# Conestoga Wealth Management Firm Brochure

This brochure provides information about the qualifications and business practices of Conestoga Endeavors LLC *d/b/a* Conestoga Wealth Management. If you have any questions about the contents of this brochure, please contact us at (610) 241-8711 or by email at: dkring@conestogaplanning.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 Conestoga Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov. Conestoga Wealth Management's CRD number is: 158981.

600 Eagleview Boulevard Suite 300, PMB 75 Exton, PA 19341 (610) 241-8711 Conestogaplanning.com Regardingwealth.com dkring@conestogaplanning.com

Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

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## Item 4: Advisory Business

#### A. Description of the Advisory Firm

Conestoga Wealth Management is a Limited Liability Company organized in the state of Pennsylvania.

This firm has been organized in May 2011 but has only been in business since August 2011, and the principal owner is David Arthur Kring.

#### **B.** Types of Advisory Services

Conestoga Wealth Management (hereinafter "CWM") offers the following services to advisory clients:

#### Selection of Other Advisors

CWM may direct clients to third party money managers, Betterment, First Ascent Asset Management, Symmetry, Loring Ward, and/or SEI Investments. CWM will charge clients a separate and distinct fee from that charged by third party advisors. All fees will be deducted by the third party money managers, and then third party money manager will forward CWM's maximum fee of 1.00% to CWM. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, CWM will always ensure those other advisors are properly licensed or registered as investment advisor.

Prior to introducing Pennsylvania clients to another investment advisor CWM will be responsible for determining the following:

- whether the investment advisor is registered with the Pennsylvania Securities Commission under Section 301 of the Pennsylvania Securities Act of 1972 ("1972 Act") whether the investment advisor is relying on an exclusion from the definition of investment advisor under Section 102(j) of the 1972 Act;
- whether the investment advisor is relying on an exemption from registration under Section 302(d) of the 1972 Act; or
- if the investment advisor is registered with the Securities and Exchange Commission, and whether it has filed a Notification Filing with the Pennsylvania Securities Commission under Commission Regulation 303.015(a).

#### Sub-Advisory Services

CWM will continue to meet with clients that are directed to Betterment, First Ascent Asset Management, Loring Ward, Symmetry, SEI and Paychex to discuss client goals, objectives, time horizon, and risk tolerance. CWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. CWM will be compensated for these services via a separate and distinct fee from that charged by the third party advisors as described in Item 5 below.

#### Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

#### Services Limited to Specific Types of Investments

CWM generally limits its investment advice to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, REITs, insurance products including annuities, and government securities. CWM may use other securities as well to help diversify a portfolio when applicable.

#### C. Client Tailored Services and Client Imposed Restrictions

CWM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CWM from properly servicing the client account, or if the restrictions would require CWM to deviate from its standard suite of services, CWM reserves the right to end the relationship.

#### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. While CWM DOES NOT participate in any wrap fee programs, Loring Ward's Structured Advantage Program, SEI and Betterment may include wrap fees. For more information look to these companies' form ADV part 2.

#### E. Amounts Under Management

CWM refers clients to third party money managers and has no assets under management.

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

#### A. Fee Schedule

#### Selection of Other Advisors Fees

CWM may direct clients to third party money managers; Betterment for Advisors (CRD# 149117), First Ascent Asset management, LLC. (CRD#281470), Symmetry (CRD# 120982), Loring Ward (LWI Financial Inc., San Jose, CA, CRD #111861), and/or SEI Investments Managements Corp (CRD # 105146). CWM will be compensated via a separate fee from that charged by the third party advisors to which it directs those clients. All fees will be deducted by the third party money managers, and then third party money manager will forward CWM's maximum fee of 1.00% to CWM. The total fees charged to clients consist of CWM's fees and the third party money manager fees. This relationship will be disclosed in the solicitor's agreement between CWM and each of the third party advisors. The fees shared will not exceed any limit imposed by any regulatory agency. The third party money managers fee schedule is separate from CWM's fee's and are as follows:

#### **Betterment for Advisors Fee Schedule**

Total Assets Under Management	Annual Fee
\$0 & above	0.25%

Fees are paid quarterly in arrears and clients may terminate their contracts with ten days' written notice. Since fees are charged in arrears no refund is necessary. All fees will be deducted by Betterment, and then Betterment will forward CWM's maximum fee of 1.00% to CWM.

