

**ProNvest, Inc.**  
**Form ADV, Part 3: CRS (Customer Relationship Summary) March 2021**

Introduction	<p>ProNvest, Inc. is registered with the Securities and Exchange Commission (SEC) as an investment adviser. It is important for you to understand the difference in the fees and services between brokerage firms and investment advisers, and this document is intended to provide you with clarity regarding our investment advisory services. Free and simple tools are available to research firms and financial professionals at <a href="http://Investor.gov/CRS">Investor.gov/CRS</a>, which also provides educational materials about broker dealers, investment advisers, and investing.</p>
<p><b>What investment services and advice can you provide me?</b></p>	<p>We offer fee-based investment advisory services to retail investors. Our services include retirement planning, goal-based asset allocation advice, and retirement account management. Our recommendations and advice are based on the information you provide to us, including your investment objectives, risk tolerance, and time horizon until retirement.</p> <p>You may receive discretionary account management, which means you allow us to buy and sell investments without asking you in advance. In a discretionary management relationship, we will ask for your consent before making any substantial change to your investment strategy or asset allocation.</p> <p>You may also receive non-discretionary account management, which means that we provide you with advice and you make the decision regarding what investments to purchase or sell.</p> <p><b>For additional information, please see our Form ADV, Part 2A Brochure page 2, Types of Advisory Services and page 7, Types of Clients</b></p> <p><b>Conversation Starters.</b> Ask your financial professional—</p> <ul style="list-style-type: none"> <li>• <b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li> <li>• <b>How will you choose investments to recommend to me?</b></li> <li>• <b>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?}</b></li> </ul>
<p><b>What fees will I pay?</b></p>	<p>ProNvest fees are generally based on a percentage of assets under management. The more assets that you have under our management, the more fees you will pay, and we may have incentive to encourage you to increase your assets under our management.</p> <p>If you receive our services under a Participant Advisory Agreement, percentage-based fees are paid an annual fee up to 1.25% of the fair market value of the securities in your account. Fees are charged quarterly (up to .3125% per quarter or 1.25% annually) based on the participant’s prior quarter end account balance. Fees may be charged in advance or in arrears, depending on the terms of your contract. Our advisory fees are withdrawn directly from your account after receiving your written authorization.</p>

	<p>If you receive our direct services under a Client Subscription Agreement, your fees are paid directly by you on a monthly basis as follows: (i) \$20.00 per month for the each \$50,000 under management; and (ii) an additional \$9.00 for any remaining balance under \$50,000. For example, an account with a \$110,000 balance will pay \$49.00 per month.</p> <p>Third Party Fees: Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. You may pay operating or distribution fees or expenses for certain investment vehicles (such as mutual funds) in addition to our fees. You should read each fund’s disclosure material for a more complete explanation of these fees and expenses. Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid to us.</p> <p><b>You will pay fees and costs whether you make or lose money on your investments. Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay.</b></p> <p><b>For additional information, please see our Form ADV, Part 2A brochure, page 5, Fees and Compensation.</b></p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul>
<p><b>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?</b></p>	<p><b>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.</b></p> <p>ProNvest offers revenue sharing opportunities with retirement plan providers whereby the provider receives payment for marketing our services to the provider’s clients. We may also enter into agreements with solicitors whereby the solicitors market our investment advisory services. If the solicitors’ marketing lead to a new client relationship for ProNvest, we will pay each solicitor a fee out of the investment advisory fees received from the new client.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"> <li>• <b>How might your conflicts of interest affect me, and how will you address them?</b></li> </ul> <p><b>For additional information, please see our Form ADV, Part 2A brochure, page 4, Distributer Service Agreement and page 12, Code of Ethics.</b></p>

<p><b>How do your financial professionals make money?</b></p>	<p>Our financial professionals benefit from the advisory services we provide to you because of the advisory fees we receive from you, as explained in the fee section above. Our financial professionals are paid a cash salary and may receive additional compensation based on a variety of factors, including business development. Compensation is generally related to the amount of client assets serviced by our financial professionals. This presents a potential conflict of interest in that our financial professionals may be incentivized to encourage you to increase the amount of assets in your account(s) managed by us or to otherwise transition accounts and assets to our management. .</p>
<p><b>Do your financial professionals have legal or disciplinary history?</b></p>	<p>Our firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients. Visit <a href="http://Investor.gov/CRS">Investor.gov/CRS</a> for a free and simple search tool to research us and our financial professionals.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"> <li>• <b>As a financial professional, do you have any disciplinary history? If so, for what type of conduct?</b></li> </ul>
<p>Additional Information</p>	<p><b>For additional information about our services, or if you would like to request a copy of our latest Client Relationship Summary, please visit our website at <a href="http://pronvest.com">pronvest.com</a> or contact us at 1-866-738-5125.</b></p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul>