

Part 2A of Form ADV: *Firm Brochure*

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August 1, 2019

This brochure provides information about the qualifications and business practices of BerganKDV Wealth Management. If you have any questions about the contents of this brochure, please contact us at (888) 812-3533 or wealthmanagement@bergankdv.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.

Additional information about BerganKDV Wealth Management (CRD # 143038) also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number.



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Item 3 - Material Changes

This Firm Brochure, dated August 1, 2019, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this Brochure within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Material changes since our last filing in 2018 are:

- BerganKDV Wealth Management has ended its affiliation with Valmark Securities, a FINRA Broker Dealer. BerganKDV will no longer offer securities products normally sold through a broker dealer and will focus entirely on providing investment advice and fee-based planning. Ending the broker dealer affiliation eliminates all conflicts of interest associated with the receipt of commission through the sale of securities products.

Item 4 - Advisory Business

BerganKDV Wealth Management, LLC ("BerganKDV") is a SEC-Registered Investment Adviser with its principal place of business located in Minnesota and Iowa. BerganKDV started conducting investment advisory business in 2007. The firm's principal shareholder (i.e., those individuals and/or entities controlling 25% or more of this company) is BerganKDV, Ltd.

BerganKDV provides personalized financial planning services, manages investment advisory accounts and offers third party asset management to individuals, pension and profit sharing plans, trusts, estates, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement and estate planning.

During our data-gathering process, we determine the client's objectives, time horizons, risk tolerance, and liquidity needs. We develop a unique investment and tax strategy, create and manage a portfolio based on the client's needs as established through interview process. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background. Our firm then prepares a written Investment Policy Statement ("IPS") detailing those needs and goals, including an encompassing policy under which these goals are to be achieved.

It is the client's obligation to notify their advisor or the firm immediately if circumstances have changed with respect to their goals.

Investment Supervisory Services ("ISS")

Individual Portfolio Management

BerganKDV manages advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment advice is not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate

- Interests in partnerships investing in oil and gas interests

Because some types of investments involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Managed Portfolios

All client portfolios are managed on a discretionary basis unless otherwise noted. BerganKDV offers a variety of managed portfolios primarily utilizing no-load mutual funds, exchange traded funds (ETF), individual equities, and money market funds. BerganKDV may also manage subaccounts within a variable annuity. Based on client circumstances, BerganKDV may create, recommend, and manage custom portfolios that fall outside the scope of the BerganKDV-managed model portfolios. BerganKDV offers the following managed portfolios:

DYNAMIC PORTFOLIO - Designed to offer a semi-passive and lower cost exposure to a diversified set of asset classes, styles, sectors and industries. As portfolio diversification explains over 90% of the variation in portfolio returns, the stable allocation model will remain fully exposed to predefined asset class ranges over time, with rebalancing occurring intermittently. Tactical allocation adjustments to asset styles (large cap, small cap, international, etc...), sectors (health care, technology, etc...) and industries (medical devices, software, etc...) are implemented (as opposed to asset class i.e. stock, bond, etc...) which remains static. These adjustment decisions are made through top-down, macro-economic analysis designed to identify potential price opportunities over the intermediate term. By focusing on a longer time frame, the potential exists to outperform relevant benchmarks through fewer transactions and lower fees.

BERGANKDV PORTFOLIOS - Offers our clients the ability to custom design their portfolio composition through the selection of one or a combination of many portfolio strategies, all designed and managed to offer the best risk adjusted returns commensurate to their objective. Whether through all equity portfolios intended for high growth or income, through portfolios developed to satisfy capital preservation and income streams, or even portfolios created to take advantage of investor momentum, investors have the opportunity to mix any combination of portfolios to their own liking. The end result is a portfolio tailored to each investor's specific preference, with each component actively managed in a manner consistent with its specific objective.

STRATEGIC PORTFOLIO - Designed to offer fully passive, low cost exposure to a pre-defined, diversified set of asset classes, and styles. This approach is a fully-passive management philosophy, where no attempt to outperform any respective benchmark is made. Allocation decisions are aligned with long-term objectives where constant exposure to a pre-set allocation is maintained throughout all market cycles, with intermittent rebalancing. No active management is made, with return expectations and performance established only through asset allocation selection. Emphasis is placed on adherence to a long-term perspective, as outcomes can be impaired when deviations from allocations occur at inopportune moments in market cycles.

