

Item 1 – Cover Page

Nabity-Jensen Investment Management, Inc.

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Omaha, NE 68114

402-391-1021

www.nabityjensen.com

March 2021

This brochure provides information about the qualifications and business practices of Nabity-Jensen. If you have any questions about the contents of this brochure, please contact us at 402-391-1021 or email rjensen@nabityjensen.com. 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.

Nabity-Jensen is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide information about which you determine to hire or retain an adviser.

Additional information about Nabity-Jensen is also available via the SEC's website www.adviserinfo.sec.gov. Our CRD Number is 128455. This website also provides information about any persons affiliated with Nabity-Jensen who are registered as investment adviser representatives of Nabity-Jensen.

Item 2 – Material Changes

Since the last annual amendment filed by Nabity-Jensen Investment Management in January 2020, we have had the following material changes to this brochure:

- We applied for registration as an investment adviser firm with the U.S. Securities and Exchange Commission in February 2020, which was accepted on March 27, 2020.

We will ensure that you receive a summary of any material changes to this and subsequent brochures annually.

As necessary, we will provide you with a brochure containing new or changed information as well as other ongoing disclosure information.

Currently, our brochure may be requested by contacting Randall Jensen, President/Chief Compliance Officer, at 402-391-1021 or rjensen@nabityjensen.com.

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Item 4 – Advisory Business

Nabity-Jensen is an investment management, investment counsel, and financial planning firm. Our predecessor firm, Stockbridge Associates, began as a Registered Investment Advisor in 1991. Nabity-Jensen is owned by Randall Jensen, CFP and David Nabity, ChFC.

Randall Jensen is the President and Chief Compliance Officer of Nabity-Jensen.

Nabity-Jensen filed for registration as an investment adviser with the U.S. Securities and Exchange Commission in February 2020, which was accepted March 27, 2020.

Investment Management Services

Our investment management services provide consistent programs for investing funds in response to our client's long-term needs. These programs typically begin with the development of a model of client and market data. The model illustrates the interaction between a client's objectives and constraints, including restrictions on certain types of securities, and the risk-reward alternatives of the market.

Reviewing these models guides the development of an Investment Policy Statement, which is a set of working guidelines for the management of an investment portfolio. We then implement the Investment Policy Statement according to current market conditions and expectations. Portfolios can include common stocks, government and municipal bonds, and other investments in which a client holds a direct ownership in the shares of a business or evidence of debt. Portfolios may also include selected mutual fund and exchange-traded fund shares.

Once constructed, we provide supervision and ongoing management and repositioning of the portfolio as changes in investment holdings, market conditions and client circumstances require. Under this program, assets are held in a brokerage account at Schwab Advisor Services which is a division of Charles Schwab & Co., Inc.

In addition to regular brokerage statements provided by Schwab Advisor Services, performance reports are prepared quarterly for all accounts, as described in Item 13 of this brochure. The reports serve as the basis for monitoring progress. A more complete accounting of progress toward your objective is provided in an annual review.

As of December 31, 2020, Nabity-Jensen manages \$160,570,576 in assets on a discretionary basis and manages no assets on a non-discretionary basis.

Special Investment Counsel Services

Special investment counsel services are highly customized and begin only after written agreement with a client. These services may range from extended additional meetings and consultations with investment management clients, to reviews, analysis or valuations of accounts not managed by us.

Financial Planning and Advisory Services

In addition to investment management and special investment counsel services, we also provide fee-based advisory services including financial planning.

Retirement Plan to Rollover IRA

Nabity-Jensen and its representatives can earn investment advisory fees by recommending that a client rollover his or her account at the retirement plan to an IRA; however, Nabity-Jensen and its investment adviser representatives will not earn any investment advisory fee if client does not rollover the funds in the retirement plan (unless a client retained Nabity-Jensen to provide advice about the retirement plan account). Thus, Nabity-Jensen and its investment adviser representatives have an economic incentive to recommend a rollover of your retirement plan account, which is a conflict of interest. Nabity-Jensen has taken steps to help manage this conflict of interest arising from rolling over funds from an Employee Retirement Income Security Act of 1974 as amended ("ERISA") covered retirement plan to an IRA. Nabity-Jensen and its investment adviser representatives will (i) provide investment advice to ERISA covered retirement plan participants regarding a rollover of funds from the ERISA covered retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in Nabity-Jensen receiving unreasonable compensation related to the rollover of funds from the ERISA covered retirement plan to an IRA, and (iii) fully disclose compensation received by Nabity-Jensen and its supervised persons and any material conflicts of interest related to Nabity-Jensen recommending the rollover of funds from the ERISA covered retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

