

## ZEGA Investments, LLC

April 7, 2025

FORM CRS

ZEGA Investments, LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS). This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

### What investment services and advice can you provide me?

We offer discretionary asset management services to retail investors. We provide customized portfolio management in accordance with the stated guidelines and objectives of the separately managed account. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/330428>.

**Account Monitoring:** If you open an investment account with our firm, as part of our standard service we will monitor your investments on a quarterly basis, at a minimum, and ensure all investments fit your risk profile.

**Investment Authority:** We manage investment accounts on a *discretionary* basis whereby we will decide which investments to buy or sell for your account.

**Investment Offerings:** We provide advice on various types of investments. Although we generally recommend investments in U.S. exchange traded options for major U.S. indexes, our services are not limited to a specific type of investment or product.

**Account Minimums and Requirements:** Investors must execute an advisory agreement with ZEGA to open an account. Although there are currently no minimum account sizes, we reserve the right to terminate your account if it becomes, in our sole opinion, too small to effectively manage. We typically charge a minimum fee which is negotiable depending on the account size but which will, in no event, exceed 3% of the account value.

### Key Questions to 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?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/330428>.

**Asset Based Fees** - Payable quarterly in arrears. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value;

**Insurance Commissions** - One or more persons providing investment advice on behalf of our firm are also licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees.

Depending on the type of account you open, you may pay additional fees and/or expenses such as commissions charged by the broker-dealer/custodian. Other possible common fees and costs applicable to our clients may include: Custodian fees; Account maintenance fees; Fees related to mutual funds and exchange-traded funds; and other product-level fees associated with your investments.

***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.***

### Key Questions to 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 can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Because many advisors revenue (including ZEGA'S) is derived from asset-based fees, advisors have an incentive to grow your account as much as possible. This could cause an advisor to take overly aggressive positions, in conflict with your interests, in an attempt to grow your account. ZEGA will review every clients' risk profile on a quarterly basis to ensure that all investments are consistent with their investment decisions.

We have an arrangement with Tidal Investments LLC ("Tidal"), an SEC registered adviser, involving Jay Pestrighelli's designation and registration as a Tidal Investment Adviser Representative ("IAR"). In this capacity, Mr. Pestrighelli provides investment advisory oversight services to one or more Tidal investment strategies. This arrangement, which may give rise to potential conflicts of interest, is governed by employment and firewall agreements outlining the respective responsibilities of each party to fulfil their fiduciary duties and ensure clients receive unbiased and fair advisory services.

**Third-Party Payments:** As noted above, one or more persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs.

Refer to our Form ADV Part 2A Brochure by clicking this link <https://adviserinfo.sec.gov/firm/brochure/330428> to help you understand what conflicts exist.

**Key Questions to 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?**

The financial professionals servicing your account(s) are compensated by receiving a salary that is based on the amount of client assets they service. See above for disclosures of conflicts of interest relating to our fee structure.

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

No for our Firm. Yes for our financial professionals. For more information, visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple research tool to research us and our financial professionals.

**Key Questions to Ask Financial Professional**

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 800-380-9342 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/330428>.

**Key Questions to Ask Your Financial Professional**

- **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?**

## **Zega Investments, LLC**

**April 7, 2025**

### **Exhibit to Form CRS**

Zega Investments, LLC is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS, implemented on April 7, 2025:

We amended our Form CRS to remove references to a Wrap Fee Program as we have determined that we are not a manager of, nor sponsor to, any Wrap Fee Program and to indicate that our portfolio management service is discretionary.

We also revised the language in the Account Minimums section to note that, we typically charge a minimum fee which is negotiable depending on the account size but which will, in no event, exceed 3% of the account value.

Additionally, we amended the Form CRS to disclose that one or more of our financial professionals is also a licensed insurance agent and will earn commission-based compensation for selling insurance products. Such insurance commissions are separate from our advisory fees.

We further updated the answer to the question that asks if our firm or financial professionals have any legal or disciplinary history to indicate that our Firm does not but one or more of our financial professionals does.

Finally, we revised our conflicts of interest disclosure to note that we have an arrangement with Tidal Investments LLC ("Tidal"), an SEC registered adviser, which involves Jay Pestrighelli's designation and registration as a Tidal Investment Adviser Representative ("IAR"). In his capacity of IAR, Mr. Pestrighelli provides investment advisory oversight services to one or more Tidal investment strategies. This arrangement, which may give rise to potential conflicts of interest, is governed by an employment agreement and firewall agreement outlining the respective responsibilities of each party to fulfil their fiduciary duties and ensure clients receive unbiased and fair advisory services.