

Firm Brochure

(Part 2A of Form ADV)

Sundvold Capital Management LLC

1000 W. Nifong

Building 4, Suite 104

Columbia, MO 65203

P: 573-443-1000

F: 573-443-8888

www.sundvold.com

jsun@sundvold.com

This brochure provides information about the qualifications and business practices of Sundvold Financial. If you have any questions about the contents of this brochure, please contact us at: 573-443-1000, or by email at: jsun@sundvold.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 Sundvold Financial is available on the SEC's website at www.adviserinfo.sec.gov

February 8, 2021

Material Changes

Annual Update

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

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 573-443-1000 or by email at: jcotter@sundvold.com.

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Advisory Business

Firm Description

Sundvold Capital Management LLC, (Sundvold Financial) was founded in 1997 as a fee-only financial planning and investment advisory firm.

Sundvold Financial provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations 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, insurance review, investment management, education funding, retirement planning and estate planning.

Sundvold Financial believes that **objectivity** is the single most important quality a consulting firm can bring to the client, so we have structured our firm to minimize potential "conflicts of interest". It is for this reason we do not accept soft dollar payments of any form, we do not sell proprietary products and we do not accept payment from money managers. Sundvold Financial also operates as an independent insurance agent representing numerous companies. We may offer health and life insurance from these companies and receive commissions as a result of such purchases. A conflict of interest may exist when the representative of Sundvold Financial recommends that a client purchase an insurance product that results in compensations being paid to them as an independent insurance agent. Clients are free to purchase insurance from other firms, if they deem that in their best interest.

Our practice begins and ends with the needs of the client. It is process driven. Solutions can be developed only after appropriate data (both quantitative and qualitative) have been gathered and evaluated. Related issues should be identified and clients should be directed to other appropriate professionals for resolution. Implementation, continuous monitoring, and as necessary, modification are an integral part of the process.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

Sundvold Financial also provides investment advice to participants in defined-contribution retirement plans (i.e., 401(k) and 403(b) whose employers (i.e. plan sponsors) have contracted with Sundvold to provide such services, or in

the case where Sundvold has been appointed as an ERISA 3(38) investment fiduciary by a named ERISA 3(21) fiduciary.

Principal Owners

Jon Sundvold is principal owner.

Types of Advisory Services

Sundvold Financial provides investment supervisory services, also known as asset management services, manages investment advisory accounts not involving investment supervisory services and furnishes investment advice through consultations.

Sundvold Financial also furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues and trust services that often include estate planning.

As of December 31, 2020, Sundvold Financial manages approximately \$ 410,000,000 in assets under advisement with \$135,000,000 being regulatory assets recognized by the Securities Exchange Commission. 100% of assets under management are managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is generally designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed. At Sundvold Financial the focus is on the implementation of that plan and the ongoing accountability we expect from our clients pertaining to the financial plan.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding

recommendations, debt management and reduction planning, savings strategies and direction.

Detailed investment advice and specific recommendations are provided as part of a financial plan.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$1,500. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. In the event that the client's situation is substantially different than disclosed, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

Advisory Service Agreement

Most clients choose to have Sundvold Financial manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement can include: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning and estate planning, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

- 1.00% on the first \$1 million
- 0.80% on the next \$4 million;
- 0.60% on the next \$5 million;
- 0.40% on the next \$10 million; and
- 0.30% above \$20 million.

Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client, or the investment manager, may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Retainer Agreement

When it is more appropriate to work on a fixed-fee basis, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement*. The minimum annual fee for a *Retainer Agreement* is \$ 1,500.

Investment Management Agreement

An *Investment Management Agreement* may be executed when financial planning is not provided as part of the relationship. The minimum annual fee for an *Investment Management Agreement* is \$ 1,500.

Hourly Planning Engagements

Sundvold Financial provides hourly planning services for clients who need advice on a limited scope of work. The minimum hourly rate for limited scope engagements is \$ 200.

Asset Management

Assets are invested primarily with institutional money managers, from Sundvold Financial research, and in no-load and exchange-traded funds. This is done through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a discount brokerage account when appropriate. The discount brokerage firm charges a transaction fee for stock and bond trades. Sundvold Financial does not receive compensation, in any form, from fund companies or brokerages.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Sundvold Financial.

Termination of Agreement

A Client may terminate any of the aforementioned agreements, at any time, by notifying Sundvold Financial in writing. The client will pay the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Sundvold Financial will refund any unearned portion of the advance payment.

Sundvold Financial may terminate any of the aforementioned agreements, at any time, by notifying the client in writing. If the client made an advance payment, Sundvold Financial will refund any unearned portion of the advance payment.

Fees and Compensation

Description

Sundvold Financial bases its fees on a percentage of assets under management, hourly charges and fixed fees.

Retainer Agreements may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fee Billing

Investment management fees are billed quarterly, in *advance*, meaning that we invoice you *before* the three-month billing period has *begun*. Payment in full is expected upon invoice presentation. Fees are deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Sundvold Financial, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. *The formula is based on gross income, gross assets and other financial considerations.*

Expense Ratios

Mutual funds and Institutional Money Managers charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual

fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Sundvold Financial.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

Sundvold Financial reserves the right to stop work on any account that is more than 45 days overdue. In addition, Sundvold Financial reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate. Any unused portion of fees collected in advance will be refunded within 45 days.

Types of Clients

Description

Sundvold Financial provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$ 150,000 of assets under management, which equates to an annual fee of \$ 1,500.

