Validus Capital LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 30, 2026

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Validus Capital LLC ("Validus Capital" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (424) 499-1360.

Validus Capital is a registered investment advisor with U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Validus Capital to assist you in determining whether to retain the Advisor.

Additional information about Validus Capital and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 319212.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Validus Capital. For convenience, the Advisor has combined these documents into a single disclosure document.

Validus Capital believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Validus Capital encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes
Since our last filed Form ADV Part 2A, dated March 31, 2025, no material changes have been made.

Future Changes
From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 319212. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (424) 499-1360.

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Item 4 – Advisory Services

A. Firm Information

Validus Capital LLC ("Validus Capital" or the "Advisor") was founded in February 2022 and became a registered investment advisor in April 2022 with the U.S. Securities and Exchange Commission ("SEC"). The Advisor is organized as a Limited Liability Company ("LLC") under the laws of the State of Delaware. John Krambeer, through Valant Holdco LLC, is the principal owner of Validus Capital.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Validus Capital. For information regarding this Disclosure Brochure, please contact Sean Chen (Chief Operating Officer and Chief Compliance Officer) at (424) 499-1371 or via email at schen@validus-cap.com.

B. Advisory Services Offered

Validus Capital provides wealth management services, including investment management, financial planning, legacy planning and family office services to high net worth individuals, families, trusts, estates, businesses, attorneys, and foundations (each referred to as a "Client").

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith towards each Client and seeks to mitigate conflicts of interest. Validus Capital's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Wealth Management Services

Validus Capital provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary wealth management and related advisory services. Validus Capital works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to design a portfolio strategy. Validus Capital will then construct an investment portfolio, primarily consisting of mutual funds, SMAs, exchange-traded funds ("ETFs"), individual equity securities, alternative investments, and/or fixed income securities. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of the Client. The Advisor may recommend unaffiliated money managers for certain investment mandates. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Validus Capital's investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Validus Capital will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Validus Capital evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Validus Capital may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Validus Capital may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against the market movement. Validus Capital may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Use of Independent Managers

Validus Capital may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

Financial Planning Services

Validus Capital will typically provide a variety of financial planning and consulting services to Clients. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning (income and expense projection), cashflow analysis, estate planning, insurance analysis, education planning, charitable planning and/or tax planning.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Validus Capital may also refer Clients to an accountant, attorney, or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For project-based or ad-hoc engagements, the Advisor may not provide a written summary.

Family Office Services

Validus Capital offers a wide range of family office services to high net worth and ultra-high net worth families, including both advisory and non-advisory services. Our services include private equity research and reporting, real estate investment strategies and reporting, tax efficient investment strategies, customized family-level financial reporting, tax planning and tax efficiency counseling, consolidated performance and tax reporting, margin lending solutions, philanthropy and family governance, concierge type services, and bill payment support.

Private Funds

Validus Capital provides investment supervisory services to investment vehicles (the "Funds") that are exempt from registration under the Investment Company Act of 1940, as amended (the "1940 Act") and whose securities are not registered under the Securities Act of 1933, as amended (the "Securities Act"). All Funds currently managed by Validus Capital are disclosed on its Form ADV 1A, Section 7.B.1.

Validus Capital provides investment supervisory services to each Fund in accordance with the limited partnership agreement (or analogous organizational document) of such Fund or separate investment and advisory, investment management or portfolio management agreements (each, an "Advisory Agreement").

Investment advice is provided directly to the Funds, subject to the discretion and control of the applicable general partner, and not individually to the investors in the Funds. Services are provided to the Funds in accordance with the Advisory Agreements with the Funds and/or organizational documents of the applicable Fund. Investment restrictions for the Funds, if any, are generally established in the Limited Partnership Agreement, the organizational or offering documents of the applicable Fund, Advisory Agreements and/or side letter agreements negotiated with investors in the applicable Fund (such documents collectively, a Fund's "Organizational Documents").