## First Ascent Asset Management, LLC. Fee Schedule

Global Explorer Portfolio series

Total Assets Under Management	Annual Fee
All assets	\$500 flat fee per account

CWM may also recommend, where appropriate, that clients invest in shares of First Ascent Asset Management's (FAAM) all ETF managed Portfolio. For this portfolio, First Ascent Charges a fee of 0.50% annually. CWM's fee is separate and in addition to Form ADV 2A & 2B Version: 10/8/2021 FAAM's fee. All fees will be deducted by FAAM, and then FAAM will forward CWM's maximum fee of 1.00% to CWM.

Fees are paid quarterly in advance and clients may terminate their contracts with ten days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. All fees will be deducted by FAAM, and then FAAM will forward CWM's maximum fee of 1.00% to CWM.

Total Assets Under Management	Annual Fee
\$0 - \$250,000	0.40%
\$250,001 - \$750,000	0.35%
\$750,001 - \$1,250,000	0.30%
\$1,250,001 - \$2,000,000	0.25%
\$2,000,001 - \$3,000,000	0.20%
\$3,000,001 - \$5,000,000	0.15%
\$5,000,001 - \$10,000,000	0.10%
\$10,000,000 & Above	0.05%

Symmetry Partners Tiered Fee Schedule:

Fees are paid quarterly in arrears and clients may terminate their contracts with ten days' written notice. Since fees are charged in arrears no refund is necessary.

#### Symmetry Retirement Program Tiered Fee Schedule:

Total Assets Under Management	Annual Fee
First \$1,000,000	0.35%
Next \$2,000,000	0.32%
Above \$3,000,000	0.30%

Fees are paid quarterly in arrears and clients may terminate their contracts with ten days' written notice. Since fees are charged in arrears no refund is necessary.

Total Assets Under Management	< \$20 Million	\$20-50 Million	\$50-100 Million	Above \$100 Million
First \$500,000	0.65%	0.60%	0.55%	0.50%
\$500,001 - \$1,000,000	0.35%	0.30%	0.25%	0.20%
\$1,000,001 - \$5,000,000	0.25%	0.20%	0.20%	0.15%
Above \$5,000,000	0.20%	0.15%	0.15%	0.10%

Loring Ward Tiered Fee Schedule:

Fees are paid quarterly in advance and clients may terminate their contracts with ten days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. All fees will be deducted by Loring Ward, and then Loring Ward will forward CWM's maximum fee of 1.00% to CWM.

CWM may also recommend, where appropriate, that clients invest in shares of the SA Funds – Investment Trust (the "SA Funds"), a family of nine asset class mutual funds advised, managed and administrated by Loring Ward. Fees are not charged directly upon investments in the SA Funds. Loring Ward receives certain fees and expenses directly from the SA Funds for its services. The annual fee is between 0.81 – 1.19% of total assets under management. CWM's fee is separate and in addition to Loring Ward's fee. All fees will be deducted by Loring Ward, and then Loring Ward will forward CWM's maximum fee of 1.00% to CWM.

#### Loring Ward Tiered Total Retirement

Total Assets Under Management	Annual Fee
\$0 - \$999,999	0.38%
\$1,000,000 - \$2,999,999	0.35%
\$3,000,000 - \$4,999,999	0.32%
\$5,000,000 and Above	0.30% (Negotiable for larger plans)

The fee schedule above is for Loring Ward's fee only. The fee charged to clients including recordkeeping, TPA, custody and Loring Ward's will be around 1.00%. The Advisor adds their fee to the fee schedule above. Fees are paid quarterly in advance and Clients may terminate their contracts with ten days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination.

