

N.V.N.G. Investments, Inc. ("NVNG")
ADV Part 3 - Client Relationship Summary (Form CRS)
January 31, 2024

Item 1: Introduction

N.V.N.G. Investments, Inc. ("NVNG") is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Current and prospective clients should be aware that services and fees differ between investment advisers and broker-dealers and it is important you understand the differences. This document gives you a summary of the types of services we offer and the fees we charge. Free and simple tools are available for you to research firms and financial professionals at: <https://www.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? We offer you, as a current or prospective client, portfolio management and investment advisory services, using our own proprietary, mathematical, computer-based methodology for selecting investments, and we employ a combination of stock analysis and market analysis in making investment decisions. We do not custody or take possession of your investments. NVNG manages investment accounts for clients on a *discretionary* or *non-discretionary* basis for a fee based on the value of the assets under its management. *Non-discretionary* means clients are notified of the purchase and sale of securities in the investment account before the purchase or sale occurs. *Discretionary* means that clients are not notified of the purchase and sale of securities until after the purchase or sale occurs.

Account monitoring: Accounts are reviewed on an ongoing basis for appropriateness and relative value of investments. The investment holdings of each account are inventoried and appraised monthly, and reviewed for accuracy from an administrative, accounting and investment standpoint.

Requirements to open and maintain an account: There are no specific requirements to open account, and there is no minimum account size. However, to make the minimum quarterly fee of \$200 a reasonable percentage of the account, it is recommended that an account be \$20,000 or above. We may waive minimums depending on the proposed account size, style, other relationships, and other factors. Additional Information about our services can be found in our Form ADV, Part 2A which is available at: <https://adviserinfo.sec.gov/firm/summary/107446>

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 experience, including your licensing, education and other qualifications and what do they mean?

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

3A. What fees will I pay? You pay us investment management fees based on a percentage of the value of assets under management. Fees are calculated each quarter and one fourth of the annual amount is billed in arrears at the end of each quarter. Our standard fee is 0.3% per quarter. The value of investments in your account affects our fees; the greater that value, the more you will pay us and thus we have an incentive to increase that value to increase our fee.

Our investment management fees do not cover brokerage commissions, transaction fees, custodial fees, deferred sales charges, odd-lot differentials, transfer and other taxes, or wire or electronic transfer fees. You may incur and be responsible for payment of these and other charges, depending on the terms and pricing structures of custodians, brokers, and other third parties. Our fees also do not cover fees charged by any financial or other advisors you engage.

In addition to our fee, you are also responsible for any brokerage costs or custodian fees incurred during the management of the investment accounts. If your account is invested in mutual funds, you may be required to pay mutual fund fees and

charges in addition to NVNG's fee. NVNG does not receive additional compensation from the sale of securities or other investment products. You are free to select any broker you wish to execute your financial transactions.

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. Additional information can be found in our Form ADV, Part 2A (Item 5) which is available at: <https://adviserinfo.sec.gov/firm/summary/107446>

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?

3B. What are NVNG's legal obligations to Clients when acting as Clients' 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 must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. For example, for those discretionary accounts for which we also have discretion to select broker-dealers to execute transactions, Form ADV Part 2A (Item 12) describes the conflict of interest we have with respect to broker-dealers that provide us research and brokerage services. You should understand, and ask us about, these conflicts because they can affect the investment advice we provide you. We have adopted a Code of Ethics describing our standards of business conduct, potential conflicts of interest and fiduciary duties. Additional information on conflicts of interest can be found in our Form ADV Part 2A (Items 7, 8, 10, 11 and 12) which is available at: <https://adviserinfo.sec.gov/firm/summary/107446>

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

How do your financial professionals make money? Our financial professionals receive a salary on fees from the accounts managed. Our financial professionals do not earn transaction-based compensation or commissions tied to buying and selling securities.

Item 4: Disciplinary History

X Yes ☐ No - You can visit <https://www.investor.gov/CRS> for free and simple search tools to research us and our professionals. NVNG was subject to an order by the SEC imposing a civil fine for not timely filing Form CRS Relationship summary, that you are reading. NVNG neither admits nor denies SEC's findings in the order.

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

Item 5: Additional Information

For additional information about our investment advisory services or if you wish to request up-to-date information or a copy of this Form CRS Customer Relationship Summary, please call us at (269) 269-2422 or contact us at RHuiskamp@netscape.net. Additional information is also available on the SEC's website at advisersinfo.sec.gov.

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?