

Firm Brochure
(Part 2A of Form ADV)

Brightworks Financial Planning LLC
1612 St. Julian Place
Columbia, SC 29204
803-240-3878
David@BrightworksFP.com
www.BrightworksFP.com

This brochure provides information about the qualifications and business practices of Brightworks Financial Planning LLC. If you have any questions about the contents of this brochure, please contact me at: 803-240-3878, or by email at: David@BrightworksFP.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 Brightworks Financial Planning LLC also is available on the SEC's website at www.adviserinfo.sec.gov

02/01/2024

Material Changes

Annual Update

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

Material Changes since the Last Update

To date Brightworks Financial Planning is in process of purchasing the practice of Barb Saylor, Palmetto Wealth Advisors LLC which started January 1st 2022 and is a 36 month buy-out.

This will incorporate the merger of assets under advisement and assets under management into Brightworks Financial Planning. Full disclosure of changes will be outlined in the rest of this brochure. Brightworks Financial Planning also hired Forest Dutton as of May 1, 2023 as an Investment Advisor Representative (IAR). Brightworks also started utilizing Orion Portfolio Solutions to provide turnkey asset management program services in addition to Brinker Capital Investments in October 2023. In October 2023, Planned Administrators Incorporated (Pai) was acquired by Ascensus who now holds the 401k plan assets previously held by Pai. As of January 1, 2024, Brightworks now also has 401k advisory business with ADP.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 803-240-3878 or by email at:

David@BrightworksFP.com

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Advisory Business

Firm Description

“Brightworks Financial Planning, LLC” founded on 4.1. 2014.

It is headquartered in Columbia, SC, and wholly owned by David N Poole, President and Investment Advisor Representative (IAR). Forest Dutton is employed as an additional Investment Advisor Representative (IAR).

This Firm is a Registered Investment Advisor, it succeeded from Pooled Resources, DBA and subsequently from First Community Financial Advisors, owned by First Community Bank headquartered in Lexington SC.

Brightworks Financial Planning, LLC provides personalized confidential financial planning to individuals, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, their current investment strategies, education funding, retirement planning, and estate planning.

Brightworks Financial Planning, LLC is a fee-based financial planning and investment advisory firm. The firm also recommends No-Load (non-commission) variable annuities, as well Life, Long Term Disability, Long Term Care, Health, and Medicare Advantage insurance products. No commissions in any form are accepted for investment advisory services or variable annuities. However, commissions are received from the other insurance product listed above and we may utilize the services of third party brokers in these transactions. No finder's fees are accepted.

Brightworks Financial Planning is a solicitor for both Orion Portfolio Solutions and Brinker Capital Inc. and helps clients identify products and services provided by them based on the Investment Advisor Representatives understanding of the client's overall financial needs, as well as specific needs for income and or growth in their portfolio. Brightworks recommends initial product selection as well as ongoing monitoring of the clients suitability with the particular platform they are using with Brinker Capital or Orion Portfolio Solutions. Brightworks serves as the liaison for the client to communicate with Brinker.

Brightworks Financial Planning recommends a No Load (Non-Commission) Variable Annuity product through Ameritas Life Insurance Company. David Poole (IAR) is listed as an “Interested Third Party” on these contracts so as to be able to receive statements and have online access to the accounts.

Brightworks' makes investment recommendations for the client at the inception of these contracts as well as recommends changes to the investment choices provided by Ameritas. Clients must agree in writing to these initial investments and any recommended changes thereafter.

Brightworks serves as the liaison for the client to communicate with Ameritas.

Investment advice is an integral part of financial planning. In addition, Brightworks Financial Planning, LLC advises clients regarding cash flow,

college planning, retirement planning, tax planning, risk management and estate planning. Brightworks does NOT engage in any tax preparation.

Investment advice is provided, with the client making the final decision on investment selection and or insurance product selection. Brightworks Financial Planning, LLC does not act as a custodian of client assets. The client always maintains asset control. Brightworks Financial Planning, LLC does not place trades for clients. Assets are managed by third party investment advisory parties detailed later in this brochure.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth or income statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

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

The initial meeting, which may be by telephone, in person, or remotely, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment advisement may be beneficial to both the client and the advisor.

Principal Owners

Brightworks Financial Planning, LLC is a wholly owned entity of David N Poole, President and IAR.

Types of Advisory Services

Brightworks Financial Planning, LLC provides investment advisory services.

On more than an occasional basis, Brightworks Financial Planning, LLC furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 01/01/2024, Brightworks Financial Planning advises approximately 200 clients with collectively \$71,000,000 in assets. Roughly \$63 million of these clients' accounts are with Brinker Capital and approximately \$2.2 million are in contracts with Ameritas no load variable annuities. Approximately \$5.25 million are with Ascensus and approximately \$300,000 are with ADP.

Brightworks Financial Planning, LLC **does not** have discretion (or custody) over its client's accounts.

Tailored Relationships

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

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning. There is a set beginning and ending date for the planning process. Ongoing investment advisement may continue after the financial plan is completed.

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

Detailed investment advice and non-product specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start

of the engagement. The Average fee is \$1,000 to \$5,000. The Financial Planning Agreement fee is typically based on 1% percentage of the client's Adjusted Gross Income (AGI).

The minimum fee is generally \$500.00. Rarely, client relationships may exist where the fees are higher or lower than the fee schedule above. In general the fee for Financial Planning is charged as a flat rate with 50% collected up front and the balance at the end of the planning process when final recommendations are given.

We also have a quarterly retainer planning model that is priced as described above and may or may not include a hybrid fee schedule depending on if assets are also under management.

Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to 3 months. Excessive follow-up implementation work can be billed separately at the rate of \$250.00 per hour.

Investment Advisement Agreement

An *Investment Advisement Agreement* may be executed when financial planning is not provided as part of the relationship. The typical annual Investment Advisement fee is based on a percentage of the investable assets according to the following schedule:

1.00% on the first \$500,000;
0.75% on the next \$500,000 (from \$500,001 to \$1,000,000);
and
0.60% on the assets above \$1,000,000.

The average annual fee ranges between \$1,000 and \$5,000 and is *NEGOTIABLE*. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Ameritas, Ascensus, ADP, Orion Portfolio Solutions, and Brinker Capital have their own fees above and beyond these fees paid to Brightworks listed above. Those fees are disclosed before the point of sale and outlined later in this brochure.

Fees are based on account balances at the end of every quarter; March

31st, June 30th, September 30th and December 31st at Brinker Capital and are assessed monthly in arrears for account balances invested under Orion Portfolio Solutions.

Ameritas' Mortality and Expense (M&E) fees and fees for any riders, if applicable, are listed separately from Brightworks' fees on Brightworks' Investment Advisement Agreement. Fees collected for assets under management with Ameritas are billed in arrears and collected separately and directly by Brightworks Financial Planning.

Ascensus plans assess an initial setup fee, a monthly record keeping fee per employee, and an annual custodial and trading fee. Certain plans also assess an annual investment fiduciary fee.

Brinker Capital and Orion Portfolio Solutions each collect their fees along with the fee for Brightworks Financial Planning LLC internally from the clients account balances. Brinker Capital and Orion Portfolio Solutions then in turn mails Brightworks their fee via a check. Brinker's fees are collected in advance while Orion Portfolio Solutions fees are collected in arrears.

ADP plans assess a monthly record keeping fee per participating employee, There is a co-fiduciary fee.

Tax Preparation

Brightworks Financial Planning, LLC does **NOT** perform Tax Preparation Services!

Hourly Planning Engagements

Brightworks Financial Planning, LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is generally \$250.00.

Asset Advisement

Assets are invested exclusively through a third party relationship with Brinker Capital Inc. in Berwyn, PA., Orion Portfolio Solutions, Ascensus, ADP, and Ameritas Advisor Annuities (Ameritas Advisor Services) through Ameritas Life Insurance Corp. in Lincoln, NE. Brightworks does not receive any compensation, in any form, from fund companies.

Initial public offerings (IPOs) are not available through Brightworks Financial Planning, LLC

Termination of Agreement

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

Fees and Compensation

Description

Brightworks Financial Planning, LLC bases its Investment Advisement fees on a percentage of assets under advisement.

Brightworks Financial Planning, LLC generally bases its Financial Planning fees on a flat rate derived from 1% of the Adjusted Gross Income of the family. This is a starting place for fee discussions and generally a rule of thumb to discover the potential complexity in the plan.

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

Termination of the Agreement

If you choose, you may terminate the Financial Planning Agreement. Brightworks will refund the money you have paid, less a charge for work done prior to the receipt of the termination in writing.

Fees are *NEGOTIABLE*.

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

Fee Billing

Investment advisement fees with **Brinker Capital** are billed quarterly, in *ADVANCE*, meaning that we invoice you *BEFORE* the three-month billing period has *BEGUN*. Fees associated with Brinker Capital Inc. are deducted from the clients account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Investment advisement fees with **Orion Portfolio Solutions** are billed monthly, in *ARREARS*, meaning that we invoice you *AFTER* the preceding monthly billing period has *ENDED*. Fees associated with

Ortion Portfolio Solutions are deducted from the clients account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Investment advisement fees with **Ameritas Advisor Annuities** are billed quarterly, in *ARREARS*, meaning that we invoice you *AFTER* the three-month billing period has *ENDED*. Payment in full is expected upon receipt of invoice.

Fees for assets under advisement in Ameritas annuities are billed directly to clients from Brightworks Financial Planning, LLC.

Investment advisement fees with **Ascensus** are billed quarterly, in *ARREARS*, meaning that we invoice you *AFTER* the three-month billing period has *ENDED*.

Investment advisement fees with **ADP** are billed quarterly, in *ARREARS*, meaning that we invoice you *AFTER* the three-month billing period has *ENDED*.

Fees for **financial plans** are typically billed 50% in advance, with the balance due upon delivery of the financial plan. If you choose, you may terminate a Financial Planning Agreement. Brightworks will refund the money you have paid, less a charge for work done prior to the receipt of the termination in writing.

Other Fees

Custodians at Brinker Capital (Fidelity and National Financial Services) and Orion Portfolio Solutions (Fidelity) may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Expense Ratio Fees

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Brightworks Financial Planning, LLC.

Performance figures quoted by Orion Portfolio Solutions, Brinker Capital and or Ameritas Annuities and their mutual fund companies in various publications are after their fees have been deducted but before fees for Brightworks Financial Planning, LLC are deducted.

Past Due Accounts and Termination of Agreement

Brightworks Financial Planning, LLC reserves the right to stop work on any account that is more than 60 days overdue. In addition, Brightworks Financial Planning, LLC reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Brightworks Financial Planning, LLC's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 60 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Brightworks Financial Planning, LLC does not use a performance-based fee structure because of the potential conflict of interest. (Performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to the client)

Types of Clients

Description

Brightworks Financial Planning, LLC generally provides investment advice to individuals, or small business entities.

Client relationships vary in scope and length of service.

Account Minimums

Brinker Capital Inc. has account minimums set at three different levels corresponding to their three different platforms (see Brinker ADV for more information). Typically the minimum account size is \$10,000., which equates to an **annual** fee of \$100 @ 1%. The fee in this example would be charged \$25 per **quarter**.

Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Orion Portfolio Solutions has many investment options with \$0 dollar minimums. Brightworks Financial Planning has no investment minimums for assets under management or advisement.

Methods of Analysis, Investment Strategies

Methods of Analysis

Brightworks analyzes the client's cash flow to determine the amount income they might need from their investments to compliment or offset other income sources such as pensions and or social security income. Attention is also given to the tax consequences of distributions from qualified and Non- Qualified sources to attempt to lessen the tax burden when possible.

Brightworks collects risk tolerance information from the client through several sources, namely; an investment suitability questionnaire, their reactions to past market fluctuations, and interviews with the client specific to their feelings and history around gain or loss.

Brightworks applies this information, along with their knowledge of product choices to recommend investment solutions across a wide array of risk tolerances primarily through Brinker Capital wrap programs as well as through Orion Portfolio Solutions.

All of the Ameritas clients have chosen this annuity due to the Guaranteed Income Rider. Once an income has begun, Ameritas controls the investment sub account for the clients.

Brightworks Financial Planning, LLC relies heavily on the research and investment advisory services of Brinker Capital and Orion Portfolio Solutions for recommendations to clients, especially in the areas of asset allocation models and Modern Portfolio Theory.

Risk of Loss

Risk of Loss

Investing in Securities involves a risk of loss that clients should be prepared to bear!

All investment programs, **especially those using securities**, have certain risks. Investors may face any of the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions.

This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present planning of investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

Brightworks Financial Planning, LLC is registered as a registered investment advisory (RIA) firm with the South Carolina Attorney General's Office. The Firm does not have a Broker Dealer.

Affiliations

Brightworks Financial Planning, LLC has two main business arrangements that are material to its advisory practice:

1. Brightworks Financial Planning, LLC is a solicitor for Brinker Capital Inc. RIA.
2. Brightworks Financial Planning, LLC is a solicitor for Orion Portfolio Solutions.
3. Brightworks Financial Planning, LLC is a solicitor for Ascensus.
4. Brightworks Financial Planning, LLC is a solicitor for ADP.
5. Brightworks Financial Planning, LLC is **not** a solicitor or agent for Ameritas Advisor Annuities, Ameritas Life Insurance Company, but uses their No Load (non-commission) Variable Annuity product especially when clients' desire guaranteed income in retirement. Ameritas accomplishes this through their Guaranteed Lifetime Income Benefit (GLMB) rider at an additional cost to the client. Brightworks principal, David N Poole, is listed as an "interested Third Party on all of these Ameritas contracts.
6. Brightworks Financial Planning LLC also holds an Insurance Agency of the same name registered through the SC Department of Insurance.

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

Code of Ethics

The employee(s) of Brightworks Financial Planning, LLC have committed to the CFP® Code of Ethics that is available for review by clients and prospective clients at the CFP® web site. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

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

Personal Trading

The Chief Compliance Officer of Brightworks Financial Planning, LLC is David N Poole. He is the owner and an investment advisor representative (IAR). Forest Dutton is an employee and an investment advisor representative (IAR).

Neither Brightworks Financial Planning, LLC, nor its IARs, trade client's accounts.

Brokerage Practices

Selecting Brokerage Firms

Brightworks Financial Planning, LLC does not have any affiliation with any broker dealer firms. Brightworks Financial Planning, LLC is a solicitor with Brinker Capital Inc., Orion Portfolio Solutions, Ascensus, ADP and Ameritas.

Brightworks Financial Planning, LLC *DOES NOT* receive any commissions from any of these arrangements.

Best Execution

Brightworks Financial Planning, LLC relies on Brinker Capital Inc. and Orion Portfolio Solutions to review the execution of trades at each custodian each quarter. Trading fees charged by the custodians are also reviewed on a quarterly basis. Brightworks Financial Planning, LLC does not receive any portion of the trading fees.

Review of Accounts

Periodic Reviews

Account reviews are performed no later than quarterly by David N Poole, Investment Advisor. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

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

Regular Reports

Clients receive, at a minimum, quarterly printed statements of their investment accounts from Orion Portfolio Solutions, Brinker Capital Inc. and/or Ameritas. On line access is provided for clients who wish to review their accounts daily.

Values shown online represent the account value at the close of business from the previous day.

Client Referrals

Incoming Referrals

Brightworks Financial Planning will rely heavily on client referrals. The referrals come from current clients, estate planning attorneys, and accountants, as well as other sources. The firm does **not** compensate referring parties for these referrals.

Referrals Out

Brightworks Financial Planning, LLC does **not** accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

Account Statements

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

Investment Discretion

Discretionary Authority for Trading

Brightworks Financial Planning, LLC **DOES NOT HAVE** discretionary authority to manage securities accounts on behalf of clients.

Brightworks Financial Planning, LLC **DOES NOT HAVE** the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold

The client approves the custodian to be used and the fees rates paid to the custodian. Brightworks Financial Planning, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Voting Client Securities

Proxy Votes

Brightworks Financial Planning, LLC does **not** vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Brightworks Financial Planning, LLC will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Financial Information

Financial Condition

Brightworks Financial Planning, LLC Investment Advisor Representative does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Brightworks Financial Planning, LLC does not serve as a custodian for client funds or securities, and does not charge planning fees in advance and does not generally require pre-payment of fees of more than \$500 per client, and six months or more in advance. Brightworks Financial Planning does not charge planning fees in advance.

Requirements for State-Registered Advisors

A. Principal Executive Officers

David N Poole, CFP® is the owner and president of Brightworks Financial Planning LLC. David Poole and Forest Dutton are employees and both are Investment Advisor Representatives (IAR).

B. Other Businesses

Brightworks Financial Planning LLC also holds an Insurance Agency of the same name registered through the SC Department of Insurance.

C. Additional Relationships

Relationships with Brinker Capital Inc., Orion Portfolio Solutions, Ascensus, ADP, Ameritas Life Insurance Company, and Brightworks Insurance Agency are detailed in the section titled "Other Financial Industry Activities and Affiliations" on page 9 of this document.

