

## Item 1: Cover Page

### Next Bloom Wealth LLC

Address: 1520 Clay Street, Suite E1  
North Kansas City, MO 64116

Mailing: 1520 Clay Street, Suite K1  
North Kansas City, MO 64116  
(816) 307-0548

### **Form ADV Part 2A – Firm Brochure**

Dated 22 February 2023

[www.nextbloomwealth.com](http://www.nextbloomwealth.com)

This Brochure provides information about the qualifications and business practices of Next Bloom Wealth LLC. If you have any questions about the contents of this Brochure, please contact us at (816) 307-0548. 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 Next Bloom Wealth LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 322155.

Next Bloom Wealth LLC is a Registered Investment Adviser. Registration does not imply any level of skill or training.

## Item 2: Material Changes

Since becoming approved on August 29, 2022, the following changes have been made to this version of the Disclosure Brochure:

- Item 4 & 5: The Advisor has added Retirement Plan Consulting as a new service. Please see Item 4 for additional information and Item 5 for applicable fees.
- The firm has applied for registration in the state of Kansas.
- The firm updated their physical address to 1520 Clay Street, Suite E1, North Kansas City, MO 64116

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Next Bloom Wealth LLC.

# Item 3: Table of Contents

## Contents

<b>Item 1: Cover Page</b>	<b>1</b>
<b>Item 2: Material Changes</b>	<b>2</b>
<b>Item 3: Table of Contents</b>	<b>3</b>
<b>Item 4: Advisory Business</b>	<b>4</b>
<b>Item 5: Fees and Compensation</b>	<b>8</b>
<b>Item 6: Performance-Based Fees and Side-By-Side Management</b>	<b>11</b>
<b>Item 7: Types of Clients</b>	<b>11</b>
<b>Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss</b>	<b>12</b>
<b>Item 9: Disciplinary Information</b>	<b>15</b>
<b>Item 10: Other Financial Industry Activities and Affiliations</b>	<b>15</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>16</b>
<b>Item 12: Brokerage Practices</b>	<b>17</b>
<b>Item 13: Review of Accounts</b>	<b>18</b>
<b>Item 14: Client Referrals and Other Compensation</b>	<b>18</b>
<b>Item 15: Custody</b>	<b>19</b>
<b>Item 16: Investment Discretion</b>	<b>19</b>
<b>Item 17: Voting Client Securities</b>	<b>19</b>
<b>Item 18: Financial Information</b>	<b>19</b>
<b>Form ADV Part 2B – Robert "Alex" Borgardts</b>	<b>21</b>
<b>Form ADV Part 2B – Ashley Dickson</b>	<b>25</b>

## Item 4: Advisory Business

### **Description of Advisory Firm**

Next Bloom Wealth LLC is a Registered Investment Adviser principally located in the state of MO. We are a limited liability company founded in May 2022. Next Bloom Wealth LLC became registered in 2022. Robert "Alex" Borgardts and Ashley Dickson are the principal owners.

As used in this brochure, the words "NBW", "we", "our firm", "Advisor" and "us" refer to Next Bloom Wealth LLC and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

### **Types of Advisory Services**

NBW is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. We offer Investment Management and Financial Planning Services. From time to time, NBW recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. NBW is not affiliated with nor does NBW receive any compensation from third-party professionals we may recommend.

### **Investment Management Services**

We utilize the services of third-party investment advisers ("Outside Managers") to assist with the management of Client accounts. We assist Clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of Outside Managers is further discussed in Item 8 of this Brochure. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

We offer fee-based annuities to our clients to help meet their income, preservation and liquidity needs. Fee-based annuities are part of our analysis when building long-term investment strategies. Through this service, we are able to provide clients access to income streams on a fee-only basis without paying commissions. We assist clients in the selection of appropriate annuity carriers, completing the carrier's applications, and requests for medical records and exams.

### **Initial Financial Plan Service**

We offer financial planning services for clients wishing to receive a personalized financial plan. This service involves an 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. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written or an electronic

report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. Upon delivery of the initial financial plan, the Client will be ultimately responsible for the implementation of the financial plan, or clients can receive advice & support on plan implementation through our hourly financial planning service.

### **Hourly Financial Planning Service**

We provide hourly financial planning services on a limited scope engagement. Hourly financial planning involves an 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. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client.