In unique cases, Validus may enter into separate agreements, commonly referred to as “side letters”, or other similar agreements with a particular member in connection with admission to a Validus Private Fund without the approval of any other member. These agreements may establish rights or terms that are more favorable to the member than those applicable to other members. These rights or terms may include, but are not limited to:

- Reporting obligations
- Waiver of certain confidentiality obligations
- “Most favored nation” provisions
- Negotiated fees
- Rights or terms requested or necessary in light of particular investment, legal, regulatory or public policy characteristics of a member

C. Client Account Management

Prior to engaging Validus Capital to provide advisory services, each Client is required to enter into one or more written advisory agreements with the Advisor that define the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Validus Capital, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Validus Capital will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client or unique client goal.
- Portfolio Construction – Validus Capital will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Wealth Management and Supervision – Validus Capital will provide wealth management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

Validus Capital does not manage a wrap fee program.

E. Assets Under Management

As of December 31, 2025, Validus Capital manages $1,851,121,746 in discretionary assets and $685,726,679 in non-discretionary assets. Total assets under management are $2,536,848,425. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written advisory agreements with the Advisor.

A. Fees for Advisory Services

Wealth Management Services

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees generally range from 0.30% to 1.00% annually based on the following tiered schedule:

First $5,000,000	1.00%
Next $5,000,000	0.75%
Next $15,000,000	0.50%
Next $25,000,000	0.40%
Over $50,000,000	0.30%

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. For certain Clients, the Advisor may charge a fixed fee for its services instead of a tiered schedule. Wealth management services may include financial planning and consulting services, pursuant to the terms of the wealth management agreement. The Client's fees will take into consideration the aggregate assets under management with the Advisor across all accounts, unless otherwise agreed in writing. All securities held in accounts managed by Validus Capital will be independently valued by the Custodian. Validus Capital will not have the authority or responsibility to value portfolio securities.

Clients may make additions to and withdrawals from their account[s] at any time, subject to Validus Capital's right to terminate an account. Additions may be in cash or securities provided that Validus Capital reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Validus Capital, subject to the usual and customary securities settlement procedures. However, Validus Capital designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a Client's investment objectives. Validus Capital may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] by the Independent Manager.

Financial Planning Services

Validus Capital may include financial planning as part of an overall wealth management engagement. For separate engagements, Validus Capital charges either on an hourly basis or a fixed engagement fee. Hourly fees range up to $500 per hour. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement at the Advisor's hourly rate. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

Private Funds

Management Fees

Validus Capital receives a management fee from its Funds. The fee is based on the net asset value within each limited partner's capital account. This fee is generally collected on a quarterly basis, and directly debited from the capital account.

The precise amount and calculation of the Management Fees for each Fund are set forth in such Fund's Limited Partnership Agreement, Advisory Agreement and/or the Organizational Documents received by each investor prior to investment in such Fund. Management Fee structures can differ from one Fund to another.

If a client funds a Validus Private Fund capital call using liquid investment assets from a separately managed Validus account, those funding amounts incur an additional advisory fee when the Validus Private Fund charges its quarterly management fee. This can happen intra-quarter when a Validus Private Fund capital call funding takes place after Validus has collected the quarterly advisory fee for its separately managed accounts, which typically occurs at the start of each quarter. In this case, the client assets will have been subject to two sets of fees charged by Validus within the same billing cycle.

Client assets may also be subject to two sets of fees where the client opts to invest in a Validus Private Fund in a subsequent closing after the initial close. In these cases, the capital invested in the Validus Private Fund will be subject to management fees dating back to the Validus Private Fund's initial closing. If the capital being committed to the Validus Private Fund in a subsequent closing was held in a separately managed Validus account at any point after the Fund's initial closing, then Validus charged fees on those assets twice for the period from the initial Fund closing through the date of the client's investment in the Fund.

The Validus Funds do not charge any incentive fees.

Expenses

Consistent with the Organizational Documents of the Funds, each Fund will bear all other expenses relating to it, including, without limitation: (i) all fees, costs, expenses, liabilities and obligations attributable to the investment process of each fund; (ii) legal, accounting, administration, custodian, depositary, auditing, insurance, litigation, and regulatory expenses; (iii) all fees related to any required annual meetings of the Fund; (iv) any taxes, fees, and other governmental charges levied against the Fund or otherwise described in the Fund's Limited Partnership Agreement; and (v) organizational expenses.

