

Form ADV Part 3: Relationship Summary

Nabity-Jensen Investment Management, Inc.

Introduction

Nabity-Jensen Investment Management, Inc. (“Nabity-Jensen Investment Management” or “we”) is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

What Investment Services and Advice Can You Provide Me?

Description of Services: Nabity-Jensen Investment Management, Inc. offers investment advisory services to retail investors. *Investment Management Services:* We provide investment management services which involves us managing and trading your designated account(s). We will discuss your investment goals and design a strategy to try and achieve your investment goals. We will continuously monitor your account when providing management services and contact you at least annually to discuss your portfolio. Investment management services are provided on a **discretionary** basis, meaning we will have the authority to determine the type and amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. For more information about investment authority, please see **Item 16** of our **Form ADV Part 2A**. *Financial Planning Services:* We also provide financial planning services which involves us creating a written financial plan for you which covers mutually agreed upon topics. It may involve one time and/or ongoing meetings to discuss your financial situation. *Special Investment Counsel Services:* We also provide highly customized services which include extended additional meetings and consultations and reviews, analysis and valuations of investment accounts not managed by us.

Limited Investment Offerings: We do not primarily recommend one type of security to clients. Instead, we recommend investment portfolios designed to be suitable for each client relative to that client’s specific circumstances and needs. When providing you services, we do not recommend or offer advice on any proprietary products.

Account & Fee Minimums: There are no minimum investment amounts or conditions.

Conversation Starters: 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?

What Fees Will I Pay?

Description of Principal Fees & Costs: Fees charged for our *Investment Management Services* are charged based on a percentage of assets under management, billed in advance on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the previous billing period. The annual fee for management services will be based upon a fee schedule which ranges between 0.50% and 1.25%. Some clients may have a grandfathered fee that is outside of our stated current fee schedule. Because our fee is based upon the value of your account, we have an incentive to recommend that you increase the level of assets in your account. When engaging us for management services, you will also incur other fees and expenses. The broker-dealer/custodian on your account will charge you transaction fees for executing trades in your account. You will also be charged internal fees and expenses by the funds we invest in within your account. *Financial Planning Services* are provided under an hourly fee arrangement of \$150 (and staff time of \$85 per hour) or a flat fee per project and stated in your client agreement. Any unpaid hourly fees are due immediately upon completion and delivery of the financial plan. *Special Investment Counsel Services* are provided under an hourly fee arrangement of \$150 (and staff time of \$85 per hour) or a flat fee per project and stated in your client agreement. Any unpaid hourly fees are due immediately upon completion and delivery of the financial plan. Any fees we charge for financial planning and special investment counsel services will not cover the costs associated with implementing any recommendations we may make.

Additional Information: 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 more information about the fees we charge and the other fees and expenses you will incur, please see **Item 5 of Form ADV Part 2A**.

Conversation Starters: 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?**

Standard of Conduct: 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 you. Here are some examples to help you understand what this means. 1) To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account ("IRA") managed by us and subject to our asset-based investment advisory fees, this is a conflict of interest because we have a financial incentive to recommend that you move your IRA to us even if it is not in your best interest. For more information about this conflict and our procedures to mitigate the conflict, see **Item 4** of our **Form ADV Part 2A**. 2) When we provide management services, we will ask that you establish an account with Charles Schwab & Co., Inc. to maintain custody of your assets and to effect trades for your account. This recommendation is not based solely on your interest of receiving the best execution possible. They provide us with research, products and tools that help us manage and further develop our business operations. As a result, we do not have to pay for such benefits, which save us money; however, these arrangements create a conflict of interest. See **Item 12** of our **Form ADV Part 2A** for more information. 3) We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts. For more information see **Item 11** of **Form ADV Part 2A**.

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

Additional Information: For more information about our conflicts of interests and the ways we are compensated, please see **Item 5** and **Item 10** of our **Form ADV Part 2A**.

How Do Your Financial Professionals Make Money?

Description of Salary/Payment of IARs: We compensate our investment adviser representative based on a salary which is not based on the level of assets that the representative brings in to the firm.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Neither us, nor our investment adviser representative have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representative at <https://www.investor.gov/CRS>.

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

Additional Information About Nability-Jensen Investment Management, Inc.

Additional information about us and a copy of this relationship summary are available on the Internet at www.nabilityjensen.com. You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/128455>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at 402-391-1021.

Conversation Starters: 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?

Item 1 – Cover Page

**Nabity-Jensen
Investment Management, Inc.**

9802 Nicholas Street, Suite 105

Omaha, NE 68114

402-391-1021

www.nabityjensen.com

February 2024

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 February 2023, we have had the following material changes to this brochure.

Item 5 and 7 – Nabity-Jensen imposes a minimum client household value of \$500,000 in order to start an investment advisory relationship with the firm. See Item 7 for more information on exceptions to this minimum.

Item 15 - Nabity-Jensen is deemed to have custody of client funds and securities when Nabity-Jensen has standing authority (also known as a standing letter of authorization or “SLOA”) to move money from a client’s account to a pre-determined third-party account.

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.

