

MiCA White Paper

Official Trump (TRUMP)

Version 1.1
Nov 2025

White Paper in accordance with Markets in Crypto Assets Regulation (MiCAR)
for the European Economic Area (EEA).

Purpose: seeking admission to trading EEA.

Prepared and Filed by LCX.com

NOTE: THIS CRYPTO-ASSET WHITE PAPER HAS NOT BEEN APPROVED BY ANY COMPETENT AUTHORITY IN ANY MEMBER STATE OF THE EUROPEAN ECONOMIC AREA. THE PERSON SEEKING ADMISSION TO TRADING IS SOLELY RESPONSIBLE FOR THE CONTENT OF THIS CRYPTO-ASSET WHITE PAPER ACCORDING TO THE EUROPEAN ECONOMIC AREA'S MARKETS IN CRYPTO-ASSET REGULATION (MICA).

This white paper has been prepared in accordance with the requirements set forth in Commission Implementing Regulation (EU) 2024/2984, ensuring that all relevant reporting formats, content specifications, and machine-readable structures outlined in Annex I of this regulation have been fully mapped and implemented, particularly reflected through the Recitals, to enable proper notification under the Markets in Crypto-Assets Regulation (MiCAR).

Copyright:

This White Paper is under **copyright** of LCX AG Liechtenstein and may not be used, copied, or published by any third party without explicit written permission from LCX AG.

00 TABLE OF CONTENT

COMPLIANCE STATEMENTS	6
SUMMARY	7
A. PART A - INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING	9
A.1 Name	9
A.2 Legal Form	9
A.3 Registered Address	9
A.4 Head Office	9
A.5 Registration Date	9
A.6 Legal Entity Identifier	9
A.7 Another Identifier Required Pursuant to Applicable National Law	9
A.8 Contact Telephone Number	9
A.9 E-mail Address	9
A.10 Response Time (Days)	9
A.11 Parent Company	9
A.12 Members of the Management Body	9
A.13 Business Activity	9
A.14 Parent Company Business Activity	10
A.15 Newly Established	10
A.16 Financial Condition for the past three Years	10
A.17 Financial Condition Since Registration	10
B. PART B - INFORMATION ABOUT THE ISSUER, IF DIFFERENT FROM THE OFFEROR OR PERSON SEEKING ADMISSION TO TRADING	11
B.1 Issuer different from offeror or person seeking admission to trading	11
B.2 Name	11
B.3 Legal Form	11
B.4 Registered Address	11
B.5 Head Office	11
B.6 Registration Date	11
B.7 Legal Entity Identifier	11
B.8 Another Identifier Required Pursuant to Applicable National Law	11
B.9 Parent Company	11
B.10 Members of the Management Body	11
B.11 Business Activity	11
B.12 Parent Company Business Activity	11
C. PART C - INFORMATION ABOUT THE OPERATOR OF THE TRADING PLATFORM IN CASES WHERE IT DRAWS UP THE CRYPTO-ASSET WHITE PAPER AND INFORMATION ABOUT OTHER PERSONS DRAWING THE CRYPTO-ASSET WHITE PAPER PURSUANT TO ARTICLE 6(1), SECOND SUBPARAGRAPH, OF REGULATION (EU) 2023/1114	12
C.1 Name	12
C.2 Legal Form	12
C.3 Registered Address	12
C.4 Head Office	12
C.5 Registration Date	12
C.6 Legal Entity Identifier	12
C.7 Another Identifier Required Pursuant to Applicable National Law	12

