

ITEM 1. COVER PAGE

Investment Advisor Brochure

Form ADV Part 2A
Disclosure Statement

NAVELLIER GENESIS MANAGEMENT, LLC

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Navellier Genesis Management, LLC is a registered investment advisor. This registration does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Navellier Genesis Management, LLC (“Navellier Genesis”). If you have any questions about the contents of this brochure, please contact us at 775-785-2300. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Navellier Genesis is also available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2. MATERIAL CHANGES

We discuss in this item only material changes since our previous brochure dated April 1, 2011 and incorporate all material changes made on subsequent amendments during 2011. Since our last annual update there are no material changes to report.

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ITEM 4. ADVISORY BUSINESS

This brochure explains Navellier Genesis's advisory business and provides important information about our operations. We encourage you to read this brochure completely and carefully. You may contact us at the number provided on the cover page if you have any questions or to request another copy of this brochure, free of charge.

Navellier Genesis registered with the SEC in 2011 as a registered investment adviser under the Investments Advisors Act of 1940, as amended (the "Advisors Act"). We are headquartered in Reno, Nevada and began conducting business in 2011.

Listed below are the firm's principal members (i.e., those individuals and/or entities controlling 25% or more of this company):

- Navellier Hedge Management, Inc.
 - Louis G. Navellier is the majority owner of Navellier Hedge Management, Inc.
- Canyon Management Company
 - Lawrence Levitt and Sheldon Wolk are the majority owners of Canyon Management Company.

Advisory Services

Navellier Genesis provides investment advisory services to a pooled investment vehicle (the "Fund"). The Fund we offer is not publicly offered or sold. Investors in the Fund generally must be "qualified clients" pursuant to Section 205-3 of the Advisers Act or applicable state law or accredited investors who are able to appropriately evaluate the risks and merits of investing in the Fund and to withstand the loss of all or a substantial portion of their investments. In addition, due to the likelihood of "unrelated business taxable income" resulting from the potential for the Fund to use borrowed funds, the Fund may not be suitable for tax-exempt investors such as qualified pension plans, profit-sharing plans, stock bonus plans, or individual retirement accounts. The Fund we manage is offered only by means of delivery of an offering or the solicitation of a confidential Private Offering Memorandum (the "Memorandum") and only in those jurisdictions where permitted by law.

We manage accounts on a discretionary basis and have full authority in determining which securities are purchased and sold. All portfolios are reviewed on a weekly, monthly, and quarterly basis. If necessary the portfolio will be rebalanced.

In making discretionary investment decisions for the Fund, Navellier Genesis does not consider the investors' broader investment objectives, risk tolerance, or overall financial condition, tax, or liquidity needs. Navellier Genesis considers only the objectives and limitations set forth in the Fund's partnership agreement and the Fund's Memorandum.

We currently offer the following fund-of-funds: Navellier Genesis, LP

Amount of Managed Assets

As of December 31, 2011, we actively manage \$41,417,000 of clients' assets on a discretionary basis

ITEM 5. FEES AND COMPENSATION

Our basic fee schedule is 1% per annum of assets under management, payable monthly, and a performance-based fee equal to 10% of annual profits, subject to a high-water mark. A performance-based fee may create an incentive for Navellier to make investments that are riskier or more speculative than would be the case in the absence of a performance-based fee. Navellier Genesis' management fee is deducted directly from the Fund and such deduction is reflected in the value of an investor's capital account. In the event that Navellier Genesis' management of the Funds is terminated prematurely, Navellier Genesis will refund any unearned portion of the management fee. (Please refer to Item 6, Performance-Based Fees & Side-by-Side Management, for further information.)

Navellier Genesis does not negotiate different fee arrangements with investors in its Fund. Navellier Genesis, in its sole discretion, may modify or waive all or any portion of the management fee for any investor for any period. We will generally waive all fees with respect to investment made by our affiliates and personnel in our pooled investment vehicle.

