



Brightworth, LLC
Part 2A of Form ADV
The Brochure

Brightworth
3344 Peachtree Road, NE
Suite 2000
Atlanta, GA 30326
404-760-9000
www.Brightworth.com

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This brochure provides information about the qualifications and business practices of Brightworth, LLC (“Brightworth”), which also does business under the name McGill Advisors, a division of Brightworth, LLC (“McGill Advisors Division”). The McGill Advisors Division’s services and fees are described in a separate Brochure, which is available upon request.

If you have any questions about the contents of this brochure, please contact us at 404-760-9000. 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 Brightworth is also available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our Firm's CRD number is 109569.

Item 2 - Material Changes

Effective 4/30/2021, CI US Holdings, Inc. which is owned by CI Financial Corp, an independent asset and wealth management company in Canada acquired a majority ownership interest in Brightworth. Each of the current Brightworth Partners have retained all or a portion of their ownership in the firm.

Additionally, Brightworth no longer has a financial arrangement with Fiduciary Network/Emigrant Bank which was previously disclosed in Item 18 of our ADV Part 2.

The Board of Directors now includes: Raymond Padron of Brightworth and Jaime Ross and Peter Papamichalopoulos of CI Private Wealth.

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Item 4 - Advisory Business

Brightworth is a fee-only financial firm that provides investment management services and wealth counsel to high net worth individuals, families, trusts, estates, charitable organizations, small business owners, pension plans and profit-sharing plans. Brightworth, LLC was founded in 1997 as Polstra & Dardaman, LLC. Effective 4/30/2021, CI U.S. Holdings, Inc. which is owned by CI Financial Corp., an independent asset and wealth management company in Canada, is the majority owner of Brightworth. The individual Brightworth Partners also retained all or a portion of their ownership in the firm.

Brightworth also does business under the name McGill Advisors, a division of Brightworth, LLC with an office located in Charlotte, North Carolina. There is a separate Brochure for the McGill Advisors Division's fees and services.

Brightworth provides its clients with investment management services through which clients receive portfolios of carefully selected investments. We build our clients' investment portfolios based on (among other things) their cash flow situation, tax considerations, tolerance for risk and time horizon. Depending upon the size and goals of each client's portfolio, we will invest client assets in separate stock and bond accounts, mutual funds, exchange traded funds (ETFs) and private investment strategies (including hedge funds, private equity and real estate). In limited circumstances, clients can place limited restrictions on investing in certain securities or types of securities (such as securities whose primary revenue comes from the manufacturing of alcohol or tobacco products).

Brightworth also offers wealth planning services, which address some or many aspects of the client's financial situation. Brightworth works with clients to determine their financial goals and objectives and develops planning strategies for the client to most effectively utilize their financial resources to achieve short and long-term financial objectives. Information we consider includes items such as a client's current financial status, financial goals, tax bracket and attitudes towards risk. Brightworth then reviews related documents supplied by the client and prepares a written wealth plan (the Brightworth Wealth Plan).

The Brightworth Wealth Plan will address the following areas, as applicable to each clients' personal needs and situation: identification of financial goals and objectives; current net worth statement; retirement planning; cash flow projections; risk management analysis; education funding analysis; business planning; tax planning; estate planning and federal estate tax analysis; charitable planning; and investment planning and asset allocation analysis.

Brightworth does not provide tax advice for our clients. Clients should consult with their accountant or other tax adviser regarding tax filings and/or estimated payments. Additionally, Brightworth does not provide legal advice or prepare legal documents. However, we work closely with our clients' estate planning attorneys and other advisors as necessary to assist in the implementation of their Wealth Plan. At the Client's request, Brightworth will perform risk management analyses for clients, but we do not provide specific analysis of existing property/casualty, medical, life, disability or long-term care insurance policies. At the request of the client, we can introduce them to a specialist in these areas.

Brightworth also offers seminars and planning services specific to business owners. The Brightworth Business Owner Academy is a series of seminars designed to guide business owners through a multi-phase process in preparing for an exit from their business. We also offer business planning services for the individual owners including the Business Owner Transition Service, which specifically addresses their specific planning, coaching and pre-sale coordination needs.

Amount of Managed Assets

As of 12/31/2020, the total discretionary assets under management of Brightworth, including the McGill Advisors Division, was approximately \$4.58 billion.

Item 5 - Fees and Compensation

Brightworth provides investment advisory services on a discretionary basis. Annual asset management fees are based on the standard schedule below:

0.30%	per annum for amounts greater than \$10,000,000
0.50%	per annum for amounts greater than \$5,000,000 up to \$10,000,000
0.75%	per annum for amounts greater than \$2,500,000 up to \$5,000,000
1.00%	per annum for the first \$2,500,000

In general, for individuals who become Brightworth clients on or after June 6, 2016, Brightworth charges fees quarterly in advance. Clients will be billed in advance at the beginning of each rolling 3-month billing period adjusted for material cash inflows and outflows. The fee will be a percentage of the market value of assets in the client's accounts on the last trading day prior to the billing date, according to the fee schedule above. Fees for the time-period preceding the initial billing date, will be pro-rated on the basis of the number of days the assets are in the account.

For individuals who became clients prior to June 6, 2016, fees are charged in arrears.

Brightworth's fee is negotiable in limited circumstances only. For example, Brightworth charges fees that are lower than the current fee schedule for clients who joined Brightworth when a previous fee schedule was in place. The specific fee schedule will be agreed upon and disclosed in each individual client's investment management agreement prior to services being provided. Clients typically authorize Brightworth to deduct fees automatically from their investment accounts.

Brightworth's minimum annual investment management fee is typically \$10,000 (1% * \$1,000,000). Brightworth will waive or reduce this minimum at the discretion of the firm's Lead Advisor and/or Chief Executive Officer. Brightworth will sometimes work with clients who do not meet the current investment minimum, when Brightworth expects the client to accumulate and invest additional assets over time.