Managed Portfolios Acknowledgement

All portfolios managed by BerganKDV involve risk including the potential loss of principal. It is important that you work closely with your investment advisor in selecting the proper allocation and investment strategy for the portion you are allocating to BerganKDV. BerganKDV will actively manage your account to ensure your investments are in line with your risk tolerance, time horizon and overall financial objectives. BerganKDV is not responsible for investments or other products recommended or purchased outside of the BerganKDV managed portfolios. Past performance is not an indication of future results.

Financial Planning

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies including: living trusts, wills, estate tax review, powers of attorney and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

BerganKDV allows two options for the payment of financial planning fees, selection of which is at the discretion of the advisor: 1) Payments may be made in two installments; half at the commencement of the planning process and final payment due upon delivery of the completed plan. 2) Full payment may be made in advance. In the case of full payment, BerganKDV will deliver plans within six months of the date of the planning agreement. Client may cancel within five business days of signing the Investment Advisory Agreement for a full refund. If cancellation occurs after five business days, client will be entitled to a pro-rata refund based on work completed.

Retirement Plan Consulting Services

We also provide several advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Retirement Plan Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

Investment Policy Statement Preparation (hereinafter referred to as "IPS")

We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

Selection of Investment Vehicles

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the IPS.

Monitoring of Investment Performance

We monitor client investments based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we also provide quarterly educational support and investment workshops designed for the plan participants when the plan sponsor engages our firm to provide these services. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

Amount of Managed Assets

As of 6/30/2019, we were actively managing \$579,557,277 of individual client's assets and \$691,144,754 of retirement plan assets.

Item 5 - Fees and Compensation

Investment Supervisory Services ("ISS")

Individual Portfolio Management/Managed Portfolio Fees

The annualized fee for Investment Supervisory Services is charged as a percentage of Assets under Management ("AUM"), ranging from 1.25% to 0.25%. Asset levels are determined from an aggregate perspective. The client's individual account values are added together to determine total household asset (portfolio) level. All individual accounts will be charged the same rate as determined by aggregate household values, regardless of size, including the 529 accounts. In no event shall a fee be based on the performance of the client's Portfolio; neither shall it depend on the return of the assets or any share of capital gains or appreciation thereof.

Other fees and charges, in addition to our investment management fees, may be imposed. Clients are responsible for the transaction and other fees charged by custodians and fund families (expense ratios) of particular securities. If a client account is terminated (de-linked from our management), fees paid in advance will be refunded on a prorated basis.

Our fees are billed quarterly, in advance or arrears (depending on the Investment Advisory Agreement), at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Client Services Agreement.

Lifewise™ Fee Structure

Lifewise™ offers four distinct services: Learn, Invest, Consult and Plan. Each service level has a separate fee structure that combines a fixed planning fee and/or an annualized fee for investment supervisory services. The fee schedule is as follows:

- Learn Free
- Invest 0.75% on Assets under Management (AUM)
- Consult \$699 for planning consultation workplace
0.60% AUM if assets are managed
- Plan \$999-\$2499 up-front, \$99-199 monthly retainer
0.60% AUM if assets are managed

Limited Negotiability of Advisory Fees - Although BerganKDV has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

Solicitor for Third Party Money Managers

BerganKDV and its associated persons may act as a solicitor and refer clients to third-party investment advisors that offer asset management services to clients. This will be described in detail under Item 10 of this brochure.

Solicitor Fees

BerganKDV and its associated persons may be paid a portion of the fee charged and collected by the third-party investment advisors in the form of solicitor fees or consulting fees. BerganKDV's fees are negotiable depending on the size, complexity of the client's account(s) and other business considerations. A complete description of the third-party investment advisor's services, fee schedules and account minimums will be disclosed in the third-party investment advisor's Form ADV, Schedule H Disclosure Brochure, or similar Disclosure Brochure.

Betterment, LLC, a third-party advisor, charges clients an all-inclusive annualized wrap fee of 0.25% of the client's account balance (further details about the fee are available in the Betterment Institutional Advisory Agreement). BerganKDV may charge a co-advisory fee that is in addition to the Betterment wrap that are outlined in BerganKDV's Investment Advisors Agreement and ADV Part 2A.