Business Continuity Plan

Death and Disability Buy Out

Brightworks has entered into a buyout agreement currently with Forest Dutton for the sole purpose of buying Brightworks in the specific case of death or disability. We are also in the process of negotiating terms for a buy-sell agreement to take place over the next 2-5 years. More details will be added as this agreement is worked out.

Forest Dutton can be reached at:
803-727-8782 or
Forest@BrightworksFP.com

Information Security Program

Information Security

Brightworks Financial Planning, LLC maintains an information security program to reduce the risk that clients personal and confidential information may be breached.

Privacy Notice

Brightworks Financial Planning, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

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

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

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

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with

unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

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

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

**Brochure Supplement (Part 2B of Form
ADV) David N Poole and Forest Dutton
Brightworks Financial Planning LLC**

1612 St. Julian Place

Columbia, SC 29204

(803) 240-3878

This brochure supplement provides information about David N Poole and Forest Dutton that supplements the Brightworks Financial Planning LLC brochure. You should have received a copy of that brochure. Please contact David N Poole at (803) 240-3878 or David@BrightworksFP.com if you did not receive Brightworks Financial Planning LLC brochure or if you have any questions about the contents of this supplement.

Additional information about David N Poole and Forest Dutton is available on the SEC's website at www.adviserinfo.sec.gov

Education and Business Standards

Brightworks Financial Planning, LLC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a **CFP®**, a CFA, a ChFC, JD, CTFA, EA or CPA.

Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment advisement.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner TM (CFP®): Certified Financial Planners TM are licensed by the CFP Board to use the CFP mark. CFP® certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

EMPLOYEE David N Poole, Educational and Business Background

Educational Background:

- Date of birth: 03-16-1956
- BS Clemson University, 1979
- Masters Degree, University of SC, 1987
- CFP® 09-16-2002, currently in good standing.

Business Experience:

- Prudential Preferred Financial Services (1989- 2002)
 - Agent and Registered Rep
 - BD Pruco Securities (1989-2002)
- Creative Financial Strategies (2002-2004)
 - Agent and Registered Rep
 - BD New England Securities (2002-2004)
- Ward Financial Advisors (2004- 2005)
 - Princor Financial Services) (2004-2005)
 - Agent and Registered Rep
- Pooled Resources LLC. Registered Investment Advisory Firm (RIA) (2005-2014)
 - Owner and President,
 - Investment Advisor Representative (IAR)
- First Community Financial Consultants (2008-2011)
 - Director, VP of First Community Bank
- First Community Financial Advisors (2011-2014)
 - Director, VP of First Community Bank
- Brightworks Financial Planning, LLC
Registered Investment Advisory Firm (RIA) (4.1.14 to present)
 - President, Owner
 - Investment Advisor Representative (IAR)

Disciplinary Information: None

Other Business Activities: Established Brightworks Insurance Agency under Brightworks Financial Planning LLC. in 2014 to contract insurance products in the line of Life and Health Licensure. Code# 198290

Additional Compensation: I receive insurance commissions through a SC licensed Ins. Agency, Titled as: Brightworks Financial Planning LLC.

The following additional items are required if you are a state-registered advisor:

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

EMPLOYEE Forest Dutton, Educational and Business Background

Educational Background:

- Date of birth: 08-29-1985
- BS University of South Carolina, 2006
- Master of Business Administration, University of SC, 2021
- Series 7 and 66 licenses (2023)
- Master of Science in Financial Planning, University of Georgia (expected 2025)

Business Experience:

- Northwestern Mutual (Dec 2022-May 2023)
 - Agent and Registered Rep
- Brightworks Financial Planning LLC (May 2023-present)
 - Investment Advisor Representative (IAR)
 - Insurance Producer (Life, Accident, and Health)
South Carolina: License #20537525

Disciplinary Information: None

Other Business Activities: Established Brightworks Insurance Agency under Brightworks Financial Planning LLC. in 2014 to contract insurance products in the line of Life and Health Licensure. Code# 20537525

Additional Compensation: I receive insurance commissions as an independent agent acting with a SC license. Third party brokerage quotes

are utilized through Vanbridge.

Supervision: Forest Dutton serves as an Investment Advisor Representative of Brightworks Financial Planning and is supervised by David N. Poole, the President and Chief Compliance Officer. Mr. Poole can be reached at (803) 240-3878.

The following additional items are required if you are a state-registered advisor:

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None