

N.V.N.G. INVESTMENTS, INC.
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FORM ADV PART 2A

Item 1. Cover Page

This brochure provides information about the qualifications and business practices of N.V.N.G. Investments, Inc. (also referred to herein as “NVNG”). If there are any questions about the contents of this brochure, please contact Robert W. Huiskamp at 269-329-2422 or email me at rhuiskamp@netscape.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about NVNG is available on the SEC’s website at:

www.sec.gov

CRD # 107446

NVNG is applying for re-registration in the States of Michigan,

Robert W. Huiskamp is the sole shareholder, director and officer of NVNG and is the only person providing investment advice on behalf of the advisor, and in that capacity will be referred herein as “Mr. Huiskamp”.

Registration as an investment adviser does not imply a certain level of skill or training.

Item 2. Material Changes

This Form ADV Part 2A is a complete restatement of the Form ADV Part II dated March 30, 2011. The firm is reregistering pursuant to administrative error in changing from SEC registration to State of Michigan registration

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Item 4. Advisory Business

N.V.N.G. Investments, Inc. is an investment adviser located in Portage, Michigan. It was started in November 1992 by Mr. Huiskamp who continues as its sole shareholder, director and officer. NVNG offers investment management services to client using its proprietary, mathematical, computer-based methodology created by Mr. Huiskamp.

Advisory Services Offered – NVNG’s advisory services consists of portfolio management for individuals and small businesses. It charges fees for investment advice provided through the management of clients’ accounts primarily on a discretionary basis.

Investment Advice – 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.

As of December 31, 2020, NVNG has \$184,968,058 of assets under discretionary management and \$0 of assets under non-discretionary management.

Servicing Client Needs – Investment advice given by NVNG may be tailored upon request to the client’s individual financial situation. Clients may impose investment restrictions on investing in certain securities or certain types of securities. These restrictions may be imposed in the client’s account agreement or other instructions received from the client.

Item 5. Fees and Compensation

For all services rendered, N.V.N.G. Investments, Inc. charges a fee based on a percentage of the assets under management. Its standard fee is 0.3% per calendar quarter, billed in arrears at the end of each quarter, based on the market value of assets in the account at the end of each quarter. The minimum quarterly fee is \$200 per account. The rate on accounts over \$5,000,000 is negotiable.

NVNG may negotiate increased fees with respect to clients receiving special services or treatment. Conversely, if warranted by the circumstances, NVNG may charge a reduced fee.

The client may terminate his or her account agreement at any time. NVNG does not charge an opening or closing fee; however, the client will be billed after termination on a pro rata basis for the portion of the quarter for which services were rendered prior to termination. In addition, NVNG reserves the right to terminate a client’s account agreement, with or without cause, upon 30 days prior written notice.

Fees are deducted from the investment accounts by the custodian or may be paid directly by the client, as determined by the client. Prior to withdrawal of the fees, the client is issued an invoice for the amount to be deducted. The invoice includes the rate, the account balance and the rationale as to how the fee is calculated.

Other Fees and Expenses – The client is also responsible for any brokerage costs or custodian fees incurred during the management of the investment accounts. If the account is

invested in mutual funds, the client may be required to pay mutual fund fees and 12b-1 charges in addition to NVNG's fee.

NVNG does not receive additional compensation from the sale of securities or other investment products.

Clients are free to select any broker they wish to execute their financial transactions and are so informed. *See XI, Brokerage Practices.*

Item 6. Performance-Based Fees and Side-by-Side Management

NVNG does not participate in side-by-side management or charge performance-based fees.

Item 7. Types of Clients

NVNG generally offers its services to a number of different clients such as individual investors and their retirement plans, trusts, estates, and small business retirement plans, and other pension or profit sharing plans.

NVNG does not have specific requirements to open an account. There is no minimum account size, as some clients may wish to begin with smaller amounts as they familiarize themselves with the investing style. However, to make the minimum fee of \$200 a reasonable percentage of the account, it is recommended that an account be \$20,000 or above. The minimum is applied to the sum of all accounts of a client with NVNG, so as to not penalize small IRAs or children's accounts.

Item 8. Methods of Analysis, Investment Strategies, and Risk of Loss

Methods of Analysis – N.V.N.G. Investments, Inc. uses its own proprietary, mathematical, computer-based methodology for selecting investments, and it employs a combination of stock analysis and market analysis in making investment decisions.

a. Stock Analysis: Investment Selections are made to return the purchase price in earnings as quickly as possible. Selections are typically held three or more years. NVNG's process develops longer term buys, rather than trading profits. Using its computer-assisted, disciplined approach to stock selection, and analyzing more than 5,000 stocks and 2,000 bonds each month, NVNG typically develops three to ten significant ideas each year. Patience is required because economic change is slow.

b. Market Analysis: Determining the market "climate" is a fundamental piece of NVNG's investment strategy. A proprietary model continuously predicts the expected gain in the Broad Stock Market 12 months in the future. This analytical process reduces exposure to overpriced markets while taking advantage of favorable market conditions.

c. Market Sentiment: The model selects many securities that are "out of favor". There is a contrarian aspect to the process the client should understand.

NVNG primarily invests in stocks and bonds due to their lower cost, liquidity, and ease of use. Mutual Funds are used in certain occasions to diversity smaller, risk adverse accounts.

Material Risk of Investment Strategies – NVNG's strategy is an aggressive methodology focusing on fundamental value in out-of-favor companies. The strategy employs a long-run

focus, and clients should not expect to realize significant short run gains. This style may not be well suited for investors who are uncomfortable with the risks and associated volatility of the strategy, or unwilling to take a long run approach to investing.

NVNG's investment strategy requires selection of investments based upon a number of factors. No combination of factors can or will guaranty investment success. NVNG's investment strategy involves limitations and risk, including NVNG's focus on fewer investments, which can increase portfolio volatility and may lead to wider swings in gains and loss. A more diverse portfolio might reduce such swings.

Risk of Loss – Investing in securities involves the risk of loss that clients should be prepared to bear. The past performance of NVNG is no guaranty of future success. Individual investors may experience periods of investment loss.

Item 9. Disciplinary Information

Neither NVNG nor Mr. Huiskamp has been:

- 1) In a criminal or civil action in a domestic, foreign or military court of competent jurisdiction;
- 2) Involved in any administrative proceeding before the Securities and Exchange Commission, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; or
- 3) Involved in any self-regulatory organization proceeding.

Item 10. Other Financial Industry Activities and Affiliations

Neither NVNG nor Mr. Huiskamp is affiliated with any other financial institution that would create a conflict of interest to the clients of NVNG

Item 11. Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics – NVNG has adopted the Code of Ethics and Standards of Professional Conduct of the CFA Institute, which is founded on the primary principle of fiduciary duty. Fiduciary duty refers to the requirement that NVNG always acts in the best interest of the client, and to prioritize those interests over those of NVNG or Mr. Huiskamp.

A copy of the Code of Ethics will be provided to any client upon request.

Participation in Client Transactions and Personal Trading – NVNG or Mr. Huiskamp may from time to time recommend to clients that they buy or sell securities or investment products in which NVNG or its sole shareholder, director and officer have financial interest. Also, NVNG or Mr. Huiskamp may from time to time buy or sell securities that are also recommended to clients. Generally, such financial interest will consist of ownership in an investment portfolio of a publicly traded corporation's debt or equity securities. Because of the limited nature of NVNG's and Mr. Huiskamp's investments, the likelihood of a conflict of interest is extremely remote, but where conflict of interest exists the client will be informed of the issue, and client consent sought.

Moreover, NVNG considers the purchase and sale of securities Mr. Huiskamp which are also recommended to clients, to be an indication to the client of NVNG's confidence and commitment in its investment advice. By doing so, NVNG or Mr. Huiskamp have put at risk their own funds; largely to the same extent the client's funds are at risk.

To avoid conflict between the client and NVNG when transacting, the policy of NVNG is to execute the client's transactions first. NVNG's and Mr. Huiskamp's transactions will be entered after client transactions are complete.

Item 12. Brokerage Practices

Selection of Brokers – The primary factor involved when selecting or recommending broker dealers for client transactions is cost. The secondary factor involved is ease of use when it comes to the brokerage platform.

Research and Soft Dollar Arrangements – NVNG does not receive research or other products or services, also known as soft dollar benefits, from a broker dealer or a third party in connection with client securities transactions.

Directed Brokerage – Clients may designate or select any broker they wish and are so informed. Otherwise, NVNG will have the authority to determine, without special client consent, the broker to be used based on the broker's costs, skills, reputation, dependability and compatibility with the client. Clients choosing to select the broker for their transactions may pay higher commission rates and may not receive best execution for their transactions.

Aggregation – The purchase and sale of securities for client accounts may be aggregated or "bundled" when it is determined to be cost effective and administratively possible. Bundled transactions may also include securities bought or sold for NVNG or its sole shareholder, director and officer. NVNG will employ various methods to be certain the securities and costs are distributed fairly to all parties.

Item 13. Review of Accounts

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.

Account statements are sent directly to the client from the brokerage firm or custodian. In addition, quarterly reports are issued by NVNG with current holdings, current prices, net worth, and an invoice for NVNG's fees. Reports can include the internal rate of return for the investor's account.

Item 14. Client Referrals and Other Compensation

NVNG does not have any arrangement by which compensation is offered to NVNG or its Sole Shareholder for referrals to a specific product or service.

NVNG does not have any arrangement by which compensation is offered to a third party for referrals for investment advice from NVNG and its Sole Shareholder.

Item 15. Custody

Clients may decide to have NVNG's fees deducted by the custodian directly from the client's investment account. Accordingly, account statements are sent directly to the client from the brokerage firm or custodian monthly, which statements will show the deduction of NVNG's fees on a quarterly basis. NVNG also issues quarterly statements to clients and includes an invoice for the amount of the fee to be deducted from the client's account. Clients are advised to carefully review all account statements to compare the custodian-prepared statement and the one from NVNG, and immediately ask for an explanation of any issues.

Item 16. Investment Discretion

Except to the extent specifically limited in the client's account agreement or any instructions of the client, NVNG will have the authority to determine, without specific client consent, the type and amount of securities to be bought or sold, the broker to be used, and the commission rates paid. This discretionary authority is provided to NVNG by the Client in the account agreement. The client, however, will be asked when the account is opened if he or she wishes to place any limitations on the authority of NVNG in these matters. The client also may impose limitations on NVNG's discretionary authority at any time, including during periodic account review with NVNG.

Item 17. Voting Client Securities

Clients are encouraged to vote their own securities. NVNG will vote proxies pertaining to securities owned by the client, if requested in the client's account agreement or any instructions of the client. NVNG will exercise the proxy voting authority in a manner consistent with its Proxy Issue Guidelines for voting with management for the election of directors and routine matters. NVNG, however, will use its judgment and discretion on all proxy voting matters in a way it determines to be in the best interest of the client. Clients may direct NVNG to vote in a particular situation, but NVNG is under no obligation to bring any proxy vote to the attention of the client. NVNG does not expect it will be in a conflict of interest with any proxy voting situation, although if such a conflict of interest arises, it will disclose the matter to the client and seek direction from the client. NVNG's Proxy Issue Guidelines will be made available to any client upon request, as well a record of any past proxy voting decisions.

Item 18. Financial Information

NVNG does not require prepayment of fees in advance, and is not required to provide its balance sheet.

NVNG has discretionary authority, but does not have custody over client's funds, and it does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

Neither NVNG nor its sole shareholder, Robert W. Huiskamp, has been the subject to any bankruptcy petition at any time during the past ten years.

Item 19. Requirements for State-Registered Advisers

Principal Executive Officer and Management Persons – The sole shareholder, director and officer of NVNG is Robert W. Huiskamp since 1993. Mr. Huiskamp was born in 1947 and graduated from Dartmouth College with a Bachelor's Degree in 1970 and a second Bachelor's Degree in 1971 in engineering from the Thayer School of Engineering at Dartmouth College. He also graduated in 1973 from the Kellogg School of Management at Northwestern University with a MBA Degree.

From 1973 to 1984 he worked for Champion International in operations management and corporate planning at various locations. Following that he worked for James River Paper Corp. until 1993 as Paper Mill Operations Manager in Parchment, Michigan where he was responsible for Mill profitability, safety, capital plans and daily operation. At that time he started NVNG

Other Businesses – Robert W. Huiskamp is not actively engaged in any other business.

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