

**Dragus Capital, LLC**  
**Customer Relationship Summary**  
**June 2020**

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**Item 1. Introduction**

Dragus Capital, LLC (“Dragus Capital”) is an investment adviser registered with the U.S. Securities and Exchange Commission. Investment advisory and brokerage services and fees differ; therefore, it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

**Item 2. Relationships and Services**

*“What investment services and advice can you provide me?”*

**Description of Services and Monitoring**

We provide investment advisory services, specifically portfolio management, to retail investors. We provide those services in separately managed accounts which, as part of our standard services, we monitor on an ongoing basis. Our Chief Compliance Officer formally reviews each client’s portfolio on a quarterly basis as part of our internal control structure, and we contact our clients at least twice every year to review their accounts. Factors that trigger reviews include changes to our investment recommendations and changes to your financial situation and/or investment objectives.

**Investment Authority**

We offer our portfolio management services on both a **discretionary** and **non-discretionary** basis. Discretionary portfolio management allows us the limited authority to buy and sell investments in your account without asking you each time a transaction is placed. With non-discretionary portfolio management, we provide investment recommendations but require your approval to proceed. You make the ultimate decision regarding the purchase or sale of investments. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

**Investment Offerings and Account Minimums**

While we can advise on any investment held in a client’s portfolio, our investment recommendations are primarily limited to US and foreign bonds, exchange traded funds, mutual funds, and individual equity and debt securities (i.e., stocks and bonds). We do not impose a minimum portfolio size as a condition for starting or maintaining a relationship.

**Additional Information**

For additional information, please see our [Form ADV Part 2A](#) (with special emphasis on Items 4, 7, and 16).

**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?”*

For portfolio management services, we charge an ongoing asset-based fee at the end of each quarter. The fee is charged in arrears and is computed as a percentage of the market value of your assets that we manage. The more assets in your advisory account, the more you will pay in fees. We may, therefore, have an incentive to encourage you to increase the assets in your account.

**Other Fees and Costs**

Some investments, such as mutual funds, impose additional fees that will reduce the value of your investments over time. Those fees may include mutual fund expenses and sales charges. You may also pay other fees to the custodian of your assets. These include, but may not be limited to, brokerage commissions, transaction fees, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

**Additional Information**

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More detailed information about our fees and costs are included in our [Form ADV Part 2A](#) (Items 5.A., B., C., and D.).

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\* Consider asking your financial professional these questions.

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**Conversation Starters** \*

- 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?”***

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:

- Our primary custodian for retail investors provides access to certain research or other investment management tools without charge for maintaining client assets with them. The receipt of such economic benefits by us or our IARs in and of itself creates a potential conflict of interest and may indirectly influence our choice of a particular custodian for custody and brokerage services. To address these potential conflicts of interest, we have developed and implemented a Compliance Program, which includes a review of the services and execution quality we receive from the custodians we recommend.

These arrangements and additional information about conflicts of interest are discussed in more detail in our [Form ADV Part 2A](#).

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

We only generate revenues from our portfolio management and services and the additional compensation summarized below.

- **Wealth Planning Services Fees**: We provide wealth planning services primarily to retail clients who are non-U.S. persons. The services include assistance with establishing an ownership structure for wealth preservation and assistance with estate planning for assets held in the U.S. For those services, we charge a fixed fee that is based on the complexity and type of services provided.
- **Consulting Fees**: Occasionally, we provide consulting services that do not involve investment management to retail clients. These services include, but are not limited to: assisting with the purchase of real estate, assisting with the purchase of businesses or making business decisions, working with accountants and other professionals, and assisting with trust structure changes. Our fee for this service is charged on an hourly basis.

**Conversation Starter** \*

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

***“How do your financial professionals make money?”***

Our financial professionals are compensated through salaries and/or a portion of revenue we receive for the advisory services we provide. The portion paid to your financial professional generally does not vary based on the type of investments that are recommended.

**Item 4. Disciplinary History**

***“Do you or your financial professionals have legal or disciplinary history?”***

No – Neither the Firm nor any of our financial professionals have a disciplinary history. We invite you to visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our Firm and financial professionals.

**Conversation Starters** \*

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

**Item 5. Additional Information**

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on [our website](#) or [adviserinfo.sec.gov](http://adviserinfo.sec.gov). Alternatively, you can call Dragus Capital toll-free at (786) 477-5777 to speak with us directly.

**Conversation Starters** \*

- 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?

\* Consider asking your financial professional these questions.