

## ITEM 1.

## Introduction

NDVR, Inc. ("NDVR"), is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these 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 broker-dealers, investment advisers, and investing.

## ITEM 2.

## Relationships and Services

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

We provide personal advice, planning, portfolio design and management services that we describe collectively as our wealth optimization services. We provide our services through proprietary digital tools with the support of professional financial advisors. The combination of advanced technology, quantitative investing techniques, and a dedicated team is designed to enable you to develop and pursue your unique wealth optimization plans.

**Monitoring**

NDVR reviews each client portfolio when it is created and, using our proprietary algorithms, continuously monitors and periodically adjusts or rebalances your portfolio to seek to maintain your targeted asset allocation, in alignment with your requirements, investment instructions, and selected strategy. Our algorithms are designed to monitor your portfolio for allocation drift resulting from factors such as asset price fluctuations, the passage of time, changing market conditions, and unplanned cash flows.

Our Investment Committee, which meets at least quarterly, oversees the operation of these algorithms and reviews the performance of client accounts. As part of our standard services, our professional advisors also conduct account reviews at least annually and review material changes to your requirements, investment instructions, and selected strategy when you make them.

**Investment Authority**

NDVR assumes full discretionary authority over client accounts. This means that, subject to your requirements, investment instructions, and selected strategy, we are given full discretionary authority to select the timing, amount, and identity of assets to buy and sell for you. If you wish to impose further restrictions on the extent to which NDVR exercises discretion over the investment selection in your account, those restrictions on NDVR's discretionary authority will be described and agreed upon in your client agreement.

**Account Minimums and Other Requirements**

NDVR does not have a minimum account size or apply specific criteria for someone to be accepted as a client; rather, we evaluate each applicant on a case-by-case basis.

**Additional information** about our services is available in Part 2 of our Form ADV, which you can find at <https://adviserinfo.sec.gov/firm/summary/310602>.

**Conversation Starters. We encourage you to ask us:**

- 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?**

We offer two different fee structures, depending on when you became a client of NDVR. For all new clients, we typically charge you an annualized fee that is tiered, based on asset level, with 0.75% for the first \$2 million, 0.65% for the \$2 million to \$4,999,999 million range, 0.55% for the \$5 million to \$9,999,999 million range, and 0.45% for assets over \$10 million. This fee is paid monthly and is annualized. This fee is calculated as of the last Business Day of the month and is due and payable on the first day of the next month. If an Account is funded after the first day of a calendar month, the fee for that month is not pro-rated. If your assets under management with NDVR are \$0 before the last business day of a calendar month, you will not be assessed a fee that month.

For Clients who hired NDVR prior to October 2023, we typically charge you a fee for the services we provide that is comprised of (i) a monthly membership fee ranging from \$400 per month to \$2,500 per month, which is the minimum fee we charge for the services we provide at the membership tier you select, plus (ii) a charge of 0.025% per month of the market value of the assets in your account. The membership fee for a calendar month is due and payable on the first day of that month. If you terminate your agreement with us subsequently during that month, no portion of the membership fee will be refunded. The asset-based charge for a calendar month is calculated as of the last business day of that month and is due and payable on the first day of the next month. For example, the asset-based charge for February will be paid in March based on your membership tier and the market value of your account as of the close of business on the last business day of February. If you fund your account after the first day of a calendar month, the asset-based charge for that month will not be pro-rated. If your assets under management with NDVR are \$0 before the last business day of a calendar month, you will not owe an asset-based charge on your account for that month.

We deduct our fee automatically from most client accounts. For some membership tiers, clients are allowed up to a certain number of portfolios before they must move to the next tier. We may therefore have an incentive to encourage you to increase the number of portfolios we manage for you, which presents a conflict of interest. Similarly, because we charge an asset-based fee, the more assets there are 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, which presents a conflict of interest. In addition to the fees noted above, you may pay other fees and costs in connection with our advisory services, including brokerage and other transaction costs, custodian fees, investment fund expenses, fund transfer fees, and taxes. You are responsible for those fees and costs. They are separate from the fee you pay us, and we do not receive any portion of those fees and expenses.

Additional information about our fees is included in Item 5 of Part 2 of our Form ADV, available at <https://adviserinfo.sec.gov/firm/summary/310602>.

**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.**

**Conversation Starter. We encourage you to ask us:**

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 to you. Here are some examples to help you understand what this means.

Custodians provide products, services and other benefits to independent investment advisers at a discount or no charge. These include access to trading capabilities, electronic communications, practice management tools, record keeping, and software. We receive these products, services and other benefits from custodians that hold our clients' assets. This creates an incentive to recommend that clients use these custodians and presents a conflict of interest.

**Conversation Starter. We encourage you to ask us:**

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

**Additional information** about conflicts of interest between NDVR and its clients is available in Part 2 of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/310602>.

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

NDVR's financial professionals receive a salary and equity compensation, typically options to buy shares of NDVR's common stock. Compensation is set with the intention of attracting and retaining highly qualified professionals. No compensation is based on the performance or selection of specific securities or portfolios. Neither NDVR nor our employees accept any compensation for the sale of assets, investment products or related contracts, including asset-based sales charges or service fees.

**ITEM 4.**

## Disciplinary History

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

No, NDVR and its personnel have not been involved in any legal or disciplinary events within the past 10 years. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Conversation Starter. We encourage you to ask us:**

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

**ITEM 5.**

## Additional Information

**Additional information** about our services can be found at [ndvr.com](https://ndvr.com). If you have any questions about the contents of this brochure, would like to request a copy of this relationship summary, or would like additional information about NDVR or our services, please contact us at 1-844-647-0045.

**Conversation Starter. We encourage you to ask us:**

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?