Breckinridge Capital Advisors, a third-party advisor, charges clients an annualized fee ranging from 0.15% to 0.20% of the client's account balance (further details about the fee are available in the Breckinridge Investment Advisory Agreement). BerganKDV may charge a co-advisory fee that is in addition to the Breckinridge advisory fee that are outlined in BerganKDV's Investment Advisors Agreement and ADV Part 2A.

Aperio Group, LLC, a third-party advisor, charges clients an annualized fee ranging from 0.10% to 0.35% of the client's account balance (further details about the fee are available in the Aperio Investment Advisory Agreement). BerganKDV may charge a co-advisory fee that is in addition to the Aperio advisory fee that are outlined in BerganKDV's Investment Advisors Agreement and ADV Part 2A.

Soft Dollar Arrangements

BerganKDV may receive economic benefits from third-party money managers, custodians or vendors in the form of items such as discounted registration fees for meeting attendance, software subscriptions and assistance on marketing or recruiting of advisors.

A conflict of interest exists when an Advisor receives soft dollars. This conflict may be mitigated by the fact that BerganKDV has a multitude of third-party money managers and custodians to choose from. The cost of any soft dollar arrangement is not passed to the client nor deducted from client's accounts.

Financial Planning Fees

BerganKDV's Financial Planning fee is determined based on the nature and complexity of the services being provided. All fees are agreed upon prior to entering into a contract with any client. Financial Planning fees may be included in the asset management fees or charged separately depending on the individual client's circumstances.

Fixed Fee

The fee for a financial plan is based on a negotiated fixed fee basis based on complexity and unique client needs, geographic market differences and the experience of the advisor preparing the plan.

Hourly Fee

BerganKDV also provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements ranges between \$75-\$350 per hour, dependent upon the services requested and the complexity of the plan. Advance hourly payments are refundable based on the pro-rata work completed. Typically, the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Advisory Fees in General - Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fee - Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Retirement Plan Consulting Fees

BerganKDV offers several fee options. BerganKDV may be compensated based on an annual percentage of plan assets for services involving ongoing reviews, or it may be compensated by an hourly fee or fixed fee. Alternatively, these different types of fees may also be combined as appropriate for the different types of services requested by the client.

Our fees for Retirement Plan Consulting Services are based on a percentage of Assets under Management ("AUM"). Typically, the annual fee ranges from 0.15% to 1.00% of plan assets depending on the services requested and the size of the plan. Fees will be based upon the value of the plan at the end of the previous period. Fees will not be adjusted based on additions and withdrawals during the calendar quarter.

BerganKDV's hourly charges range from \$150 to \$350 per hour. A fixed fee may be quoted based on an estimate of hours for the services requested. BerganKDV may request a retainer for hourly and fixed fee arrangements. The amount of a requested retainer will never exceed the fee for services to be provided within the first six months of an engagement.

Plan sponsors are invoiced in advance at the beginning of each calendar quarter.

External Compensation for the Sale of Securities and Non-Securities Products to Clients

BerganKDV does not receive external compensation for the sale of securities and non-securities products.

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

BerganKDV does not charge performance-based fees.

Item 7 - Types of Clients

BerganKDV provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Charitable Organizations
- Pension and profit-sharing plans (other than plan participants)
- Retirement Plans
- Corporations or other businesses not listed above

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

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting - In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

Fundamental Analysis - We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis - We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis - In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Quantitative Analysis - We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis - We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation - Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of equities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis - We look at the experience and track record of the manager of the mutual fund or ETF (Exchange Traded Fund) in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis - Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases - We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases - When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Trading - We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Option writing - We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative,

because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.
- A put gives us the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

We will use options to speculate on the possibility of a sharp price swing. We will also use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio.

We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

We use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

Risk of Loss - Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 - Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Criminal or Civil Actions

The firm and its management do not have any criminal or civil actions to report.

Administrative Enforcement Proceedings

The firm and its management have not been involved in any reportable administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 - Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

Management personnel of our firm are also partners in the accounting firm of BerganKDV Ltd., where they are individually licensed and practicing Certified Public Accountants providing accounting services for separate and typical compensation.