To the extent Nabity-Jensen provides investment advice to a participant in a retirement plan under ERISA regarding 1) whether to maintain investments and/or proceeds in an ERISA retirement plan, 2) rollover such investment/proceeds from the ERISA retirement plan to an individual retirement account ("Rollover IRA account"), or 3) make a distribution from the ERISA retirement plan: Nabity-Jensen hereby acknowledges its fiduciary obligations with regard to its investment advice about whether to maintain, rollover or distribute proceeds from those ERISA Retirement plans. As a fiduciary, with respect to our investment advice about whether to maintain, rollover or distribute proceeds from those ERISA retirement plans, Nabity-Jensen and its representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing. Nabity-Jensen and its representatives will conduct business based on your investment objectives, risk tolerance, financial circumstances and needs, without regard to personal or company self-interest.

Item 5 – Fees and Compensation

Investment Management Services

Nabity-Jensen charges fees according to a written agreement with our clients called the Discretionary Investment Management Agreement. The fee for our Investment Management Services is an annual percentage of the value of assets under our management. The percentage is determined by a regressive rate schedule (lower rates for larger accounts). An example is included below.

Asset levels for each percentage	Fee Percentage	Maximum Percentage
Up to \$250,000	1.25 %	1.75%
From \$250,000 to \$1,000,000	1.00 %	1.75%
From \$1,000,000 to \$5,000,000	0.75 %	1.75%
\$5,000,000 and over	0.50 %	1.75%

Example: The total annual fee for a billable balance of \$425,000 is \$4,875 calculated as follows.

Schedule	Calculation	
Tier	Tier x (Rate)	Annual Fee
\$0.00 to \$250,000	\$250,000 x 1.25%	\$3,125
\$250,000 to \$1,000,000	\$175,000 x 1.00%	\$1,750
	TOTAL	\$4,875

Fees are not normally negotiable. However, alternative fee arrangements might be made for accounts outside the customary balanced accounts (bonds and stocks). In such cases the fee will be set at a mutually agreed upon rate. Exceptions to the standard fee schedule outlined above may include:

- Large accounts usually more than \$5,000,000 in billable asset value
- Charitable and non-profit accounts
- Clients who began a business relationship with Nabity-Jensen under our prior fee schedule
- An asset composition that varies significantly from a typical portfolio composition
- Asset allocation accounts investing only in passively managed index mutual funds or Exchange Traded Funds
- Accounts of current and former employees of Nabity-Jensen and its advisory affiliates

Investment Management fees are payable in advance at the beginning of each quarter. The amount is based on the market value of the account as of the end of the prior quarter. Unless the client pays us directly, Schwab Advisor Services, the custodian holding the account, will facilitate the payment according to the authorization provided in the Schwab account application. Nabity-Jensen provides both you and Schwab Advisor Services with a notice of the fee amount. In addition to that notice the monthly statements you receive from Schwab Advisor Services will also show the management fee amount. Nabity-Jensen does not have custody of client funds or securities.

The fee for the quarter in which our management begins will be prorated based on the number of days remaining in the quarter as of the date the assets are first deposited. Upon written notice, either party may end the Investment Management Agreement. If termination occurs before the end of a calendar billing period, a pro-rata refund of unearned fees will be made.

The fees in the schedule above make up all fees and charges for the services of Nabity-Jensen. You can incur charges from the custodian (Schwab Advisor Services), brokers or other third parties. Mutual funds, exchange traded funds and other investment products have internal expenses which are disclosed in the product's prospectus.

Special Investment Counsel & Financial Planning and Advisory Services

Compensation for special investment counsel, planning and advisory services is based on one of two methods and is documented in the Financial Advisory Agreement prior to providing the service.

- 1) Flat Fee per project and stated in the client agreement

or

- 2) Hourly at the following rates:
Professional time: \$150
Staff time: \$85

In addition to the amounts above, clients will be billed for all out-of-pocket expenses accompanying these services. Billing for these services follows one of two methods; (1) quarterly, in arrears, as work progresses or, (2) one half at the beginning (but not more than six months in advance of the service) and the remainder at the end of the project.

Item 6 – Performance-Based Fees and Side-By-Side Management

Nabity-Jensen does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Nabity-Jensen provides portfolio management services to individuals, high net worth individuals, corporations and charitable institutions.

Nabity-Jensen has no minimum investment amount or minimum fee,

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

Nabity-Jensen's investment analysis and strategy are based primarily on Modern Portfolio Theory (MPT) which involves diversifying investment portfolios to obtain the highest possible return for a given level of risk. The components of MPT are:

- Expected Risk as defined by the standard deviation of each asset class,
- Expected Return of each asset class, and
- Correlation of each pair of asset classes (MPT combines assets whose returns are not highly correlated).