C.8 Parent Company	12
C.9 Reason for Crypto-Asset White Paper Preparation	12
C.10 Members of the Management Body	12
C.11 Operator Business Activity	12
C.12 Parent Company Business Activity	13
C.13 Other persons drawing up the white paper under Article 6 (1) second subparagraph MiCA	13
C.14 Reason for drawing up the white paper under Article 6 (1) second subparagraph MiCA	13
D. PART D - INFORMATION ABOUT THE CRYPTO-ASSET PROJECT	14
D.1 Crypto-Asset Project Name	14
D.2 Crypto-Assets Name	14
D.3 Abbreviation	14
D.4 Crypto-Asset Project Description	14
D.5 Details of all persons involved in the implementation of the crypto-asset project	14
D.6 Utility Token Classification	14
D.7 Key Features of Goods/Services for Utility Token Projects	14
D.8 Plans for the Token	15
D.9 Resource Allocation	15
D.10 Planned Use of Collected Funds or Crypto-Assets	15
E. PART E - INFORMATION ABOUT THE OFFER TO THE PUBLIC OF CRYPTO-ASSETS OR THEIR ADMISSION TO TRADING	16
E.1 Public Offering or Admission to Trading	16
E.2 Reasons for Public Offer or Admission to Trading	16
E.3 Fundraising Target	16
E.4 Minimum Subscription Goals	16
E.5 Maximum Subscription Goal	16
E.6 Oversubscription Acceptance	16
E.7 Oversubscription Allocation	16
E.8 Issue Price	16
E.9 Official Currency or Any Other Crypto-Assets Determining the Issue Price	16
E.10 Subscription Fee	16
E.11 Offer Price Determination Method	16
E.12 Total Number of Offered/Traded Crypto-Assets	16
E.13 Targeted Holders	17
E.14 Holder Restrictions	17
E.15 Reimbursement Notice	17
E.16 Refund Mechanism	17
E.17 Refund Timeline	17
E.18 Offer Phases	17
E.19 Early Purchase Discount	17
E.20 Time-Limited Offer	17
E.21 Subscription Period Beginning	17
E.22 Subscription Period End	17
E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets	17
E.24 Payment Methods for Crypto-Asset Purchase	17
E.25 Value Transfer Methods for Reimbursement	17
E.26 Right of Withdrawal	17
E.27 Transfer of Purchased Crypto-Assets	17

E.28 Transfer Time Schedule	17
E.29 Purchaser's Technical Requirements	17
E.30 Crypto-asset service provider (CASP) name	18
E.31 CASP identifier	18
E.32 Placement Form	18
E.33 Trading Platforms name	18
E.34 Trading Platforms Market Identifier Code (MIC)	18
E.35 Trading Platforms Access	18
E.36 Involved Costs	18
E.37 Offer Expenses	18
E.38 Conflicts of Interest	18
E.39 Applicable Law	18
E.40 Competent Court	18
F. PART F - INFORMATION ABOUT THE CRYPTO-ASSETS	19
F.1 Crypto-Asset Type	19
F.2 Crypto-Asset Functionality	19
F.3 Planned Application of Functionalities	19
F.4 Type of white paper	19
F.5 The type of submission	19
F.6 Crypto-Asset Characteristics	19
F.7 Commercial name or trading name	19
F.8 Website of the issuer	19
F.9 Starting date of offer to the public or admission to trading	19
F.10 Publication date	19
F.11 Any other services provided by the issuer	19
F.12 Language or languages of the white paper	19
F.13 Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available	19
F.14 Functionally Fungible Group Digital Token Identifier, where available	19
F.15 Voluntary data flag	19
F.16 Personal data flag	19
F.17 LEI eligibility	20
F.18 Home Member State	20
F.19 Host Member States	20
G. PART G - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS	21
G.1 Purchaser Rights and Obligations	21
G.2 Exercise of Rights and Obligation	21
G.3 Conditions for Modifications of Rights and Obligations	21
G.4 Future Public Offers	21
G.5 Issuer Retained Crypto-Assets	21
G.6 Utility Token Classification	21
G.7 Key Features of Goods/Services of Utility Tokens	21
G.8 Utility Tokens Redemption	21
G.9 Non-Trading Request	21
G.10 Crypto-Assets Purchase or Sale Modalities	21
G.11 Crypto-Assets Transfer Restrictions	21

G.12 Supply Adjustment Protocols	21
G.13 Supply Adjustment Mechanisms	21
G.14 Token Value Protection Schemes	22
G.15 Token Value Protection Schemes Description	22
G.16 Compensation Schemes	22
G.17 Compensation Schemes Description	22
G.18 Applicable Law	22
G.19 Competent Court	22
H. PART H – INFORMATION ON THE UNDERLYING TECHNOLOGY	23
H.1 Distributed ledger technology	23
H.2 Protocols and Technical Standards	23
H.3 Technology Used	23
H.4 Consensus Mechanism	23
H.5 Incentive Mechanisms and Applicable Fees	23
H.6 Use of Distributed Ledger Technology	23
H.7 DLT Functionality Description	24
H.8 Audit	24
H.9 Audit Outcome	24
I. PART I – INFORMATION ON RISKS	25
I.1 Offer-Related Risks	25
I.2 Issuer-Related Risks	25
I.3 Crypto-Assets-Related Risks	25
I.4 Project Implementation-Related Risks	25
I.5 Technology-Related Risks	25
I.6 Mitigation Measures	25
J. PART J – INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS	26
J.1 Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism	26
J.2 Supplementary information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism	27

01 DATE OF NOTIFICATION

2025-11-17

COMPLIANCE STATEMENTS

- 02 This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Economic Area. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

Where relevant in accordance with Article 6(3), second subparagraph of Regulation (EU) 2023/1114, reference shall be made to 'person seeking admission to trading' or to 'operator of the trading platform' instead of 'offeror'.

