

# Fundamental

## Prime Rating Report V2.0

**Protocol:** TrueFi  
**Version:** 1  
**Previous Report:** N/A

**Date:** 04/02/2022  
**Author:** OriginalSK  
**Reviewed by:** xm3van  
**Season/competition:** Season 2

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## 1. Value Proposition

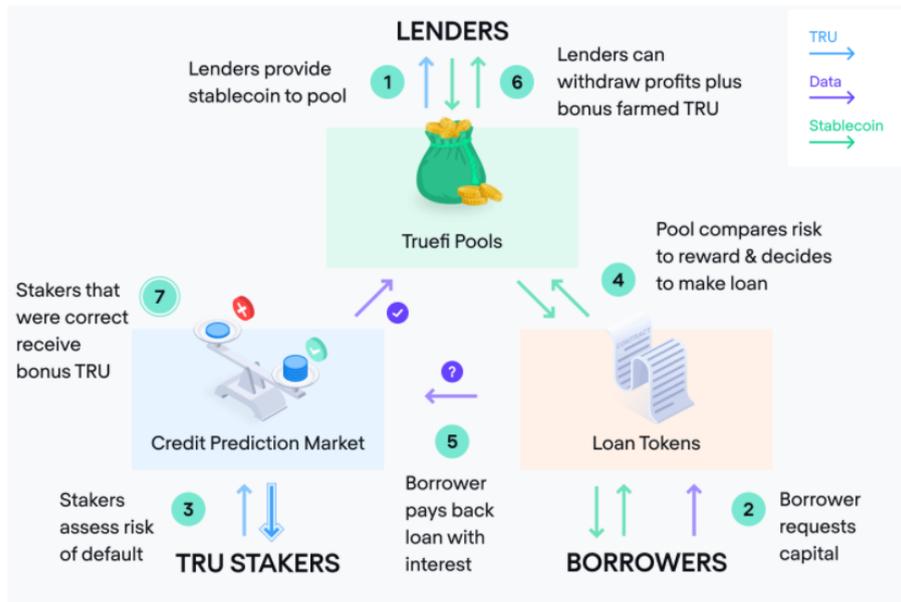
The Value Proposition section describes the value a protocol delivers to its users. Based on the proportion of the problem the protocol aims to solve and the potential of the protocol to effectively solve the problem - better than other industry solutions - a Value Proposition rating is created.

### a) Novelty of the solution (15 points)

This score evaluates the novelty (uniqueness) of the protocol. Has the protocol introduced any new innovations that help solve user's problems more efficiently? Is the project a fork? To what extent did they copy/fork the original?

**Answer:**

Lending protocol that provides uncollateralized (unsecured) loans to borrowers. TrueFI is the [first and leading](#) uncollateralized loan provider in DeFi, differentiating itself from the standard overcollateralization model that other lending protocols use like Aave and Compound. This uncollateralized model allows lenders to “to earn higher long-term returns than secured lending, and for borrowers to maximise their capital efficiency”.



### TrueFi Approved loan and repayment processes

To enable their uncollateralized loans TrueFi also developed the first on-chain [credit score model](#). The credit score of a borrower determines their creditworthiness and associated risk, scores between 0 to 255 are generated from both on-chain and off-chain data e.g. trading history, asset custody, liquidity and risk exposure. Additionally loans are secured through enforceable [lending agreements](#) and 2 stage TRU holder (TrueFi native token) approval.

Currently TrueFi only provides loans to approved institutions through their Know Your Business (KYB) process.

**Score: 11**

## b) Market fit/demand (15 points)

This score evaluates the degree to which the protocol satisfies a strong market demand. The market fit evaluates if the protocol is able to satisfy the needs of a specific market (can also be measured by user adoption/ #of users). To what extent has the protocol proven to meet the demand of a specific market? Is the timing of the product right for the market? Is the protocol targeting the right market?

### Answer:

TrueFi's total value locked of +\$530M currently makes it the 8th largest lending protocol according to [DefiPulse](#). Since launching in 2020 Nov [108 loans](#) have originated, totaling \$1.15B distributed between TUSD, USDC, BUSD and USDT loan pools.



### [TrueFi TVL](#)

Given that TrueFi currently [only offers loans to Institutions](#), comparing total users against more general lending protocols like Aave wouldn't indicate their market fit within the institutional lending market. A more appropriate measure would be to look at the institutions using TrueFi, namely trading firms [Alameda Research](#) (over \$1B in digital assets), [Invictus Capital](#) (\$200M Aum), market maker [Wintermute](#) (\$1400B trading volume) and crypto financial services platform [Celsius Network](#) (1.5M users) and a number of other institutions have borrowed an average of [\\$10.7M](#).

