

Visdom Investment Group LLC
Form ADV Part 3 (“Form CRS”)
October 18, 2024

Item 1: Introduction

Visdom Investment Group LLC (“Visdom”) is an investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What Investment Services and Advice Can You Provide Me?

Visdom provides investment advisory services on a discretionary basis to retail investors, which include individuals, families, trusts and foundations, with a particular focus on high-net-worth individuals and families. Visdom provides investment advisory services based on the specific investment objectives and strategies that are set forth in your investment management agreement. Investment advisory services provided by Visdom are not limited to any type of investment or product but are generally based on customized option-based solutions with a focus on absolute return, yield enhancement and risk reduction. Visdom does not currently require a minimum account size.

Visdom reviews your account and portfolio on an ongoing basis to determine whether securities positions should be maintained in view of current market conditions. This review is carried out by the portfolio managers and/or Visdom’s investment personnel. Your custodian will typically provide monthly statements describing investments in your account, summarizing that period’s activities, and comparing the market value of the securities in your account for that period with your account’s performance for prior periods. Visdom has complete discretion with respect to allowing any prospective investor to open an advisory account.

FOR ADDITIONAL INFORMATION about our advisory services, please see Items 4, 7, and 13 of our Form ADV Part 2A Firm Brochure.

CONVERSATION STARTERS:

- 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?

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

What Fees Will I Pay?

Retail investors will generally pay us an annual management fee ranging from 0.25% to 0.50% based on the value of assets under management depending on the relevant strategy and terms of your investment management agreement. These fees are charged each month or quarter in advance or in arrears depending on the particular strategy and your investment management agreement. When management fees are charged in advance, you will receive a refund of the unused portion of any pre-paid management fees.

Our clients generally pay a fixed asset-based management fee. Such fees may create conflicts of interest because the more assets there are in your advisory account, the more you will pay in fees. Thus, Visdom may have an incentive to encourage a retail investor to increase the assets in his or her account and to favor those clients that pay Visdom higher fees. Visdom has adopted and implemented policies and procedures intended to address conflicts of interest relating to the management of multiple accounts, including accounts with different fee arrangements.

In addition to paying investment management fees to Visdom, other fees and costs related to Visdom’s management of your account may include transaction-based fees when we buy or sell an investment for you (e.g., applicable commissions paid to broker-dealers for buying or selling investments). You may also experience fees, including margin expenses, paid to a broker-dealer or bank that holds your assets. You may be part of a “wrap fee” program and subject to asset-based transaction fees, in which you are typically charged a minimum fee per month, instead

of paying brokerage commissions. Visdom is not a sponsor of any wrap fee program. If you are part of a “wrap fee” program, you should consult with your program sponsor for details on fees and expenses applicable to your account.

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 about our fees and costs, please see Items 5 and 12 of our Form ADV Part 2A Firm Brochure.

CONVERSATION STARTER: 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 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 can affect the investment advice we provide you. Here is an example to help you understand what this means:

The more assets there are in your advisory account, the more you will pay in fees, and the firm may therefore have an incentive to encourage you to increase the assets in your account.

CONVERSATION STARTER: How might your conflicts of interest affect me, and how will you address them?”

Our obligations to you. We must abide by certain laws and regulations in our interactions with you. We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis. Our interests can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them.

How do your financial professionals make money?

Visdom’s financial professionals receive cash compensation in the form of a salary based on level of experience. Certain professionals may also receive a performance bonus based on their contribution to the adviser, which may include a bonus for the amount of client assets that the professional manages and services for the adviser.

Item 4: Disciplinary History

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

No. You may visit www.investor.gov/CRS for a free and simple search tool to research Visdom and our financial professionals.

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

Item 5: Additional Information

You can obtain additional information about our investment advisory services, request up-to-date information and request a copy of the relationship summary by contacting Patrick Joseph “Joe” Clough, our Chief Compliance Officer, at jclough@visdomig.com.

CONVERSATION STARTER: 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?