These expenses will be directly deducted from the Funds' capital accounts.

Limited Partners should review their subscription documents to confirm the exact expense policies for their Fund.

B. Fee Billing

Wealth Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the market value of assets under management as of the end of the prior calendar quarter. Clients will be provided with a statement, generally monthly, from the Custodian reflecting the deduction of the wealth management fee. Clients provide written authorization permitting advisory fees to be deducted by Validus Capital to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees may include Validus Capital's wealth management fee (as noted above) plus wealth management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s]. In other instances the Advisor and the Independent Manager will each assume the responsibility for calculating and deducting their respective fees from the Client's account[s].

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

Private Funds
Private Fund advisory fees are calculated by the Validus' fund administrator and deducted from the Fund's capital accounts at the Custodian, in the process described above. Intra-quarter capital activity is prorated and accounted for the following quarter, where an adjustment will be made.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Validus Capital, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by Validus Capital are separate and distinct from these custody and execution fees. The Client is also responsible for any fees charged by an Independent Manager for its services.

In addition, all fees paid to Validus Capital for wealth management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Validus Capital but would not receive the services provided by Validus Capital which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Validus Capital to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information. Additionally, as noted above, the Advisor will select share classes that do not have trading costs when possible. These will in most cases be institutional share classes but in some cases may be share classes with higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Wealth Management Services
Validus Capital is compensated for its wealth management services in advance of the quarter in which services are rendered. Either party may terminate the wealth management agreement, at any time, by providing thirty (30) days' advance written notice to the other party. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination through the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

Private Fund Termination
Private Funds are governed by the Fund's Limited Partnership Agreement, Advisory Agreement and/or the Organizational Documents. Termination of the Fund before its maturity or final distribution date are not available. Before investing in private funds, Clients acknowledge and represent their understanding of the risks of investing in private funds by executing signed subscription and fund operating documents.

Use of Independent Managers
In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Validus Capital will assist the Client with the termination and transition as appropriate.

Financial Planning Services
Validus Capital may be partially compensated for its financial planning services at the start of an engagement. Either party may terminate the financial planning agreement, at any time, by providing thirty (30) days' advance written notice to the other party. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the

engagement scope completed by the Advisor. Upon termination, the Advisor will refund any unearned, prepaid planning fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Validus Capital does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the wealth management fees noted above.

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

Validus Capital does not charge performance-based fees for its wealth management services or for its private funds. The fees charged by Validus Capital are as described in Item 5 above.

Item 7 – Types of Clients

Validus Capital provides wealth management services, including investment management, financial planning, legacy planning and family office services to high net worth individuals, families, trusts, estates, businesses, attorneys, and foundations Validus Capital generally does not impose a minimum relationship size, but its services are tailored to high net worth and ultra-high net worth individuals, families and entities.

Additionally, Validus Capital provides investment advisory services to the Validus Funds, which are pooled investment vehicles. For the avoidance of doubt, Validus Capital provides investment advisory services to the Funds (subject to the direction and control of the general partner of each such Fund) and not individually to investors in such Fund.

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

A. Methods of Analysis

Validus Capital primarily employs fundamental and quantitative analysis methods in developing investment strategies for its Clients. Research and analysis from Validus Capital are derived from numerous sources, including financial media companies, third-party research materials, professional data subscriptions, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria generally consists of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Quantitative Analysis: The use of models, or algorithms, to evaluate assets for investment. The process usually consists of searching vast databases for patterns, such as correlations among liquid assets or price-movement patterns (trend following or mean reversion). The resulting strategies may involve higher-frequency trading. The results of the analysis are taken into consideration in the decision to buy or sell securities and in the management of portfolio characteristics. A risk in using quantitative analysis is that the methods or models used may be based on assumptions that prove to be incorrect.