- 03 This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.
- 04 The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.
- 05 Not Applicable
- 06 The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council. The crypto-asset referred to in this white paper is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.

SUMMARY

07 Warning

This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law.

This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council (36) or any other offer document pursuant to Union or national law.

08 Characteristics of the crypto-asset

The Official Trump Token (TRUMP) is a meme coin launched on the Solana blockchain in mid-January 2025 as a branded collectible tied to Donald Trump's persona—not intended as a utility token or traditional investment instrument. It has a total supply of 1 billion tokens, of which 200 million were initially released to the public while the remaining 800 million remain held by Trump-owned entities such as CIC Digital LLC and Fight Fight Fight LLC.

09 Not applicable

10 Key information about the offer to the public or admission to trading

Here are the key information about the Official Trump (TRUMP):

<i>Total offer amount</i>	Not applicable
<i>Total number of tokens to be offered to the public</i>	Not Applicable
<i>Subscription period</i>	Not Applicable
<i>Minimum and maximum subscription amount</i>	Not Applicable
<i>Issue price</i>	Not Applicable
<i>Subscription fees (if any)</i>	Not Applicable
<i>Target holders of tokens</i>	Not Applicable
<i>Description of offer phases</i>	Not Applicable
<i>CASP responsible for placing the token (if any)</i>	Not Applicable

<i>Form of placement</i>	Not Applicable
<i>Admission to trading</i>	LCX AG, Herrengasse 6, 9490 Vaduz, Liechtenstein

A. PART A - INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING

A.1 Name

LCX

A.2 Legal Form

AG

A.3 Registered Address

Herrengasse 6, 9490 Vaduz, Liechtenstein

A.4 Head Office

Herrengasse 6, 9490 Vaduz, Liechtenstein

A.5 Registration Date

24.04.2018

A.6 Legal Entity Identifier

529900SN07Z6RTX8R418

A.7 Another Identifier Required Pursuant to Applicable National Law

FL-0002.580.678-2

A.8 Contact Telephone Number

+423 235 40 15

A.9 E-mail Address

legal@lcx.com

A.10 Response Time (Days)

020

A.11 Parent Company

Not applicable

A.12 Members of the Management Body

Full Name	Business Address	Function
Monty C. M. Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	President of the Board
Katarina Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	Board Member
Anurag Verma	Herrengasse 6, 9490 Vaduz, Liechtenstein	Director of Technology

A.13 Business Activity

LCX provides various crypto-asset services under Liechtenstein's Token and Trusted Technology Service Provider Act ("Token- und Vertrauenswürdige Technologie-Dienstleister-Gesetz" in short "TVTG") also known as the Blockchain Act. These include custody and administration of crypto-assets, offering secure storage for clients' assets and private keys. LCX operates a trading platform, facilitating the matching of buy and sell orders for crypto-assets. It enables both crypto-to-fiat and crypto-to-crypto exchanges, ensuring compliance with AML and KYC regulations. LCX also supports token placements, marketing crypto-assets on behalf of offerors.

Under MiCA, LCX is classified as a Crypto-Asset Service Provider (CASP). LCX is not yet formally supervised under MiCA until the license is granted by the competent authority.

Under the TVTG framework, LCX provides:

- TT Depositary – Custody and safekeeping of crypto-assets.
- TT Trading Platform Operator – Operation of a regulated crypto-asset exchange.
- TT Exchange Service Provider – Crypto-to-fiat and crypto-to-crypto exchange.
- Token Issuer – Marketing and distribution of tokens.
- TT Transfer Service Provider – Crypto-asset transfers between ledger addresses.
- Token Generator & Tokenization Service Provider – Creation and issuance of tokens.
- Physical Validator – Enforcement of token-based rights on TT systems.
- TT Verification & Identity Service Provider – Legal capacity verification and identity registration.
- TT Price Service Provider – Providing aggregated crypto-asset price information.

A.14 Parent Company Business Activity

Not applicable

A.15 Newly Established

false

A.16 Financial Condition for the past three Years

LCX AG has a strong capital base, with CHF 1 million (approx. 1,126,000 USD) in share capital (Stammkapital) and a solid equity position (Eigenkapital) in 2023. The company has experienced fluctuations in financial performance over the past three years, reflecting the dynamic nature of the crypto market. While LCX AG recorded a loss in 2022, primarily due to a market downturn and a security breach, it successfully covered the impact through reserves. The company has remained financially stable, achieving revenues and profits in 2021, 2023 and 2024 while maintaining break-even operations.

