone. In dealing with PCIDX Group, LLC, clients can expect that we will take the steps outlined below to keep all their information confidential and secure.

OUR PRIVACY POLICY

In providing financial services and products to our clients, we collect certain non-public information about them. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to our clients, or as permitted by law. Protecting your privacy is important to us.

INFORMATION WE COLLECT

The non-public personal information we have about clients includes what they give us when opening an account or communicating with us. This could include:

- Name and address
- Social Security Number
- EINs
- Investment objectives and experience
- Financial circumstances
- Account balance and account transactions

HOW WE SHARE YOUR PERSONAL INFORMATION

We do not sell personal client information to anyone.

Affiliates. We may share personal information about you with our affiliated companies for everyday business purposes, however, our affiliated companies are not permitted to use this information to market their products or services to you.

We do not disclose personal information about our clients to non-affiliated third parties, without expressed written consent. We may disclose anonymous information that cannot be linked to an individual client on occasion, but only to companies that we hire to help us provide products and services to our clients, or as required by law, or as authorized by the client personally, or as otherwise described in this Privacy Policy.

Service Providers. Companies and individuals that provide services on our behalf or help us operate our services and business (such as IT, hosting, tax, audit, customer relationship management and support, print and mail fulfillment, data management, email delivery, etc.).

Service-Related Third Parties. Brokers, custodians, administrators, transfer agents, investment funds and their respective managed and other non-affiliated third parties as necessary to provide our services to you.

HOW INFORMATION IS USED

We use your personal information for the following purposes:

Service Delivery. We use your personal information to provide, operate, and improve the Service; execute your transactions; provide support for the service; and respond to your inquiries, questions and feedback.

Compliance and Operations. We may use your personal information to: comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities; protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); audit our internal processes for compliance with legal and contractual requirements and internal policies; and prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

HOW INFORMATION IS SAFEGUARDED

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of client information. These include confidentiality agreements with companies we hire to help us provide services to clients, password-protected user access to our computer files, and strict confidentiality policies that apply to all Firm personnel, vendors, and contractors.

YOUR DATA CHOICES

You have the following choice with respect to your personal information:

Decline to provide information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

How to contact us. You can reach us in the following ways:

- Office Location: 555 Fayetteville Street, Suite 300, Raleigh, NC 27601
- Email: cyrill@pcidx.io
- Phone: (917) 626-5512