

**GARDNER ADVISORS, INC.**  
**Form CRS Customer Relationship Summary**  
**SEPTEMBER 13, 2020**

OUR FIRM IS REGISTERED WITH THE STATE OF MINNESOTA AS AN INVESTMENT ADVISER

\*\*Investment advisory services and fees differ. It is important that you understand these differences and ask questions as they arise. Free and simple tools are available to research us at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational information. \*\*

Question/Topic	Firm Response
What investment services and advice can you provide me?	<b>We offer advisory services through Investment Advisor Representatives (“IAR’s”). Our advisory services include services to retail customers for an ongoing asset-based fee based on the value of the assets in your account. We also offer fixed hourly rate advice and financial planning for a fixed plan fee.</b>
Monitoring.	Our advisory services including periodic monitoring of your accounts and your financial plan as outlined in your agreements with us. Our advisory services and monitoring includes meeting with you to understand your financial circumstances, goals and risk tolerance. Based upon what we learn, we will recommend a portfolio meeting your needs and objectives.
Investment Authority.	Our advisory services are offered on a non-discretionary basis meaning that we do not have discretion to buy and sell securities for you. You must authorize all transactions (other than a discretionary liquidation to cover fees you owe us per terms in your advisory agreement.)
Limited Investment Offerings.	Our firm limits its investment offerings to certain types of securities, strategies and product sponsors. For example, our firm does not allow certain types of options strategies and we may not transact business with certain annuity or mutual fund companies.
Account Minimums and Other Requirements.	The account minimum for services is \$25,000. We also engage certain third party managers who may impose higher account minimums.
Additional Information	You should consult with your IAR and the disclosure and account documentation of the particular investment program you are interested in to determine what service or account limitations may be imposed.
<b>Conversation Starters. Ask Us!</b>	<b><i>Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i></b>
Question/Topic	Firm Response
What fees will I pay?	<b>Financial Planning fees include hourly fees (\$175/hour) and fixed plan fees ranging from between \$400 and \$1,200. An estimate of the total cost will be provided at the start of the advisory relationship. Portfolio Management fees are based upon a percentage of assets under management. The more assets you have in your advisory account, the more fees you will pay and accordingly, the more money our firm will make. Fees range from .40% to 2% with a maximum fee of 2.75%.</b>
Other fees and costs	You may incur other charges imposed by third parties such as custodians like statement/confirmation fees, mutual fund 12b-1 distribution, CDSC or management fees, sub accounting fees, variable annuity fees and surrender charges, short term redemption fees, qualified retirement plan fees, account maintenance fees, wire transfer, overnight check, duplicate statement and other custodian imposed fees..
Additional information:	You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.
<b>Conversation Starters. Ask Us!</b>	<b><i>Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?</i></b>

Question/Topic	Firm Response
What are your legal obligations to me when providing recommendations when acting as my investment adviser?	When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice, we provide you. Here are some examples to help you understand what this means.
How else does your firm make money and what conflicts of interest do you have?	Our firm and our IARs may receive compensation as a result of the specific investment recommendation made to you. This compensation will vary and be dependent upon the type of investment and could create a conflict when the recommendation is made. For example, if you are choosing between different advisory strategies, there may be a fee differential that would incentivize representatives to recommend the strategy that will result in a higher ongoing asset fee. When you invest, you should be sure to review the specific information related to fees and compensation paid that is required to be provided separately from this Form CRS. Our firm, including affiliates, offers a cash sweep program as a core account sweep vehicle with our custodian, RBC. The sweep program generates financial benefits for us which creates a conflict of interest.
Examples of ways we make Money and Conflicts of interest.	Proprietary Products. Our firm does not offer proprietary products. Third Party Payments. Our firm does not receive any third party payments. Revenue Sharing. Our firm does not participate in revenue sharing arrangements. Principal Trading. Our firm does not participate in principal trading.
Additional Information.	Please review all firm fee disclosures and forms required to make purchases at the time of the recommendation.

**Conversation Starters. Ask Us!** *How might your conflicts of interest affect me, and how will you address them?*

Question/Topic	Firm Response
How Financial Professionals Make Money	Our investment advisor representatives are compensated based upon the fees they earn for making recommendations. We do not offer sales contests, do not compensate individuals based upon the amount of assets they service, the type of product sold, or the revenue that the Firm earns. We do offer our representatives a sliding pay scale where the percentage of commissions they receive will increase as the total amount increases. This creates a conflict because while your advisory fee rate may not change, a representative could be incentivized to recommend certain programs as they get closer to the next level, if such programs offer higher fees.

Question/Topic	Firm Response
Do you or your financial professionals have legal or disciplinary history?	Our firm does not have disciplinary history. However, certain of our financial professionals have disciplinary history. Please visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

**Conversation Starters. Ask Us!** *As a financial professional, do you have any disciplinary history? If yes, for what type of conduct?*

**ADDITIONAL INFORMATION**

You may receive additional information about our services by reviewing information location here: [www.gardnerfinancialmn.com](http://www.gardnerfinancialmn.com)

You may always request a copy of this relationship summary at the following address:

8421 Wayzata Blvd.  
Suite 350  
Minneapolis, MN  
952-935-4601

**Conversation Starters. Ask Us!** *Who is my primary contact person? Is he or she a representative of an investment advisor or a broker dealer? Who can I talk to if I have concerns?*