Nabity-Jensen Investment Management, Inc. accomplishes this analysis at present by combining asset classes that may include domestic and international equities, fixed income securities and low correlation asset classes such as commodities, real estate or foreign currencies. These assets are blended to formulate a more efficient asset allocation.

We then implement this allocation on a customized basis for each client. We do not specialize or limit our management to any particular type of security. Within each asset class we select the securities that are most suited to the client considering the following:

- Risk expectations,
- Return expectations,
- Tax considerations,
- Cash flow needs,
- Liquidity needs, and
- Other client constraints or preferences.

While investing in securities involves risk of loss that clients should be prepared to bear, a feature of these methods and strategies is the management of risk through diversification by:

- Market sector,
- Company size,
- Geographic region,
- Fixed-income quality and maturity, and
- Limits of concentration in the securities of any single issuer.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Nabity-Jensen or the integrity of our management. Such events include criminal action, civil action, regulatory proceeding, and self-regulatory organization proceeding. Nabity-Jensen has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Nabity-Jensen's passive owner, Mr. David Nabity, is also:

- the owner of Nabity Business Advisors Inc. Nabity Business Advisors Inc. is no longer registered as an investment adviser firm but remains an active business entity.
- a Registered Representative of Lion Street Financial, LLC, an unaffiliated FINRA registered Broker-Dealer.
- a licensed insurance agent with various insurance companies.

However, Mr. Nabity is **not** involved in any of the day-to-day operations or investment decisions of Nabity-Jensen, nor are our clients under any obligation to engage Mr. Nabity in any of his outside business activities. Mr. Nabity and Nabity-Jensen have an Ongoing Business Relationship Agreement in place for Mr. Nabity to receive up to 40% percent of the investment management revenue of clients referred to Nabity-Jensen in his role as Vice President.

Item 11 – Code of Ethics

Nabity-Jensen has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and personal securities trading procedures, among other things. Nabity-Jensen's clients or prospective clients can request a copy of the firm's Code of Ethics by contacting Randall Jensen at 402-391-1021 or rjensen@nabityjensen.com.

The employees of Nabity-Jensen may buy or sell securities, for their own accounts, which are also held by clients of the firm and, further, they may buy or sell securities for client accounts which are owned by them. As part of its Code of Ethics, Nabity-Jensen's Personal Securities Policy has imposed certain restrictions upon employee's transactions to ensure that each client's interest is given precedence.

These include:

- Definition of an employee account to include accounts of the employee's family over which he exercises

control or any accounts over which he has a beneficial interest.

- Prohibitions of a security transaction in an employee account if one can reasonably construe intent to gain a direct benefit from client transactions.
- Precedence given to client transactions when client and employee trade occurs in the same security on the same day.
- Requirement for preapproval by the Chief Compliance Officer of personal securities transactions in “Restricted Securities.” Restricted securities include the securities of public companies which the firm is currently recommending or considering for its clients.
- Review of all employee security transactions by a designated officer of the firm to ensure compliance with the Personal Securities policy.

Item 12 – Brokerage Practices

Nabity-Jensen has chosen Schwab Advisor Services as custodian for client accounts. Other advisors may direct clients to a different or multiple custodians. We have selected Schwab Advisor Services based upon the quality and depth of services provided to our clients and to us.

Although the commissions paid by clients comply with our duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction if we determine in good faith that the commission is reasonable in relation to the value of the brokerage, research, and support services received. Examples include:

Brokerage

- account maintenance
- recordkeeping
- custodial and other services

Research

- analysis pertaining to specific securities, companies, or sectors
- market, financial, and economic information
- financial publications
- portfolio management systems
- statistical and pricing services

Support

- technology that provides access to client account data
- compliance and practice management-related publications
- discounted or gratis consulting services
- discounted or gratis attendance at conferences, meetings, and other educational or social events
- marketing support
- other products used by Registrant in its investment management business

Regarding transactions for client accounts, some trades are executed in aggregate for several accounts. For example, the purchase of new issue bonds for two or more client accounts with similar requirements, these transactions are routinely aggregated.

In general, other securities are transacted on a client by client basis. These transactions are infrequent and at varying times so as to negate the need or benefit of aggregation of the trades.

Item 13 – Review of Accounts

Portfolios are overseen and reviews are conducted by Randall Jensen, President and general investment manager. We conduct internal reviews of client accounts as determined by the client's investment objectives and the type of securities held but not less than quarterly.