As noted above, Validus Capital generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Validus Capital will typically hold all or a portion of a security for more than a year but

may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Validus Capital may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Validus Capital will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond ETF Risks

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bonds time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investors rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily; therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Private Fund Risks

Investing in Private Funds carry specific risks that should be taken into consideration before making an investment. These risks may include lack of transparency, valuation concerns, limited liquidity, and lack of regulatory oversight. Private Funds may have specific investment objectives and strategies that may not be aligned with the investment goals of all investors. In addition, investments in Private Funds may be subject to restrictions on resale, which may impact an investor's ability to liquidate their holdings. As with all investments, the value of an investment in Private Funds may fluctuate, and investors may experience a loss of principal. Before making an investment, investors should carefully review the offering documents and understand the risks associated with investing in Private Funds.

Conflicts of Interest

In administering client portfolios and financial reporting, advisers face inherent interest conflicts. They mitigate these conflicts through comprehensive written supervisory compliance policies and procedures, which provide that the client's interest is always held above that of the Firm and its employees.

Force Majeure

Investments may be affected by force majeure events (i.e., events beyond the control of the party claiming that the event has occurred, including, without limitation, acts of God, fire, flood, earthquakes, outbreaks of an infectious disease, pandemic or any other serious public health concern, war, terrorism, and labor strikes). Some force majeure events may adversely affect the ability of a party to perform its obligations until it is able to remedy the force majeure event. In addition, the cost of repairing or replacing damaged assets resulting from such force majeure event could be considerable. Certain force majeure events (such as war or an outbreak of an infectious disease) could have a broader negative impact on the world economy and international business activity generally, or in any of the countries in which clients may invest specifically. Additionally, a major governmental intervention into industry, including the nationalization of an industry or the assertion of control over certain assets, could result in a loss to clients. Any of the foregoing may therefore adversely affect the performance of a client’s investments.

Cybersecurity and Disaster Recovery

Cyber incidents affecting the Advisor and its various service providers have the ability to disrupt and impact business operations, potentially resulting in financial losses, interference with an advisor’s ability to value its client’s securities or other investments, impediments to trading, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs. Similar adverse consequences could result from cyber incidents affecting issuers of invested securities, counterparties to transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies and other financial institutions and other parties. In addition, substantial costs may be incurred to prevent any cyber incidents in the future. While business continuity plans and risk management systems are designed to prevent and mitigate cyber incidents and other disasters, there are inherent limitations in such plans and systems including the possibility that certain risks have not been identified. Imperial has limited cyber security and disaster recovery plans for its operations and relies on outside parties for some key operational functions, who in turn may also have limited cyber security and disaster recovery plans, which could negatively impact investors.

Inflation & Interest Rates

Security prices and portfolio returns will likely vary in response to inflation and interest rates changes. Inflation causes future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of investments to decline.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Validus Capital or its management persons. Validus Capital values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 319212.

Item 10 – Other Financial Industry Activities and Affiliations

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

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

Various entities serve as general partners or managing members of the Funds and are related persons of the Adviser.

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

A. Code of Ethics

Validus Capital has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Validus Capital ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Validus Capital and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Validus Capital' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (310) 892-6912.

B. Personal Trading with Material Interest

Validus Capital allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Validus Capital does not act as a principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. Validus Capital does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Validus Capital allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Validus Capital requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Validus Capital allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Validus Capital, or any Supervised Person of Validus Capital, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Validus Capital does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Validus Capital to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, Validus Capital does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Validus Capital does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Validus Capital. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Validus Capital may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. Validus Capital will generally recommend that Clients establish their account[s] at either Charles Schwab & Co, Inc. ("Schwab") or Fidelity Brokerage Services, LLC ("Fidelity". Schwab and Fidelity (collectively, the "Custodians") are FINRA-registered broker-dealers and members of SIPC. Either will serve as a Client's "qualified custodian".

Validus Capital has established an institutional relationship with the Custodians to assist the Advisor in managing Client account[s]. Access to the Custodian's platform is provided at no charge to the Advisor. The Custodian's platform include brokerage, custody, administrative support, record keeping, technology and related services designed to support registered investment advisors like Validus Capital in serving Clients. These services are intended to serve the best interests of the Advisor's Clients.

