

OCTOBER 2022 PERFORMANCE

The Fort Stable Fund generated a return of +3.49 % for the month of October 2022.

A less volatile and better trending market this month saw ETH trade in a tight range around \$1320 for the first 20 days only to rally and close the month at \$1,590, up 19% on the month. The driver of the recovery was a macro change in sentiment as opposed to anything crypto asset specific.

As we discussed in our September Performance report, “We maintain a “core” exposure of around 10% long and would be looking to increase our exposure on any dips in price probably via the sale of options. While we mentioned some early signs of a decoupling of the ETH price from TradFi markets, the macro is still the most important near-term influence of price so we will be taking our cue from global economic events.”

We increased our ETH exposure via the sale of puts and purchase of call options and by month end, our exposure was at 25% long as the call options moved more into the money. Our yield-based strategies earned 0.20% for the month and our long ETH position generated 3.26%. Life to date the Fund has returned +0.85%* (*Post management, performance and entry fees. Past performance is not indicative of future performance.)

Two things to discuss - The Macro and The Regulatory outlook.

Macro – The Central Banks of the world have a limited selection of tools. All they can control is the quantity and the price of money. What they are trying to manipulate through these two tools by either changing or equally signalling a change is the demand for money. The demand for money is driven by GDP, employment, inflation, risk seeking or avoiding attitudes. These are

TOTAL NET RETURN

PERIOD	FUND RETURN
1 Month	+3.46%*
Life to date	+0.85%*

*Post management, performance and entry fees. Past performance is not indicative of future performance.

all, for want of a better phrase driven by, “animal spirits” or confidence. Given how financialised and leveraged the economies of The West have become the FED and Global Central Banks main challenge can often be managing psychology or confidence with these limited tools.

Global Central Banks are currently almost exclusively focused on inflation not becoming entrenched. The markets current concern is the risk that the Central Banks in curing inflation by destroying activity or demand are going to end up “crashing” or “breaking” an aspect of the Financial Markets. We can acknowledge that Central Banks have highly ineffective tools (except at the extremes - i.e. They can accelerate the economy from 0-100 faster than is responsible and equally shut it down) and therefore it perhaps wasn’t a misplaced fear. The real question is what changed over the month of October that led to risk generally and equities and digital assets rallying globally?

At the beginning of the month, we had extreme positioning for negative outcomes. Bank of America has a survey of investor sentiment that in the middle of the month indicated that investors held [cash levels not seen for 21 years](#). Equally there was Equity Put purchasing (options that benefit from a declining market) from professional investors outstripping Calls by a ratio of 3-1, again unheard of. Volatility in Global rates and equities markets were at extremes over the month, interestingly US equity vol was realizing more than BTC over the month. There was also a significant position of short in Digital Assets, [notably ETH](#). Towards the end

of the month we had a WSJ journalist who has been utilised previously as a mouthpiece to communicate FED “views” write a note where he flagged that some members of the FED were concerned with the “speed” of rate hikes. This was enough to set the markets to rebalance the positioning and hence the rally we saw.

Has anything changed? Not really, The Federal reserve hiked 75bp and Gov. Powell reasserted that his view was unchanged, he will hike until growth is tempered and inflation eases and from that point hold rates at an elevated level. However given the extreme positioning we can perhaps see a continuation of this adjustment. The problem we still face is the path that interest rate hikes (and cuts) take to work their way through an economy are normally in the following order.

1. Housing - House prices, demand for construction and turnover – All of these have declined, however in Australia we still haven’t taken back the Covid bump.
2. Orders – Demand from businesses to meet demand or grow their business – again slower but not disastrous. PMI’s are teetering around 50 (above 50 is expansionary, below contractionary)
3. Profits – Again mixed, energy companies and banks doing very well, while we have seen headwinds in the tech industry and some bellwethers like Apple and Amazon warning us Q4 is looking weak.
4. Employment – still strong, some patches of weakness but generally the Western Economies are sitting at low unemployment levels with worker shortages plaguing many industries.

So if we agree that to target “end demand” i.e. cause unemployment in order to reduce inflation and we need to hike enough to reduce activity in the first 3

parameters. In the case of the FED they have some way to go to effect change given the current data.

The Regulatory back drop.

The noise around regulation is heating up which indicates that we are getting closer to resolving some of the outstanding issues. We have long advocated that a lack of clarity in regulation is an impediment to the full realisation of the Digital Asset class. Good regulation is clearly what we hope for, and the industry is heavily involved trying to direct the narrative.