In 2023 and 2024, LCX AG strengthened its operational efficiency, expanded its business activities, and upheld a stable financial position. Looking ahead to 2025, the company anticipates positive financial development, supported by market uptrends, an inflow of customer funds, and strong business performance. Increased adoption of digital assets and service expansion are expected to drive higher revenues and profitability, further reinforcing LCX AG's financial position.

A.17 Financial Condition Since Registration

LCX AG has been financially stable since its registration, supported by CHF 1 million in share capital (Stammkapital) and continuous business growth. Since its inception, the company has expanded its operations, secured multiple regulatory registrations, and established itself as a key player in the crypto and blockchain industry.

While market conditions have fluctuated, LCX AG has maintained strong revenues and break-even operations. The company has consistently reinvested in its platform, technology, and regulatory compliance, ensuring long-term sustainability. The LCX Token has been a fundamental part of the ecosystem, with a market capitalization of approximately \$200 million USD and an all-time high exceeding \$500 million USD in 2022. Looking ahead, LCX AG anticipates continued financial growth, driven by market uptrends, increased adoption of digital assets, and expanding business activities.

B. PART B - INFORMATION ABOUT THE ISSUER, IF DIFFERENT FROM THE OFFEROR OR PERSON SEEKING ADMISSION TO TRADING

B.1 Issuer different from offeror or person seeking admission to trading

True

B.2 Name

CIC Digital LLC

B.3 Legal Form

Limited Liability Company

B.4 Registered Address

251 Little Falls Dr. Wilmington New Castle, DE 19808, United States

B.5 Head Office

Not Available

B.6 Registration Date

Not Available

B.7 Legal Entity Identifier

Not Available

B.8 Another Identifier Required Pursuant to Applicable National Law

identification: 6646611

B.9 Parent Company

Not Available

B.10 Members of the Management Body

Not Available

B.11 Business Activity

Not Available

B.12 Parent Company Business Activity

Not Applicable

C. PART C - INFORMATION ABOUT THE OPERATOR OF THE TRADING PLATFORM IN CASES WHERE IT DRAWS UP THE CRYPTO-ASSET WHITE PAPER AND INFORMATION ABOUT OTHER PERSONS DRAWING THE CRYPTO-ASSET WHITE PAPER PURSUANT TO ARTICLE 6(1), SECOND SUBPARAGRAPH, OF REGULATION (EU) 2023/1114

C.1 Name

LCX AG

C.2 Legal Form

AG

C.3 Registered Address

Herrengasse 6, 9490 Vaduz, Liechtenstein

C.4 Head Office

Herrengasse 6, 9490 Vaduz, Liechtenstein

C.5 Registration Date

24.04.2018

C.6 Legal Entity Identifier

529900SN07Z6RTX8R418

C.7 Another Identifier Required Pursuant to Applicable National Law

FL-0002.580.678-2

C.8 Parent Company

Not Applicable

C.9 Reason for Crypto-Asset White Paper Preparation

LCX is preparing this MiCA-compliant whitepaper for TRUMP to enhance transparency, regulatory clarity, and investor confidence. While TRUMP has its classification as “Other Crypto Asset,” LCX is providing this document to support its role as a Crypto-Asset Service Provider (CASP) and ensure compliance with MiCA regulations in facilitating TRUMP trading on its platform.

C.10 Members of the Management Body

Full Name	Business Address	Function
Monty C. M. Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	President of the Board
Katarina Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	Board Member
Anurag Verma	Herrengasse 6, 9490 Vaduz, Liechtenstein	Director of Technology

C.11 Operator Business Activity

LCX provides various crypto-asset services under Liechtenstein’s Token and Trusted Technology Service Provider Act (“Token- und Vertrauenswürdige Technologie-Dienstleister-Gesetz” in short “TVTG”) also known as the Blockchain Act. These include custody and administration of crypto-assets, offering secure storage for clients’ assets and private keys. LCX operates a trading platform, facilitating the matching of buy and sell orders for crypto-assets. It enables both crypto-to-fiat and crypto-to-crypto exchanges, ensuring compliance with AML and KYC regulations. LCX also supports token placements, marketing crypto-assets on behalf of offerors.

Under MiCA, LCX is classified as a Crypto-Asset Service Provider (CASP).

Under the TVTG framework, LCX provides:

- TT Depositary – Custody and safekeeping of crypto-assets.
- TT Trading Platform Operator – Operation of a regulated crypto-asset exchange.
- TT Exchange Service Provider – Crypto-to-fiat and crypto-to-crypto exchange.
- Token Issuer – Marketing and distribution of tokens.
- TT Transfer Service Provider – Crypto-asset transfers between ledger addresses.
- Token Generator & Tokenization Service Provider – Creation and issuance of tokens.
- Physical Validator – Enforcement of token-based rights on TT systems.
- TT Verification & Identity Service Provider – Legal capacity verification and identity registration.
- TT Price Service Provider – Providing aggregated crypto-asset price information.