## SEI Investments Fees

Strategy	Annual Fee
	0.90% for the first \$500,000
	0.85% for the next \$500,000
Large Cap Core/Transition	0.80% for the next \$1 million
Strategy	0.75% for the next \$3 million
	0.70% for the next \$5 million
	0.65% for amounts over \$10 million
All Cap/Large Cap Core, All Cap	0.90% for the first \$500,000
Value, Large Cap Core, US Large	0.85% for the next \$500,000
Cap Growth , US Large Cap	0.80% for the next \$1 million
Value , and Managed	0.75% for the next \$3 million
Volatility/Tax-Sensitive	0.70% for the next \$5 million
Managed Volatility Strategies	0.65% for amounts over \$10 million
	0.90% for the first \$500,000
	0.85% for the next \$500,000
Mid Cap Strategies	0.80% for the next \$1 million
white Cap Strategies	0.75% for the next \$3 million
	0.70% for the next \$5 million
	0.65% for amounts over \$10 million
	1.10% for the first \$500,000
	1.05% for the next \$500,000
Small Can Strataging	1.00% for the next \$1 million
Small Cap Strategies	0.95% for the next \$3 million
	0.90% for the next \$5 million
	0.85% for amounts over \$10 million
	0.90% for the first \$500,000
	0.85% for the next \$500,000
Mid Cap Core International	0.80% for the next \$1 million
Developed Strategy	0.75% for the next \$3 million
	0.70% for the next \$5 million
	0.65% for amounts over \$10 million
	1.25% for the first \$500,000
	1.20% for the next \$500,000
International Emerging	1.15% for the next \$1 million
Strategy	1.10% for the next \$3 million
	1.05% for the next \$5 million
	1.00% for amounts over \$10 million
	0.65% for the first \$500,000
Preferred Securities, Active	0.60% for the next \$500,000
Municipal Bond, Government	0.56% for the next \$1 million
Credit, Closed End Fund and	0.54% for the next \$3 million
Core Aggregate Strategies	0.50% for the next \$5 million

### Managed Account Program

Strategy	Annual Fee
	0.45% for amounts over \$10 million
Laddered Strategies, Municipal Bond, Government/Corporate Bond, Corporate Bond, Treasury Inflated Protected Security, Certificate of Deposit (CD) Portfolio Strategy and Floating Rate Note Strategy	0.30% for the first \$500,000 0.27% for the next \$500,000 0.25% for the next \$1 million 0.20% for the next \$3 million 0.19% for the next \$5 million Negotiable for amounts over \$10 million
Integration feature	0.10% in addition to the fees paid to SIMC described above

The fee schedule above is for SEI Investments' fee only. CWM adds their fee to the fee schedule above. Fees charged by SEI are separate and distinct from those collected by CWM. All fees will be deducted by the third party money managers, and then third party money manager will forward CWM's maximum fee of 1.00% to CWM. Fees are paid quarterly in arrears and Clients may terminate their contracts with ten days' written notice.

#### Sub-Advisory Fees

**CWM Tiered Fee Schedule:** 

Total Assets Under Management	Annual Fee
\$1 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.80%
\$3,000,001 - \$5,000,000	0.50%
Above \$5,000,000	Negotiable

Fees are negotiable and are paid quarterly in advance or in arrears. Clients may terminate their contracts with ten days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. For fees paid in arrears, no refund policy is necessary. All fees will be deducted by third party money manager which will forward CWM's maximum fee of 1.00% to CWM.

#### CWM's Tiered fee schedule for Paychex 401k

Total Assets Under Management	Annual Fee
\$1 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.80%
\$3,000,001 - \$5,000,000	0.50%

Total Assets Under Management	Annual Fee
Above \$5,000,000	Negotiable

The fees for this service are negotiable. CWM acts as an advisor to the plan and offers education to participants within the plan. Paychex 401k provides access to a mutual fund program offered in a 401k platform. They are a record keeper; Paychex does not charge a fee for AUM, but a per participant fee, and other costs from the administrative fee charged for a suite of services such as payroll accounting, etc.

Total Assets Under Management	Annual Fee
\$1 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.80%
\$3,000,001 - \$5,000,000	0.50%
Above \$5,000,000	Negotiable

CWM's Tiered fee schedule for Em	plovee Fiduciary	<b>Retirement Plan services</b>
	·p-0,00	

The fees for this service are negotiable. CWM acts as an advisor to the plan and offers education to participants within the plan. Employee Fiduciary provides access to a mutual fund program offered in a retirement platform. They are also a record keeper & TPA where they Charge separate fees for Recordkeeping, Third Party Administrative, and other fees. A schedule of their fees is available on request. Frugal Financial, owned by Employee Fiduciary, acts as a 3(38) Fiduciary manager for an additional 10 BPS annually if the Plan Sponsor chooses to add their services.

#### **Financial Planning Fees**

#### Hourly Fees for Written Financial Plan

The hourly fee for these services is \$200. There is a minimum of five hours of service. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. A portion of the fees are paid in advance based on the estimated number of required hours, but never more than six months in advance, with the remainder due upon presentation of the plan. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. The fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

#### Subscription Based service Fees

Includes ongoing guidance & continuous access to our online Planning Software which includes such tools as Budgeting, Cash Flow, Estate flow chart, Asset allocation, Insurance planning, Retirement planning & education planning tools.