The Custodian may charge brokerage commissions (securities transaction fees) for effecting certain securities transactions. The Custodian enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. The Custodian's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and

transaction fees charged by the Custodian may be higher or lower than those charged by other custodians and broker-dealers. Please see Item 14 below for additional information.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Validus Capital does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - Validus Capital does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis," where Validus Capital will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Validus Capital will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

A Client may pay a commission that is higher than another qualified custodian might charge to affect the same transaction. The Advisor has determined in good faith that the commissions charged by the Custodian is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not necessarily the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Custodian's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the Advisor will seek competitive rates, to the benefit of all Clients, it may not necessarily obtain the lowest possible commission rates for specific Client account transactions. Although the investment research products and services that may be obtained by the Advisor will generally be used to service all the Advisor's Clients, they may not equally benefit all Clients. Please also see Item 14.

Schwab - As part of the institutional programs offered by Schwab, Validus receives benefits that it would not receive if it did not provide investment advice to clients. While there is no direct affiliation or fee sharing arrangement between Schwab and the Adviser, economic benefits are received by the Adviser which would not be received if the Adviser did not have an established relationship with these companies. These benefits do not depend on the amount of transactions directed by the Adviser to Schwab. These benefits may include: a dedicated trading desk that services the Adviser's clients, a dedicated service group and an account services manager dedicated to the Adviser's accounts, access to a real time order matching system, ability to block client trades, electronic download of trades, portfolio management software, access to an electronic interface, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements), a quarterly newsletter, access to mutual funds, ability to have loads waived for the Adviser's clients who invest in certain loaded funds when certain conditions are met and maintained, and the ability to have custody fees waived.

Fidelity – Validus has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides Validus with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist Validus in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help Validus manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Validus may contract directly. Validus is independently operated and owned and is not affiliated with Fidelity.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Validus Capital will execute its transactions through the Custodian as authorized by the Client. Validus Capital may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Validus Capital and periodically by the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Validus Capital if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic, or political events.

C. Review Reports

The Client will receive brokerage statements generally monthly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Validus Capital

Validus Capital is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. Validus Capital does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Validus Capital may refer Clients to various unaffiliated, non-advisory

professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Validus Capital may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform (Schwab)
Validus Capital has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Validus Capital. As a registered investment advisor participating on the Schwab Advisor Services platform, Validus Capital receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and support to Validus Capital that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Validus Capital believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

Validus Capital does not engage paid solicitors for Client referrals.

Item 15 – Custody

All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct Validus Capital to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Validus Capital to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from the Client's account to a third party (a "Standing Letter Of Authorization" or "SLOA"), the Advisor may have custody of those assets. In order to avoid additional regulatory requirements associated with SLOAs, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions. The safeguards are in reliance of the SEC's "No-Action Letter" dated February 21, 2017. Validus Capital and its Custodians follow the seven (7) safeguards set forth in the No-Action Letter. Therefore, the Advisor is not subject to an independent audit.

Validus Capital maintains the Validus Funds accounts at a qualified custodian. As the adviser or an affiliate serves as the general partner of the Funds, Validus Capital is deemed to be in custody pursuant to Advisers Act Rule 206(4)-2. Cash and securities attributed to the Funds are required to be maintained by a 'qualified custodian' in such Fund's name, unless the security is otherwise exempt from this requirement (e.g., certain privately offered securities). The financial statements of certain Funds will be (where applicable): (a) prepared or reconciled in accordance with US GAAP, (b) audited by an independent accounting firm that is registered with, and subject to regular examination by, the Public Company Accounting Oversight Board ('PCAOB') and (c) distributed to the Fund's investors (i) within 120 days following such fund's fiscal year end and (ii) promptly after liquidation.

Item 16 – Investment Discretion

Validus Capital generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Validus Capital. The discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of a wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by Validus Capital will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Validus Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies. However, the Client retains the sole responsibility for proxy decisions and voting. Validus Capital will generally not assume responsibility to submit class action and securities litigation claims.