TrueFi seems to have found a market fit within institutional lending with established institutions, how promising this market is still to be determined as [crypto regulation](#) is still uncertain involving institutions. In conclusion the average borrowing amount and zero default indicate a promising market.

**Score: 11**

## c) Target market size? (10 points)

The target market size evaluates the current and future size of the problem the protocol is aiming to solve. The category of the Open Finance solution can be used as a reference to the target market (for example: Lending). Because Open Finance is by definition global, the global market for a specific problem equals the target market size.

### **Answer:**

TVL in DeFi is approx [~\\$79B](#), up to Dec 2021 lending made up approximately [47% of total value locked](#) in DeFi. For the year 2021 the lending category has grown significantly by more than [300%](#), from Jan 7 (\$10.1B) till Dec 7 (\$44.95B). Current DeFi lending TVL sits at +\$40B and is the 2nd largest DeFi category by TVL according to [DefiLlama](#).

Within TrueFi's current market fit, institutional crypto lending is [dominated by OTC](#) (over-the-counter) lenders, in 2021 the largest lender Genesis [originated \\$131B in loans](#) alone, a 7X increase from 2020.



### [Lending Category DeFi TVL](#)

Global lending is currently worth over [\\$6T \(trillion\)](#) and is expected to grow to over \$8T by 2025.

When considering TrueFi's current market fit/focus institutional lending appears to be a large market and with good opportunity for the protocol given collateralization requirements and the [lack of transparency](#) in OTC markets.

Looking at the wider market the dominant size of the lending category in DeFi and growth of global lending, TrueFi's target market is substantial if they were to expand into retail lending ([a stated potential outcome](#) and [proposal efforts](#))

**Score: 10**

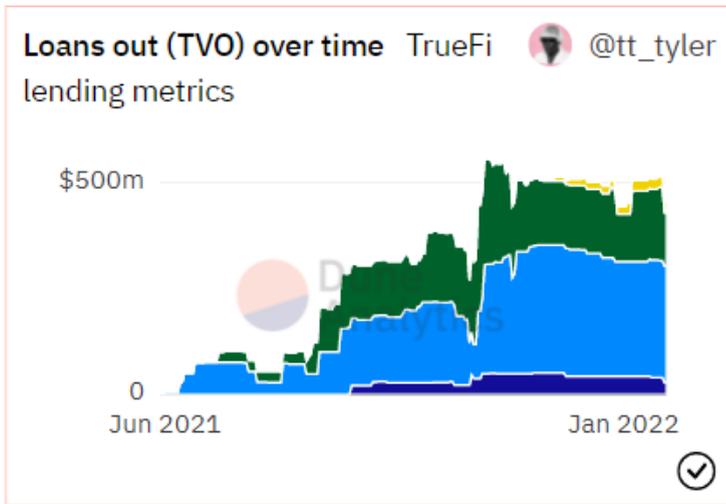
## **d) Competitiveness within market sector(s) (10 points)**

This score evaluates the competitiveness of the protocol within the market sector(s) it operates in. This score offers a relative comparison of the protocol and other protocols operating in the same market sector(s). To evaluate this, metrics to directly compare with the competition can be used (e.g. TVL, trading volume, number of users).

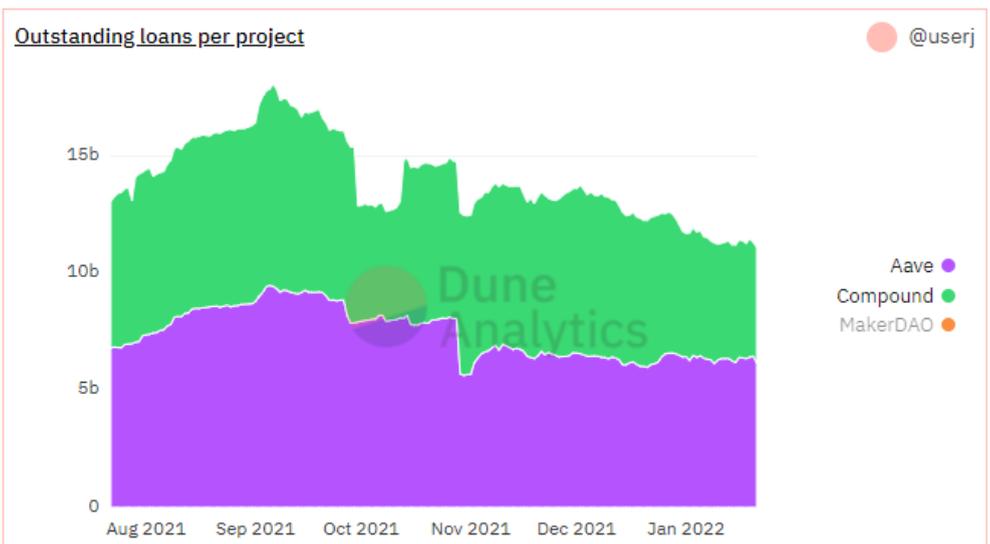
### **Answer:**

The largest lending protocols by TVL Compound (~\$6B), Aave (~\$9B) are the clear lending market leaders with the closest protocol being Liquity (~\$1B). TrueFi's TVL of +\$530M puts it in the top 10 of lending protocols out of +/- 30 lending protocols tracked by [DeFiPulse](#). When considering other chains TrueFi is [ranked 14th](#) among lending protocols.