We may enter revenue sharing agreements with brokers, advisers, and consultants. We require that revenue sharing agreements be disclosed to investors in the Fund to which such agreements apply. Investors in the Fund generally may withdraw some or all of their capital semi-annually. Written notice is required at least 60 days' prior to any proposed withdrawal. Navellier Genesis reserves the right to terminate an investor account in the Fund at any time for any, or no, reason.

Navellier Genesis' fees are charged separately net of any of brokerage commissions, transaction fees, fund fees, or other fund or separate account related costs and expenses, which are incurred by the Fund, including legal and accounting costs. (Please refer to Item 12, Brokerage Practices, for further information of brokerage commissions).

ITEM 6. PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

Navellier Genesis receives performance-based fees from the Fund. (Please refer to Item 5, Fees and Compensation, for further information on the complete fee schedule Navellier Genesis charges the Fund.) Performance-based fees are calculated based on a share of capital appreciation of the Fund's assets.

The performance-based fee arrangements may create an incentive for us to recommend investments that may be riskier or more speculative than those we would recommend under a different fee arrangement.

We endeavor at all times to put the Fund's interests first as part of our fiduciary duty as a registered investment adviser. Accordingly, we take the following steps to address these conflicts:

- We disclose to the Fund the existence of all material conflicts of interest, including the potential for our firm and employees to earn more compensation from advisory clients who pay performance-based fees;
- We collect, maintain, and document accurate, complete, and relevant investor background information, including the Fund's financial goals, objectives, and risk tolerance;
- Our management conducts regular reviews of the Fund's account to verify that all recommendations made to the Fund are suitable to the Fund's needs and circumstances;
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to the Fund.

PERFORMANCE-BASED FEES WILL ONLY BE CHARGED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 205-3 OF THE ADVISERS ACT AND/OR APPLICABLE STATE REGULATIONS. THE FEES WILL NOT BE OFFERED TO ANY CLIENT RESIDING IN A STATE IN WHICH SUCH FEES ARE PROHIBITED.

ITEM 7. TYPES OF CLIENTS

Navellier Genesis provides advisory services through a privately offered pooled investment vehicle. The investors in the Fund include high net worth individuals, trusts, partnerships and corporations, and retirement plans.

The Fund has a stated minimum investment requirement of \$250,000. Navellier Genesis may accept initial investment in the Fund below the stated minimum. We evaluate these situations on a case-by-case basis and include a consideration of whether the investor has an expectation of fulfilling the stated minimum requirement over a relatively short period of time.

ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

Navellier Genesis's Fund intends to achieve its objective principally through pooling investment funds and placing them with professional money managers (each a "Manager," and, collectively, "Managers") who employ a variety of investment strategies.

The Managers may manage the Fund's assets on a managed account basis or through their own pooled investment funds ("Portfolio Entity"). Unlike investment funds that pursue a single strategy, the Fund takes a concentrated, multi-manager approach in asset allocation to attempt to: (1) enhance returns and (2) mitigate risk. While the Fund may invest directly in securities, investment discretion with respect to the Fund's invested assets generally is vested in the Managers.

We believe that a multi-Manager fund offers value because of the research, selection, due diligence, and on-going monitoring processes performed. Further, by spreading the Fund's investment among a mix of Managers with low correlations to the equity market; a multi-Manager fund has the potential to reduce Manager risk and lower the volatility of returns.

Quantitative Analysis: Navellier Genesis' quantitative analysis begins by determining the universe of eligible Managers for inclusion in the Fund's portfolio. Navellier Genesis' quantitative screens rely primarily on third party databases and are applied objectively. (Although Navellier Genesis may use databases for broad, initial screening, we will also discover many of the Manager candidates through industry sources.)

Working from reliable performance figures, Navellier Genesis initially ranks the pool of potential Managers by traditional performance analyses, such as the compound annual rate of return, standard deviation for monthly returns, downside deviation vis-à-vis U.S. Treasury Bills, information ratio, Sharpe ratio, maximum drawdown, and correlation to the appropriate benchmark. Navellier Genesis undertakes a series of analyses to determine the combination of investment styles and strategies we believe are most appropriate for achieving the Fund's investment objectives.