First, let’s start with the G20 – India are chairing the G20 for the next 12 months and the chair has indicated that Crypto regulation is high on the agenda. Given the fact that digital assets and distributed ledger technology are largely stateless it indeed does require a global approach. The Chief Economic Advisor to the government, V. Anantha Nageswaran, in a speech ahead of the G20 this month said “consensus-based solutions for accelerating the scale and scope of the response of the global community to many transboundary challenges such as regulation of virtual assets,” would be the third objective of India’s G20 Presidency. Ranking so highly on the agenda is a positive. Its particularly important to embrace the power of the technology to many of those currently unbanked in the world.

Moving on to the ECB who are close to finalising its Markets in Crypto Assets law (MiCA). What’s been released so far is focused on how they plan regulate centralized entities, which is in line with other brokerages and trading firms.

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They have however attempted to wrestle with more distributed forms of lending or investment in DeFi that are based on software protocols. They acknowledge that their technology has potential and are generally positive, what they want to protect against is fraud and manipulation. The expert's advice who seems to be most noted and regarded is a Professor Roukny, an assistant professor from Leuven University in Belgium. He is quoted as saying "DeFi tools hold a credible promise for new forms of financial services adapted to a globalized, competitive, fair and digital economy," "At the same time," he added, "severe threats to consumers, producers and the economy at large accompany this opportunity."

He is pushing for what seems to be a voluntary authentication or verification by the ECB that the protocol abides by a number of rules that protect consumers. Enforcement against bad actors is difficult when you are interacting with protocols, but warnings or verification checks show that regulators are coming to terms with the idea that the technology requires a different approach than we have currently have in place. If you are interested further details can be found [here](#).

The US regulators have become more focused on getting their legislation progressing through the channels of power, it seems largely as they realise others are doing the same and it may leave them disadvantaged. United States Senators Cynthia Lummis and Kirsten Gillibrand proposed their legislation. The Responsible Financial Innovation Act proposes a comprehensive set of crypto regulations for the digital assets sector. This has in turn seen many in the industry lobbying for and against proposals,

engagement is indeed a positive.

Notably this month Sam Bankman Fried, the founder of the trading platform FTX and significant contributor to political candidates issued what he termed his crypto-regulatory manifesto "[Possible Digital Asset Industry Standards](#)." The proposals generated a great deal of debate. The debate morphed over weeks from quite hostile to eventually something constructive, or at least a consensus to agree to disagree on some key points.

The majority of the proposal was accepted or at least understood. What's a security? Some processes around hacks and rewards for the hackers in identifying the flaws. Ways to navigate OFAC lists and tainted coins that have been held in sanctioned addresses. Customer protections and suitability as well as changes to rules allowing those who pass knowledge based tests to trade as opposed to means testing. The main point of contention was his ideas around regulating the DeFi space.

The proposal that caused greatest consternation was as follows –

1. The following activities would potentially require some license/registration/etc.:

a. An American hosting a website on e.g. AWS that actively provides a front-end that encourages and facilitates US retail users to trade on decentralized protocols

b. Actively marketing DeFi products to US retail investors

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While in theory this sounds rather benign the reality is that undermines a large part of the ethos of the space. He acknowledges that maintaining free, decentralized validators and smart contracts is absolutely crucial for DeFi. But draws the line at the point where the on ramp happens. That is, it can be a throttle point to which the regulators can deny or approve access to the service. The idea is that DeFi is code, free speech and access should be restricted only by your lack of access to technology. You should under all circumstances be able to have access to financial empowerment regardless of your political, religious or economic standing. Lofty goals for sure and while for many the proposal would ensure some degree of safety the enforcement indeed seems nebulous and open to overreach.

Some of the criticism was personal flagging his role as donator to politicians. Adam Cochran of Synthetix and Yearn Finance called the rules “a moat that lets centralized entities control at least part of the flow into DeFi.” Others pointed out that you can’t claim to believe in effective altruism, as Bankman Fried does, and impose rules that exclude marginalized at-risk people in far away nations. To his credit he engaged in the conversation with his detractors.

What it indeed highlighted was there will need to be compromises made, regulation is inevitable. While the purists argue from their libertarian perches that we need to let markets sort out the order. On the other side we have the incumbents looking to protect their centralised fee generating patches. These two opposing positions both are looking to expand the opportunity set of digital assets and appealing to the politicians who at best are regulating to protect investors and as worst

are regulating to be voted back in. At FCAM we remain hopeful that the regulatory touch remains light and can allow the full potential of the space to be realised.

In the words of Joseph Joubert - The aim of argument, or of discussion, should not be victory, but progress.

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