Loans out (i.e. borrow volume) by protocol also echoes the fact that Aave and Compound are market leaders with TrueFi ([~\\$320M](#)) lagging behind Aave and Compound each with [~\\$4B and ~\\$3B](#) (as of 03 Feb 2022) respectively.



[TrueFi borrow volume \(Outstanding loans\)](#)



[Aave & Compound Outstanding loans](#)

As stated, TrueFi currently only provides funds to institutions. In the short term this gap between TrueFi and the market leaders may not be significant within their niche, however long term as they open the protocol to retail users or potentially competitors offering similar institutional loan pools this gap could become more significant to and effect TrueFi's market position.

Given TrueFi's current focus on institutions and their overall market position within lending, a score reflecting 'the protocol having competitive capabilities but is yet to establish itself' seems appropriate.

**Score: 5**

## e) Integrations & Partnerships (15 points)

Due to crypto's open-source nature, the code of most protocols can easily be forked. This score represents a piece of "unforkable value". Some indicators to look at are the number of applications built on top of the protocol (vertical integration), other entities integrating the protocol's services (horizontal integration) or the number of relevant partnerships (be careful of logo collections/partnerships without much purpose).

**Answer:**

[Binance](#): The largest centralised exchange, integration with TrueFi allows holders of TRU to stake directly to TrueFi through Binance, enabling stakers to participate in the lending and assurance functionality. Stakers are rewarded for participating. Binance users benefit from improved utilisation of their TRU holdings. ([source](#))

[Sushiswap](#): AMM decentralised exchange, partnership with Sushiswap via Onsen for their Sushiswap V2 "Double Reward" where liquidity providers receive both SUSHI and TRU for providing liquidity.

[Lithium Finance](#): Decentralised pricing oracle for illiquid assets; [partnership](#) integrates TrueFi with Lithium's 1st party data oracle receiving timely and accurate pricing to increase liquidity for the various lending pools.

[Finoa](#): Regulated Digital Asset custodian, provides institutional-grade crypto custody for TRU, supported TrueFi's launch and TRU staking.

TrueFi's integrations and partnerships all aim to improve the protocol, however not many protocols are integrated with TrueFi. From an institutional borrower's perspective this may not be as significant as the strength of integrations like Finoa. Lenders may feel similarly, with favourable interest rates, TRU utility on Sushiswap and potentially [CREAM Finance](#).

**Score: 8**

## 2. Tokenomics

The Tokenomics section assesses the function of a protocol's token. This includes the token distribution, functionalities of the token, the ability of the token to incentivize positive behavior in the protocol, and the ability of the token to capture a portion of the value created.

### a) Is the token sufficiently distributed? (15 points)

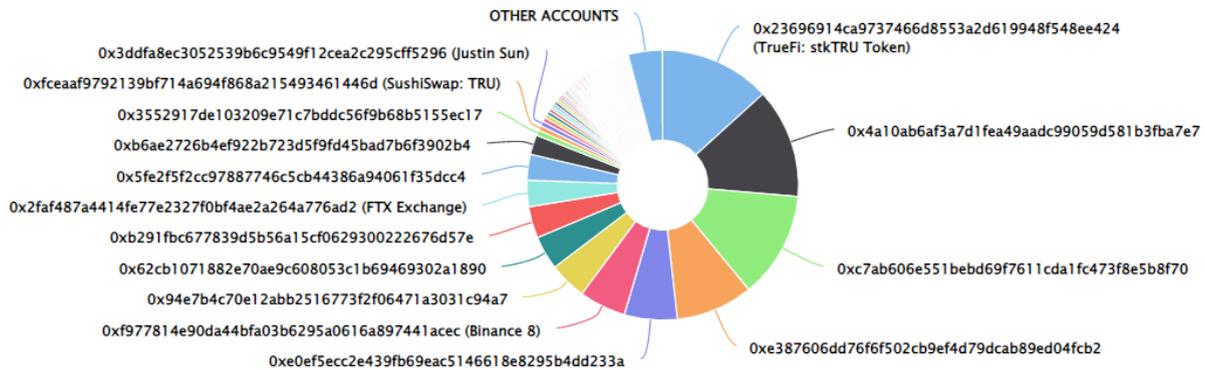
The token distribution can be an indicator of a healthy protocol. When the protocol tokens are widely distributed among different stakeholder groups and contributors, this genuinely improves the coordinating capability of the token and strengthens the resiliency of the protocol. Was the initial distribution balanced between relevant stakeholders? Are the tokens distributed over sufficient participants (10, 25, 100 largest addresses)?

