FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: BRIGHTER FINANCIAL CAPITAL MANAGEMENT, LLC

Other-Than-Annual Amendment - All Sections

4/30/2025 8:43:11 AM

CRD Number: 300619 Rev. 10/2021

W	•		omissions may result in denial of your filing periodic amendments. See Form	application, revocation of your registration, or criminal ADV General Instruction 4.					
Ite	m 1 Identifying Information								
info			-	ou. If you are filing an <i>umbrella registration</i> , the prince or assist you with filing an <i>umbrella</i>					
A.	Your full legal name (if you are BRIGHTER FINANCIAL CAP		first, and middle names):						
В.	(1) Name under which you pri		business, if different from Item 1.A.						
	List on Section 1.B. of Schedu	le D any additional names ui	nder which you conduct your advisory	business.					
	(2) If you are using this Form	ADV to register more than o	ne investment adviser under an umbre	ella registration, check this box \square					
	If you check this box, complet	re a Schedule R for each rely	ing adviser.						
C.	If this filing is reporting a char the name change is of \square your legal name or \square your		1 1.A.) or primary business name (Iten	n 1.B.(1)), enter the new name and specify whether					
D.	(2) If you report to the SEC as	s an <i>exempt reporting advise</i>	lviser, your SEC file number: 801-131 er, your SEC file number: ssigned by the SEC ("CIK Numbers"), a No Information Filed						
E.	(1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: 300619								
	If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.								
	(2) If you have additional <i>CRD</i>	Numbers, your additional C	RD numbers: No Information Filed						
F.	Principal Office and Place of Bu	usiness							
	(1) Address (do not use a P.O Number and Street 1: 1984 ISAAC NEWTON SQ. City:	•	Number and Street 2: SUITE 203 Country:	ZIP+4/Postal Code:					
	RESTON	Virginia	United States	20190					
	If this address is a private	e residence, check this box:							
	business. If you are apply state or states to which you registered only with the S	ring for registration, or are re ou are applying for registrati	egistered, with one or more state secu on or with whom you are registered. It o the SEC as an exempt reporting advi	siness, at which you conduct investment advisory rities authorities, you must list all of your offices in the f you are applying for SEC registration, if you are ser, list the largest twenty-five offices in terms of					
	(2) Days of week that you no	rmally conduct business at y	our principal office and place of busine	ess:					
	• Monday - Friday • Other: Normal business hours at this location: 9:00 AM - 5:00 PM								
	(2) Tolophono number at this	lo antion :							

	(4) Facsimile number at 703-796-0957(5) What is the total number of your most	mber of offices, othe	er than your <i>principa</i>	al office and place	of busines	ss, at which you conduct investment advisory bu	siness a	s of
	0							
G.	Mailing address, if differe	ent from your <i>princip</i>	pal office and place	of business addres	ss:			
	Number and Street 1:		,	Number and Stre				
	City:	State:		Country:		ZIP+4/Postal Code:		
	If this address is a priva	te residence, check	this box: \Box					
Н.	If you are a sole propriet	or, state your full re	sidence address, if	different from you	r <i>principal</i>	office and place of business address in Item 1.F.	.:	
	Number and Street 1:			Number and Stre	eet 2:			
	City:	State:		Country:		ZIP+4/Postal Code:		
							Yes	No
I.	Do you have one or more and LinkedIn)?	e websites or accoun	its on publicly avail	able social media p	olatforms ((including, but not limited to, Twitter, Facebook	•	0
	Schedule D. If a website without listing addresses	address serves as a for all of the other i vailable social media	portal through whi information. You ma a platforms where y	ch to access other ay need to list mor you do not control t	information te than one the conten	ublicly available social media platforms on Section you have published on the web, you may list to e portal address. Do not provide the addresses ont. Do not provide the individual electronic mail (media platforms.	the port of websit	tal tes
J.	Chief Compliance Officer							
	(1) Provide the name and contact information of your Chief Compliance Officer. If you are an <i>exempt reporting adviser</i> , you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.							
	Name: MEGAN CLARK		Other titles, if a MANAGING ME	•	T ADVISO	R REPRESENTATIVE		
	Telephone number: 703-796-0957		Facsimile numb 703-796-0957	per, if any:				
	Number and Street 1: 1984 ISAAC NEWTON SO	-	Number and St SUITE 203	reet 2:				
	City: RESTON	State: Virginia	Country: United States			ZIP+4/Postal Code: 20190		
	Electronic mail (e-mail) MEGAN@CLARKFINANCI		mpliance Officer has	s one:				
		mpany Act of 1940 illumber (if any):				you, a <i>related person</i> or an investment company officer services to you, provide the <i>person's</i> name	-	
К.	Additional Regulatory Cor about this Form ADV, you	· ·		e Chief Compliance	Officer is	authorized to receive information and respond t	o questi	ions
	Name:			Titles:				
	Telephone number:			Facsimile numbe	r, if any:			
	Number and Street 1:			Number and Stre	eet 2:			
	City:	State:		Country:		ZIP+4/Postal Code:		
	Electronic mail (e-mail)	address, if contact p	person has one:				W	
L.	Do vou maintain some or	all of the books and	d records vou are re	eauired to keep un	der Sectio	on 204 of the Advisers Act, or similar state law,	Yes	. No
	somewhere other than yo		•					٠
	If "yes," complete Section	n 1.L. of Schedule D).				Yes	No
М.	Are you registered with a	foreign financial reg	gulatory authority?				0	•

Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial
regulatory authority. If "ves." complete Section 1.M. of Schedule D.

Yes No

N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934?

C ⊙ Yes No

O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year? If yes, what is the approximate amount of your assets:

0 0

- $_{
 m C}$ \$1 billion to less than \$10 billion
- $_{
 m C}$ \$10 billion to less than \$50 billion
- c \$50 billion or more

For purposes of Item 1.0. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.

P. Provide your Legal Entity Identifier if you have one:

A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.

SECTION 1.B. Other Business Names

No Information Filed

SECTION 1.F. Other Offices

No Information Filed

SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: https://www.instagram.com/clarkfinancialsolutions/

Address of Website/Account on Publicly Available Social Media Platform: https://www.facebook.com/ClarkFinancialPlanning/

Address of Website/Account on Publicly Available Social Media Platform: https://clarkfinancialplanning.com/

Address of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/1863617/admin/dashboard/

SECTION 1.L. Location of Books and Records

No Information Filed

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

Ttom	2	SEC	Registrati	on/Pen	ortina

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration. If you are filing an *umbrella registration*, the information in Item 2 should be provided for the *filing adviser* only.

shoul	d be	e prov	ided for the <i>filing adviser</i> on	nıy.					
A. To register (or remain registered) with the SEC, you must check at least one of the Items 2.A.(1) through 2.A.(12), below. If you are submitting annual updating amendment to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction provides information to help you determine whether you may affirmatively respond to each of these items.						-			
	You	(the	adviser):						
	V	(1)	are a large advisory firm that either:						
(a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or									
(b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent annual upda amendment and is registered with the SEC;									
		(2)	are a mid-sized advisory million (in U.S. dollars) and	firm that has regulatory assets under you are either:	management of \$25 million (in U.S. o	dollars) or more but less than \$100			
			(a) not required to be regis place of business; or	stered as an adviser with the state seco	urities authority of the state where yo	u maintain your <i>principal office and</i>			
			(b) not subject to examinat	tion by the state securities authority of	f the state where you maintain your p_i	rincipal office and place of business;			
			Click HERE for a list of authority.	states in which an investment adviser,	, if registered, would not be subject to	examination by the state securities			
		(3)	Reserved						
		(4)	have your <i>principal office ai</i>	nd place of business outside the Unit	ed States;				
		(5)	are an investment advise	er (or subadviser) to an investment	t company registered under the Inve	stment Company Act of 1940;			
			are an investment advise	er to a company which has elected f 1940 and has not withdrawn the elec	to be a business development con	npany pursuant to section 54 of the			
		(7)	are a pension consultant exemption in rule 203A-2(a	with respect to assets of plans having o);	an aggregate value of at least \$200,0	000,000 that qualifies for the			
		(8)		er rule 203A-2(b) that <i>controls</i> , is <i>cont</i> d your <i>principal office and place of bu</i> s					
			If you check this box, comp	plete Section 2.A.(8) of Schedule D.					
		(9)	are an adviser relying on r	rule 203A-2(c) because you expect to	be eligible for SEC registration wi	thin 120 days;			
			If you check this box, comp	plete Section 2.A.(9) of Schedule D.					
		(10)	are a multi-state adviser	that is required to register in 15 or mo	ore states and is relying on rule 203A-	2(d);			
			If you check this box, comp	plete Section 2.A.(10) of Schedule D.					
		(11)	are an Internet adviser re	elying on rule 203A-2(e);					
		,		plete Section 2.A.(11) of Schedule D.					
		(12)	,	ler exempting you from the prohibition	n against registration with the SEC:				
		()		plete Section 2.A.(12) of Schedule D.	agamet region and in the elect				
		(12)		remain registered with the SEC.					
		(13)	are no longer engible to r	emain registered with the SEC.					
C+-+	- 6-		daa Aastaadta Nation Filim		Domestine Advisors				
				gs and State Reporting by Exempt isers may be required to provide to sta	-	Form ADV and any amondments they			
				tice filings. In addition, exempt reporti	• • • • • • • • • • • • • • • • • • • •	•			
			•	they file with the SEC. If this is an init					
				d all subsequent filings or reports you he box(es) next to the state(s) that yo		_			
	-			mendment to your registration to stop	your <i>notice filings</i> or reports from goi	ng to state(s) that currently receive			
	tner	n, un	check the box(es) next to th	ose state(s).					
	Jur	isdicti	ons						
		AL		□ IL	□ NE	□ sc			
		AK			□ NV	□ SD			
		ΑZ		□ IA	□ NH	□ TN			
		AR		□ KS	□ NJ	□ TX			
		CA		□кү	□ NM	□ UT			