Sundvold Financial has the discretion to waive the account minimum. Accounts of less than \$ 150,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts. Other exceptions can apply to employees of Sundvold Financial and their relatives, or relatives of existing clients.

Clients receiving ongoing asset management services will be assessed a \$ 1,500 minimum annual fee. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Sundvold Financial uses sources of information that may include Lockwood Advisors, Mobius Inc., Ned Davis Research, Rogers Casey, Morningstar Principia mutual fund information, Morningstar Principia stock information,

Charles Schwab & Company's "SchwabLink" service, Advisor Intelligence, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. We use active money managers as well as passive index, and exchange-traded, funds to follow Modern Portfolio Theory. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes a Investment Policy Statement that documents their objectives and desired investment strategy.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from

a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Market Timing Risk:** This risk can prevent growth of an investment by missing out on market gains by being out of the market in order to avoid short-term market loss.
- **Running out of Money Risk:** This risk generally is not a focus until the later years of one's life when the "Do I have enough money for my objective or will I run out" question arises. It is generally due to: an improper balance of saving and spending; a lack of wise planning and investing; not starting a savings program early enough; the goal or objective takes place relatively soon compared to the cost necessary to fund it; or the goal and objective requires funding that is longer than planned.

Disciplinary Information

Legal and Disciplinary

Sundvold Financial, and the employees of Sundvold Financial, has not been involved in legal or disciplinary events related to past or present investment clients.

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

Code of Ethics

The employees of Sundvold Financial have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Sundvold Financial, management and employees, may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Sundvold Financial *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of Sundvold Financial is Jon Sundvold. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

Sundvold Financial does not have affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. Sundvold Financial recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Sundvold Financial recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab and Pershing.

Sundvold Financial *DOES NOT* receive fees or commissions from any of these arrangements.

Best Execution

Sundvold Financial reviews the execution of trades at each custodian each quarter. The review is documented in the Sundvold Financial *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. Sundvold Financial does not receive any portion of the trading fees.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Accounts will have an annual review by advisors. Investment managers, funds and market reviews will be performed quarterly with the investment committee. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information and changes in a client's situation.

Client Referrals and Other Compensation

Incoming Referrals

Sundvold Financial has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Sundvold Financial does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

Account Statements

All assets are held at qualified custodians. The custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Sundvold Financial.

Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our client relationship management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. Net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Voting Client Securities

Proxy Votes

Sundvold Financial does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Sundvold Financial will provide recommendations to the client. Any conflict of interest will be disclosed to the client.

Financial Information

Financial Condition

Sundvold Financial does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not provided because Sundvold Financial does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,500 per client six months or more in advance.

Business Continuity Plan

General

Sundvold Financial has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

Sundvold Financial has experienced executive and advisory staff capable of filling key roles in the event of unforeseen key personnel loss issues.

Information Security Program

Information Security

Sundvold Financial maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Sundvold Financial is committed to maintaining the confidentiality, integrity and security of the personal information entrusted to the firm.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors. Federal and state securities regulators may review Sundvold Financial records and your personal records as permitted by law.

Personal identifiable information about you will be maintained while you are a client and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

Sundvold Financial requires that advisors in its employment have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a AIF®, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Jon Sundvold, AIF®

President

Educational Background:

- Date of birth: July 2, 1961
- University of Missouri, BS Business Administration – 1983
- Accredited Investment Fiduciary® - 2011

Sundvold Financial President 1997 to Current

Bryan England, AIF®

Director of Operations

Educational Background:

- Date of birth: July 31, 1965
- Baylor University, BS Education – 1989
- Baylor University, MS Education – 1991
- Accredited Investment Fiduciary® - 2012

Licenses: Series 65

Sundvold Financial Director of Operations 1999 - Present

Robert O. Weagley, CFP

Investment Advisor

Educational Background:

- Date of birth: April 18, 1952
- University of Missouri, Sociology – 1974
- Cornell University, PhD – 1985
- College of Financial Planning, CFP

Employment:

Sundvold Financial: 1999 – present
 University of Missouri: Professor, 1984 – 2016
 University of Missouri: Chair of Personal Financial Planning
 Department 2003 – 2016

Licenses: Series 65

Joshua A. Putnam

Investment Advisor

Educational Background:

- Date of birth: March 10, 1970
- Baylor University, BBA Financial Planning & Insurance - 1993

Licenses: Series 65, Life, Health

Employment:

Mass Mutual: 2001-2003
 The Putnam Group: 2003- 2005
 Sundvold Financial: 2005 - Present

Gregory D. Holloway

Investment Advisor

Educational Background:

- Date of birth: December 28, 1968

- University of Missouri, BS Consumer & Family Economics - 1991

Licenses: Series 65, Life, Health

Employment:

Legacy Financial Group:	1992 - 2005
Sundvold Financial:	2005 – Present

Richard K. Bartolacci, AIF®

Investment Advisor

Educational Background:

- Date of birth: October 27, 1963
- University of Missouri, BA Sociology – 1994
- American College,
- Chartered Life Underwriter (CLU)
- Chartered Financial Consultant (ChFC)
- Chartered Mutual Fund Counselor (CMFC)
- Accredited Investment Fiduciary® - 2013

Licenses: Series 65, life, health, property and casualty

Employment:

New York Life:	1993 – 1998
Prudential Financial:	1998 – 2005
Bartolacci Financial:	2005 – 2006
Sundvold Financial:	2006 - Present