**Answer:**

There are ~5,200 Total holders of TRU, The top 100 holders [collectively own ~95%](#) of the total supply of TRU. The total supply distribution of TRU is still an ongoing process and it should be noted that the circulating supply (i.e. transferable) differs from the total supply of TRU. Currently only around [+567M TRU tokens](#) are in circulation of the max supply of 1.44B TRU.

## TrueFi Top 100 Token Holders

Source: Etherscan.io



### TRU distribution

1. Incentives (yield farming) = 565,500,000 (39%)
2. Pre-Sale = 387,917,402 (26.75%)
3. Team = 268,250,000 (18.5%)
4. Company/Foundation = 163,082,598 (11.25%)
5. Future Team = 65,250,000 (4.5%)

Given the tokens allocation, over time 65.75% of TRU will be allocated to the community in the form of incentives and Pre-Sale. 34.25% is allocated to the Company/Team, a proportion of these funds are intended to be used as Treasury funds or in providing liquidity for TRU on AMM's (>10M TRU) (see 2c for more details on issuance model over time).

Of the tokens unlocked and available to the company they have been used to:

- Provided liquidity on Uniswap
- Loans to market makers to provide liquidity on centralised exchanges;
- Fund marketing campaigns such as trading competitions, hold-to-earn incentives and AMAs; and
- Voted/Staked on loans that otherwise would not have met the minimum requirements.

In effect over 65% of TRU seems to be fairly distributed with the community and team. Relative to protocol lending competitors Aave and Compound, TrueFi's distribution is more favourable than Compound's where ~50% of the distribution was allocated to the community and around 46% to the founding team and investors. Compared to Aave's initial 75% community distribution TRU is not as distributed.

**Score: 9**

## **b) What is the extent of the token's capabilities? (10 points)**

Is the token useful within the protocol? Does the token allow the holders to participate in governance or influence the protocol in any way? Does it serve any other purposes?

**Answer:**

TRU is the native governance and staking token. Lenders provide assets to TrueFi loan pools and earn TRU, in addition to the interest paid by Borrowers. Staking TRU on TrueFi enables users to:

1. Protects lenders in the event of default defaults, staked TRU partially liquidated.
2. Contribute to development of the protocol through on-chain governance
3. Vote to approve new Borrowers and loans.

Stakers also receive the [protocol's 10% fee](#) charged on loans. The token provides governance rights, revenue and risk management utility.

**Score: 10**

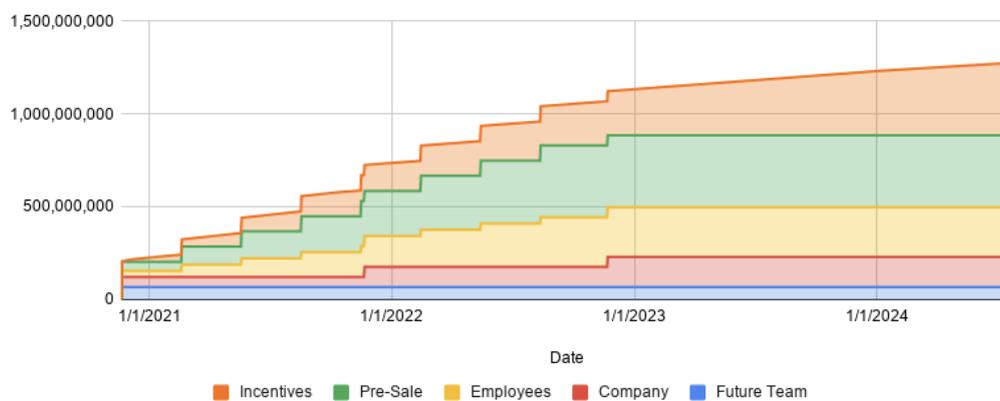
### c) Is the issuance/distribution model able to improve the coordination of the protocol? (10 points)

To what extent does the issuance of the token support the advancement and function of the protocol? Are the tokens justifiably being issued? Does the issuance model incentivize the right behavior? Are all relevant stakeholders benefiting from the issuance model?

**Answer:**

TRU's issuance schedule progressively unlocks and distributes the tokens allocation, unlocking quarterly.