BerganKDV Ltd. typically recommends BerganKDV Wealth Management to accounting clients in need of advisory services. Conversely, BerganKDV Wealth Management typically recommends BerganKDV Ltd. to advisory clients in need of accounting services. Accounting services provided by BerganKDV Ltd. are separate and distinct from our advisory services and are provided for separate and typical compensation. There are no referral fee arrangements between our firms for these recommendations. No BerganKDV Wealth Management client is obligated to use BerganKDV Ltd. for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. BerganKDV Ltd. accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory client's behalf.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Third Party Investment Advisors

BerganKDV and its associated persons may act as a solicitor and refer clients to unaffiliated third-party investment advisors that offer asset management services to clients. As a result, BerganKDV and its associated persons may be paid a portion of the fee charged and collected by the third-party investment advisor in the form of solicitor fees or consulting fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with

SEC Rule 206(4)-3. BerganKDV has utilized the following third-party investment advisors in limited circumstances:

- Aspire
- Betterment, LLC (MTG, LLC, a FINRA member broker dealer).
- Breckinridge Capital Advisors
- Aperio Group, LLC

Clients are advised that investment advisor representatives have a conflict of interest by only offering a third-party investment advisor that has agreed to pay a portion of its advisory fee to advisor. At present, Aspire and Betterment collect an advisory fee that encompasses both the Advisor and Sub-Advisor fees. Breckinridge and Aperio collect advisory fees separate from BerganKDV's advisory fee. Clients are advised that there may be other third-party managed programs that may be suitable to the client that may be more or less costly. No guarantees can be made that the client's financial goals or objectives will be achieved. Further, no guarantees of performance can be offered. Investments involve risk, including the possible loss of principal.

BerganKDV performs a due diligence review on all third-party money management firms to ensure that they are properly registered in the states where BerganKDV conducts business.

529 Plans

All 529 Accounts are on the Schwab Platform. The Schwab 529 Plan is a 529 education investment program established by the state of Kansas, managed by American Century Investment Management, Inc., under the name Schwab 529 College Savings Plan, and available through Charles Schwab & Co., Inc. The Plan was created by the Kansas Legislature under the provisions of Section 529 of the Internal Revenue Code.

Item 11 - Code of Ethics

Participation or Interest in Client Transactions and Personal Trading

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

BerganKDV and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

BerganKDV's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to wealthmanagement@bergankdv.com, or by calling us at (888) 812-3533.

BerganKDV and individuals associated with our firm are prohibited from engaging in principal transactions.

BerganKDV and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with: (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in certain securities which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We have established procedures for the maintenance of all required books and records.
6. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
7. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
8. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
9. Any individual who violates any of the above restrictions may be subject to termination.

Item 12 - Brokerage Practices

BerganKDV does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co, Inc. (Schwab), or Fidelity Brokerage Services, LLC (Fidelity), both are registered broker-dealers, members SIPC, as the qualified custodians. We are independently owned and operated and are not affiliated with Schwab nor Fidelity. Custodian will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to. While we recommend that you use Schwab or Fidelity as custodian/broker, you will decide whether to do so and will open your account with a custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at the custodian, we can still use other brokers to execute trades for your account as described below.

We seek to use a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds,

- exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients

Both Schwab and Fidelity provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to retail customers. The custodians also make available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. The custodian's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of their support services:

Services that benefit you include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services that indirectly benefit you include: investment research and software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts

Services that generally benefit only us might include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

The custodians may provide some of these services themselves; in other cases, it will arrange for third-party vendors to provide the services to us. The availability of these services from the custodians may benefit us because we do not have to produce or directly pay for them. These services are not contingent upon us committing any specific amount of business in trading commissions or assets in custody. With multiple custodians to choose from, we have no incentive to recommend one custodian over another. We believe that having choices in custodian selection is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of each custodian's services.

Occasionally, to achieve best execution, BerganKDV will "bunch" or block trade client orders. Orders may be bunched where it permits best execution and provides a clear benefit to the participating clients. Certain clients may not be favored over others who would equally benefit. Prior to execution of such an order, BerganKDV identifies which accounts will be included, and how allocations among those accounts will be effectuated. If a block trade is not fully filled, executed shares are allocated on a pro rata basis, as are the remaining shares when they are filled. No client is favored over another, as all executed shares will transact at the same price (or average price for multiple fills.) Clients must receive individualized advice as to their participation in bunched trades. BerganKDV does not include any accounts in which it or any of its principals has a proprietary interest, including general partner interests in investment partnerships in the allocation.

