

VestGen Investment Management LLC.
Form CRS – Customer Relationship Summary
December 6, 2024

Introduction

VestGen Investment Management, LLC. (“VestGen” or the “Firm”) is registered with the SEC as an Investment Adviser. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment adviser, and investing. Brokerage and investment advisory services and fees differ, and it is important for the retail investor to understand the differences.

What investment services and advice can you provide me?

VestGen provides investment advisory and investment management services to clients. These services are primarily offered through its Managed Account Platform (“Platform”). Through the Platform, VestGen provides clients with access to several of its own proprietary model portfolios and those of third-party investment managers. The minimum account size is \$50,000 but VestGen may accept clients with less than the minimum portfolio size if VestGen believes the smaller portfolio size will not cause a substantial increase of investment risk beyond the client’s identified risk tolerance.

VestGen has full discretion when a client invests in a model portfolio. This means that VestGen may purchase and sell securities for your account without having to obtain your permission. When a client invests in securities that are not a part of a model portfolio, the client will inform VestGen whether the client is granting VestGen with discretion over those securities.

VestGen monitors clients’ portfolios as part of an ongoing process with account reviews conducted periodically. Such reviews consist of system-generated reports identifying client portfolios that may be out of tolerance for the model allocation selected.

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 detailed information about our services, please see our Form ADV, Part 2A brochure (Items 4 and 7 of Part 2A or Items 4.A and 5.A., B., C., and D. of Part 2A Appendix 1).

- **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?

VestGen provides investment management services for an annual fee that is charged quarterly based upon a percentage of the market value of the clients’ assets being managed by VestGen. Generally, VestGen’s fee will not exceed 1.80% per annum. Some accounts could be higher but will not exceed 2.20%. If the client account was introduced to VestGen, VestGen will share a portion of their fee with that firm pursuant to an agreement between VestGen and the firm. Depending on the account type the client opens at the third-party custodian, the custodian may charge the client transaction fees for certain transactions.

Mutual funds, ETFs and alternative investments charge their own fees for investing the pool of assets in the

respective investment vehicles. In addition, third-party model managers may charge the client a separate fee ranging from 0.0% to 0.35% but may be higher and will be disclosed to the client at the time of account opening.

Clients will pay fees and costs whether they make or lose money on their investments. Fees and costs will reduce any amount of money clients make on their investments over time. Clients need to make sure they understand what fees and costs they are paying.

Conversation Starter *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 affect the recommendations we provide you. Here are some examples to help you understand what this means.

Because VestGen bases its advisory fee on the value of the client's account, the more assets there are in a client's account, the more a retail investor will pay in fees, and VestGen may therefore have an incentive to encourage their clients to increase the assets in their account.

VestGen provides investment management services through an affiliated mutual fund, the Tactical Dividend and Momentum Fund ("TDM"). The TDM Fund may be a part of the underlying holdings of some of VestGen's proprietary model portfolios. VestGen earns fees for providing investment advisory services to its clients in addition to investment management fees charged by the TDM fund.

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

How do your financial professionals make money?

The firm servicing client accounts receives a portion of the advisory fee paid to VestGen. The portion of the advisory fee shared with the referring firm is determined by an agreement between VestGen and that firm.

Do your financial professionals have legal or disciplinary history?

Yes. For more detailed information, visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to review firms and financial professionals.

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

Additional Information

For additional information about our services, please refer to VestGen's ADV. To receive an up-to-date Form CRS, please contact VestGen's Compliance Department at (609) 601-1200.