TRU Token Distribution Schedule (Actual + Projection)



#### TRU distribution

Stakeholder	Total Allocation
Incentives (yield farming)	39%
Pre-Sale	26.75%
Team	18.5%
Company/Foundation	11.25%
Future Team	4.5%

Actual circulating supply is lower than projected due to changes made by the community to reduce incentive distributions. Unallocated tokens from these changes are intended to be repurposed or burned. A portion of TRU distributed to team and company are either [awarded, token options or vested](#) over a period of time.

As stated in [2a](#), over 65% of the issuance has been allocated to the community and some of the distributed TRU that isn't allocated to the community has been used to improve the protocol e.g. creating an insurance fund ([SAFU](#)). Additionally, distributions meant for the company and team are staggered and incentivized, encouraging behaviour beneficial to the protocol as long term growth of the protocol is mutually beneficial.

It should be noted however that the changes to the distribution schedule and projections exceeding actual circulation could weaken incentives - especially the [reduced Incentives distribution](#). For this section, repurposed TRU for insurance and staggered team/company distribution incentives are diminished due to over 3rd of the distribution being centralised, therefore a score of 7 is given.

**Score: 7**

## **d) Is the value capture model able to accrue and distribute value? (10 points)**

A value accrual and distribution mechanism can help improve the utility of a token and its ability to be used as an effective coordination mechanism. Does the protocol have mechanisms to distribute some of the value created to the token holders?

**Answer:**

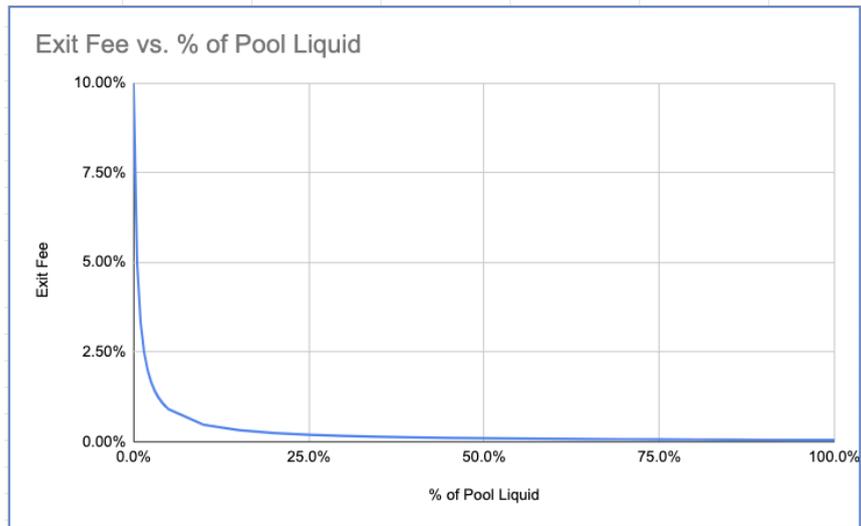
TRU holders can access protocol generated values by staking TRU ([stkTRU](#)). Stakers receive a portion of fees generated by TrueFi and additional TRU tokens. Currently, stkTRU earns 100% of the fees generated by the TrueFi protocol. The protocol fees currently consist of 10% of all interest amount generated from loans paid at the end of successful repayment of a loan.

Protocol fees generated by TrueFi pools are exchanged for USDC, USDC is then lent it's USDC Pool in exchange for tfUSDC tokens. Stakers are rewarded with tfUSDC tokens and charged an '[exit fee](#)' for the underlying token.

TRU stakers earn additional returns in the form of more TRU as incentive to stake their TRU on the platform. Risk exists for stakers as their TRU can be liquidated to cover defaults.

The protocol also generates revenue from idle funds by sending them to DeFi [yield generating strategies](#) like Curve. Main source [here](#).

TrueFi accrues and distributes revenue through lending and use of idle funds, as a result protocol owned revenue comes from exit fees that lenders and stakers pay when redeeming their loan tokens. The effectiveness of this for protocol self-sufficiency varies with liquidity. Therefore a 7 is given for this section.



Score: 7

### e) Is the token sufficiently liquid to enable active use and trade? (5 points)

Is the token widely available and is there sufficient liquidity available to facilitate all protocol functionalities?

Answer:

TRU is available on over [15 centralised and 2 decentralised exchanges](#), namely Binance, Coinbase, FTX, Sushiswap and Uniswap. Market liquidity on centralised exchange markets (scored on a scale from 0 - 1000 on CoinMarketCap, with scores close to 1000 representing high liquidity) is relatively good with liquidity scores generally between 120 - 500 and multiple trading pairs available e.g. MEXC and Binance.

