

Item 1 Cover Page

**Antigravity Investments
Firm CRD Number: 290288**

Form ADV Part 2A – Disclosure Brochure

Effective: April 12, 2020

www.antigravityinvestments.com

This brochure provides information about the qualifications and business practices of Antigravity Investments. 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. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Antigravity Investments, CRD #290288 also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Form ADV 2A (*the "Disclosure Brochure"*) provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. Our updated Disclosure Brochure or a Summary of Material Changes shall be available on our website.

Information about our firm and services has been updated in this Brochure version. Item 4A was amended to reflect our firm's current registration status with the SEC. Item 4B and Item 8A were amended to reflect our firm's focus on providing asset allocation and stock portfolio construction services. Other items were updated to reflect our support of billing via a Client's bank account in addition to a credit card and removing the specific number of unaffiliated brokerage firms we support, given that firm support may change regularly.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 3 Table of Contents

Item 3 Table of Contents.....	3
Item 4 Advisory Business	4
Item 5 Fees and Compensation	5
Item 6 Performance-Based Fees and Side-by-Side Management.....	6
Item 7 Types of Clients and Minimum Account Size.....	6
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 Disciplinary Information	8
Item 10 Other Financial Industry Activities and Affiliations	8
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	9
Item 12 Brokerage Practices	10
Item 13 Review of Accounts.....	10
Item 14 Client Referrals and Other Compensation.....	11
Item 15 Custody	11
Item 16 Investment Discretion.....	11
Item 17 Voting Client Securities.....	11
Item 18 Financial Information	12
Privacy Policy	13

Item 4 Advisory Business

A. Description of Advisor Firm.

Antigravity Investments is a Delaware C-Corporation that was formed in July 2017 and is registered as an investment advisor with the Securities and Exchange Commission (“SEC”). The principal owner of the firm is William Brendon Li-Wei Wong. For a more complete description of our services, see Item 4B.

B. Description of Advisory Services Offered

Antigravity Investments (“AI”) has created a proprietary technology platform to provide automated portfolio management to visitors (“Clients”) using its web site located at www.antigravityinvestments.com.

Clients have the option of creating a risk profile which is a quantitative mathematical function representing their risk tolerance, constructed via a sophisticated series of risk/reward decisions. The algorithm bases each question on the combination of preceding answers to pinpoint that Client’s risk tolerance to within a reasonable margin of error.

The client can select a range of investment strategies, with the aid of their risk profile. These strategies are primarily in the area of passive asset allocation and dynamic asset allocation, as well as passively or actively constructing stock portfolios. Certain strategies are publicly available, and other strategies are sophisticated proprietary algorithms to predict security performance, increase diversification and constrain portfolio risk to the Client’s personal risk profile.

At no time are any of the product’s calculations or services based on subjective information about a particular security, but rather on a Client’s inputs, as well as quantitative data about securities including historical return and volatility, provided by third party vendors. The securities that may be included in a Client’s portfolio include Exchange Traded Funds (ETFs) and stocks.

Once a Client’s investment strategy is selected, they make the determination if they want to implement the investment strategy. If the Client elects to implement the investment strategy, the Client will then open an account with one of the unaffiliated broker dealer firms supported by AI. AI will not provide securities custodial or other administrative services for Clients.

AI does provide names of unaffiliated broker dealers for Clients to consider and use as they deem appropriate for their individual needs. At no time does AI claim to endorse, analyze or recommend any broker dealer who is included within its site.

AI strongly recommends that users of this tool should not make any investment decision without consulting your personal financial advisor, and conducting your own research, including the careful review of annual reports, quarterly reports, and other public filings of the issuer. Further, Clients who use this site are strongly encouraged to conduct their own research into any broker dealer named on the site, including but not limited to consulting with independent tax, legal or financial adviser as necessary.

C. Clients Tailored Services and Client Imposed Restrictions

The AI web site is designed to allow each Client who decides to use its site to include their individual risk tolerance to determine their own investment portfolio based upon their individual needs. AI helps the Client to design such a portfolio by providing the Internet tools for this purpose.

D. Wrap Fee Programs

AI does not provide portfolio management services to wrap fee programs.

E. Assets Under Management

As of April 12, 2020, AI has \$1,127,413.36 in assets under management.

Item 5 Fees and Compensation

A. & B. Method of Compensation and Fee Schedule and Client Payment of Fees

Clients who use our site, before the investment strategy is deployed, will enter billing information in a secure portal and will be charged a monthly or quarterly fee, in arrears, based on the investment strategy they have selected. The fee for each strategy will be made clear to the client before they choose to invest in a particular strategy. The range of the annual fee for each investment strategy offered is up to 2.00%.