The goal of this screening is to attempt to eliminate funds that fall outside certain performance and risk parameters. Proprietary and evolving analytical processes are then applied to search for candidate Managers that demonstrate acceptable volatility within Navellier Genesis' benchmarks. Navellier Genesis then attempts to identify the combination of Managers that best meets our parameters and benchmarks by developing scenario analyses to stress-test the buy candidates in both up and down markets. Navellier Genesis' analytical routine is then re-applied periodically using fresh statistics to evaluate each Manager's continued acceptability for the Fund's portfolio in a continuing effort to attempt to produce a reliable fund of funds with a desirable risk/reward ratio.

Qualitative Analysis: Navellier Genesis' qualitative analysis is designed to identify the non-mathematical working components of a particular Manager. The process typically begins after Navellier Genesis' quantitative analysis. The first step begins by narrowing the opportunities in each of the targeted sectors. Each candidate is selected independently of other strategies for sector or investment style integrity. Navellier Genesis also employs a due diligence process, which includes the following:

- Full review of audited financial statements;
- Confirmation of investment approach;
- Establishment of investment guidelines;
- Organizational structure review;
- Operational infrastructure evaluation;
- Investigation of regulatory violations (if any);
- Investor references;
- Site visits; and

- Discussions with prime brokers, accountants, attorneys, and administrators when deemed necessary.

Portfolio Re-balancing: Navellier Genesis will periodically re-balance the Fund assets allocated among the Managers. The purpose of this re-balancing is to attempt to avoid risk distortions that could negate the benefits of diversifying the Fund assets among Managers.

By periodically re-balancing the asset allocations, Navellier Genesis believes that the combined performance among the Managers will be higher than the average return of each Manager, while reducing market risk.

Investment Strategies

Navellier Genesis actively manages a portfolio of Managers. The Managers may be in the form of partnerships, limited liability companies, or separately managed accounts. Manager strategies may, from time-to-time, include, without limitation the following:

- **Long/Short Global Equity** - generalists-specialists, global, market neutral, and emerging markets
- **Event Driven** - merger arbitrage, takeovers-spinoffs-reorganizations-catalyst driven
- **Multi-Strategy** - long/short equity, event driven, relative value, growth, volatility arbitrage, statistical arbitrage, market neutral, global macro, distressed securities
- **Fixed Income** – relative value, market volatility, yield curve analysis
- **Managed Futures**

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

An investment in the Fund involves significant risks not associated with other investment vehicles. There can be no assurances or guarantees that the Fund's investment objectives will be realized; the investment strategies of the Fund or the investment vehicles in which it invests will prove successful; or investors will not lose all or a portion of their investment in the Fund.

Additional information on investment risk is discussed in the Memorandum of the Fund.

Prospective investors should consider the Fund as a supplement to an overall investment program and should only invest if they are willing to undertake the risks involved. In addition, prospective investors who are subject to income tax should be aware that the investment in the Fund may create taxable income or tax liabilities.

In addition to the other information provided in the Memorandum, prospective investors should carefully consider, among other factors, the risks described below. These risk factors are not meant to be an exhaustive listing of all potential risks associated with an investment in the Fund.

Reliance on Management: Navellier Genesis is the investment adviser and the general partner of the Fund. Messrs. Lawrence Levitt, Sheldon Wolk, Arjen Kuyper, and Peter Knapp constitute the investment committee of Navellier Genesis. While each of these individuals is experienced in investment management, the investment committee has no common operating history upon which potential investors may evaluate its performance.