Brightworth's investment management fees are separate from the external or internal fees and expenses that separate account money managers, mutual funds, exchange traded funds, custodians, private partnerships, etc. charge to clients. Clients also will incur custodial fees and transaction costs to purchase and/or hold stocks, bonds, mutual funds, exchange traded funds, partnership interests or other securities. (Please review the information below under Brokerage Practices and visit the custodians' websites for current pricing.)

The mutual funds that Brightworth invests in for our clients are no-load funds. Clients will incur short-term redemption fees if funds are redeemed within 30-90 days depending on the specific mutual fund and share class. Neither Brightworth nor the McGill division receives 12b-1 fees or any other sales load in the course of investing our clients' portfolios. A complete explanation of expenses charged by each separate account manager, mutual fund, exchange traded fund, or partnership is contained in the appropriate marketing materials, form ADV, mutual fund prospectus, private placement memorandum

and/or other documents. Clients should carefully review all documentation to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Fees for an initial Wealth Plan will vary based on the scope and complexity of the financial analyses to be completed. Brightworth does not require a prepayment of fees six or more months in advance.

When a financial planning service engagement is terminated (by either the client or Brightworth) prior to the end of the agreement, the client will pay Brightworth's fee for the time spent on the client's plan at Brightworth's current rates. Clients can terminate any agreement without penalty within five business days after entering into any agreement. Wealth Planning and Investment Management services can be terminated without penalty at any time by written notice of either party. If investment management services for which fees are paid in advance are terminated before the end of the quarter for which fees have been paid, we shall refund the pro-rated balance of any unearned portion of the fee. The pro rata refund will be calculated on the total number of calendar days remaining in the billing period after the date of the effective date of termination. Refunds of advance payments owed back to you shall be paid as soon as reasonably possible but not sooner than ten (10) business days after receipt of termination notice.

The Business Owner seminar attendance fees cover seminar materials and administration costs. The individual Business Owner Transition Service planning fees are based on the complexity of the financial analysis to be completed and Brightworth's level of ongoing involvement in the preparation for sale and eventual business transaction. A separate fee will be applicable for business owners who desire to engage Brightworth for planning and coaching services throughout the sale of their business, prior to their transaction. These fees will be paid monthly and are also based on the complexity and time involved.

Item 6 – Performance-Based Fees and Side-by-Side Management

Brightworth does not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Brightworth has no performance-based fee accounts, Side-by-Side Management is not applicable.

Item 7 - Types of Clients

Brightworth primarily provides investment management services to high net worth individuals, families, trusts, estates, charitable organizations, small businesses, pension plans and profit-sharing plans. Brightworth's standard minimum account size is \$1,000,000, but the average size of client relationships is typically much larger. Brightworth will sometimes work with clients who do not meet the current investment minimum, when Brightworth expects the client to accumulate more assets to invest over time.

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

Methods of Analysis

Brightworth's Investment Committee and investment analysts conduct research and due diligence on third party money managers that we recommend for client accounts. We use independent money

managers who specialize in the different components of our clients' portfolios. We evaluate, select, and monitor these managers using a combination of quantitative and qualitative methods. We generally use multiple managers in each client account to allow for focused expertise in each asset class or sector (such as small cap U.S. stocks or international stocks).

Don Wilson, Brightworth's Chief Investment Officer, leads our Investment Committee, which also includes Jeff Harrell, Director of Portfolio Management and Wealth Advisor; Ray Padrón, Chief Executive Officer and Wealth Advisor; Mike DeWitt, Partner and Wealth Advisor, and John Darby, Senior Investment Analyst. The Investment Committee is assisted by the firm's investment analysts, wealth planners and wealth advisors. The Investment Committee generally meets monthly to discuss existing and prospective investments. The Investment Committee evaluates investments independently, as well as in the context of our overall portfolio strategy.

Some factors we consider when reviewing a third-party money manager include:

- The experience, education, and background of the key people involved in the investment process
- The investment style and process of the manager
- Length of time the investment strategy has been in existence, the tenure of the current manager(s)
- Past performance, relative to other investments having similar investment objectives and relative to appropriate benchmarks (if available and applicable)
- Costs relative to other investment strategies with similar objectives and investment styles
- Total assets of the proposed investment strategy

We also manage discretionary individual stock portfolios. In so doing, the research process utilizes a "top down" approach to selecting investments by first analyzing broad industry fundamentals. The process seeks to identify "tail wind" industries or those that have a current economic profile suggesting the industry is in the process of experiencing attractive growth opportunities. After these industries are identified, individual security selection is performed on the companies within the industry to identify the top investment opportunities. Company fundamentals along with management experience and stock price momentum are all analyzed to determine final purchase decisions. Third-party research such as Morningstar and Standard & Poor's are used to assist in both industry analysis and final security selections.

The portfolio utilizes a sector neutral approach as compared to the S&P 500 Index. Further, individual position sizes start between 1.5% and 3.0%. These two features are hallmarks of the risk management approach taken with respect to portfolio construction.

Securities will typically be sold from the portfolio for reasons such as changing industry fundamentals, a detrimental change to a company within an industry, negative stock price momentum, or a material management change.

We also select securities so that the characteristics of the overall stock portfolio, such as valuation, earnings growth, dividend yield, sector weight, etc., are similar to a benchmark or index.

Investment Strategies

Brightworth uses asset allocation strategies to create the investment portfolios for clients. One or more of the following broad asset classes comprise the major components of our client portfolios: stocks, bonds, and alternatives and hybrids. The stock portion invests globally in both U.S. and internationally based companies. The bond portion is broadly diversified across the fixed income markets and will normally maintain an intermediate maturity. The alternatives and hybrids portion of the portfolio includes a variety of non-traditional asset classes and strategies including, but not limited to: flexible asset allocation, long-short equity, market neutral, hedged equity, inflation hedged, real estate, hedge funds, commodities, oil and gas, timber, master-limited partnerships, and managed futures.