We charge a one-time upfront fee not to exceed \$1000 & a monthly fee not to exceed \$499 per month for these services, billed in advance and collected by Advice Pay. We may change our fee by providing you 30 days prior notice. Client may terminate this type of engagement at any time by giving written notice. Monthly Subscription fees are nonrefundable after 5 days of agreement. The upfront fee charged will be refunded based on the prorated amount of work completed at the point of termination at the Financial Planning hourly rate of \$200 per hour as outlined in "hourly fees" above if applicable.

Subscription fees are negotiable. Subscription fees do not include assets under advisement. If the client wishes for help with investable assets there will be an additional charge. As described above under "sub-advisory fees"

#### **B.** Payment of Fees

#### **Payment of Selection of Other Advisors Fees**

Selection of Other Advisors fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears or in advance. All fees will be deducted by the third party money managers, and then forward the appropriate fee to CWM

#### **Payment of Financial Planning & Online Planning Portal Fees**

Hourly Financial Planning fees are paid via check in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

Payment for subscription Fees are in advance and are non refundable after 5 days of executing the agreement. The upfront fee charged will be refunded based on the prorated amount of work completed at the point of termination at the Financial Planning hourly rate of \$200 per hour as outlined in "hourly fees" above if applicable, and as already set forth in Section 5A.

#### C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. third party advisors, record keeping, custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CWM. Please see Item 12 of this brochure regarding broker/custodian.

#### **D.** Prepayment of Fees

CWM collects fees in advance and in arrears. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check or return to credit card. Fees will be deposited back into client's account within fourteen days.

The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the quarter up to and including the day of termination. (\*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

#### **E.** Outside Compensation For the Sale of Securities to Clients

Neither CWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

CWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

CWM generally provides investment advice to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans

#### Minimum Account Size

There is an account minimum, \$10,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

#### A. Methods of Analysis and Investment Strategies

#### Methods of Analysis

CWM uses modern portfolio theory and efficient frontier analysis with Long term investment objectives as a goal.

#### Investment Strategies

CWM uses long term trading strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

#### **B.** Material Risks Involved

#### Methods of Analysis

Modern portfolio theory is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

#### Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

#### C. Risks of Specific Securities Utilized

CWM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## **Item 9: Disciplinary Information**

#### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

#### **B.** Administrative Proceedings

There are no administrative proceedings to report.

#### C. Self-regulatory Organization (SR) Proceedings

There are no self-regulatory organization proceedings to report.

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

#### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CWM nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

## **B.** Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CWM nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

#### C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

David Arthur Kring is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CWM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CWM in their capacity as an insurance agent.

#### **D.** Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

CWM will direct clients to the third party money managers; Symmetry, Loring Ward, and/or SEI Investments. CWM will be compensated via a separate and distinct fee from that charged by the third party advisors to which it directs those clients. This relationship will be disclosed in each contract between CWM and each third party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. CWM will always act in the best interests of the client, including when determining

which third party manager to recommend to clients. CWM will ensure that all recommended advisors or managers are licensed or notice filed in the states in which CWM is recommending them to clients.

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

#### A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

#### **B.** Recommendations Involving Material Financial Interests

CWM does not recommend that clients buy or sell any security in which a related person to CWM or CWM has a material financial interest.

#### C. Investing Personal Money in the Same Securities as Clients

CWM refers clients to other third party money managers and offers financial planning services. However, from time to time, representatives of CWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. CWM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

#### D. Trading Securities At/Around the Same Time as Clients' Securities

CWM refers clients to other third party money managers, has no assets under management, and does not trade client's accounts.

## **Item 12: Brokerage Practices**

A. Factors Used to Select Custodians and/or Broker/Dealers

CWM refers clients to other third party managers and offers financial planning services. The Custodians will be chosen based on their relatively low transaction fees and access to mutual funds and ETFs. CWM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### 1. Research and Other Soft-Dollar Benefits

CWM receives no research, product, or services other than execution from a brokerdealer or third-party in connection with client securities transactions ("soft dollar benefits").