Hourly Financial Planning is available for Clients:

- Who wish to receive advice & support on financial plan implementation.
  - Looking to address specific questions or issues. In this case, the Client may choose from one or more of the below topics below or other areas as requested and agreed to by NBW.
- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
  - **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
  - **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
  - **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
  - **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney,

trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

- **Social Security Analysis:** We may analyze the impact of claiming Social Security benefits at different ages and guide clients to the optimal filing strategy for their unique circumstances. The analysis generally will consider total lifetime earnings estimates, the break-even-point, and the impact on their goals.

### **Retirement Plan Consulting**

Our firm provides retirement plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include:

- **Participant Education Consulting:** The Advisor consults with the Plan on the effectiveness of the employee education program. The Advisor also conducts and coordinates education consulting efforts with the Plan's current providers.
- **Participant Education & Enrollment Meetings:** The Advisor conducts periodic employee retirement and/or investment education meetings. The Advisor also conducts periodic employee group enrollment meetings at which information will be provided about the Plan, how to participate in the Plan, the benefits of Plan participation, and, in the case of a participant-directed plan, the investment options available under the Plan. The Advisor will not provide investment advice to the Plan participants.
- **Vendor Searches & Analysis:** The Advisor assists the Plan Sponsor in evaluating and selecting service providers to the Plan including recordkeepers, third-party administrators, trustees, custodians or participant education providers.

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

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to NBW in writing. NBW will notify Clients if they are unable to accommodate any requests.

## **Retirement Account Advice**

When NBW provides investment advice to Clients regarding Client's retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with Client's interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **Assets Under Management**

As of December 31, 2022, NBW has \$0 in discretionary and \$11,022,057 in non-discretionary assets under management.

## Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client consent.

## **Investment Management Services**

<b>Account Value</b>	<b>NBW's Annual Advisory Fee</b>	<b>TAMP's Annual Advisory Fee</b>	<b>Total Advisory Fee</b>
<b>All Assets</b>	1.00%	Up to .55%	Up to 1.55%



The TAMP's fee varies based on the selected investment strategy and the amount of assets in the account. The fee disclosed above reflects the maximum amount charged across the various investment strategies provided by the TAMP. A full breakdown of TAMP's possible Annual Advisory Fees is available upon request and will also be disclosed to clients prior to establishing an account under the TAMP's management and in their quarterly statements.

Our annual fee for this service is 1.00% of assets under management as of the last trading day of the billing cycle and is negotiable. Fees may be charged monthly or quarterly and in arrears or in advance based on the TAMP used. Additional fee payment details, including frequency, will be outlined in your Advisory Contract. At no point will the combined fee charged to the Client exceed 2% of assets under management.

In determining the advisory fee, we will allow accounts of members of the same household to be aggregated. NBW relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

### **Initial Financial Plan**

We charge a fixed fee for an initial Financial Plan. Fixed fee rates range between a minimum fee of \$2,500 to \$10,000. The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant.

NBW collects 50% of the fee for this service in advance with the remainder due upon completion of the services. Upon delivery of the financial plan & completion of this service, our remaining initial financial plan fee will be waived for clients who engage in our Investment Management Service within 30 days of plan delivery. NBW will not bill an amount above \$500 more than 6 months or more in advance of rendering the services. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract.

### **Hourly Financial Planning**

We charge an hourly fee for Project-Based Financial Planning. Our hourly rate is \$250 per hour, per Investment Advisor Representative and our hourly rate is negotiable based on scope, complexity and client needs.

NBW collects 50% of the fee for this service in advance with the remainder due upon completion of the services. NBW will not bill an amount above \$500 more than 6 months or more in advance of rendering the services.

### **Retirement Plan Consulting**

The maximum fee for our retirement plan consulting services is 0.50% of plan assets. The annual advisory fee is paid quarterly in arrears based on the average daily balance of the Plan.

As desired, we also offer an option to pay via a fixed fee between \$1,000 and \$10,000 for the plan design when assisting with due diligence and plan creation. 50% of the fixed fee is paid at the start of the engagement and the remainder is collected at the completion of the plan implementation.

These fees do not include fees to other parties, such as record keepers, custodians, or third-party administrators. NBW relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

### **Fee Deduction**

The Outside Manager will debit the Client's account for both the Outside Manager's fee, and NBW's advisory fee.

For Financial Planning services, fees are paid by electronic funds transfer (EFT) or check.

For Retirement Plan services, fees are either paid directly by the plan sponsor or deducted directly from the plan assets by the custodian. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT) or check.

We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Clients may incur fees from third-party professionals such as accountants and attorneys that NBW may recommend, upon Client request. Such fees are separate and distinct from NBW's advisory fees.