C.12 Parent Company Business Activity

Not Applicable

C.13 Other persons drawing up the white paper under Article 6 (1) second subparagraph MiCA

Not Applicable

C.14 Reason for drawing up the white paper under Article 6 (1) second subparagraph MiCA

Not Applicable

D. PART D - INFORMATION ABOUT THE CRYPTO-ASSET PROJECT

D.1 Crypto-Asset Project Name

Official Trump

D.2 Crypto-Assets Name

TRUMP

D.3 Abbreviation

TRUMP

D.4 Crypto-Asset Project Description

TRUMP token was created to harness the cultural and political influence surrounding Donald Trump, the TRUMP token was marketed as a way for supporters to express engagement with his ideals and rally around his brand. The coin was launched via Trump's social media channels and quickly spiked in value and trading activity, reaching an estimated market cap as high as \$24–27 billion on day one.

TRUMP was minted on 17 January 2025 with a fixed supply of 1,000,000,000 tokens: 200,000,000 (20 %) entered public circulation at launch, 800,000,000 (80 %) were allocated to six vesting tranches held by affiliated entities, subject to 3, 6, and 12-month cliffs followed by linear daily release over 24 months

D.5 Details of all persons involved in the implementation of the crypto-asset project

These people/entities collaborate to maintain and improve the TRUMP token ecosystem:

Full Name	Business Address	Function
CIC Digital LLC	251 Little Falls Dr. Wilmington New Castle, DE 19808, United States	Issuing Entity of the Official Trump Token.

D.6 Utility Token Classification

False

D.7 Key Features of Goods/Services for Utility Token Projects

Not Applicable

D.8 Plans for the Token

At launch, the token was explicitly stated as not intended to be a security or a traditional investment, with no official roadmap for utility or dApp integration. The project was largely built around brand engagement and community identity, with hopes that the cultural momentum might eventually lead to further developments—but no concrete technical or functional plans were disclosed.

D.9 Resource Allocation

Token ownership is highly centralized—around 80% of tokens remain held by Trump-affiliated entities, while 20% were publicly distributed. The locked holdings are subject to a three-year vesting/unlock schedule. Exchanges rushed to list the token, speeding up listing timelines from the typical 129 days to within 48 hours, indicating a resource-heavy promotional push fronted by Trump and the listing platforms.

D.10 Planned Use of Collected Funds or Crypto-Assets

Financial disclosures suggest the project raised at least \$350 million through token sales and related fees. Funds appear to have gone directly to the Trump organization and associated entities, with no transparency or detailed plans provided regarding use—fueling ethical concerns given Trump's simultaneous role as a political leader. Additional promotional stunts—such as exclusive dinners for

top token holders offering access to the president—have magnified scrutiny over the mingling of political influence and financial gain.

E. PART E - INFORMATION ABOUT THE OFFER TO THE PUBLIC OF CRYPTO-ASSETS OR THEIR ADMISSION TO TRADING

E.1 Public Offering or Admission to Trading

ATTR

E.2 Reasons for Public Offer or Admission to Trading

LCX is filing a MiCA-compliant whitepaper for TRUMP to enhance transparency, regulatory clarity, and investor confidence. TRUMP is classified as “Other Crypto-Assets” under MiCA, this initiative supports compliance readiness and aligns with MiCA’s high disclosure standards. By doing so, LCX strengthens its position as a regulated exchange, ensuring a trustworthy and transparent trading environment for TRUMP within the EU’s evolving regulatory framework. Additionally, this filing facilitates market access and institutional adoption by removing uncertainty for institutional investors and regulated entities seeking to engage with TRUMP in a compliant manner. It further supports the broader market adoption and integration of TRUMP into the regulated financial ecosystem, reinforcing LCX’s role in shaping compliant and transparent crypto markets.

E.3 Fundraising Target

Not applicable

E.4 Minimum Subscription Goals

Not applicable

E.5 Maximum Subscription Goal

Not applicable

E.6 Oversubscription Acceptance

Not applicable

E.7 Oversubscription Allocation

Not applicable

E.8 Issue Price

Not applicable

E.9 Official Currency or Any Other Crypto-Assets Determining the Issue Price

Not applicable

E.10 Subscription Fee

Not applicable

E.11 Offer Price Determination Method

Not applicable

E.12 Total Number of Offered/Traded Crypto-Assets

There are currently 200,000,000 TRUMP tokens in circulation, all of which are available for trading.