Investment Selection; Trading: The Fund's investment returns will be largely dependent upon a Manager's skill in selecting particular investment positions. Managers have complete discretion to invest and trade the assets they manage, based on their own analysis and judgment. In making its decisions, a Manager may rely on information and data provided and prepared by third parties, including issuers of securities. A Manager will not always be in a position to confirm the completeness, genuineness, or accuracy of such information and data. Further, there can be no assurances that a Manager's investment and trading decisions will be profitable over any particular period or at all.

Multi-Manager Strategy: In an attempt to obtain diversification of trading methods and markets, the Fund intends to invest with multiple Managers, each of whom trade independently of the others. Therefore, it is always possible that

one or more Managers might take positions opposite that of other Managers such that any potential gains might be effectively offset.

Similarly, there can be no assurance that the use of different trading approaches will not effectively result in overall portfolio losses by certain of the Managers offsetting any profits achieved by others. Such offsetting could result in a significant reduction in the Partnership's assets, as any performance-based fees may be payable with respect to those Managers that had recognized profits, irrespective of the counterbalancing losses. Moreover, despite the intent of the Navellier Genesis to select Managers whose styles have tended to result in low correlation with one another, it is possible that virtually all Managers might together suffer losses during certain time periods, resulting in substantial losses to the Fund. The Fund's diversification of trading approaches, intended to reduce downside risk while maintaining the ability to capitalize on profitable trends, may, in fact, have the opposite result, minimizing the Fund's ability to achieve overall profits while failing to reduce exposure to significant losses.

If a Manager is replaced at a time when it has incurred cumulative losses since the last payment of a performance fee, the Fund would lose the benefit of such losses for purposes of performance fee calculation. From the point that a replacement Manager begins to generate new profits, the Fund will be required to pay performance fees even though such profits were only serving to recover losses previously incurred.

To the extent the Fund invests in pooled investment vehicles and other "pass-through" entities which are treated as partnerships for federal income taxation purposes, the Fund must rely on such vehicles to deliver to it certain tax information that is necessary to complete the Fund's own tax returns. If this information is not delivered to the Fund in a timely fashion, the Fund will be delayed in providing tax information to the investors.

Risks of Certain Investment Strategies: The Managers may employ traditional hedge fund strategies whose performance is intended to be non-correlated with major financial market indices. Although Navellier Genesis believes that these strategies may mitigate losses in generally declining markets, there can be no assurance that losses will be avoided. Investment strategies that have historically been non-correlated or demonstrated low correlations to one another or to major world financial market indices may become correlated at certain times, such as during a liquidity crisis in global financial markets. During such periods, certain hedging strategies may cease to function as anticipated. Absolute return strategies generally emphasize hedged positions rather than non-hedged positions in securities and derivatives in an effort to protect against losses due to general movements in market prices; however, no assurance can be given that such hedging will be successful or that consistent absolute returns will be achieved. Additional information on risks associated with some of these strategies is provided in the Memorandum of the Fund.

Lack of Liquidity in Portfolio Interests: The Fund typically acquires portfolio interests that have not been registered under federal or state securities laws and, as a result, are not readily salable. Consequently, the Fund may be unable to readily liquidate its portfolio interests in the event it becomes necessary or advisable for it to do so, including in connection with investor withdrawals.

Please remember that investing in securities generally involves risk of loss that the Fund and investors in the Fund should be prepared to bear.

ITEM 9. DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Navellier Hedge Management, Inc. is an investment advisory firm whose majority owner is Louis G. Navellier. Navellier Hedge Management, Inc. itself is not currently managing any money management programs, but it is a managing member of Navellier Genesis Management, LLC.

Navellier Genesis is affiliated through common control with Navellier & Associates, Inc. Mr. Navellier also is the majority owner of Navellier & Associates, Inc. which is a registered investment advisor located in Reno, Nevada. The firm provides investment advice to individually managed accounts and acts as the sub-adviser to the Touchstone Large Cap Growth Fund (symbol TEQAX).