Depending on each client's situation, we use different types of investment vehicles to implement a client's portfolio, including but not limited to individual stocks and/or bonds, mutual funds, exchange traded funds, separate stock and bond accounts, limited partnerships, as well as hedge funds and private investments. We manage portfolios on an enterprise level to provide our current thinking across our clients and to create consistency for clients with similar objectives. In general, we invest each client's portfolio in a model portfolio and will further customize the client's investments, as applicable, based on the specific goals and objectives for each account (based on factors including the size of the account, the net worth of the client, risk tolerance of the client, the specific goals and objectives of the client, legacy positions with taxable gains, as well as any restrictions the client places on the account, if applicable).

Clients receive an Investment Policy Statement (IPS) which provides guidelines on how their accounts will be managed including time horizon, liquidity, risk tolerance, asset allocation targets and ranges, and restrictions placed on the account, if applicable.

Risk of Loss

We primarily invest for time horizons of more than ten years. However, market developments could cause us to sell investments more quickly. Securities investments are not guaranteed, and you may lose money on your investments. Investing involves a wide variety of risks that all clients should be able and prepared to bear including:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Most of the investments in our Client Portfolios allow settlement within two business days. The Brightworth Dynamic Investment Portfolios currently utilize two funds that invest in long-term assets such as commercial real-estate, infrastructure, timber, and farmland. Due to the long-term nature of the underlying assets, these funds, known as interval funds, offer to repurchase a portion of their outstanding shares each quarter. There is no guarantee that clients will be able to fully redeem all of the shares they wish to sell in any given quarter. While this is not typical, investors need to be aware that in certain market environments it may take multiple quarters for an investor to completely liquidate his/her position in these funds.

- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Political Risk:** Stock and bond markets can be positively or negatively affected by world political events.
- **ETF Risks:** The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments.
- **Mutual Fund Risks:** The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful will not always be able to replicate that success in the future. There is also a risk that a manager will deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Item 9 - Disciplinary Information

Neither Brightworth nor its Partners and Staff have been involved in any legal or disciplinary events that would be material to a client's evaluation of the company or its personnel.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Brightworth nor its Partners and Staff have any relationships or arrangements with other financial services companies that pose material conflicts of interest. CI U.S. Holdings which is owned by CI Financial Corp., an independent asset and wealth management company in Canada, holds a majority ownership interest in Brightworth. CI U.S. Holdings owns other wealth management firms in the United States.

Brightworth through the McGill Advisors Division has an informal cross-referral arrangement with the McGill & Hill Group. The McGill & Hill Group is made up of the following firms: Roger K. Hill & Co., Dental Practice Transitions & Brokerage; McGill & Hassan, PA, a law firm; Jonathan White, CPA, an accounting firm; FuturePlan, by Ascensus® Company, a third-party administrator for retirement plans; and John K. McGill & Company (“JKMC”), Tax and Business Planning for Dentists. There is no direct or indirect compensation paid for referrals between these companies, other than a referral arrangement with JKMC. See Item 14 of this document for information on the referral arrangement with JKMC.

The McGill Advisors Division of Brightworth will refer clients to members of the McGill & Hill Group when it believes it is in the best interest of the client.

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

Brightworth has adopted a written code of ethics that is applicable to all Partners and Staff. Among other things, the code requires Brightworth and its Partners and Staff to act in clients’ best interests, abide by all applicable regulations, and avoid even the appearance of insider trading.

Brightworth has policies and procedures designed to address our duty as a fiduciary to our clients. This means that we abide by the duty to place client interests ahead of our own individual interests. We take this duty seriously and provide full and fair disclosure of relevant facts and conflicts of interest when applicable. We also have a duty of loyalty and good faith to our clients.

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

Partners and Staff associated with Brightworth and McGill Advisors Division are permitted to buy or sell securities identical to or different from those recommended to our clients for their personal accounts. In addition, related person(s) are also permitted to have an interest or position in a certain security(ies) which are also recommended to clients.

Brightworth reviews personal securities trading which applies to Partners and Staff, as well as Partners and Staff’s family members living in the same household. As part of our Code of Ethics, all Partners and Staff must also abide by rules relating to their Personal Securities investments. These rules include: (1) annually providing the firm with a list of all personal accounts and reportable securities in which they have a beneficial ownership, (2) quarterly reporting all reportable securities transactions, and (3) pre-clearing certain personal securities transactions.

A copy of Brightworth’s Code of Ethics is available upon request.

Item 12 - Brokerage Practices

Brightworth believes that, as an industry best practice of separation of duties, the custody of client assets should be separated from the management of client assets. Brightworth generally recommends that clients hold their investment accounts with one or more of the following unaffiliated custodians: Charles Schwab, Fidelity Investments or TD Ameritrade. Brightworth will recommend which custodian(s) to use based on custodian transaction costs, as well as the best mix of quality, timeliness of execution and administrative service support. Clients normally will pay transaction fees to the custodian. The Wealth Advisors at Brightworth are not registered representatives of these custodial/brokerage firms. Neither Brightworth nor its Wealth Advisors receive any commissions or fees for using or recommending these custodians.

Soft Dollar Benefits

Brightworth does not have soft dollar arrangements with any brokerage firms based on volumes of transactions.

Other Benefits

Brightworth does receive certain products and services from Charles Schwab, Fidelity Investments and TD Ameritrade (Recommended Custodians) free of charge or at discounted rates:

- Access to institutional brokerage – trading, custody, reporting and related services;
- Duplicate client confirmations, statements, and other account information;
- Direct advisory fee debiting capabilities;
- Access to on-line investment research;
- Access to business consulting services, publications and presentations on various investment, financial planning and practice management topics
- Discounts on Alternative Investment Transaction fees, Annual Custody Fee and the Annual Custody Cap (with Charles Schwab)
- Discount pricing on Educational Conferences;

In 2021, Brightworth will receive a one-time stipend from Charles Schwab which will be used for the reimbursement of specific marketing expenses. These funds will be used specifically for our Business Owners practice area and include sponsoring a social client event, as well as expenses associated with creating an introductory video for our Business Owner services. These expenses would otherwise be payable by Brightworth. This arrangement provides an incentive to recommend that Clients custody their accounts with Schwab, which creates a potential conflict of interest. Brightworth receives this benefit regardless of whether our Clients maintain an account at Schwab. Clients do not incur any additional fees as a result of this arrangement.

Brightworth has an incentive to use Recommended Custodians because their services enable us to more efficiently serve clients. Brightworth does not believe that clients whose accounts are held by Recommended Custodians incur any additional costs in connection with Brightworth's receipt of the products and services described above. There is no affiliation or fee sharing arrangement between

Brightworth and the Recommended Custodians. However, Brightworth would not receive the operational and economic benefits described above if Brightworth did not have an established relationship with these companies. These benefits do not depend on the amount of transactions directed by Brightworth to the Recommended Custodians.

Trading & Best Execution

Brightworth generally trades stocks, mutual funds and ETFs through the client's account custodian. Although Brightworth does not typically trade individual bonds for our client accounts, when we do, we normally solicit multiple bids and consider items such as sufficient liquidity, favorable pricing and operational efficiency.

In general, on an annual basis, Brightworth's Investment Operations Department reviews and evaluates the pricing and services offered by Charles Schwab, Fidelity Investments and TD Ameritrade.

Brightworth's trading process generally involves systematically placing trades in each client account individually. This allows us to review the accounts for things like restrictions, tax impact, upcoming withdrawals or future additions to the account. It also enables Brightworth to try to minimize taxes and reduce or eliminate short-term redemption fees and wash sales in client accounts.

Item 13 - Review of Accounts

On an ongoing basis, members of the Firm's Investment Operations Team monitor the investment accounts that we manage. Our Investment Operations Team also regularly reviews a number of other reports that are designed to identify accounts that are outside the expected ranges for asset classes, subclasses, or returns.

On a daily basis the Investment Operations Team analyzes our accounts to determine when trading actions and reviews need to take place. Factors triggering a review of client accounts could include changes in the client's financial needs or circumstances based on the client's particular objectives as well as deposits and withdrawals into the account.

Clients receive account statements directly from their chosen custodian on at least a quarterly basis. These statements can be received as paper copies in the mail or set up to be viewed electronically. Clients should inform Brightworth immediately if they are not receiving such statements or if they do not contain the amount of assets and positions expected at the beginning and end of the period, as well as details of all transactions, including fees deducted from the account, during the period.

In addition to the custodial statement, Brightworth also typically provides clients with performance reports during client meetings or as requested.

Item 14 - Client Referrals and Other Compensation

Brightworth has a policy that allows its employees to be eligible to receive additional compensation for referring new clients to the firm. The compensation is a cash payment calculated as a percentage of the fees generated by the assets under management referred to Brightworth. This policy could potentially create a conflict of interest in that an employee could be motivated to refer potential clients to the firm to earn compensation. Brightworth addresses this potential conflict by having the Brightworth Wealth Advisor who will manage the new client relationship, review the prospective client's situation to

determine if the potential client is a good fit for Brightworth's services. Brightworth is not obligated to accept as a client any prospective client referred by any Partner or Staff.

Brightworth also has a relationship with a few Consultants who periodically refer prospective clients to the firm. In some cases, these Consultants are also clients of Brightworth. The Consultant's compensation typically consists of a bonus based on net assets added for each client referred by the Consultant to the firm. Consultants' specific compensation is detailed in the Solicitor Disclosure Statement, which the Consultant shall provide to prospective clients prior to the start of their relationship with Brightworth.

Specifically, John K. McGill & Company (JKMC) has entered into a Consulting Agreement to which JKMC solicits potential clients for Brightworth's investment advisory business. JKMC will receive compensation of up to 25% of the annual fees paid by the client to Brightworth for additional assets added.

These Client Referral arrangements do not increase or in any way affect the fees clients pay to Brightworth, including the McGill Advisors Division. We are not obligated to accept as a client any prospective client referred by a Consultant. Consultants do not have access to client or prospective client's financial and/or personal data, unless the client chooses to disclose personal information directly to them.

Item 15 - Custody

All clients' accounts are held in custody by unaffiliated broker/dealers (typically Charles Schwab, Fidelity Investments and TD Ameritrade). Participant-directed 401(k) plans are custodied at Matrix Trust Company and Folio. Brightworth is deemed to have custody of clients' assets through its ability to debit advisory fees and because certain clients have executed standing letters of authorization ("SLOA") for distributions. Brightworth has implemented procedures to meet the specific conditions as stated in the SEC's SLOA no action letter under which the obligation to obtain a surprise examination is waived. Clients will receive account statements directly from the custodian at least on a quarterly basis. Clients can review these statements in addition to any account information provided by Brightworth. Clients can access their accounts on-line at any time through the custodian's website.

Item 16 - Investment Discretion

Brightworth has investment management discretion over all clients' discretionary accounts, which is granted by the client in the Brightworth Investment Management Agreement. Clients grant Brightworth trading authority as part of the custodial paperwork. Brightworth will periodically also open accounts for clients to assist clients in holding legacy positions or other assets that we do not manage. Brightworth does not have investment discretion or trading authority over these non-managed accounts.

Item 17 - Voting Client Securities

Effective 5/1/2020, Brightworth's Atlanta office offers outsourced proxy voting services for securities held in client investment accounts. This will be authorized by the client, in the clients' Investment Management Agreement as well as in the custodial paperwork signed by the client.

Clients can also choose to personally retain proxy-voting authority for their accounts and in these instances, Brightworth and the McGill Division do not have proxy voting responsibility and will not take

any action regarding these clients' proxies. Clients will receive proxies directly from their custodian, the fund company transfer agent (in the case of a mutual fund) or by a third-party vendor hired by the fund company or custodian.

Brightworth has engaged the services of Broadridge's ProxyEdge platform to vote and maintain records of proxy votes. Brightworth will maintain relevant and appropriate proxy records as part of the firm's Proxy Voting Policy & Procedures. This information is available to clients upon written request. To receive this information, please send a written request to the Atlanta address listed on the cover page of this brochure or by calling us at (404) 760-9000.

Item 18 - Financial Information

Brightworth does not require prepayment of fees more than six months in advance. Brightworth has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.

Thank you for taking the time to read this information. For additional information about Brightworth or the McGill Advisors Division, please visit our websites at:

www.brightworth.com www.mcgilladvisors.com



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Brightworth, LLC
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Updated: August 1, 2021

This brochure supplement provides information about David Polstra, Raymond Padrón, Donald Wilson, Annika Ferris Cushnie, Lisa Brown, Charlie Jordan, Michael DeWitt, Thomas Presley, Nathan Corbitt, Ryan Halpern, Christopher “Bud” Boland, Chase Mouchet, Patricia Sklar, Amanda Valenti, Wesley Wood, Josh Monroe, Jeff Harrell, and John Darby. It supplements Brightworth’s accompanying Form ADV brochure. Please contact Brightworth’s Chief Compliance Officer, Sherry Hodor, at 404-760-9000 or sherry.hodor@brightworth.com, if you have any questions about the Form ADV brochure or this supplement, or if you would like to request additional or updated copies of either document.

Additional information about the above referenced individuals is available on the SEC’s website at www.adviserinfo.sec.gov.

David W. Polstra, CPA, CFP®, CIMA®

Educational Background and Business Experience (preceding 5 years)

David Polstra was born in 1957. He received a Bachelor of Business Administration degree from the University of Texas at Austin in 1979 graduating Cum Laude. He also attended an Executive Education program at The Wharton School of Business at the University of Pennsylvania in 2001, where he completed the Investments and Wealth Institute® (formerly known as IMCA) Certified Investment Management Analyst® Program.

Mr. Polstra is a founding Partner/Member of Brightworth (formerly Polstra & Dardaman, LLC). He co-founded the firm in May of 1997 and is a Wealth Advisor. He holds the following designations: Certified Public Accountant (GA), CERTIFIED FINANCIAL PLANNER™ practitioner and Certified Investment Management Analyst®.

Disciplinary Information

None

Other Business Activities

Mr. Polstra is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Polstra does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Polstra's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Polstra is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Raymond V. Padrón, CPA, CFP®, CIMA®

Educational Background and Business Experience (preceding 5 years)

Ray Padrón was born in 1956. He graduated Cum Laude from The University of Maryland with a Bachelor of Science in Accounting in 1978. Mr. Padrón attended an Executive Education program at The Wharton School of Business at the University of Pennsylvania in 2004 where he completed the Investments and Wealth Institute® (formerly known as IMCA) Certified Investment Management Analyst® Program.

Mr. Padrón joined Brightworth as a Wealth Advisor and Partner/Member of the firm in 2004. He also currently serves as Brightworth's Chief Executive Officer. He holds the following designations: Certified Public Accountant (MD), CERTIFIED FINANCIAL PLANNER™ practitioner, Certified Investment Management Analyst®, Accredited Estate Planner®, Chartered Financial Consultant® and Chartered Life Underwriter®.

Disciplinary Information

None

Other Business Activities

Mr. Padrón is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Padrón does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Padrón is a member of Brightworth's Investment Committee. His investment-related activities are overseen by Brightworth's other Investment Committee members, Don Wilson, Mike DeWitt, Jeff Harrell and John Darby. He is also overseen by Sherry Hodor, Brightworth's Chief Compliance Officer.

Donald W. Wilson, IV, CFA®, CFP®

Educational Background and Business Experience (preceding 5 years)

Don Wilson was born in 1971. He graduated Summa Cum Laude from Georgia Institute of Technology with a bachelor's degree in Electrical Engineering in 1995.

Mr. Wilson joined Brightworth in 1998 and became a Partner/Member of the firm in 2008. He is the Chief Investment Officer of Brightworth, effective January 2014. Mr. Wilson previously served as Brightworth's Director of Portfolio Management since 2006. Prior to this position, Mr. Wilson worked in the roles of Investment Operations Specialist and Portfolio Manager at Brightworth. He holds the following designations: Chartered Financial Analyst® and CERTIFIED FINANCIAL PLANNER™ practitioner.

Disciplinary Information

None

Other Business Activities

Mr. Wilson is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Wilson does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Wilson is a member of Brightworth's Investment Committee. His investment-related activities are overseen by Brightworth's other Investment Committee members, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Wilson is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Annika Ferris Cushnie, CFP®, CIMA®, CExP™

Educational Background and Business Experience (preceding 5 years)

Annika Cushnie was born in 1975. She attended the University of Colorado at Boulder and received two degrees: a B.S. in Business graduating Cum Laude and B.A. in Biology. She then attended Georgia State University and received an MBA in Risk Management/Personal Financial Planning in 2003. Ms. Cushnie attended an Executive Education program at The Wharton School of Business at the University of Pennsylvania in 2008, where she completed the Investments and Wealth Institute® (formerly known as IMCA) Certified Investment Management Analyst® Program. In 2019, Ms. Cushnie studied to become a Certified Exit Planner™ through the Business Exit Institute (BEI).

Ms. Cushnie joined Brightworth in 2003. She has been a Partner/Member of Brightworth since 2008 and has served as a Wealth Advisor of the firm since 2007. Ms. Cushnie was a Financial Planner at Brightworth from 2003 – 2006. Ms. Cushnie holds the following certifications: CERTIFIED FINANCIAL PLANNER™ practitioner, Certified Investment Management Analyst®, and Certified Exit Planner™

Disciplinary Information

None

Other Business Activities

Ms. Cushnie is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Ms. Cushnie does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Ms. Cushnie's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Ms. Cushnie is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Lisa L. Brown, CFP®, CIMA®

Educational Background and Business Experience (preceding 5 years)

Lisa Brown was born in 1977. She graduated from LeMoyne College with a Bachelor of Science in Finance and Economics, Summa Cum Laude. She earned her MBA from Georgia State University graduating in 2003. Ms. Brown also attended an Executive Education program at The Haas School of Business at The University of California Berkeley in 2008, where she completed the Investments and Wealth Institute® (formerly known as IMCA) Certified Investment Management Analyst® Program.

Ms. Brown became a Partner/Member at Brightworth in 2010. She joined Brightworth in 2005 as a Senior Financial Planner and currently serves in the role of Wealth Advisor and Partner in Charge – Corporate Professionals and Executives. She has also served as Manager of Financial Planning for Brightworth. Ms. Brown holds the following certifications: CERTIFIED FINANCIAL PLANNER™ practitioner and Certified Investment Management Analyst®.

Disciplinary Information

None

Other Business Activities

Ms. Brown is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Ms. Brown does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Ms. Brown's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Ms. Brown is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Charles L. Jordan, CPA, CFP®, CeFT®

Educational Background and Business Experience (preceding 5 years)

Charlie Jordan was born in 1978. He graduated from the University of Florida with a bachelor's degree in Finance in 2000. He received a Master's in Accountancy with a concentration in Taxation from Kennesaw State University in 2009 with Honors.

Mr. Jordan became a Partner of Brightworth in 2013. Mr. Jordan joined Brightworth in 2008 as a Financial Planner and was promoted to Wealth Advisor in January 2011. Before joining Brightworth, Mr. Jordan worked as a Financial Planner at Tegra Financial Partners from 2007 – 2008 and as a Manager at The National Christian Foundation from 2004 – 2007.

Mr. Jordan holds the following certifications: Certified Public Accountant (GA), CERTIFIED FINANCIAL PLANNER™ practitioner, and Certified Financial Transitionist®.

Disciplinary Information

None

Other Business Activities

Mr. Jordan is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Jordan does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Jordan's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Jordan is also supervised by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Michael R. DeWitt, CFA®

Educational Background and Business Experience (preceding 5 years)

Mike DeWitt was born in 1971. He received a Bachelor of Science in Finance from Auburn University.

Mr. DeWitt joined Brightworth in 2016 as a Wealth Advisor and became a Partner of the firm in 2017. He served in the role of Wealth Advisor and was a Partner at Smith & Howard Wealth Management from July 2001 to June 2016. Prior to that position, he was a Portfolio Manager in the trust department of AmSouth Bank from March 1994 to July 2001. He holds the Chartered Financial Analyst® designation and is an active member of the Atlanta Society of CFAs.

Disciplinary Information

None

Other Business Activities

Mr. DeWitt is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. DeWitt does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. DeWitt is a member of Brightworth's Investment Committee. His investment-related activities are overseen by Brightworth's other Investment Committee members, Ray Padrón, Don Wilson, Jeff Harrell and John Darby. Mr. DeWitt is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Thomas C. Presley, CPA, CFP®, PFS

Educational Background and Business Experience (preceding 5 years)

Tom Presley was born in 1986. He graduated from the University of Georgia with a Bachelor of Business Administration in Accounting with Honors. He also earned his Master of Accountancy with Honors from the University of Georgia. Mr. Presley attended an Executive Education program at the Wharton School in 2014 as part of the Investments and Wealth Institute® (formerly known as IMCA) Certified Investment Management Analyst® Program.

Mr. Presley joined Brightworth in 2011 as a Financial Planner and currently serves in the role of Wealth Advisor. He became a Partner at Brightworth as of July 2017. Mr. Presley holds the following certifications: Certified Public Accountant (GA), CERTIFIED FINANCIAL PLANNER™ practitioner, and Personal Financial Specialist.

Disciplinary Information

None

Other Business Activities

Mr. Presley is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Presley does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Presley's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Presley is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Nathan Corbitt, CPA, CFA®, CFP®, CExP™

Educational Background and Business Experience (preceding 5 years)

Nathan Corbitt was born in 1981. He graduated from Georgia Southern University with a Bachelor of Accounting and earned his Master of Accountancy as a University Honors Program Scholar on May 1, 2004.

Mr. Corbitt joined Brightworth in 2011 as a Financial Planner and currently serves in the role of Wealth Advisor. He became a Partner at Brightworth as of July 2017. Mr. Corbitt holds the following certifications: Certified Public Accountant (GA), Chartered Financial Analyst®, CERTIFIED FINANCIAL PLANNER™ practitioner, and Certified Exit Planner™.

Disciplinary Information

None

Other Business Activities

Mr. Corbitt is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Corbitt does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Corbitt's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Corbitt is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Ryan Halpern, CPA, CFP®, PFS

Educational Background and Business Experience (preceding 5 years)

Ryan Halpern was born in 1984. He graduated Magna Cum Laude from the University of Georgia with a Bachelor of Business Administration in Accounting. He also earned his Master of Accountancy from the University of Georgia.

Mr. Halpern joined Brightworth in 2013 as a Financial Planner and currently serves in the role of Wealth Advisor. He became a Partner at Brightworth as of January 2020. He started his career at Ernst & Young from October 2008 to February 2011 and continued his career on the tax team at Pathstone Family Office from February 2011 to March 2013. Mr. Halpern holds the following certifications: Certified Public Accountant (GA), CERTIFIED FINANCIAL PLANNER™ practitioner, Personal Financial Specialist and has earned the CFA Institute Claritas® Investment Certificate.

Disciplinary Information

None

Other Business Activities

Mr. Halpern is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Halpern does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Halpern's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Halpern is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Christopher “Bud” Boland, CFP®

Educational Background and Business Experience (preceding 5 years)

Christopher “Bud” Boland was born in 1982. He graduated from Clemson University where he received his bachelor’s degree in Financial Management with an emphasis in Financial Services.

Mr. Boland joined Brightworth in 2016 as a Senior Financial Planner and currently serves in the role of Wealth Advisor. He served in the role of Senior Wealth Planner at Smith & Howard Wealth Management from June 2010 to June 2016. He also was an Associate at Apogee Family Office, LLC from April 2006 to April 2010. Mr. Boland is a CERTIFIED FINANCIAL PLANNER™ practitioner.

Disciplinary Information

None

Other Business Activities

Mr. Boland is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Boland does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Boland’s investment-related activities are overseen by Brightworth’s Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Boland is also overseen by Ray Padrón, Brightworth’s Chief Executive Officer and Sherry Hodor, Brightworth’s Chief Compliance Officer.

Chase Mouchet, CFP®, CIMA®

Educational Background and Business Experience (preceding 5 years)

Chase Mouchet was born in 1987. He graduated Cum Laude from The University of Georgia with a Bachelor of Science in Family and Consumer Sciences in Family Financial Planning and a Bachelor of Business Administration in Finance.

Mr. Mouchet joined Brightworth in 2015 as a Financial Planner and was promoted to Senior Financial Planner in 2016. Currently he serves in the role of Wealth Advisor. He previously worked at Strategic Financial Planning, Inc. as a Financial Planner from August 2013 to August 2015 and Alpha Financial Management as a Support Advisor/Chief Compliance Officer from April 2010 to June 2013. Mr. Mouchet is a CERTIFIED FINANCIAL PLANNER™ practitioner and Certified Investment Management Analyst®.

Disciplinary Information

None

Other Business Activities

Mr. Mouchet is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Mouchet does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Mouchet's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Mouchet is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Patricia Dampf Sklar, CPA, CFP®, CFA®

Educational Background and Business Experience (preceding 5 years)

Patricia Sklar was born in Baton Rouge in 1985. She graduated from The University of Georgia where she received her Bachelor of Business Administration in Accounting. She then attended Louisiana State University where she received her Master of Science in Accounting.

Ms. Sklar joined Brightworth in 2016 as a Financial Planner and was promoted to Senior Financial Planner in 2017. Currently she serves in the role of Wealth Advisor. At BT Wealth Management, LLC, she served in the role of Investment Advisor from October 2012 to February 2016. Ms. Sklar also served the role of Tax Senior at Bennett Thrasher PC on the accounting side of the firm from February 2011 to October 2012. Ms. Sklar is a Certified Public Accountant, a CERTIFIED FINANCIAL PLANNER™ practitioner, and a Chartered Financial Analyst®.

Disciplinary Information

None

Other Business Activities

Ms. Sklar is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Ms. Sklar does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Ms. Sklar's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Ms. Sklar is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Amanda Valenti, CFP®

Educational Background and Business Experience (preceding 5 years)

Amanda Valenti was born in Chicago, IL in 1986. She graduated from The University of Illinois where she received two degrees, a Bachelor of Science in Finance and Bachelor of Science in Accounting. Ms. Valenti also received a Certificate of Financial Planning from Northwestern University in Chicago, IL.

Ms. Valenti joined Brightworth in 2019 as the Director of Financial Planning. At Lenox Wealth Advisors, she served in the role of Assistant Vice President – Wealth Strategist from February 2017 to January 2018. Ms. Valenti also served the role of Client Relationship Manager at Oxford Financial Group from November 2013 to February 2017. Ms. Valenti is a CERTIFIED FINANCIAL PLANNER™ practitioner.

Disciplinary Information

None

Other Business Activities

Ms. Valenti is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Ms. Valenti does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Ms. Valenti's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Ms. Valenti is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Wesley Wood, CFP®

Educational Background and Business Experience (preceding 5 years)

Wesley Wood was born in 1994. Mr. Wood attended the University of Alabama where he was a member of the Honors College. Mr. Wood graduated summa cum laude with a master's degree in Consumer Sciences with a concentration in Family Financial Planning and Counseling and with a bachelor's degree in Consumer Sciences with a concentration in Consumer Affairs.

Mr. Wood joined Brightworth as a Financial Planner in 2017. He started his career at a fee-only wealth management firm in Silicon Valley where he developed plans to help high net worth clients use their wealth more purposefully and assisted with firm-wide strategy and operations. Mr. Wood is a CERTIFIED FINANCIAL PLANNER™ practitioner.

Disciplinary Information

None

Other Business Activities

Mr. Wood is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Wood does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Wood's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Wood is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Josh Monroe, CFP®, CIMA®

Educational Background and Business Experience (preceding 5 years)

Josh Monroe was born in 1987. Mr. Monroe attended Georgia State University where he graduated cum laude with a bachelor's degree in Music Performance.

Mr. Monroe joined Brightworth in 2019 as a Wealth Planner. Before Brightworth, Mr. Monroe spent 8 years at Northwestern Mutual in a variety of roles including compliance and supervision. Mr. Monroe is a CERTIFIED FINANCIAL PLANNER™, Chartered Life Underwriter®, Chartered Financial Consultant®, and Certified Investment Management Analyst®.

Disciplinary Information

None

Other Business Activities

Mr. Monroe is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Monroe does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Monroe's investment-related activities are overseen by Brightworth's Investment Committee members Don Wilson, Ray Padrón, Mike DeWitt, Jeff Harrell and John Darby. Mr. Monroe is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Jeffrey A. Harrell, CFA®

Educational Background and Business Experience (preceding 5 years)

Jeffrey Harrell was born in 1976. He attended American River Community College from 1994 to 1997. Mr. Harrell graduated from California State University at Sacramento in 2000 with a Bachelor of Science in Finance.

Mr. Harrell joined Brightworth as of July 2017 as a Wealth Advisor and the Director of Portfolio Management. Previously he served in the roles of Investment Adviser Representative at McGill Advisors, Inc. from December 2000 to June 2017 and Director of Portfolio Management from July 2000 to June 2017. He also served as the Vice President of McGill Advisors, Inc. from February 2006 to June 2017 and Principal and Shareholder from January 2010 to June 2017. Mr. Harrell holds the Chartered Financial Analyst® designation.

Disciplinary Information

None

Other Business Activities

Mr. Harrell is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Harrell does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Harrell is a member of Brightworth's Investment Committee. His investment-related activities are overseen by Brightworth's other Investment Committee members, Ray Padrón, Don Wilson, Mike DeWitt and John Darby. Mr. Harrell is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

John Darby, cfa®

Educational Background and Business Experience (preceding 5 years)

John Darby was born in 1988. Mr. Darby graduated from the University of Alabama-Birmingham with a bachelor's degree in marketing.

Prior to his current role, Mr. Darby spent five years working at a regional bank, most recently in an investment research role in which he contributed to the Wealth Management group's manager selection and asset allocation decisions. He is a Chartered Financial Analyst®.

Disciplinary Information

None

Other Business Activities

Mr. Darby is not engaged in any other investment related business and does not receive compensation in connection with any investment related business activity outside of Brightworth.

Additional Compensation

Mr. Darby does not receive economic benefits from any person or entity other than Brightworth in connection with the provision of investment advice to clients.

Supervision

Mr. Darby is a member of Brightworth's Investment Committee. His investment-related activities are overseen by Brightworth's other Investment Committee members, Ray Padrón, Don Wilson, Jeff Harrell and Mike DeWitt. Mr. Darby is also overseen by Ray Padrón, Brightworth's Chief Executive Officer and Sherry Hodor, Brightworth's Chief Compliance Officer.

Summary of Professional Designations

This section provides additional details on the certifications and credentials held by our Wealth Advisors and staff as indicated in their bios on the previous pages. The descriptions of the credentials listed below were derived from the organizations' websites.

CERTIFIED FINANCIAL PLANNER™

The CFP® certification is recognized for its high standard of professional education, stringent code of ethics and standards of conduct and ethical requirements that govern professional engagements with clients. To attain the CFP® designation, an individual must fulfill the education requirements and complete advanced-level courses in: Professional Conduct and Regulation, General Principles of Financial Planning, Education Planning, Risk Management and Insurance Planning, Investment Planning, Tax Planning, Retirement Savings and Income Planning, Estate Planning, and Financial Plan Development (Capstone Course). This is followed by a rigorous 2-day exam and there is also an experience requirement to obtain the certification. On an ongoing basis CFP® professionals must complete continuing education courses (30 hours every two years), including an ethics course requirement. CFP® professionals are bound by the Code of Ethics and Standards of Conduct which require certificants to act as a fiduciary and provide financial planning services in the best interests of their clients. (www.cfp.net)

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 (typically currently 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 Accounts (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. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own. (www.aicpa.org)(www.aicpa.org)

Chartered Financial Analyst® (CFA®)

To enroll in the CFA® program, an individual must have four years of qualified investment work experience. A CFA® designation requires an individual to complete a graduate-level self-study program. The curriculum includes ethics and professional standards as well as economics. It also covers a variety of technical financial topics including: quantitative methods, financial reporting and analysis, corporate finance, equity investments, fixed income, derivatives, alternative investments, and portfolio management and wealth planning. Candidates must then pass three six-hour exams that test the individual's knowledge in these areas of investments and finance. Completing the Program takes most candidates between two and five years. The CFA® candidate is also required to adhere to the CFA Institute *Code of Ethics and Standards of Professional Conduct* on an annual basis. Holders of this designation must also become a member of CFA Institute. (www.cfainstitute.org)

Certified Investment Management Analyst® (CIMA®)

The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. A CIMA® must show an expertise not only in finance but also in business strategy, operations and management. This makes them well suited for assessing risk and making decisions on the scale of entire corporations or funds. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program currently provided by the University of Chicago Booth School of Business, the Wharton School at The University of Pennsylvania and the Yale School of Management, pass an online Certification Examination. CIMA® designees are required to adhere to the Investments and Wealth Institute's *Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks*. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through the Investments and Wealth Institute® (formerly known as IMCA). (www.investmentsandwealth.org)

Certified Financial Transitionist® (CeFT®)

A Certified Financial Transitionist® (CeFT®) is trained to help clients navigate through major life events and the financial transitions that accompany them. The CeFT® is the industry's first designation specifically geared toward financial change and transition. The certification is offered by the Financial Transitionist Institute, which is the training and certification division of the Sudden Money Institute. Training involves studying the stages of transition, how people behave during their financial transition, and how to most effectively work with them. The program is designed for professionals who have at least five years of face-to-face client contact. It is a "level-up" designation, meaning that individuals must have already obtained at least one industry certification, such as the CFP®, CIMA®, or CFA®. The CeFT® designation is maintained by completing a minimum of 15 hours of continuing education per year. (www.financialtransitionist.com)

Certified Exit Planner™ (CEXP™)

Offered since 2009, the Certified Exit Planner designation (CEXP™) is designed for individuals who desire to become the preeminent Exit Planning resource for business owners. This designation is offered through Business Enterprise Institute (BEI) and begins with a Boot Camp for Advisors which is the first step in their Exit Planning education. Next the Advanced Exit Planning courses require candidates to participate in a three-part professional education and training process to provide them with the foundation to sit for the exam to acquire the designation. This training helps provide CEXP™ professionals with the expertise to advise business owners on valuing the business, transferring ownership, maintaining continuity, and handling the financial proceeds. (www.exitplanning.com)

Chartered Life Underwriter® (CLU®)

For over 80 years, the CLU® has been the respected risk management credential for advisors. Designees have completed eight or more college-level courses. Topics for required courses include insurance and financial planning, life insurance law, estate planning, and planning for business owners and professionals. Elective courses include such advanced topics as income taxes, group benefits, retirement planning, and health insurance. CLU® designees must meet experience and continuing education requirements and must adhere to a high ethical standard. The mark is awarded by The American College. (www.theamericancollege.edu)

Chartered Financial Consultant® (ChFC®)

The ChFC® designation has been a mark of excellence for almost thirty years and currently requires eight or more college-level courses, the most of any financial planning credential. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College. (www.theamericancollege.edu)

Thank you for taking the time to read this information. If you have any questions, please visit our website at www.brightworth.com or call us at 404-760-9000.