

Form CRS – Customer Relationship Summary (May 2025)

Introduction

Virgo Digital Asset Management Inc. (“VDAM”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Investment advisory services and fees differ from those of a broker-dealer, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about investment advisers, broker-dealers, and investing.

Relationships and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail investors through separately managed accounts (“**SMAs**”). We tailor your portfolio to your investment goals and manage it on a discretionary basis, which means we make investment decisions on your behalf without seeking prior approval for each trade. You may impose reasonable restrictions on the account, subject to our approval.

We review accounts at least monthly and rebalance them when market conditions or your goals change. Our strategies include equity exposure to the digital asset sector, principal-protected strategies, options-based strategies, and arbitrage strategies where appropriate. We may also use derivatives, options, or leverage in certain strategies, which can significantly increase both potential gains and losses. You could lose some or all of your investment.

We do not impose account minimums. Our clients are generally “qualified clients” under SEC rules. For additional information, please reference our Form ADV Part 2 Brochure.

Questions to Ask Us:

- **Given my financial situation, should I choose an investment advisory service? Why or why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

You will pay an annual management fee of 2.00%, charged monthly based on your account’s daily value. We may also charge a performance fee equal to 20% of any gains above the highest historical value of your account (“high water mark”). Charging a performance fee may encourage us to pursue riskier investments or strategies that have the potential for higher returns but also increase the risk of loss. This could lead to outcomes that differ from what a flat-fee model might produce.

You will also pay other fees such as brokerage commissions, custody fees, fund expenses, and account maintenance fees charged by your custodian. For additional information, please reference our Form ADV Part 2 Brochure.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees you are paying.

What are your legal obligations to me when acting as my investment adviser?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts. For example, our employees may buy or sell securities for their own accounts that we also recommend to you, which could create conflicts. We have policies to reduce this risk. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

How else does your firm make money and what conflicts of interest do you have?

The primary way we make money is through the advisory and performance fees you pay us. If we charge you a performance-based fees, we will have an incentive to pursue strategies that pose more risk but increase the likelihood of generating high returns.

We require that your assets be held at a single custodian (Interactive Brokers), which may limit our ability to seek better execution or lower costs elsewhere.

We may receive research and services from brokers when we direct trades to them, which is known as a “soft dollar” arrangement. This creates an incentive for us to trade with those brokers, even if they are not the lowest-cost option.

How do your financial professionals make money?

Our financial professionals are paid salaries and may receive discretionary bonuses. They do not receive commissions or bonuses based on sales or the amount of client assets they bring in.

Questions to Ask Us:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- How might your conflicts of interest affect me and how do you address them?

Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Questions to Ask Us:

- As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For additional information about our services or to request a copy of this Form CRS, please visit our website at <https://vdam.virgo.co>, email us at vdam@virgo.co, or call us at +1 437-455-3150.

Questions to Ask Us:

- Who is my primary contact person?
- Is he or she a representative of an investment adviser or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?