Clients who use this site are strongly encouraged to conduct their own research into any broker dealer, including but not limited to consulting with independent tax, legal or financial adviser as necessary.

C. Additional Client Fees Charged

Clients should be aware that by utilizing the services of any third parties mentioned on our site, Client may incur brokerage commissions, account opening fees, transaction fees, custodian fees, investment adviser fees and other related costs and expenses that will be incurred directly by the Client and billed directly to the Client's account.

D. Prepayment of Client Fees

AI's fee is billed to the Client's bank account or credit card in arrears, therefore this question is not applicable.

E. External Compensation for the Sale of Securities to Clients

AI does not accept compensation for the sale of securities. Our only compensation for this Internet service as described in Item 5 A&B above.

Item 6 Performance-Based Fees and Side-by-Side Management

AI does not charge performance-based fees.

Item 7 Types of Clients and Minimum Account Size

AI does not individually advise Clients. Therefore, it does not have a minimum account size.

The users of AI's web site are generally individual investors who are seeking to optimize their investment portfolio. However, as this product is offered on the Internet, AI has no control over who will choose to use the service.

Prior to receiving personalized investment recommendations from AI, individuals are required to open a user account. To open a user account, a prospective Client is required to provide AI with:

- Identifying information (name, email address and password);
- The amount of money the Client has to invest;
- Agreement to AI's terms of service; and
- Agreement to AI's privacy policy and access to this Brochure

Some of AI's informational services are accessible prior to registering an account, to allow prospective Clients to understand the service prior to opening a user account. Such services do not involve the provision of investment advice.

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

A. Methods of Analysis and Investment Strategies

As described in Item 4B above, AI formulates and provides Clients with investment advice via its web site. After capturing a Client's personal risk tolerance, the service provides the Client with an investment strategy to match their own risk tolerance.

AI offers a wide range of evidence-based investing strategies. Some strategies, such as the Global Market Portfolio, are well-regarded and publicly available. Other strategies are proprietary systems developed by our firm based on the latest academic research. These strategies typically fall in the categories of passive asset allocation, dynamic asset allocation, or the direct construction of stock portfolios.

The investment strategies that AI will suggest to Clients may include long term purchases of securities held at least for one year; short term purchases for securities sold within a year; trading of securities sold within 30 days and margin transactions.

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear. Clients are strongly encouraged to conduct their own analysis of the recommendations generated by AI proprietary technology.

B. Investment Strategy and Method of Analysis Material Risks

During our research phase described in 8A., we may utilize Fundamental, Technical and Cyclical analysis as a part of our process. Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns as compared with the recent past. The risks with this strategy are two-fold 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

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.

C. Material Risks of Investing

Every type of investment involves risk. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment.

Generally speaking, risk and potential return are related. This is the risk/return trade-off. Higher risks are usually taken with the expectation of higher returns at the cost of increased

volatility. While an investment with higher risk has the potential for higher return, it also has the greater potential for losses or negative returns. The school of thought when investing suggests that the longer your investment time horizon is the less affected you should be by short-term volatility. Therefore, the shorter your investment time horizon, the more concerned you should be with short-term volatility and higher risk.

AI may utilize Exchange Traded Funds (ETFs) within its investment strategies. Here are the some of the risks of investing in ETFs.

Exchange-Traded Funds (ETFs). ETFs are typically investment companies that are legally classified as open end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the “spread.” The spread varies over time based on the ETF’s trading volume and market liquidity, and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

Margin Accounts. Client should be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up, but will result in increased losses if the value of the securities in the account goes down. The custodian, acting as the client’s creditor, will have the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact the performance figures reflected on the quarterly advisory reports.

Item 9 Disciplinary Information

Clients should be aware that neither AI nor its management person have had any legal or disciplinary events, currently or in the past.

Item 10 Other Financial Industry Activities and Affiliations

A. Broker-Dealer or Representative Registration

AI is not a broker dealer nor is its management person a registered representative of a broker dealer.

B. Futures or Commodity Registration

Neither AI nor its management person are registered, or have an application pending as a futures commission merchant, commodity pool operator, or a commodity trading advisor, or as an associated person of the foregoing entities.

C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

As mentioned in Item 4B, AI does provide names of unaffiliated broker dealer firms where Clients will need to open an account in order to follow the investment strategy. However, AI does not receive any compensation from any of firms named on its site therefore no conflict of interest exists.

D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest

AI does not recommend or select other investment advisers for clients.

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

A. Code of Ethics Description

AI is registered with the SEC and maintains a Code of Ethics pursuant to SEC rule 204A-1. AI has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of AI deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of AI are conducted in a manner that avoids any conflict of interest between such persons and Clients of the adviser or its affiliates. AI collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. AI maintains a code of ethics, which is available upon request by emailing compliance@antigravityinvestments.com.