#### 2. Brokerage for Client Referrals

CWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. Clients Directing Which Broker/Dealer/Custodian to Use

CWM will not allow clients to direct CWM to use a specific broker-dealer to execute transactions. Clients must use CWM recommended custodian (broker-dealer).

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

CWM refers clients to third party managers, has no assets under management, and does not trade client's accounts.

## Item 13: Reviews of Accounts

#### A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly by David Arthur Kring, Managing Member. David Arthur Kring is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at CWM are assigned to this reviewer.

## **B.** Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

#### C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

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

#### A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CWM clients.

#### **B.** Compensation to Non – Advisory Personnel for Client Referrals

CWM will, via written arrangement, retain third parties to act as solicitors for CWM.'s investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. CWM will ensure each solicitor is properly registered in all appropriate jurisdictions.

## Item 15: Custody

CWM refers clients to third party managers and will not have custody of client's assets. Client's assets will be held directly at the custodians. Clients will receive all required account statements and billing invoices that are required in each jurisdiction directly from the custodians, and they should carefully review those statements for accuracy.

## Item 16: Investment Discretion

CWM does not have discretion over client accounts at any time.

## Item 17: Voting Client Securities (Proxy Voting)

CWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## Item 18: Financial Information

#### A. Balance Sheet

CWM does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

#### **B.** Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CWM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

#### C. Bankruptcy Petitions in Previous Ten Years

CWM has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

#### A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

CWM currently has only one management person/executive officer; David Arthur Kring. David Arthur Kring's education and business background can be found on the Supplemental ADV Part 2B form.

## **B.** Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

David Arthur Kring's other business activities can be found on the Supplemental ADV Part 2B form.

## C. How Performance Based Fees are Calculated and Degree of Risk to Clients

CWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

#### D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at CWM or CWM has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

## E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither CWM, nor its management persons, has any relationship or arrangement with issuers of securities.

This brochure supplement provides information about David Arthur Kring that supplements the Conestoga Wealth Management brochure. You should have received a copy of that brochure. Please contact David Arthur Kring, Managing Member if you did not receive Conestoga Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about David Arthur Kring is also available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

## **Conestoga Wealth Management**

## Form ADV Part 2B - Individual Disclosure Brochure

for

## David Arthur Kring

Personal CRD Number: 4949862 Investment Adviser Representative

> Conestoga Wealth Management 600 Eagleview Boulevard, Suite 300 Exton PA 19341 (610) 451-5997 dkring@conestogaplanning.com

> > UPDATED: 3/28/2016

## Item 2: Educational Background and Business Experience

#### Name: David Arthur Kring

**Born:** 1969

#### **Education Background and Professional Designations:**

#### **Education:**

BA History, Gettysburg College – 1991

#### **Designations:**

#### **CFP® - Certified Financial Planner**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- i. Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- ii. Ethics Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## **Business Background:**

11/2011 - Present	Managing Member Conestoga Wealth Management
01/2006 - Present	Independent Insurance Agent Conestoga Insurance Planning
01/2007 – Present	Talent Greer Lange Agency
09/2006 - 11/2011	Investment Adviser Representative Walnut Street Securities
09/2006 - 08/2011	Registered Representative Walnut Street Securities
04/2006 - 11/2006	Loan Officer Countrywide
10/2005 - 9/2006	Registered Representaitive World Group Securities
07/2005 - 03/2006	Loan Broker Dove Capital
03/2004 - 06/2005	Loan Broker Coast to Coast Mortgage
12/2002 - 03/2004	Sales Sierra Environmental

## **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## **Item 4: Other Business Activities**

David Arthur Kring is a school board Director for the Downingtown Area School District. He is also a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that insurance services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Conestoga Wealth Management always acts in the best interest of the client;

including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Conestoga Wealth Management in their capacity as an insurance agent.

## **Item 5: Additional Compensation**

Other than salary, annual bonuses, regular bonuses, David Arthur Kring does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Conestoga Wealth Management.

## Item 6: Supervision

As the only owner and representative of Conestoga Wealth Management, David Arthur Kring supervises all duties and activities of the firm. David Arthur Kring's contact information is on the cover page of this disclosure document. David Arthur Kring adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements For State Registered Advisers

This disclosure is required by Pennsylvania securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. David Arthur Kring has <u>NOT</u> been involved in any of the events listed below.
  - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.

B. David Arthur Kring has <u>NOT</u> been the subject of a bankruptcy petition at any time.