### **Terms & Terminations**

For Investment Management services, the Agreement begins upon the Effective Date of a signed Agreement and continues in full force until written notice is received by either party of its intention to terminate this Agreement. This Agreement may be terminated, without penalty, upon at least 15 calendar days' written notice by either party. Termination will become effective 15 calendar days after receipt of such notice or on another date as agreed to by the Client and the Advisor. For clients paying in advance, a prorated refund will be given, if applicable, upon

termination of this Agreement for any unearned fee. For clients paying in arrears, Client shall be charged a pro-rata fee based upon the number of days in the month/quarter up to the date of termination of this Agreement. The Advisor specifically reserves the right to terminate this Agreement without notice if the Client fails to pay fees in a timely manner, intentionally provides false or misleading information, or fails to cooperate with a request by the Advisor to provide information necessary to perform the services required under this Agreement.

For Initial Financial Plan services, the Agreement begins upon the Effective Date and automatically terminates upon receipt of the final fees. If (as a result of Client's actions or inaction) this Agreement has not been completed within six months from the Effective Date, this Agreement will automatically terminate. Either party may terminate this Agreement by notifying the other in writing. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Agreement for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the number of days in the month/quarter up to the date of termination of this Agreement.

For Hourly Financial Planning services, the Agreement begins upon the Effective Date and automatically terminates upon receipt of the final fees. If (as a result of Client's actions or inaction) this Agreement has not been completed within six months from the Effective Date, this Agreement will automatically terminate. Either party may terminate this Agreement by notifying the other in writing. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Agreement for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the number of days in the month/quarter up to the date of termination of this Agreement.

Retirement Consulting Services, may be terminated, at any time, by either party, by written notice to the other party.

### **Sale of Securities or Other Investment Products**

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

## Item 7: Types of Clients

We provide financial planning and investment management services to individuals and high net-worth individuals.

We do not have a minimum account size requirement for Investment Management Services. For clients engaging in our Initial Financial Plan, our minimum fee is \$2,500.

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

Below is a brief description of our methods of analysis and primary investment strategies.

### **Methods of Analysis**

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Tactical analysis** is an active management portfolio strategy that shifts the percentage of assets held in various categories to take advantage of market pricing anomalies or strong market sectors. This strategy allows portfolio managers to create extra value by taking advantage of certain situations in the marketplace. It is a moderately active strategy since managers return to the portfolio's original strategic asset mix once reaching the desired short-term profits.

**Use of Outside Managers:** We may refer Clients to Third Party Investment Advisers or advisory programs ("Outside Managers"). Our analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Managers in an attempt to determine if that Outside Manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the Outside Manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the Outside Manager's compliance and business enterprise risks. A risk of investing with an Outside Manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that an Outside Manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the Outside Manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

### **Investment Strategies**

#### **Asset Allocation**

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") 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 equities, 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. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

### **Passive and Active Investment Management**

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in Client's portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our Clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our Clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a Client's portfolio, but we strive to keep internal fund expenses as low as possible.

### **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

**Turnover Risk:** Actively managed mutual funds tend to have a higher turnover rate than passive funds. A high portfolio turnover would result in higher transaction costs and in higher taxes when shares are held in a taxable account. These factors may negatively affect the account's performance.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Mutual Funds** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general

risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

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

NBW and its management persons have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of NBW or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

### **Broker-Dealer Affiliation**

Neither NBW or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

### **Other Affiliations**

Neither NBW or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

### **Related Persons**

Outside of those listed below, neither NBW or its management persons have any relationship or arrangement with any related parties.

Robert "Alex" Borgardts is currently a licensed insurance agent, and may sell fee-based annuities, however, he no longer sells any commissionable insurance products.

Robert "Alex" Borgardts is the owner and a Certified Public Accountant at Borgardts CPA, LLC. At times, he will refer clients between NBW and Borgardts CPA, LLC when appropriate but will not receive any compensation in exchange for the referral. This may create a potential conflict of

interest as Robert "Alex" Borgardts may receive additional income from clients for services provided by Borgardts CPA, LLC, in addition to services offered by NBW. Clients are not obligated to use the services of either party recommended to them or obligated to purchase any content from Robert "Alex" Borgardts.

Ashley Dickson is currently a licensed insurance agent, and may sell fee-based annuities, however, she no longer sells any commissionable insurance products.

### **Recommendations or Selections of Other Investment Advisers**

As referenced in Item 4 of this brochure, NBW recommends Clients to Outside Managers to manage their accounts.

In the event that we recommend an Outside Manager, we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5 of this brochure) In addition, you will be provided a copy of the Outside Manager's Form ADV 2A, Firm Brochure, which also describes the Outside Manager's fee. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Moreover, NBW will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.



- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

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

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

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

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by NBW's Chief Compliance Officer in advance of the transaction in an account. NBW maintains a copy of access persons' personal securities transactions as required.

### **Trading Securities At/Around the Same Time as Client's Securities**

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities.

## Item 12: Brokerage Practices

### **Factors Used to Select Custodians and/or Broker-Dealers**

We use Outside Managers for Investment Management Services and do not have any affiliation with any custodians.

### **Research and Other Soft-Dollar Benefits**

We use Outside Managers for Investment Management Services and do not have any soft-dollar arrangements with broker-dealers.

### **Brokerage for Client Referrals**

We use Outside Managers for Investment Management Services and do not receive referrals from a broker-dealer or third party.

### **Clients Directing Which Broker/Dealer/Custodian to Use**

We use Outside Managers for Investment Management Services and therefore do not recommend a specific custodian.

### **Aggregating (Block) Trading for Multiple Client Accounts**

Outside Managers used by NBW may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

## Item 13: Review of Accounts

### **Periodic Reviews**

Clients who engage us for investment management services will have their account(s) reviewed regularly on a quarterly basis by Robert "Alex" Borgardts or Ashley Dickson, Co-Founders of NBW. The account(s) are reviewed with regards to the Client's investment policies and risk tolerance levels. Most reviews are conducted with clients present either virtually or in person; in some circumstances, clients may not be present or available for a review and an internal review will be conducted by NBW.

### **Triggers of Reviews**

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

### **Review Reports**

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

NBW does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian as part of their account statements.

## Item 14: Client Referrals and Other Compensation

### **Compensation Received by Next Bloom Wealth LLC**

NBW is a fee-only firm that is compensated solely by its Clients. NBW does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

### **Client Referrals from Solicitors**

NBW does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

## Item 15: Custody

We use Outside Managers for Investment Management Services and therefore do not maintain custody.

## Item 16: Investment Discretion

For Clients participating in our Investment Management service, our TAMP will hold discretionary authority to determine the securities and the amount of securities to be bought or sold in a Client's account. Clients will sign a separate agreement with the TAMP, in addition to NBW's advisory agreement which will further outline the services provided. NBW does not hold discretionary authority over client funds.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months or more in advance.

## Item 19: Requirements for State-Registered Advisers

### **Principal Officers**

Robert "Alex" Borgardt and Ashley Dickson serve as NBW's principals. Information about Robert "Alex" Borgardt and Ashley Dickson's education, business background, and outside business activities can be found on their ADV Part 2B, Brochure Supplements attached to this Brochure.

### **Outside Business**

All outside business information, if applicable, of NBW is disclosed in Item 10 of this Brochure.

**Performance-Based Fees**

Neither NBW nor Robert "Alex" Borgardts or Ashley Dickson are compensated by performance-based fees.

**Material Disciplinary Disclosures**

No management person at NBW has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

**Material Relationships That Management Persons Have With Issuers of Securities**

NBW nor Robert "Alex" Borgardts have any relationship or arrangement with issuers of securities.

## Next Bloom Wealth LLC

Mailing: 1520 Clay Street. Suite K1  
North Kansas City, MO 64116  
(816) 307-0548

### **Form ADV Part 2B – Brochure Supplement**

Dated 07 February 2023

[www.nextbloomwealth.com](http://www.nextbloomwealth.com)

*For*

### **Robert "Alex" Borgardts**

Co-Founder and Chief Compliance Officer

This brochure supplement provides information about Robert "Alex" Borgardts that supplements the Next Bloom Wealth LLC ("NBW") brochure. A copy of that brochure precedes this supplement. Please contact Robert "Alex" Borgardts if the NBW brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Robert "Alex" Borgardts is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6979606.

## Item 2: Educational Background and Business Experience

### **Robert Alexander Borgardts**

Born: 1990

#### **Educational Background**

- 2014 – Masters of Science, Accounting, University of Missouri - Kansas City
- 2013 – Bachelor of Science, Accounting and Information Systems, Virginia Tech

#### **Business Experience**

- 05/2022 – Present, Next Bloom Wealth LLC, Co-Founder and CCO
- 06/2018 – 07/2022, Copper Financial Network LLC, Registered Representative
- 05/2013 – Present, US Army Reserve, Officer
- 06/2017 – 06/2018, DST Systems Inc., Risk Analyst

#### **Professional Designation(s)**

**CFP® (Certified Financial Planner):** Robert "Alex" Borgardts is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, Robert "Alex" Borgardts may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and Robert "Alex" Borgardts may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not

guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

**Chartered Financial Consultant (ChFC):** This designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning; income taxation, investments and application of financial planning; as well as two elective courses involving the application of the aforementioned disciplines. Each course has a final proctored exam and once issued, the individual is required to submit 30 hours of continuing education every two years.