#	Source	Pairs	Price	+2% Depth	-2% Depth	Volume	Volume %	Confidence	Liquidity	Updated
1	Binance	TRU/USDT	\$0.1673	\$39,160.44	\$62,667.60	\$1,635,610	18.53%	High	560	Recently
2	Coinbase Exchange	TRU/USD	\$0.1676	\$48,382.24	\$82,956.25	\$554,068	6.28%	High	459	Recently
3	Gate.io	TRU/USDT	\$0.1666	\$765,738.73	\$769,890.12	\$272,677	3.09%	High	394	Recently
4	Binance	TRU/BTC	\$0.1672	\$50,849.30	\$49,124.87	\$220,450	2.50%	High	591	Recently
5	FTX	TRU/USD	\$0.1671	\$19,826.03	\$25,910.13	\$125,510	1.42%	High	332	Recently
6	Coinbase Exchange	TRU/EUR	\$0.1669	\$30,163.85	\$37,600.64	\$52,683	0.60%	High	388	Recently
7	Poloniex	TRU/TUSD	\$0.167	\$444.83	\$887.35	\$41,635	0.47%	High	94	Recently
8	FTX	TRU/USDT	\$0.1661	\$4,278.59	\$3,507.34	\$40,040	0.45%	High	308	Recently
9	KuCoin	TRU/USDT	\$0.1665	\$12,242.32	\$13,640.21	\$38,297	0.43%	High	319	Recently
10	Poloniex	TRU/USDT	\$0.1661	\$811.36	\$780.25	\$24,082	0.27%	High	370	Recently
11	Coinbase Exchange	TRU/USDT	\$0.1673	\$46,986.46	\$51,060.49	\$18,928	0.21%	High	370	Recently

[Exchange list part 1](#)

However, liquidity on leading decentralised exchanges Uniswap and Sushiswap appears to low or limited in trading pair pools (according to coingecko liquidity on Sushiswap's [TRU/WETH](#) has a good trust score)

15	 Uniswap (V2)	<a href="#">TRU/WETH</a> 	\$0.1646	-	-	\$2,159	0.02%	<span>N/A</span>	-	Recently
16	 Binance	<a href="#">TRU/RUB</a>	\$0.1653	\$462.88	\$2,536.55	\$1,713	0.02%	<span>High</span>	516	Recently
17	 MEXC	<a href="#">TRU/USDT</a>	\$0.1663	\$37,516.55	\$55,240.97	\$232,005	2.63%	<span>High</span>	391	Recently
18	 ZB.COM	<a href="#">TRU/USDT</a>	\$0.1664	\$1,148.45	\$1,001.23	\$148,857	1.69%	<span>Moderate</span>	11	Recently
19	 SushiSwap	<a href="#">TRU/WETH</a>	\$0.1661	-	-	\$108,481	1.23%	<span>N/A</span>	-	Recently

### [Exchange list part 2](#)

Sufficient liquidity can be found on more CEXs rather than DEXs.

**Score: 3**

## f) Are there any extrinsic productivity use cases for the token? (10 points)

Besides the protocol's value distribution model as described in 2. d), can the token be used productively on other protocols (e.g. as collateral, for lending, LPing, yield farming, etc.)?

**Answer:**

TRU holders can [provide liquidity and earn LP fees](#) on Uniswap and Sushiswap (farm additional TRU).

**Score: 3**

## 3. Team

The Team section describes the quality of the team behind the protocol. The current version of Prime Rating favors teams that are publicly identifiable. In the case of an anon team, the track record of the specific anons involved can be taken into account

### a) Is the team credible and public? (15 points)

Are the identities of the core contributors and team publicly identified? In the case of anon team members, is there any way to track their background/record?

**Answer:**

Initially developed by TrustToken, developers of fiat-backed stablecoins. Co-founded in 2017 by [Stephen Kade](#), Rafael Cosman, and [Jai An](#). TrustToken is currently led by:

Rafael Cosman: CEO, [LinkedIn](#), [Crunchbase](#), [Twitter](#)

Alex de Lorraine: COO, [LinkedIn](#), [Twitter](#)

Tom Shields: Chief Strategy Officer, [LinkedIn](#), [Crunchbase](#), [Twitter](#)

Marek Kirejczyk: CTO; [LinkedIn](#), [Twitter](#)

Bill Wolf: Chief Investment Officer, [LinkedIn](#)

Russell Korte: Chief Financial Officer, [LinkedIn](#)

Employees are visible on the company's [website](#).

**Score: 15**

## **b) Does the team have relevant experience? (10 points)**

Are there any documents or trails available to showcase the track record of the team? Do the team members have relevant backgrounds and skill sets?

**Answer:**

CEO and co-founder Rafael Cosman created [TrueUSD \(TUSD\)](#), the first compliant and independently backed US-dollar backed stablecoin along with the first stablecoins backed by the Hong Kong Dollar, Canadian Dollar, British Pound, and Australian Dollar. Prior to starting TrustToken Rafael worked at Google and Palantir, with an educational background in Computer Sciences.

