

NAVELLIER & ASSOCIATES, INC.

and Louis Navellier

One E. Liberty, Suite 504

Reno, Nevada 89501

775-785-2300

www.navellier.com

FORM CRS-(Relationship Summary)

Form ADV Part 3

March 21, 2024

ITEM 1. Introduction

Navellier & Associates, Inc. (“NAI”) is a registered investment adviser with the Securities and Exchange Commission (SEC). Louis Navellier is also a registered investment advisor and is affiliated with NAI. Brokerage and investment advisory services and fees differ and it is important for retail investors to understand the differences.

Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS. The resource also provides educational materials about broker-dealers, investment advisors and investing.

ITEM 2. Relationship Services

What Investment services and advice can you provide me? We offer investment advisory services to retail investors, including a broad range of investment styles (growth, value, international, global, and combinations of these) and market capitalization (micro, small, mid, large, and combinations of these). We use a multi-step screening process that incorporates fundamental and quantitative analysis to construct our portfolios.

We primarily manage accounts on a discretionary basis and have full authority in determining which securities are purchased and sold in conformance with the investment strategy chosen by our client. On a case-by-case basis, we will tailor our advisory services to the individual needs of clients. We initially screen investors to assure that the investor is qualified for the investment he/she has chosen. We do not thereafter monitor for suitability. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry groups. We review all portfolios on a monthly or quarterly basis, and if necessary, the portfolio will be rebalanced. We offer this as part of your standard service. We also offer accounts on a non-discretionary basis. In these instances, the client makes the ultimate decision regarding the purchase and sale of the investments.

Navellier participates in certain Wrap Fee or Managed Account Programs in which clients pay an “all-in” fee that includes brokerage fees and charges and our management fee. Our minimum account size for retail separate accounts when aggregated is typically \$500,000 but we may accept smaller accounts at our discretion. Accounts under the minimum aggregate account size will be billed at an annual rate of 1.25%. Existing client accounts when aggregated that fall under \$500,000 because of withdrawals will be billed at a rate of 1.25%.

For additional information, please see Navellier & Associates Form ADV, Part 2A Items 4 and 7, copies of which are available upon request.

Conversation starters. Ask your financial professional the following questions:

- **Given my financial situation, should I choose an investment advisory service? Why and 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?

NAI and Mr. Navellier through NAI generally offer two management fee options:

Fees Based on Assets Under Management. Fees based on assets under management for the services provided by NAI and or Mr. Navellier to the client generally range, depending on the particular investment strategy, from an annual fee of 0.30% to 1.25% of assets under management. For the Navellier Private Client Group (NAI retail clients) see standard fee structure, unless otherwise individually negotiated, described below:

| <i>PCG Client Assets</i> |
|----------------------------|
| \$500,000 to \$1,500,000 |
| \$1,500,001 to \$2,500,000 |
| \$2,500,001 to \$5,000,000 |
| \$5,000,000 + |

| <i>Annual Management Fee</i> |
|------------------------------|
| 1.00% |
| 0.85% |
| 0.70% |
| 0.60% |

Fees are accrued daily and are calculated and payable in advance on a quarterly basis, unless negotiated otherwise. Navellier calculates fees based on the market value of the account as of the first business day of each calendar quarter. Navellier participates in certain Wrap Fee or Managed Account Programs in which clients pay an “all-in” fee that includes brokerage fees and charges and our management fee. Navellier may not have discretionary authority to select the brokerage firm or the commission rates to be paid for Wrap Fee or Managed Account Program accounts we manage. In addition, some clients direct Navellier to use a particular broker.

In all these cases, the client may pay a higher commission or receive smaller discounts than if Navellier had discretion to choose a broker or may receive a worse price for the security than other clients for the same security.

Please be aware the more assets there are in retail investor’s account, the more a retail investor will pay in fees, and the firm may therefore have an incentive to encourage the retail investor to increase the assets in his or her account.

Performance-Based Fees: Performance-Based fees of 10% of net profits (unless special exception is made) are available to qualified clients who meet all requirements of SEC Rule 205-3, including either 1) demonstrating a net worth of at least \$2,100,000 or 2) having at least \$1,000,000 under management immediately after entering into a management agreement with NAI. Performance-Based fees are based on net profits at the end of the one year period beginning on the date management of the client’s account begins and ending 12 months later. NAI calculates fees, as outlined on the Investment Advisory Agreement between the client and NAI, on the amount of increase, if any, in the net market value of the account in the preceding twelve (12) month period after deduction of all fees and commissions paid (including fees and commissions charged by the broker-dealer or other custodian of the account and accounting for all net investment income and gains, whether realized or unrealized).

You will incur brokerage and other transaction costs related to your accounts. NAI’s or Mr. Navellier’s fees do not cover any execution-related expenses, commissions and margin interest, if any, securities exchange fees, or other fees required by law or charged by the broker-dealer with custody of your account. (NAI and Mr. Navellier do not charge separate fees. Mr. Navellier is affiliated with NAI which solely charges (through NAI) for its and his investment advisory services.)

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, please see Navellier & Associates Form ADV, Part 2A Items 4 & 7.

Conversation starters. Ask your financial professional the following questions:

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much money would 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 advisor? How else does your firm make money and what conflicts do you have?

When we act as your investment adviser, we have to 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. You should understand and ask us about these conflicts because they affect the recommendations we provide you. Here are some examples to help you understand what this means.

NAI and Mr. Navellier may on occasion invest in the same securities we invest in for you. In those situations, NAI or Mr. Navellier purchases those securities after they are purchased for you and sells them after they are sold for you.

Conversation starters. Ask your financial professional the following questions:

- **How might your conflicts of interest affect me, and how will you address them?**
We trade on last in last out basis in common trade situations.

For additional information, please see Navellier & Associates Form ADV, Part 2A, free copy of which is available upon request.

How do your financial professionals make money?

They are paid a cash salary and some receive commissions based on assets they bring in or assets they manage or oversee.

ITEM 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history? Yes, please visit Investor.gov/CRS for free and simple tools to research Navellier & Associates Inc., and Louis Navellier. See also NAI's ADV part 2A Item 9, a free copy is available upon request.

Conversation starters. Ask your financial professional the following questions:

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

ITEM 5. FEES AND COMPENSATION

For additional information, about our investment advisory services and this relationship summary please see Navellier & Associates Form ADV, Part 2A; or please contact us at 775-785-2300, info@navellier.com or www.navellier.com or you may obtain a free copy of our ADV part 2A and this relationship summary upon request.

Conversation starters. Ask your financial professional the following questions:

- **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?**