An internal review is a two-part process that includes:

- 1) Review of the portfolio with respect to the Investment Policy Statement. This includes the client's objectives, return expectations, risk tolerance, and time horizon. Of primary importance is the suitability of the asset allocation for each client.
- 2) Review of the individual positions that make up the portfolio with relative to other investments available in each asset class.

Along with internal portfolio reviews, we also recommend client review meetings at least annually or more frequently as agreed upon.

In addition to these reviews, clients receive a quarterly portfolio report—either written or electronic. We write a general letter to investors with commentary about the economy and financial markets and give some insight to our approach to portfolio management in light of the current environment. This quarterly communication also includes client portfolio-specific details such as allocation, portfolio cash flows and values, as well as a performance review.

Nabity-Jensen communicates with its clients through a range of reports, telephone calls, letters, and regular client meetings. The frequency and type of communication varies from client to client and depends on each client's needs, circumstances, and wishes.

Investment management clients receive a regular brokerage statement for each account from the custodian, Schwab Advisor Services, which includes an inventory of portfolio assets and a list of transactions occurring in each account.

We urge you to carefully review these statements and compare official custodial records from Schwab Advisor Services to the reports that we provide you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. When you have questions about your account statement, you should contact our firm and your qualified custodian.

Item 14 – Client Referrals and Other Compensation

Nabity-Jensen does not compensate anyone outside of our company for referring clients to us. We also do not receive compensation or receive an economic benefit from anyone other than what is disclosed in Item 5 – *Fees and Compensation* and Item 12 – *Brokerage Practices*.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Nabity-Jensen is deemed to have custody of client funds and securities whenever Nabity-Jensen is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Nabity-Jensen will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Nabity-Jensen is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Nabity-Jensen. When clients have questions about their account statements, they should contact Nabity-Jensen or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

When providing asset management services, Nabity-Jensen maintains trading authorization over your account and will provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities, the amount of securities that can be bought or sold for your portfolio and the broker or dealer to be used for your portfolio without obtaining your consent for each transaction.

We observe the client's stated investment objectives, goal and risk tolerance levels as outlined in the client's Investment Policy Statement for each account. As a part of the Investment Policy Statement, clients have the ability to identify securities for inclusion in or exclusion from the portfolio and, if desired, the maximum or minimum amount of shares or percentage of the portfolio these securities represent.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Nabity-Jensen does not have any authority to and does not vote proxies on behalf of our investment management clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

General questions about the proxy voting process can be directed to Randall Jensen at 402-391-1021.

Item 18 – Financial Information

As registered investment advisers we are required to provide you with certain financial information or disclosures about our financial condition. Nabity-Jensen has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and it has not been the subject of a bankruptcy proceeding.

Item 1 – Cover Page

Randall L. Jensen

Nabity-Jensen
Investment Management, Inc.

9802 Nicholas Street, Suite 105

Omaha, NE 68114

402-391-1021

March 2021

This Brochure Supplement provides information about Randall L. Jensen that supplements the Nabity-Jensen Investment Management Brochure. You should have received a copy of that brochure. Please contact Randall L. Jensen if you did not receive Nabity-Jensen Investment Management's brochure or if you have any questions about the contents of this supplement. Additional information about Randall Jensen is available on the SEC's website at www.adviserinfo.sec.gov. His CRD Number is 2813307.

Item 2 – Educational Background and Business Experience

Randall L. Jensen was born in 1958 and earned an Associate Degree from Northwest Missouri State University in 1979. From 1995 until 2005 he worked as an investment manager at Nabity Financial Group. In addition, he was branch manager at Walnut Street Securities from 1998 until 2004. In 2006 Randall Jensen became president of Nabity-Jensen Investment Management, Inc.

In 1995 Randall Jensen earned official recognition as a Certified Financial Planner (CFP). Qualifications for certification include first meeting the education requirements. This requires a bachelor's degree or its equivalent and courses in:

- General Principles of Financial Planning
- Insurance Planning and Risk Management
- Employee Benefits Planning
- Investment Planning
- Income Tax Planning
- Retirement Planning and
- Estate Planning.

Additionally, three years of full-time, relevant personal financial planning experience must be fulfilled as well as passing the CFP Certification Examination. The final step for certification is agreeing to the CFP Board's:

- Code of Ethics and Professional Responsibility
- Rules of Conduct and Financial Planning Practice Standards and
- Disciplinary Rules and Procedures.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Such events include criminal action, civil action, regulatory proceeding, and self-regulatory organization proceeding. No information is applicable to this Item.

Item 4 – Other Business Activities

No information is applicable to this Item.

Item 5 – Additional Compensation

No information is applicable to this Item.

Item 6 – Supervision

Randall L. Jensen is the Chief Compliance Officer and is responsible for all supervision.