Item 18 – Financial Information

Neither Validus Capital, nor its management, have any adverse financial situations that would reasonably impair the ability of Validus Capital to meet all obligations to its Clients. Neither Validus Capital, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Validus Capital is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of $1,200 or more for services to be performed six months or more in the future.

VALIDUS CAPITAL

Form ADV Part 2B – Brochure Supplement

for

John M. Krambeer
Chief Executive Officer & Partner

Effective: August 8, 2022

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of John M. Krambeer (CRD# 1938468) in addition to the information contained in the Validus Capital LLC ("Validus Capital" or the "Advisor", CRD# 319212) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Validus Capital Disclosure Brochure or this Brochure Supplement, please contact us at (424) 499-1360.

Additional information about Mr. Krambeer is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1938468.

Item 2 – Educational Background and Business Experience

John M. Krambeer, born in 1968, is dedicated to advising Clients of Validus Capital as its Chief Executive Officer and Founder. Mr. Krambeer earned Bachelors in Finance from Woodbury University in 1991. Mr. Krambeer's employment history is included below.

Employment History:

Chief Executive Officer and Founder, Validus Capital LLC	04/2022 to Present
Founder & Partner, Camden Capital, LLC	01/2004 to 04/2022
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith Incorporated	07/1997 to 01/2004

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Krambeer. Mr. Krambeer has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Krambeer.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Krambeer.***

However, we do encourage you to independently view the background of Mr. Krambeer on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1938468.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Krambeer is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Krambeer's role with Validus Capital. As an insurance professional, Mr. Krambeer will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Krambeer is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Krambeer or the Advisor. Mr. Krambeer spends approximately less than 10% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Krambeer has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Krambeer serves as the Chief Executive Officer and Founder of Validus Capital. Mr. Krambeer is also supervised by Sean X. Chen (Chief Operating Officer and Chief Compliance Officer). Mr. Chen can be reached at (424) 499-1360. Validus Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Validus Capital. Further, Validus Capital is subject to regulatory oversight by various agencies. These agencies require registration by Validus Capital and its Supervised Persons. As a registered entity, Validus Capital is subject to examinations by regulators, which may be announced or unannounced. Validus Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Matthew L. Schulz
Managing Partner

Effective: August 8, 2022

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Matthew L. Schulz (CRD# 5709946) in addition to the information contained in the Validus Capital LLC ("Validus Capital" or the "Advisor", CRD# 319212) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Validus Capital Disclosure Brochure or this Brochure Supplement, please contact us at (424) 499-1360.

Additional information about Mr. Schulz is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5709946.

Item 2 – Educational Background and Business Experience

Matthew L. Schulz, born in 1987, is dedicated to advising Clients of Validus Capital as a Managing Partner. Mr. Schulz earned an MBA from UCLA Anderson School of Business in 2020. Mr. Schulz also earned a B.S. in Business from Indiana University in 2009. Additional information regarding Mr. Schulz's employment history is included below.

Employment History:

Managing Partner, Validus Capital LLC	04/2022 to Present
Managing Director, Camden Capital, LLC	01/2013 to 04/2022
Associate, Culver Capital	03/2012 to 12/2012

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Schulz. Mr. Schulz has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Schulz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Schulz.***

However, we do encourage you to independently view the background of Mr. Schulz on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5709946.

Item 4 – Other Business Activities

Mr. Schulz is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Schulz does not have any other business activities.

Item 5 – Additional Compensation

Mr. Schulz is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Schulz does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Schulz serves as a Managing Partner of Validus Capital and is supervised by Sean X. Chen (Chief Operating Officer and Chief Compliance Officer). Mr. Chen can be reached at (424) 499-1360.

Validus Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Validus Capital. Further, Validus Capital is subject to regulatory oversight by various agencies. These agencies require registration by Validus Capital and its Supervised Persons. As a registered entity, Validus Capital is subject to examinations by regulators, which may be announced or unannounced. Validus Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

VALIDUS CAPITAL

Form ADV Part 2B – Brochure Supplement

for

Kevin G. Harnischfeger
Managing Director

Effective: August 8, 2022

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Kevin G. Harnischfeger (CRD# 7156218) in addition to the information contained in the Validus Capital LLC ("Validus Capital" or the "Advisor", CRD# 319212) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Validus Capital Disclosure Brochure or this Brochure Supplement, please contact us at (424) 499-1360.