B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither AI nor any of its related persons recommend to individual Clients or buys or sells for Client accounts, securities in which AI has a direct material financial interest. AI does not have investment authority to purchase any securities on behalf of Clients. Once a recommendation has been generated by the Client by utilizing the Internet service offered by AI, it is in the sole discretion of the Client whether or not to engage the services of a broker for the execution of such portfolio. However, AI related persons may purchase securities for their own accounts which may, in certain instances, be the same securities as those recommended to Clients. As previously stated, AI has implemented a Code of Ethics to ensure the ethical conduct of its Access Persons, which is available upon request to compliance@antigravityinvestments.com.

C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

As previously stated above, AI does not buy securities for its own account so no conflict exists at the firm level.

Access Persons may own securities which are also owned by Clients. AI requires that its Access Persons follow its basic policies and ethical standards as set forth in its Code of Ethics. AI has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of AI deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of AI are conducted in a manner that avoids any conflict of interest between such persons and Clients of the adviser or its affiliates. AI collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. The Code of Ethics is available upon request by emailing compliance@antigravityinvestments.com.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

See the response to Item 11C above.

Item 12 Brokerage Practices

A. Factors Used to Select Broker-Dealers for Client Transactions

As previously stated, a Client visiting our site who chooses to invest in the recommended investment strategy must open an account with one of the unaffiliated broker dealer firms AI supports. The inclusion of the broker dealer's name on the site should not be construed by the Client as a recommendation or endorsement of that particular broker dealer by AI to the Client. Further, Client's should be aware that AI has not performed any review, analysis or comparison of broker dealers that are named on the site. **Clients are strongly encouraged to research the named broker dealer and the services they provide prior to engaging their services.**

Research and Other Soft Dollar Benefits.

AI does not receive research or other products or services from a broker dealer or any third party.

Brokerage for Client Referrals.

AI does not recommend any particular brokerage firm in exchange for Client referrals.

B. Aggregating Securities Transactions for Client Accounts

AI does not execute Client transactions. Therefore, aggregating securities transactions is not applicable to the firm.

Item 13 Review of Accounts

A. Indicate whether your firm periodically reviews client accounts or financial plans. If you do, describe the frequency and nature of the review and the titles of the supervised persons who conduct the review.

AI uses automated technology to conduct account management. Therefore, it does not have any Client accounts to review, nor does it prepare financial plans. This question is not applicable to the firm.

B. If the firm reviews client accounts on other than a periodic basis, describe the factors that trigger a review.

As stated above, AI does not conduct reviews. Therefore, this question is not applicable to the firm.

C. Describe the content and indicate the frequency of regular reports the firm provides to clients regarding their accounts. State whether these reports are written.

Clients may be able to access account information via AI's website and/or their brokerage provider including account balance and account performance. AI does not provide written reports to Clients regarding their accounts.

Clients who utilize the site will be provided with a dashboard that may, from time to time, have articles or newsletters posted to the dashboard. Clients will not be charged for these articles or newsletters.

Item 14 Client Referrals and Other Compensation

A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest

AI does not have any other arrangements in place whereby it receives any economic benefits from external sources.

B. Advisory Firm Payments for Client Referrals

AI does not currently have any such arrangements.

Item 15 Custody

AI does not have custody of Client assets. Therefore, this question is not applicable.

Item 16 Investment Discretion

AI may possess discretionary authority over Client accounts depending on the Client's arrangement with AI.

Item 17 Voting Client Securities

AI does not have Clients and therefore does not vote proxies on behalf of Clients. AI does not have the authority to vote Client securities.

Item 18 Financial Information

A. Balance Sheet

AI does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, a balance sheet is not included with this Brochure.

B. Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

AI is not currently aware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments to its Clients.

C. Bankruptcy Petitions During the Past Ten Years

Neither AI nor its management person have been the subject of a bankruptcy petition.

Privacy Policy

Antigravity Investments

Effective: August 8, 2018

Our Commitment to You

Antigravity Investments (“AI”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. AI (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with servicing your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does AI provide such information to others except for discrete and proper business purposes in connection with the servicing your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you electronically sign up for an account on our website. This information may include the following:

Social security or taxpayer identification number	Date of Birth
Name, address and phone number(s)	Assets and liabilities
Email address(es)	Income and expenses
Account information (including other institutions)	Investment activity
	Investment experience and goals

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, investment questionnaires;
- Information about your transactions with us or others

Information about You That Antigravity Investments Shares

AI works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint

business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy AI's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information about Former Clients

AI does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll keep you informed

We will publish notice of our privacy policy on our website for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will update our website with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice. You may obtain a copy of our current privacy policy by contacting us at (650) 273-6362.