E.13 Targeted Holders

ALL

E.14 Holder Restrictions

Not applicable

E.15 Reimbursement Notice

Not applicable

- E.16 Refund Mechanism**
Not applicable
- E.17 Refund Timeline**
Not applicable
- E.18 Offer Phases**
Not applicable
- E.19 Early Purchase Discount**
Not applicable
- E.20 Time-Limited Offer**
Not applicable
- E.21 Subscription Period Beginning**
Not applicable
- E.22 Subscription Period End**
Not applicable
- E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets**
Not applicable
- E.24 Payment Methods for Crypto-Asset Purchase**
Not applicable
- E.25 Value Transfer Methods for Reimbursement**
Not applicable
- E.26 Right of Withdrawal**
Not applicable
- E.27 Transfer of Purchased Crypto-Assets**
Not applicable
- E.28 Transfer Time Schedule**
Not applicable
- E.29 Purchaser's Technical Requirements**
Not applicable
- E.30 Crypto-asset service provider (CASP) name**
Not applicable
- E.31 CASP identifier**
Not applicable
- E.32 Placement Form**
NTAV
- E.33 Trading Platforms name**
LCX AG
- E.34 Trading Platforms Market Identifier Code (MIC)**
LCXE

E.35 Trading Platforms Access

TRUMP is widely traded on multiple regulated and unregulated trading platforms globally. TRUMP is not restricted to a single exchange and can be accessed by retail and institutional investors worldwide.

LCX Exchange also provides access to TRUMP trading with the TRUMP/EUR pair. Investors can access TRUMP through [LCX.com](https://www.lcx.com), the official LCX exchange, as well as other supported cryptocurrency trading platforms. To trade TRUMP, users must register, complete KYC (Know Your Customer) verification, and comply with platform-specific requirements.

E.36 Involved Costs

Not applicable

E.37 Offer Expenses

Not applicable

E.38 Conflicts of Interest

Not Applicable

E.39 Applicable Law

For admission to trading of TRUMP on LCX, the applicable law is Liechtenstein law, applied in accordance with MiCA and EU regulations. For decentralized, on-chain use of TRUMP outside LCX, applicable law depends on the user's jurisdiction.

E.40 Competent Court

Any disputes related to services provided by LCX fall under the jurisdiction of the Courts of Liechtenstein. For independent on-chain activities with TRUMP, no centralized legal recourse exists.

F. PART F - INFORMATION ABOUT THE CRYPTO-ASSETS

F.1 Crypto-Asset Type

Other Crypto-Asset

F.2 Crypto-Asset Functionality

It enables access to digital goods, participation in events, staking, governance input, and payment for in-platform services.

F.3 Planned Application of Functionalities

Participation rewards, network access, governance. Functionality will be activated progressively through protocol upgrades and network scaling.

F.4 Type of white paper

OTHR

F.5 The type of submission

NEWT

F.6 Crypto-Asset Characteristics

Blockchain & Type: The Official Trump token is a SPL (Solana Program Library) meme coin launched on the Solana blockchain by CIC Digital LLC (an affiliate of the Trump Organization) on January 17, 2025, just before Trump's inauguration.

Supply & Distribution:

Total supply: 1 billion TRUMP tokens.

Circulating: 200 million were released via ICO; the remaining 800 million are held by CIC Digital LLC and Fight Fight Fight LLC (Trump-affiliated companies).

Purpose: Marketed primarily as a symbolic expression of support—described as a branded collectible rather than a utility or investment token, with no inherent uses or services backing it.

F.7 Commercial name or trading name

TRUMP

F.8 Website of the issuer

<https://gettrumpmemes.com>

F.9 Starting date of offer to the public or admission to trading

2025-12-17

F.10 Publication date

2025-12-17

F.11 Any other services provided by the issuer

Not applicable

F.12 Language or languages of the white paper

English

F.13 Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available

LJDPGNXXK

F.14 Functionally Fungible Group Digital Token Identifier, where available

False

F.15 Voluntary data flag

true

F.16 Personal data flag

false

F.17 LEI eligibility

false

F.18 Home Member State

Liechtenstein

F.19 Host Member States

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.

G. PART G - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS

G.1 Purchaser Rights and Obligations

Rights:

Buyers can trade the token on the Solana-based secondary markets and blockchain exchanges.

Obligations:

There are no mandatory obligations imposed on TRUMP purchasers.

(This refers to a very similar token proposal, but strongly indicates the lack of purchaser obligations.)