In the event of an error while placing a trade for an account BerganKDV bears the costs of correcting the trade (if the cost is under \$100, Schwab or Fidelity will absorb the cost, anything higher and BerganKDV is responsible for payment). If the trade error results in a gain in the traded position, this gain inures to Schwab or Fidelity. In either instance, the client will neither lose nor gain from the error. When trade errors are identified and corrected after settlement, the client must be "made whole" (i.e. the client is in as good or better position than they were prior to the trade), which includes the payment of interest or reimbursement for margin interest for the time period the client's funds were tied up.

Custodians/Brokers that we select to execute transactions may from time to time refer clients to our firm. BerganKDV will not make commitments to any

custodian/broker to compensate them through brokerage transactions for client referrals; however, we may compensate the custodian/broker in the form of a participation fee that is based on the client's asset under management. A potential conflict of interest may arise between the client's interest in obtaining best price and execution and BerganKDV's recommendation on the custodial platform. Further details of referral programs are discussed in *Item 14 - Referral Fees*.

Item 13 - Review of Accounts

Investment Supervisory Services ("ISS")

Individual Portfolio Management

Reviews - While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least *annually*. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. These accounts are reviewed by the CEO, CIO or CCO.

Reports - In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide online access to account information via a client portal that allows customers to customize account performance, balances and holdings information.

Retirement Plan Consulting Services

Reviews - BerganKDV will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. BerganKDV will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly.

These accounts are reviewed by the Retirement Planning Solution Leader or an approved designee.

Reports - BerganKDV will provide reports to Retirement Plan Consulting Services clients based on the terms set forth in the client's Investment Policy Statement (IPS).

Financial Planning Services

Reviews - While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

Reports - Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

Item 14 - Client Referrals and Other Compensation

We may receive an economic benefit from Schwab or Fidelity in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab or Fidelity. These products or services, how they benefit us, and the related conflicts of interest are described above (see *Item 12 - Brokerage Practices*). The availability to us of these products and services are not based on us giving particular investment advice, such as buying particular services for our clients.

Client Referrals

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our *Firm Brochure*) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral.

It is BerganKDV's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-

client in conjunction with the advisory services we provide to our clients.

Referral Fees

BerganKDV receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through BerganKDV's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with BerganKDV. Schwab does not supervise BerganKDV and has no responsibility for BerganKDV of clients' portfolios or Advisor's other advice or services. BerganKDV pays Schwab fees to receive client referrals through the Service. BerganKDV's participation in the Service may raise potential conflicts of interest described below.

BerganKDV pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by BerganKDV is a percentage of the fees the client owes to BerganKDV or a percentage of the value of the assets in the client's account. BerganKDV pays Schwab the Participation Fee for so long as the referred client's account remains in custody at Schwab. The Participation Fee is billed to BerganKDV quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by BerganKDV and not by the client. BerganKDV has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs BerganKDV charges clients with similar portfolios who were not referred through the Service.

BerganKDV generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from, Schwab. This Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Advisor generally would pay in a single year. Thus, BerganKDV will have an incentive to recommend that client accounts be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees will be based on assets in accounts of BerganKDV clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, BerganKDV will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit BerganKDV fees directly from the accounts.

For accounts of BerganKDV clients maintained in custody at Schwab or Fidelity, Schwab nor Fidelity will not charge the client separately for custody but will receive compensation from BerganKDV clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab or Fidelity. Schwab and Fidelity also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab or Fidelity. Schwab's or Fidelity's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, BerganKDV may have an incentive to cause trades to be executed through Schwab or Fidelity rather than another broker-dealer. BerganKDV nevertheless acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab or Fidelity may be executed through a different broker-dealer than trades for BerganKDV's other clients. Thus, trades for accounts held at Schwab or Fidelity may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

Other Compensation

Our advisors do not receive commissions or other compensation on the sale of securities or other investment products.

Item 15 - Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct a custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. The qualified custodian maintains actual custody of your assets. You will receive account statements directly from the custodians at least quarterly; they will be sent to the email or postal mailing address you provided to them. You should carefully review those statements promptly when you receive them. We also urge you to compare the custodian's account

statements with the periodic account statements you will receive from us. Clients should contact us directly if they believe that there may be an error in their statement.