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

As required by SEC rules, Navellier Genesis has adopted a Code of Ethics that sets forth high ethical standards of business conduct required of all our employees. Navellier Genesis and our employees owe a fiduciary duty of loyalty, fairness, and good faith to our clients and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics permits employees to trade in securities. However, because Navellier Genesis does not directly invest in individual securities, we do not require pre-clearance for employee securities transactions, except for IPOs and private placements, which do require pre-clearance. The Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by access persons.

Among other things, our Code of Ethics also requires prior approval of any acquisition of securities in limited offerings (e.g., private placements) or initial public offerings, policies prohibiting employees from using material non-public information to buy or sell securities (insider trading), disclosure of conflicts of interest, and policies for serving on boards of directors of issuing companies by investment personnel, receiving/giving gifts, and political contributions. Our Code also discusses oversight, enforcement, and recordkeeping provisions.

We will provide a copy of our Code of Ethics to any client or prospective client upon request. You may request a copy by emailing tracis@navellier.com or by calling us at 775-785-2300.

ITEM 12. BROKERAGE PRACTICES

Although we may from time to time do so, currently, we do not trade individual securities.

When Navellier Genesis has discretionary authority to select brokerage firms in placing orders to purchase and sell securities, our policy is to seek and secure the best net execution that includes both commissions and execution prices. Determining what may constitute best execution and price in the execution of a securities transaction by a broker-dealer involves a number of considerations. When selecting broker-dealers to execute portfolio transactions, we will consider factors such as the price of the security; the rate of commission; the size and difficulty of the order; the reliability, integrity, financial condition, and general execution and operational capabilities of competing broker-dealers; and the brokerage and research services they provide us. We will place orders with broker-dealers we believe are responsible and give effective execution of such orders under the most favorable conditions to the accounts. We will transact over-the-counter purchases and sales directly with the principal market makers except in those circumstances where, in our opinion, better prices and executions are available elsewhere.

ITEM 13. REVIEW OF ACCOUNTS

Each account is reviewed on a regular basis, at least quarterly. Most accounts are reviewed more often, for example when cash flows or investment actions occur. Clients generally receive quarterly reports regarding their accounts.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

Navellier Genesis may from time to time enter into distribution or placement agreements with certain brokerage or advisory firms. Such agreements may require that we share a portion of our fees with the brokerage or advisory firm. Our clients do not pay any additional fees in such cases. We require that all revenue sharing agreements be disclosed to clients to which such agreements apply.

ITEM 15. CUSTODY

We manage a fund-of-funds and may receive monies from investors, which are placed with a qualified custodian bank and then invested in various entities that consist primarily of hedge fund limited partnerships. Investors will not receive any account statements from any qualified custodian bank. At least quarterly, we or the Fund's third party administrator will provide investors a statement showing the investor's share of the aggregate capital of the Fund. We urge investors to carefully review their statements and contact Navellier Genesis directly if they believe there are any errors.

ITEM 16. INVESTMENT DISCRETION

Navellier Genesis has discretionary authority to manage securities on behalf of the Fund. This discretionary authority allows Navellier Genesis to place trades in a Fund's account without contacting the Fund prior to each trade to obtain the Fund's permission. Navellier Genesis exercises our investment discretion consistent with the applicable investment strategy and subject to the restrictions specified in the partnership agreement and the Memorandum of the Fund.

ITEM 17. VOTING CLIENT SECURITIES

Proxy Voting

Currently, Navellier Genesis does not vote proxies with respect to the assets held by the Fund. In the event that in the future we hold securities that are subject to a voting issue, Navellier Genesis maintains written policies and procedures designed to ensure that we vote client securities in a manner that is in the best interest of the Fund. Such policies and procedures include how Navellier Genesis addresses material conflicts that may arise between our interests and our principals and the interest of the Fund.

The proxy voting policy and the voting results are available to investors for review by emailing tracis@navellier.com or calling us at 775-785-2300.

ITEM 18. FINANCIAL INFORMATION

Under no circumstances does Navellier Genesis require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual obligations. We have no such financial conditions to report.

We have not been the subject of a bankruptcy petition at any since inception.