Additional information about Mr. Harnischfeger is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7156218.

Item 2 – Educational Background and Business Experience

Kevin G. Harnischfeger, born in 1995, is dedicated to advising Clients of Validus Capital as a Managing Director. Mr. Harnischfeger earned a Master of Business Administration from SUNY New Paltz in 2018. Mr. Harnischfeger also earned Bachelors in History from SUNY New Paltz in 2017. Additional information regarding Mr.
Harnischfeger's employment history is included below.

Employment History:

Managing Director, Validus Capital LLC	04/2024 to Present
Director, Validus Capital LLC	04/2022 to 03/2024
Investment Analyst, Camden Capital, LLC	04/2019 to 04/2022
IB Analyst Intern, New Century Capital Partners	01/2019 to 04/2019
Graduate Intern, Beyond Wealth Management	01/2018 to 12/2018
Founder, Alpha Werks, LLC	01/2017 to 06/2018
Production, Cornerstone Services	08/2013 to 04/2016

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Harnischfeger. Mr. Harnischfeger has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Harnischfeger.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Harnischfeger.***

However, we do encourage you to independently view the background of Mr. Harnischfeger on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7156218.

Item 4 – Other Business Activities

Mr. Harnischfeger is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Harnischfeger does not have any other business activities.

Item 5 – Additional Compensation

Mr. Harnischfeger is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Harnischfeger does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Harnischfeger serves as a Director with Validus Capital and is supervised by Sean X. Chen (Chief Operating Officer and Chief Compliance Officer). Mr. Chen can be reached at (424) 499-1360.

Validus Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Validus Capital. Further, Validus Capital is subject to regulatory oversight by various agencies. These agencies require registration by Validus Capital and its Supervised Persons. As a registered entity, Validus Capital is subject to examinations by regulators, which may be announced or unannounced. Validus Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

VALIDUS CAPITAL

Form ADV Part 2B – Brochure Supplement

for

William R. Moffly
Senior Director

Effective: November 15, 2022

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of William R. Moffly (CRD# 7655517) in addition to the information contained in the Validus Capital LLC ("Validus Capital" or the "Advisor", CRD# 319212) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Validus Capital Disclosure Brochure or this Brochure Supplement, please contact us at (424) 499-1360.

Additional information about Mr. Moffly is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7655517.

Item 2 – Educational Background and Business Experience

William R. Moffly, born in 1996, is dedicated to advising Clients of Validus Capital as a Senior Director. Mr. Moffly earned a Bachelor of Science from University of California, Santa Barbara in 2019. Additional information regarding Mr. Moffly's employment history is included below.

Employment History:

Senior Director, Validus Capital LLC	04/2025 to Present
Director, Validus Capital LLC	10/2022 to 03/2025
Black Knight Financial Services	03/2021 to 09/2022
PennyMac Financial Services	07/2019 to 02/2021
Glen Annie GC	10/2018 to 05/2019
Bank of America	06/2018 to 09/2018
Camden Capital	06/2017 to 09/2017
Annandale GC	06/2016 to 09/2016

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Moffly. Mr. Moffly has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Moffly.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Moffly.***

However, we do encourage you to independently view the background of Mr. Moffly on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7655517.

Item 4 – Other Business Activities

Mr. Moffly is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Moffly does not have any other business activities.

Item 5 – Additional Compensation

Mr. Moffly is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Moffly does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Moffly serves as a Senior Director with Validus Capital and is supervised by Sean X. Chen (Chief Operating Officer and Chief Compliance Officer). Mr. Chen can be reached at (424) 499-1360.