Disclaimers:

The token's offering includes disclaimers stating it's not intended as a security or investment, and explicitly "has nothing to do with any political campaign, political office, or government agency."

Legal terms reportedly prohibit buyers from joining class-action lawsuits against the project and include indemnity clauses—though the full text wasn't directly cited in my sources, this aligns with the disclaimers noted in official filings.

G.2 Exercise of Rights and Obligation

The core right of TRUMP is its transferability, which is facilitated by standard blockchain transactions.

G.3 Conditions for Modifications of Rights and Obligations

Token Terms & Modifiability:

The token's design, disclaimers, and operational terms (such as class-action waivers) are defined in its initial documents. Major changes (e.g., altering ownership rights, obligations, token supply) would presumably require disclosures or legal updates—but there's no evidence of any pre-defined mechanism for unilateral modification by the issuer.

Unlock Schedule:

The 800 million tokens held by CIC Digital LLC and affiliates are on a lock-up schedule, with staged releases extending through 2026—potentially altering control dynamics over time..

G.4 Future Public Offers

Not applicable

G.5 Issuer Retained Crypto-Assets

Not applicable

G.6 Utility Token Classification

False

G.7 Key Features of Goods/Services of Utility Tokens

Not Applicable

G.8 Utility Tokens Redemption

Not applicable

G.9 Non-Trading Request

True

G.10 Crypto-Assets Purchase or Sale Modalities

Not applicable

G.11 Crypto-Assets Transfer Restrictions

Not applicable

G.12 Supply Adjustment Protocols

False

G.13 Supply Adjustment Mechanisms

Not Applicable

G.14 Token Value Protection Schemes

False

G.15 Token Value Protection Schemes Description

Not Applicable

G.16 Compensation Schemes

False

G.17 Compensation Schemes Description

Not Applicable

G.18 Applicable Law

For admission to trading of TRUMP on LCX, the applicable law is Liechtenstein law, applied in accordance with MiCA and EU regulations. For decentralized, on-chain use of TRUMP outside LCX, applicable law depends on the user's jurisdiction.

G.19 Competent Court

Any disputes related to services provided by LCX fall under the jurisdiction of the Courts of Liechtenstein. For independent on-chain activities with TRUMP, no centralized legal recourse exists.

H. PART H – INFORMATION ON THE UNDERLYING TECHNOLOGY

H.1 Distributed ledger technology

TRUMP is built on the Solana blockchain, utilizing the Solana Program Library (SPL) standard for fungible tokens. This enables fast, cost-effective transactions.

H.2 Protocols and Technical Standards

Token Standard:

As an SPL token, \$TRUMP follows Solana's programmatic interfaces for transfers, minting, and wallet integrations.

Cross-Chain Bridges:

There are bridged versions of \$TRUMP on other networks—including Ethereum, Base, and BNB Smart Chain—suggesting interoperability via bridge protocols.

Consensus Mechanism:

Being on Solana means it inherits Solana's Proof-of-Stake (PoS) consensus and PoH (Proof of History) timestamping. While not unique to \$TRUMP, it benefits from the platform's speed and throughput.

H.3 Technology Used

Wallet Integration:

The token integrates with standard Solana wallets and community tools. For instance, Gem Wallet enables users to buy, store, and swap \$TRUMP and requires SOL for transaction (gas) fees.

Blockchain Explorer Support:

Explorers like Solscan provide transparency into token transfers, wallet holdings, and unlock progress.

Token Governance:

Although not a decentralized governance model, control remains centralized. Entities like CIC Digital LLC and Fight Fight Fight LLC hold and manage unlocking schedules.

H.4 Consensus Mechanism

The TRUMP token is issued on the Solana blockchain, which provides high network security, energy efficiency, and scalability through validators who propose and confirm transactions.

H.5 Incentive Mechanisms and Applicable Fees

Transaction Fees as Revenue:

Though Solana fees are minimal, a portion flows indirectly to Trump-linked entities through enhanced trading volume and liquidity management. Financial Times reported combined earnings of over \$320 million from token sales and transaction fees.

Speculative Demand & Perks:

The main incentive is cultural and speculative. The token is marketed as a symbolic collectible, not a financial instrument.

Additionally, the project has offered exclusive benefits such as private dinners with Trump for top holders, blending crypto incentives with real-world access

H.6 Use of Distributed Ledger Technology

True

H.7 DLT Functionality Description

Token Transfers:

Like any SPL token, \$TRUMP can be transferred instantly across the Solana network. Users pay SOL as gas for transactions.

Unlock & Vesting Mechanics:

A structured schedule controls circulation:

20% of the supply was released at launch.

