



Form CRS

August 21, 2024

Introduction

Galapagos Advisory LLC (“Galapagos”) is an investment adviser registered with the Securities and Exchange Commission (“SEC”). Investment advisory services and fees differ from brokerage accounts and services, and it is important for you to understand these differences. This document gives you a summary of the types of services we provide to individual retail clients and how you pay for them. *Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, brokers, and investing.*

What investment services and advice can you provide me?

We offer investment advisory services primarily to individual retail clients. Our offerings are geared towards high-net worth international clients, primarily from Brazil. We also service trusts, corporations, and institutional investors. We have a \$250,000 account minimum.

Our services include investment management on a wide range of investment products including individual stocks, bonds, time deposits, mutual funds, exchange traded funds, hedge funds, alternative investments, currencies, and commodities. When appropriate, we may select affiliated or unaffiliated third-party managers or subadvisors, and we offer consolidated reporting and other services tailored to the client’s specific needs. Our standard investment management services include periodically monitoring and reviewing your portfolio (or the portion of the portfolio under our management) to ensure that your portfolio is meeting your stated goals and investment plan.

As an independently owned adviser, Galapagos has an open architecture that allows us access to a wide range of investment products. Clients should be aware that other firms may provide advice on a wider or more limited range of choices and at a higher or lower cost.

We manage your account on a discretionary or non-discretionary basis. In a discretionary arrangement, Galapagos has discretion over the selection and amount of securities to be bought or sold in client accounts, subject to specified investment objectives, guidelines, or limitations set forth by each client. In a non-discretionary account arrangement, the client must approve each of our recommendations and make the ultimate decision regarding the purchase or sale of investments.

For additional information, please refer to Items 4, 7, and 8 of our Form ADV, Part 2A Brochure available at the SEC’s website, www.adviserinfo.sec.gov, or by contacting us.

Ask your financial professional:

- **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?**

What fees will I pay?

Galapagos charges a quarterly asset-based fee that is dependent on the value of the assets we manage. The more assets in your account, the more you will pay in fees and therefore we may have an incentive to encourage you to increase the assets in your account. You will generally pay additional fees related to having a brokerage account at the custodian that holds

your assets. These fees typically include custodial fees, brokerage commissions, transaction fees, fees charged by third-party managers, and other transactional or product-level fees. **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 and costs you are paying.** For additional information, please refer to Items 5 and 12 of Form ADV, Part 2A Brochure.

Ask your financial professional:

- **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?**

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

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 with your interests. You should understand and ask us about these conflicts because they affect the recommendations, we provide you. Here are some examples to help you understand what this means:

- We have an incentive to recommend adding assets to any account that we manage because this increases the asset-based fee clients pay us.
- We have a financial incentive to recommend products issued, sold, or underwritten by our affiliates over third-party products.

We do not charge performance-based fees, engage in principal trading, receive third party payments, or have “soft dollar,” or revenue sharing arrangements. This summary does not identify all our conflicts of interest, or all material facts about the conflicts of interest listed. For additional information, please refer to Items 10, 11, 12, and 14 of our Form ADV, Part 2A Brochure.

Ask your financial professional:

- **How might your conflicts of interest affect me, and how will you address them?**

How do your financial professionals make money?

Our financial professionals do not receive additional compensation or commissions for recommending certain products or services. Our financial professionals are compensated through salary and a discretionary performance bonus based on factors such as the amount of client assets served, the amount of revenue the firm earns, and other non-economic factors. In addition, our financial professionals may also receive stock interests in the firm’s parent company. One of our financial professionals is dually registered with an unaffiliated broker-dealer and in this capacity receives commission-based brokerage compensation.

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

No. We do not have legal and disciplinary events. Please visit www.Investor.gov/CRS for a free and simple search tool to research us and our financial professionals. Also refer to the Form ADV Part 2B Brochure Supplements for additional information regarding our financial professionals’ experience, qualifications.

Ask your financial professional:

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

Additional Information

For additional information about our investment advisory services, or to request a copy of our latest Client Relationship Summary, please contact Guilherme Lee, Chief Compliance Officer via email at: complianceusa@galapagoscapital.us, or by telephone at 305-504-6134.

Ask your financial professional:

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



Amended Form CRS (Client Relationship Summary)

August 21, 2024

SUMMARY OF MATERIAL CHANGES

We have updated the Client Relationship Summary (Form ADV Part 3) to disclose that one of our financial professionals is dually registered with an unaffiliated FINRA registered broker-dealer and in this capacity, receives commission-based compensation. We also updated the contact telephone number.

You can find additional information about our investment advisory services by visiting www.adviserinfo.sec.gov, or by visiting our website <https://galapagos-advisory.com/>. You can also request up to date information, a copy of our Client Relationship Summary, or inquire as to any material changes by contacting us at 305-504-6134.