Validus Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Validus Capital. Further, Validus Capital is subject to regulatory oversight by various agencies. These agencies require registration by Validus Capital and its Supervised Persons. As a registered entity, Validus Capital is subject to examinations by regulators, which may be announced or unannounced. Validus Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

VALIDUS CAPITAL

Form ADV Part 2B – Brochure Supplement

for

Christy Charles, CFP®
Senior Director

Effective: March 31, 2023

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Christy Charles (CRD# 6621979) in addition to the information contained in the Validus Capital LLC ("Validus Capital" or the "Advisor", CRD# 319212) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Validus Capital Disclosure Brochure or this Brochure Supplement, please contact us at (424) 499-1360.

Additional information about Ms. Charles is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 6621979.

Item 2 – Educational Background and Business Experience

Christy Charles, born in 1990, is dedicated to advising Clients of Validus Capital as a Senior Director of Client Services. Ms. Charles earned a Bachelor of Arts from University of California, Riverside in 2012. Ms. Charles obtained her CERTIFIED FINANCIAL PLANNER™ certification in 2022. Additional information regarding Ms. Charles' employment history is included below.

Employment History:

Validus Capital LLC	06/2022 to Present
Camden Capital, LLC	04/2014 to 06/2022
MemberPlanet	08/2012 to 04/2014

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Charles. Ms. Charles has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Charles.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Charles.***

However, we do encourage you to independently view the background of Ms. Charles on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 6621979.

Item 4 – Other Business Activities

Ms. Charles is dedicated to the investment advisory activities of Validus Capital's Clients. Ms. Charles does not have any other business activities.

Item 5 – Additional Compensation

Ms. Charles is dedicated to the investment advisory activities of Validus Capital's Clients. Ms. Charles does not receive any additional forms of compensation.

Item 6 – Supervision

Ms. Charles serves as a Senior Director of Client Services with Validus Capital and is supervised by Sean X. Chen (Chief Operating Officer and Chief Compliance Officer). Mr. Chen can be reached at (424) 499-1360.

Validus Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Validus Capital. Further, Validus Capital is subject to regulatory oversight by various agencies. These agencies require registration by Validus Capital and its Supervised Persons. As a registered entity, Validus Capital is subject to examinations by regulators, which may be announced or unannounced. Validus Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

VALIDUS CAPITAL

Form ADV Part 2B – Brochure Supplement

for

John C. Bullitt, CFP®
Senior Director

Effective: March 31, 2025

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of John C. Bullitt (CRD# 6361324) in addition to the information contained in the Validus Capital LLC ("Validus Capital" or the "Advisor", CRD# 319212) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Validus Capital Disclosure Brochure or this Brochure Supplement, please contact us at (424) 499-1360.

Additional information about Mr. Bullitt is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6361324.

Item 2 – Educational Background and Business Experience

John C. Bullitt, born in 1991, is dedicated to advising Clients of Validus Capital as a Senior Director. Mr. Bullitt earned an MBA from USC Marshall School of Business in 2020. Mr. Bullitt also earned a B.A. in Economics from

Connecticut College in 2014. Mr. Bullitt obtained his CERTIFIED FINANCIAL PLANNER™ certification in 2025. Additional information regarding Mr. Bullitt's employment history is included below.

Employment History:

Validus Capital LLC	12/2024 to Present
MainStreet	10/2022 to 06/2024
StartEngine Crowdfunding	10/2020 to 07/2022
Morgan Stanley Private Wealth Management	06/2014 to 05/2018

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Bullitt. Mr. Bullitt has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Bullitt.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Bullitt.***

However, we do encourage you to independently view the background of Mr. Bullitt on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6361324.

Item 4 – Other Business Activities

Mr. Bullitt is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Bullitt does not have any other business activities.

Item 5 – Additional Compensation

Mr. Bullitt is dedicated to the investment advisory activities of Validus Capital's Clients. Mr. Bullitt does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Bullitt serves as a Senior Director of Validus Capital and is supervised by Sean X. Chen (Chief Operating Officer and Chief Compliance Officer). Mr. Chen can be reached at (424) 499-1360.

Validus Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Validus Capital. Further, Validus Capital is subject to regulatory oversight by various agencies. These agencies require registration by Validus Capital and its Supervised Persons. As a registered entity, Validus Capital is subject to examinations by regulators, which may be announced or unannounced. Validus Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.