Item 16 - Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 - Voting Client Securities

We vote proxies for all client accounts; however, clients always have the right to vote proxies themselves. You can exercise this right by instructing us in writing to not vote proxies in their accounts.

We will vote proxies in the best interests of our clients and in accordance with our established policies and procedures. Our firm will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a copy of any document created by us that was material to deciding on how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict and retain an independent third-party to cast a vote.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting Lori Buettner by telephone, email, or in writing. Clients may request, in writing, information on how proxies for his/her shares were voted. If any client requests a copy of our complete proxy policies and procedures or how we voted proxies for his/her account(s), we will promptly provide such information to the client.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Clients can instruct us to vote proxies according to particular criteria (for example, to always vote with management, or to vote for or against a proposal to allow a so-called "poison pill" defense against a possible takeover). These requests must be made in writing. Clients can also instruct us on how to cast their votes in a particular proxy contest by contacting us at wealthmanagement@bergankdv.com.

Item 18 - Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. BerganKDV has no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

BerganKDV has not been the subject of a bankruptcy petition at any time during the past ten years.

Brochure Supplement (Part 2B of Form ADV)

August 1, 2019

Executive Officers and Management Brochure

This brochure supplement provides information about the Executive Officers and Management that supplements the BerganKDV Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact us at the above address, if you did not receive BerganKDV Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement. Additional information about the Executive Officers and Management may be available on the SEC's website at www.adviserinfo.sec.gov.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP®):

Certified Financial Planner is a designation granted by the CFP® Board. CFP® requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- Once the CFP® designation is obtained, the CFP® must renew the certification every year, pay a certification fee and complete 30 hours of continuing education.

Chartered Financial Analyst (CFA):

Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Certified Public Accountant (CPA):

- In order to become a CPA in the United States, the candidate must sit for and pass the Uniform Certified Public Accountant Examination, which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy. Eligibility to sit for the Uniform CPA Exam is determined by individual State Boards of Accountancy. Typically, the requirement is a Bachelor's degree which includes a minimum number of qualifying credit hours in accounting and business administration with an additional 1-year study. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license (i.e., permit to practice) to practice public accounting. CPAs are required to take continuing education courses in order to renew their license. Requirements vary by state. The vast majority of states require 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year. The requirement can be fulfilled through attending live seminars, webcast seminars, or through self-study (textbooks, videos, online courses, all of which require a test to receive credit). As part of the CPE requirement, most states require their CPAs to take an ethics course during every renewal period. Ethics requirements vary by state, and the courses range from 2–8 hours

Chartered Financial Consultant (ChFC):

Chartered Financial Consultants are licensed by the American College to use the ChFC mark. ChFC certification requirements:

- Complete ChFC coursework within five years from the date of initial enrollment
- Pass the exams for all required elective courses. You must achieve a minimum score of 70% to pass.
- Meet the experience requirements: Three years of business experience immediately preceding the date of use of the designation are required. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your ChFC designation, you must earn your recertification every two years.

Chartered Life Underwriter (CLU):

Chartered Life Underwriters are licensed by the American College to use the CLU mark. CLU certification requirements:

- Complete successfully CLU coursework 5 required and 3 electives
- Meet the experience requirements: Three years of business experience immediately preceding the date of use of the designation are required. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your CLU designation, you must earn 30 hours of continuing education credit every two years.

Accredited Investment Fiduciary (AIF®):

Accredited Investment Fiduciary is issued by the Center for Fiduciary Studies. AIF certification requirements:

- AIF designation requires the passing score of 75% or better on a 90-minute examination

Once accredited, AIF designees have the following annual obligations:

- Sign and agree to abide by a Code of Ethics
- Complete appropriate continuing education requirements
- Submit a renewal application with \$325 in annual dues

Continuing Education Requirements

- AIF designees are required to complete six hours of continuing education annually. The continuing education offerings are offered via live conference events, live webinars, and on-demand webinars.

Education and Business Standards

BerganKDV requires each investment advisory agent who renders investment and financial planning to clients to be an investment advisor representative meeting the registration requirements in their applicable state.