**Personal Financial Specialist (PFS):** This designation is issued by the American Institute of Certified Public Accountants (AICPA) and is granted to individuals who must meet all of the following prerequisites: a member of the AICPA; hold an unrevoked CPA certificate issued by a state authority; earn at least 100 points under the PFS point system; and have substantial business experience in personal financial planning related services. The candidate is required to obtain personal financial planning specific education in addition to holding a valid CPA. The candidate must take a final certification examination (proctored by the AICPA) and once issued the individual must undergo Continuing Education in the form of 60 PFS points in personal financial planning experience as well as qualified 'life-long learning' activities every three years.

**Certified Public Accountant (CPA):** CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

### Item 3: Disciplinary Information

Robert "Alex" Borgardts has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### Item 4: Other Business Activities

Robert "Alex" Borgardts is currently employed as a Certified Public Accountant at Borgardts CPA, LLC. This activity accounts for approximately 5% of his time during trading hours.

Robert "Alex" Borgardts is currently employed as an Officer in the US Army reserves. This activity accounts for approximately 5% of his time during trading hours.

Robert "Alex" Borgardts is currently a licensed insurance agent, and may sell fee-based annuities, however, he no longer sells any commissionable insurance products. This activity does not account for any of his time during trading hours.

### Item 5: Additional Compensation

Robert "Alex" Borgardts does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through NBW.

### Item 6: Supervision

Robert "Alex" Borgardts as Chief Compliance Officer of NBW, supervises the advisory activities of our firm. Robert "Alex" Borgardts is bound by the firm's policies and procedures and Code of Ethics. Clients may contact Robert "Alex" Borgardts at the phone number on this brochure supplement.

### Item 7: Requirements for State Registered Advisers

Robert "Alex" Borgardts has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



## Next Bloom Wealth LLC

Mailing: 1520 Clay Street. Suite K1  
North Kansas City, MO 64116  
(816) 307-0548

### **Form ADV Part 2B – Brochure Supplement**

Dated 07 February 2023

[www.nextbloomwealth.com](http://www.nextbloomwealth.com)

*For*

### **Ashley Dickson**

Co-Founder

This brochure supplement provides information about Ashley Dickson that supplements the Next Bloom Wealth LLC (“NBW”) brochure. A copy of that brochure precedes this supplement. Please contact Ashley Dickson if the NBW brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Ashley Dickson is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6993977.

## Item 2: Educational Background and Business Experience

### Ashley Dickson

Born: 1986

#### Educational Background

- 2008 – Bachelor of Liberal Arts, University of Missouri - Kansas City
- 2006 – Associate of Arts, Longview Community College

#### Business Experience

- 06/2022 – Present, Next Bloom Wealth LLC, Co-Founder
- 06/2018 – 07/2022, Copper Financial Network LLC, Registered Representative
- 04/2008 – 06/2018, Community America Credit Union, Branch Manager

#### Professional Designation(s)

**CFP® (Certified Financial Planner):** Ashley Dickson is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, Ashley Dickson may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and Ashley Dickson may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

**Chartered Financial Consultant (ChFC):** This designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning; income taxation, investments and application of financial planning; as well as two elective courses involving the application of the aforementioned disciplines. Each course has a final proctored exam and once issued, the individual is required to submit 30 hours of continuing education every two years.

### Item 3: Disciplinary Information

Ashley Dickson has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### Item 4: Other Business Activities

Ashley Dickson is currently a licensed insurance agent, and may sell fee-based annuities, however, she no longer sells any commissionable insurance products. This activity does not account for any of her time during trading hours.

Ashley Dickson is currently employed as a Tax Preparation Specialist at Borgardts CPA, LLC. This activity accounts for approximately 5% of her time during trading hours.

### Item 5: Additional Compensation

Ashley Dixon does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through NBW.

### Item 6: Supervision

Robert "Alex" Borgardts as Chief Compliance Officer of NBW, is responsible for supervision of Ashley Dixon and is bound by the firm's policies and procedures and Code of Ethics. Clients may contact Robert "Alex" Borgardts at the phone number on this brochure supplement.

### Item 7: Requirements for State Registered Advisers

Ashley Dixon has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.