Item 3 -Table of Contents

Firm Brochure

Item 1 – Cover Page	i
Item 2 – Material Changes.....	ii
Item 3 – Table of Contents	iii
Item 4 – Advisory Business.....	1
Item 5 – Fees and Compensation.....	3
Item 6 – Performance-Based Fees and Side-By-Side Management	4
Item 7 – Types of Clients.....	4
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	4
Item 9 – Disciplinary Information	6
Item 10 – Other Financial Industry Activities and Affiliations	6
Item 11 – Code of Ethics	6
Item 12 – Brokerage Practices	7
Item 13 – Review of Accounts	7
Item 14 – Client Referrals and Other Compensation.....	8
Item 15 – Custody.....	8
Item 16 – Investment Discretion.....	9
Item 17 – Voting Client Securities	9
Item 18 – Financial Information	9

Brochure Supplement

Randy L. Jensen ADV Part 2B	10
Jennifer Ann Jorgenson ADV Part 2B	12

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, 2023, Nabity-Jensen manages \$206,050,914 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 Rollover Recommendations

When Nabity-Jensen provides investment advice about your retirement plan account or individual retirement account (“IRA”) including whether to maintain investments and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that Nabity-Jensen is a “**fiduciary**” within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”) as applicable, which are laws governing retirement accounts. The way Nabity-Jensen makes money creates conflicts with your interest so Nabity-Jensen operates under a special rule that requires Nabity-Jensen to act in your best interest and not put our interest ahead of you.

Under this special rule’s provisions, Nabity-Jensen must act as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

- Meet a professional standard of care when making investment recommendations (e.g., give prudent advice);
- Never put the financial interests of Nabity-Jensen ahead of you when making recommendations (e.g., give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that Nabity-Jensen gives advice that is in your best interest;
- Charge no more than is reasonable for the services of Nabity-Jensen; and
- Give Client basic information about conflicts of interest.

To the extent we recommend you roll over your account from a current retirement plan account to an individual retirement account managed by Nabity-Jensen, please know that Nabity-Jensen and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by Nabity-Jensen. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by Nabity-Jensen.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the 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 retirement plan to an IRA, and (iii) fully disclose compensation received by Nabity-Jensen and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

When providing advice to you regarding a retirement plan account or IRA, our investment advisor representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client’s needs, without regard to the financial or other interests of Nabity-Jensen or our affiliated personnel.

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 household 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
- Accounts of current and former employees of Nabity-Jensen and its advisory affiliates
- Accounts with the potential for additional account deposits
- Accounts of family members of current clients may be negotiated on a case-by-case basis

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.

Exceptions to the standard fee schedule outlined above may include:

- Financial Planning services based on client's financial situation and background

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.

As a condition for starting and maintaining an investment advisory relationship with Nabity-Jensen, we impose a minimum client household value of \$500,000 in assets under management. Nabity-Jensen may, in its sole discretion, accept clients with smaller household values based upon certain criteria, including anticipated future earning capacity, anticipated future additional assets, , related/legacy accounts, , pre-existing client and account retention.

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.

Crypto-Assets

Nabity-Jensen prohibits the direct purchase of cryptocurrency (e.g. Bitcoin), initial coin offering (ICO), distributed ledger technology, blockchain and any related products or pooled investment vehicles (collectively “Crypto-Assets”). However, Nabity-Jensen may recommend the purchase of ETFs or mutual funds that contain Crypto-Assets. Nabity-Jensen believes the risk is too high for the majority of our clients. There are a number of additional risks associated with digital currencies, including but not limited to:

- **Liquidity risk.** Cryptocurrencies are unregulated, and no party is required to accept payments in virtual currency. As a result, certain market conditions might make it difficult or impossible to sell quickly at a reasonable price.
- **Pricing risk.** Cryptocurrencies trade in decentralized markets. In addition, cryptocurrency exchanges and platforms do not feature the regulations, controls, and investor protections available in traditional stock, options, and futures markets. For these reasons, there is no unifying single pricing mechanism that reflects digital currency values.
- **Regulatory risk.** Cryptocurrencies essentially compete with currencies issued by governments. At some point, governments may seek to regulate or restrict cryptocurrencies, or issue a digital version of their own currencies. Such developments could adversely affect cryptocurrency prices.

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 Nability-Jensen or the integrity of our management. Such events include criminal action, civil action, regulatory proceeding, and self-regulatory organization proceeding. Nability-Jensen has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

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

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

Item 11 – Code of Ethics

Nability-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. Nability-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@nabilityjensen.com.

The employees of Nability-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, Nability-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. Nabity-Jensen is also deemed to have custody

of client funds and securities when Nabity-Jensen has standing authority (also known as a standing letter of authorization or “SLOA”) to move money from a client’s account to a pre-determined third-party account.

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

February 2024

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's 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.

Item 1 – Cover Page

Jennifer Ann Jorgenson

**Nabity-Jensen
Investment Management, Inc.**

9802 Nicholas Street, Suite 105

Omaha, NE 68114

402-391-1021

February 2024

This Brochure Supplement provides information about Jennifer A. Jorgenson that supplements the Nabity-Jensen Investment Management Brochure. You should have received a copy of that brochure. Please contact Jennifer A. Jorgenson 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 Jennifer A. Jorgenson is available on the SEC's website at www.adviserinfo.sec.gov. Her CRD Number is 7488667.

Item 2 – Educational Background and Business Experience

Jennifer A. Jorgenson was born in 1974 and earned a Bachelor's Degree in Finance from University of Iowa in 1996. From 2009 until 2016 she worked as an Accountant 3/ Budget Analyst 2 at Glenwood Resource Center – State of Iowa. In addition, she was an Accountant at Shenandoah Medical Center from 2018 until 2020. She worked in Compliance/Operations at Nabity – Jensen Investment Management, Inc from 2016 until 2018, and again from 2020 until present. In 2021 Jennifer A. Jorgenson became Investment Advisor Representative at Nabity-Jensen Investment Management, Inc.

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.