The remaining 80% is locked across several allocations with staged unlocks after 3–12 months, followed by gradual daily releases over 24 months.

Chain Interoperability:

Bridged tokens allow activity across multiple blockchains, expanding usability and liquidity potential.

Visibility & Transparency:

All token movements and unlocks are publicly viewable on Solana explorers like Solscan.

No Smart Contracts for Utility or Governance:

There are no built-in governance mechanisms, staking features, or utility beyond speculative trading and access-based rewards.

H.8 Audit

True

H.9 Audit Outcome

A recent on-chain audit (referred to as an "X-Ray audit") evaluated the \$TRUMP smart contract on Solana.

It scored a robust 93.65 out of 100, indicating strong design with no detected critical vulnerabilities, such as honeypot functions, abusive freezing, or theft vectors.

At the time of that audit:

The token had 642,192 holders and around 66.9 million transactions on Solana. Here is the link for the audit report of the TRUM Token:

<https://blog.kryll.io/official-trump-trump-x-ray-audit-on-chain-analysis/>

I. PART I – INFORMATION ON RISKS

I.1 Offer-Related Risks

Market Volatility: The value of TRUMP may fluctuate significantly after launch.

Insufficient Demand: The offering may not attract the expected user base or funding.

Limited Liquidity: There is no guarantee of active secondary markets for trading TRUMP.

I.2 Issuer-Related Risks

Operational Risk: The issuing entity may face financial, legal, or management issues.

Regulatory Risk: Future regulatory changes could impact the issuer's ability to operate.

Dependence on Key Personnel: Loss of core team members may affect the project's progress.

I.3 Crypto-Assets-Related Risks

Price Volatility: Crypto-assets in general are subject to high price fluctuations.

Cybersecurity Threats: Wallets, exchanges, or smart contracts may be vulnerable to attacks.

Lack of Legal Recourse: Users may have limited remedies in the event of token loss or theft.

I.4 Project Implementation-Related Risks

Delays: Project features or milestones may be postponed or fail to launch.

Resource Constraints: Funding shortfalls or technical challenges may affect delivery.

Integration Failure: Planned partnerships or features may not materialize as expected.

I.5 Technology-Related Risks

Smart Contract Bugs: Undiscovered flaws in deployed contracts could cause failures.

Blockchain Dependencies: Reliance on the underlying blockchain (e.g., Solana or other) may introduce external risks like congestion or forks.

System Downtime: Platform outages or infrastructure failure could disrupt service.

I.6 Mitigation Measures

Audits: Smart contracts are subject to independent security audits.

Vesting and Reserves: Controlled token releases reduce the risk of market shocks.

Regulatory Alignment: The project is designed to comply with MiCA and EU laws.

Transparency: Regular updates and on-chain data provide user visibility and trust.

Contingency Planning: A reserve fund and legal structure are in place to handle operational risks.

J. PART J – INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS

Adverse impacts on climate and other environment-related adverse impacts.

J.1 Information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism

The TRUMP token operates on a user-friendly, scalable blockchain infrastructure, optimized for accessibility and low-cost transactions. The platform's low environmental impact and commitment to sustainable operations align with MiCA's standards for distributed ledger technologies. The network's annual energy consumption is 1508.34129 kWh/a.

General information	
S.1 Name <i>Name reported in field A.1</i>	LCX
S.2 Relevant legal entity identifier Identifier referred to in field A.2	529900SN07Z6RTX8R418
S.3 Name of the crypto-asset Name of the crypto-asset, as reported in field D.2	Official Trump
S.4 Consensus Mechanism The consensus mechanism, as reported in field H.4	Combination of Proof of History and Stakes
S.5 Incentive Mechanisms and Applicable Fees Incentive mechanisms to secure transactions and any fees applicable, as reported in field H.5	Solana combines PoH and PoS to secure its network, rewarding validators and delegators while enforcing penalties and low fees to ensure efficiency, decentralization, and responsible network participation.
S.6 Beginning of the period to which the disclosure relates	2024-05-18
S.7 End of the period to which the disclosure relates	2024-05-18
Mandatory key indicator on energy consumption	
S.8 Energy consumption Total amount of energy used for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions, expressed per calendar year	1508.34129 kWh per year
Sources and methodologies	
S.9 Energy consumption sources and Methodologies Sources and methodologies used in relation to the information reported in field S.8	The energy consumption of the TRUMP token is calculated using a bottom-up approach, focusing on node activity. Public data, open-source tools, and certified lab tests inform estimates. Network-level energy use is attributed to the token based on its gas usage,

	using FFG DTI data to identify asset implementations.
--	---

J.2 Supplementary information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism

Not Applicable