

**Item 1: Cover Page**

**FORM ADV PART 2 A  
DISCLOSURE BROCHURE**

**Antigravity Investments Inc.**

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This brochure provides information about the qualifications and business practices of Antigravity Investments Inc. . Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (650) 273-6362. 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 ANTIGRAVITY INVESTMENTS INC. (CR  
D # 290 288) IS AVAILABLE ON THE SEC'S WEBSITE AT  
[WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV)**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

Since the last update on February 20, 2025, there has been no material changes.

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## **Item 4: Advisory Business**

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### **Firm Description**

Antigravity Investments Inc. ("AI") is a Delaware C-Corporation that was formed in July 2017. William Brendon Li-Wei Wong ("Brendon Wong") is 100% owner.

"Antigravity Investments Inc. provides investment advice via its automated platform ("Orbit"). Orbit is an operational interactive website that offers algorithm-based model portfolios and digital investment advisory services on an ongoing basis.

### **Types of Advisory Services**

#### **ASSET MANAGEMENT**

AI offers web-based discretionary asset management services to advisory Clients through its operational interactive website. AI will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

### **Client Tailored Services and Client Imposed Restrictions**

Our web-based interactive website captures Clients current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

### **Wrap Fee Programs**

AI does not sponsor any wrap fee programs.

### **Client Assets under Management**

AI has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$520,030	\$0	December 17, 2024

## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

#### **ASSET MANAGEMENT**

Assets Under Management		Annual Advisory Fee
<b>Tier 1</b>	\$0 - \$25,000	\$49
<b>Tier 2</b>	\$25,001 - \$250,000	\$199
<b>Tier 3</b>	\$250,001 - \$2,000,000	\$1,000
<b>Tier 4</b>	\$2,000,001 - and above	0.50%

The annual fees are paid in advance on a monthly or annual basis. The advisory fee is a tiered fee and is calculated by assessing the annual advisory flat fee or rate to the appropriate level of assets as shown in the above chart. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by AI with thirty (30) days written notice to Client and by the Client at any time with written notice to AI. Upon termination no refunds will be required as account terminations will be processed on the last day of the billing period.

#### **Client Payment of Fees**

Fees for this service may be paid by debit or credit card.

#### **Additional Client Fees Charged**

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. AI does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to AI. For more details on the brokerage practices, see Item 12 of this brochure.

#### **External Compensation for Client Referrals to Third Parties**

AI receives external compensation for the referral of Clients to American Deposit Management, LLC (ADM) and StoneCastle Cash Management, LLC (SCM) for deposit management services.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

AI does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for AI to recommend an investment that may carry a higher degree of risk to the Client.

## **Item 7: Types of Clients**

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### **Description**

AI generally provides investment advice to individuals, high net worth individuals, trusts, estates, or charitable organizations, corporations or business entities.

### **Account Minimums**

AI does not require a minimum dollar amount to open and maintain an advisory account.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.



Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

We may also utilize quantitative analysis techniques as a part of our research process.

Quantitative analysis refers to economic, business or financial analysis that aims to understand or predict behavior or events through the use of mathematical measurements and calculations, statistical modeling and research. Quantitative analysts aim to represent a given reality in terms of a numerical value. Quantitative analysis is employed for a number of reasons, including measurement, performance evaluation or valuation of a financial instrument, and predicting real world events such as changes in a country's gross domestic product (GDP) growth rate.

In general terms, quantitative analysis can best be understood as simply a way of measuring or evaluating things through the examination of mathematical values of variables. The primary advantage of quantitative analysis is that it involves studying precise, definitive values that can easily be compared with each other, such as a company's year-over-year revenues or earnings.

### **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives or by the Client via Orbit's portfolio. The Client may change these objectives at any time through our interactive website.

### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with AI and independent legal counsel, accountant, and other professionals.:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid- cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

AI and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

AI and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

AI and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of AI or the integrity of its management.

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## **Item 10: Other Financial Industry Activities and Affiliations**

### **Broker-Dealer or Representative Registration**

AI is not registered as a broker-dealer and no affiliated representatives of AI are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither AI nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

#### **StoneCastle Cash Management, LLC ("SCM")**

AI may refer Clients to SCM for deposit management services provided by SCM. SCM may pay AI a referral fee for these referrals, calculated via the client's deposit balance with SCM. StoneCastle Cash Management, LLC does not provide investment services or securities as part of its deposit management services.

#### **American Deposit Management, LLC ("ADM")**

AI may refer Clients to ADM for deposit management services provided by ADM. ADM may pay AI a referral fee for these referrals, calculated via the client's deposit balance with ADM. American Deposit Management, LLC does not provide investment services or securities as part of its deposit management services.

These practices represent conflicts of interest because they give an incentive to recommend products based on the fees received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another deposit management service of their choosing.

### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

AI does not select or recommend other investment advisors.

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## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics Description**

The affiliated persons (affiliated persons include employees and/or independent contractors) of AI have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of AI affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of AI. The Code reflects AI and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

AI's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of AI may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

AI's Code is based on the guiding principle that the interests of the Client are our top priority. AI's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

AI will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

#### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

AI and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

#### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

AI and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide AI with copies of their brokerage statements.

The Chief Compliance Officer of AI is Brendon Wong. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

#### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

AI does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide AI with copies of their brokerage statements.

The Chief Compliance Officer of AI is Brendon Wong. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of

affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

AI will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. AI will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. AI relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by AI. AI does not receive any portion of the trading fees.

AI also recommends the use of the broker-dealer, Altruist for custodial purposes.

- *Research and Other Soft Dollar Benefits*

AI does not receive any soft dollar benefits.

- *Brokerage for Client Referrals*

AI does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

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**Aggregating Securities Transactions for Client Accounts**

AI manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

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**Item 13: Review of Accounts**

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**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

AI's Orbit platform maintains and monitors Client's individual account parameters. This review may include types of account, investment objectives, overall financial conditions, personal and business assets, risk tolerances, and other factors unique to the Client's individual situations.

**Review of Client Accounts on Non-Periodic Basis**

Periodic reviews of online questionnaires may result in recommendations communicated through our interactive website to rebalance Client investment advisory portfolios.

**Content of Client Provided Reports and Frequency**

AI does not provide specific reports to Clients. Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

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**Item 14: Client Referrals and Other Compensation**

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**Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

AI receives compensation from American Deposit Management, LLC and StoneCastle Cash Management, LLC. See Item 10 for additional information.

**Advisory Firm Payments for Client Referrals**

AI does not compensate for Client referrals.

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**Item 15: Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by AI.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

AI requires discretionary authority to manage securities accounts on behalf of Clients. AI has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

AI does not allow account restrictions.

The Client approves the custodian to be used and the commission rates paid to the custodian. AI does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

AI does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, AI will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided to Clients because AI does not serve as a custodian for Client funds or securities and AI does not require prepayment of fees of more than \$1,200 per Client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

AI has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

### **Bankruptcy Petitions during the Past Ten Years**

AI has not had any bankruptcy petitions in the last ten years.