Recently TrustToken appointed leadership with experience in traditional finance to expand into DeFi, namely: COO Alex de Lorraine who has over 20 years of [experience](#) in finance, operations, and compliance from Google, Pfizer and IBM.

CTO Marek Kirejczyk ran [ETHWorks](#) - a Web3 development company (smart contracts and DApps) - before being [acquired by TrustToken](#). CFO Russell Korte was previously CFO at [Allegro Credit](#), leading the sale of the consumer lending company to Synchrony Financial, a \$100 billion consumer lending institution.

TrustToken's operational members can be viewed [here](#), critical functions like engineering, security and compliance are well staffed with to perform the protocols necessary functions.

**Score: 10**

## **c) Does the team participate and help shape the public debate? (5 points)**

To what extent do the protocol contributors participate in the public debate around open finance? Are the team members giving presentations, sharing their thoughts and opinions, and do they help raise

the collective intelligence of the industry?

**Answer:**

Marek Kirejczyk is the most active publicly, having given presentations at TEDxtalk and Chainlink, recently Marek has been cited by [Cointelegraph](#) on decentralisation and writes regularly on [Medium](#) and [Twitter](#) on Web3 technology. Rafael Cosman regularly shares his opinions on Twitter and speaks publicly, most notably Invictus Capital podcasts and Blockhash. Full score reserved for the whole team.

**Score: 4**

## **d) Is the team able to effectively attract and coordinate resources? (10 points)**

How effective is the team at attracting and coordinating resources for the benefit of the protocol? Has the team raised sufficient funding or are there mechanisms in place to attract resources when needed?

**Answer:**

TrueFi [raised \\$12.5M](#) in Jan 2022 from prominent investors Blocktower, a New York-based cryptocurrency investment firm, Sam Bankman-Fried's Alameda Research (founder of FTX ) and A16z. Alameda and Blocktower have previously been TrueFi borrowers, the previous relationship created from institutional borrowers seems like a smart way to network to attract additional resources. Russell Korte and Bill Wolfe have experience in coordinating finances along with the community as the protocol becomes more decentralised.

Prior to venture capital raise TrueFi [raised \\$28M](#) from a 26.75% presale of TRU in 2018.

**Score: 10**

## **4. Governance**

The Governance section evaluates how the protocol is governed and who the governors are. The different governance functionalities and processes are evaluated to determine to what extent the Protocol will be able to self-govern in a way that ensures the development of the protocols while respecting the needs of all current and future stakeholders.

### **a) Admin Keys (20 points)**

Admin Keys allow some critical functionalities of a protocol to be controlled by an admin. This allows the developers to react to potential bugs, but also creates a risk as the developers could potentially misuse the admin keys to exploit the protocol. Does the protocol have admin keys and how are they managed?

**Answer:**

Currently, protocol admin access and updates are [centralised and controlled](#) by the TrueFi team, no timelocks are associated. TrueFi aims to progressively decentralise.



TrueFi contract [access controls](#) exchange with [Clément Lesaege](#), CTO at [Kleros](#).

TrueFi's banking partner/institutional obligations indicate that the admin keys are operated by credible individuals however the lack of timelock indicates poor private key management and creates liability as mentioned by Clément. A score of 8 is attributed to this section.

**Score: 8**

## **b) Extent of Governance capabilities (15 points)**

Distributed governance allows the token holders to participate in the governance of open finance protocols. How much influence does the governance mechanism have? Are the votes affecting on-chain changes or do they function solely as signals to the team?

**Answer:**

Governance is done through [forum and Snapshot voting](#), TRU holders direct the future development of the protocol, including changes to the lending and borrowing mechanics.

The TrueFi team is progressively decentralising the protocol, meaning protocol decisions like: Initial borrowers, adding new assets and lending pools are determined by team with community input via proposals ([100,000 TRU threshold](#)) and Snapshot quorum. Development of [V5 and onwards](#) indicates more leading control may be given to the community.

**Score: 8**

## **c) Active Governance contributors (5 points)**

Governance is a process that can be rather resource-intensive if executed well. To ensure good governance is practiced by the protocol, it's important to have a sufficient number of governors allocate resources to the governance process of the protocol. How many individuals participate in the debate around the protocol? How active are voters?

**Answer:**

Over 30 TIP's have been sent to [Snapshot](#), TrueFi have a relatively low Snapshot member count at 29 when compared to competitor protocols like Aave and Compound. Snapshot member participation is quite high though, with an average of at least 10 members voting per proposal( "[Proposal] A Medium-Term Strategy for Lending Pool Incentives" reached [25 votes](#)).

A majority of [forum proposals](#) made have come from TrustToken's core team (perhaps a condition of their progressive decentralisation policy), views per proposal range between 90 - 2.1K and more frequently 300 - 500. Debates are quite diverse and in depth with participation from the team (e.g. [Revised Tokenomics and proposed token BURN](#), [Staking Locked TRU Proposal](#)).

Given the fact that TrueFi has a low Snapshot member count but a decent forum governor participation, a score of 3 seems appropriate.

**Score: 3**

## **d) Governance technology/infrastructure (10 points)**

The Governance infrastructure relates to the technology, software, and models used by the protocol's governance. Does the protocol have a reliable and usable voting mechanism? Are there channels for governance debate? Is there sufficient documentation available?

**Answer:**

Discord acts as the informal medium of filtering proposals, thereafter formal TIP (TrueFi Improvement Proposals) are posted on [forum](#) for further discussion and votes cast on Snapshot. Votes reaching quorum ([15% of TRU circulating supply](#)) are executed.

This infrastructure doesn't appear to be formally published, as a result it is hard to determine to what extent the infrastructure presented has actually been established. Therefore a useful infrastructure score is given.

**Score: 7**

## **e) Robustness of Governance process (10 points)**

This score requires documentation specifically on the governance process that sets the basic framework in terms of agreements, norms, and language for governing the protocol and to create social consensus. Does the protocol have a formal governance process? How robust is the governance process and does it promote good governance?

**Answer:**

The governance process is documented loosely across their litepaper, faq page and forum posts. Their [litepaper](#) introduces how the protocol uses the forum and snapshot for governance, while the [stkTRU page](#) in faq provides some detail on how stkTRU plays a role in enabling governance.

Forum posts "[TrueFi Governance](#)" and "[How Snapshot Governance of TrueFi Will Work](#)" provide the most formal governance framework, however forum posts aren't a uniform way to promote an accessible governance process or create a social consensus.

Compared to other protocols who have their governance processes documented in a gitbook or whitepaper a score of 7 seems appropriate taking into consideration that the forum posts have a formalised structure.

**Score: 7**

## 5. Regulatory

The Regulatory section describes the extent and quality of the regulatory environment that affects the Protocol. To be able to guarantee functionality, security, and legality the protocol should comply with regulatory requirements, or limit itself to facilitating services to users who are willing to operate outside of the traditional regulatory environment.

### a) Does the protocol have any legal accountability? (15 points)

Does the protocol have any form of legal accountability? Can users and partners hold the protocol accountable in case of a breach of the agreement?

**Answer:** [TrustToken Inc.](#), developed TrueFi and currently runs some operations (e.g. borrower whitelisting), progressively decentralising.

**Score: 15**

### b) What is the quality of the legal jurisdiction? (10 points)

If the protocol has a legal entity, what is the quality of the jurisdiction the entity is established in? Will the jurisdiction be able to facilitate the legal framework for the protocol to expand while remaining accountable.

**Answer:** [USA](#)

**Score: 10**

## Scorecard

1. Value Proposition	Points
a) Novelty of the solution	11 / 15
b) Market fit/demand	11 / 15
c) Target Market Size	10 / 10
d) Competitiveness within market sector(s)	5 / 10
e) Integrations & Partnerships	8 / 15
<b>Total Points - Value Proposition</b>	<b>45 / 65</b>
2. Tokenomics	Points
a) Is the token sufficiently distributed?	9 / 15
b) What is the extent of the token's capabilities?	10 / 10
c) Is the issuance model able to improve the coordination of the protocol?	7 / 10
d) Is the value capture model able to accrue and distribute value?	7 / 10
e) Is the token sufficiently liquid to enable active use and trade?	3 / 5
f) Are there any extrinsic productivity use cases?	3 / 10
<b>Total Points - Tokenomics</b>	<b>39 / 60</b>
3. Team	Points
a) Is the team credible and public? (No, Partly, Yes & Anon , Yes & Public)	15 / 15
b) Does the team have relevant experience?	10 / 10
c) Does the team participate and help shape the public debate?	4 / 5
d) Is the team able to effectively attract and coordinate resources?	10 / 10
<b>Total Points - Team</b>	<b>39 / 40</b>
4. Governance	Points
a) Admin Keys	8 / 20
b) Extent of Governance capabilities	8 / 15
c) Active Governance contributors	3 / 5
d) Governance infrastructure	7 / 10
e) Robustness of Governance process	7 / 10
<b>Total Points - Governance</b>	<b>33 / 60</b>

<b>5. Regulatory</b>	<b>Points</b>
a) Does the protocol have any legal accountability?	<b>15 / 15</b>
b) What is the quality of the legal jurisdiction?	<b>10 / 10</b>
<b>Total Points - Regulatory</b>	<b>25 / 25</b>
<b>Total</b>	<b>181 / 250</b>

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