David Hinnenkamp, Chief Executive Officer/Principal

Year of Birth: 1962



Education

- St. Cloud State University; BS, Accounting; 1984

Business Experience

- BerganKDV Ltd.; Accountant; from 1984 to 1992
- BerganKDV Ltd.; Partner; from 1992 to Present
- BerganKDV Wealth Management; CEO; from 2007 to Present

Designations

Dave Hinnenkamp has earned the following designation(s) and is in good standing with the granting authority:

- Certified Public Accountant; American Institute of Certified Public

Disciplinary Information

Dave has no reportable disciplinary history.

Other Business Activities

Dave is not engaged in any investment-related activities. Dave does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

Dave is the CEO of BerganKDV, Ltd, a Certified Public Accounting firm. Dave is also the managing member of the Wealth Management firm, as well as other wholly owned subsidiaries of BerganKDV, Ltd.

Additional Compensation

Dave does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision

Dave is not currently registered with the Investment Advisor, however he remains a control person of the firm. As the CEO and managing member of BerganKDV Wealth Management, LLC, Dave's supervisory activities are monitored by Greg Stecher, Chief Compliance Officer. Greg Stecher's contact information: Tele: (952) 563-6930, Email: greg.stecher@bergankdv.com

Matthew Cosgriff, Service Group Leader

Year of Birth: 1988



Education

- St. Olaf; Bachelors, Economics, concentration in Finance;
- Minnesota State University, CFP® coursework;

Business Experience

- BerganKDV Wealth Management; Investment Advisor Representative; from 2014 to Present
- All Star Financial; Retirement Plan Consultant; from 2013 to 2014
- All Star Financial; Paraplanner; from 2011 to 2013

Designations

Matt has earned the following designation:

(CFP®) Certified Financial Planner- Certified Financial Planner Board of Standards

Disciplinary Information

Matt has no reportable disciplinary history.

Other Business Activities

Matt does not receive commissions or other compensation on the sale of securities or other investment products.

Matt is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Additional Compensation

Matt does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision

Matt's advisory activities are reviewed by Greg Stecher, Chief Compliance Officer. He reviews Matt's advisory work through frequent office interactions. The CCO also reviews Matt's activities through our client relationship management system. Greg Stecher's contact information: Tele: (952) 563-6930, Email: greg.stecher@bergankdv.com



Gregory Stecher, Chief Compliance Officer

Year of Birth: 1961

Education

- University of Iowa
Majors: Marketing and Finance
Minor: Computer Science

Business Experience

- AXA Equitable, Senior Vice President – Regional Administrative Officer; March 1985 to April 2007
- GWG Life, Chief Operations Officer; October 2007 to January 2009
- Gradient Securities/Gradient Advisors, Chief Compliance Officer; October 2009 to November 2013
- BerganKDV Wealth Management, Director of Operations/Chief Compliance Officer; November 2013 to present

Qualifications

- FINRA Exams Series 6, 7, 24, 53, 66, 99

Disciplinary Information

Greg has no reportable disciplinary history.

Other Business Activities

Greg is not involved in any outside business activities.

Additional Compensation

Greg does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision

Greg's activities are supervised by Matthew Cosgriff, Service Group Leader. He reviews Greg's advisory work through frequent office interactions. Matthew Cosgriff also reviews Greg's activities through our client relationship management system. Matthew Cosgriff's contact information: Tele: (952) 563-6956, Email: matt.cosgriff@bergankdv.com.



Derek Hoyt, Chief Investment Officer

Year of Birth: 1971

Education

- St. Olaf College; BS, Biology; 1994
- University of Minnesota; Masters, Applied Economics; 2004

Business Experience

- Analytics Investment Advisors; Account Manager; from 2000 to 2006
- BerganKDV Wealth Management; Portfolio Manager; from 2007 to Present

Designations

Derek Hoyt has earned the following designation(s) and is in good standing with the granting authority:

- Chartered Financial Analyst®; CFA Institute;

This designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA® charter, candidates must successfully complete three exams and gain at least four (4) years of qualifying work experience, among other requirements. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

Disciplinary Information

Derek has no reportable disciplinary history.

Other Business Activities

Derek is not engaged in any other investment-related activities. Derek does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

Derek is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Additional Compensation

Derek does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision

Derek's advisory activities are supervised by Matthew Cosgriff, Service Group Leader. He reviews Derek's advisory work through frequent office interactions. Matthew Cosgriff also reviews Derek's activities through our client relationship management system. Matthew Cosgriff's contact information: Tele: (952) 563-6956, Email: matt.cosgriff@bergankdv.com.