30/25, 7:44 AM	IA	ARD - All Sections [User Name: smushel18	94, OrgID: 300619]
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pay that state's notice fi	ling or report filing fee for the	coming year, your amendment must be filed	before the end of the year (December 31). Ontrol, are controlled by, or are under common
control with an investment ac adviser, provide the following Name of Registered Investme	information:	e SEC and your principal office and place of	business is the same as that of the registered
CRD Number of Registered In	nvestment Adviser		
SEC Number of Registered In	vestment Adviser		
SECTION 2.A.(9) Investme	nt Adviser Expecting to be I	ligible for Commission Registration witl	nin 120 Days
you will be deemed to have r I am not registered or rec register with the SEC with I undertake to withdraw f	nade the required representati Juired to be registered with the Jin 120 days after the date my	ons. You must make both of these represents SEC or a <i>state securities authority</i> and I have registration with the SEC becomes effective. 120th day after my registration with the SEC	ve a reasonable expectation that I will be eligible to
SECTION 2.A.(10) Multi-St	ate Adviser		
If you are relying on rule 203	A-2(d), the multi-state advise	exemption from the prohibition on registrat y checking the appropriate boxes, you will be	. ,
\square I have reviewed the appli		with the SEC, you must make both of these d have concluded that I am required by the london those states.	
		amendment to this registration indicating the securities authorities of those states.	nat I would be required by the laws of fewer than 15
		u must make this representation:	ederal laws and have concluded that I am required
, ,	-	nent adviser with the <i>state securities author</i>	•
SECTION 2.A.(11) Internet	Adviser		
If you are relying on rule 203	A-2(e), the Internet adviser ex	emption from the prohibition on registration iate box, you will be deemed to have made to	, you are required to make a representation about the required representation.
If you are applying for registregistration, you must make		with the SEC or changing your existing Iter	n 2 response regarding your eligibility for SEC
☐ I will provide investment	advice on an ongoing basis to	more than one client exclusively through an	
registration, you must make	•	teng registration and are continuing to fely C	on the internet dayiser exemption for SEC

I have provided and will continue to provide investment advice on an ongoing basis to more than one client exclusively through an <i>operational</i> interactive website.
SECTION 2.A.(12) SEC Exemptive Order
If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:
Application Number: 803-
Date of order:

Item 3 Form of Organization

If you are filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

- A. How are you organized?
 - C Corporation
 - C Sole Proprietorship
 - C Limited Liability Partnership (LLP)
 - C Partnership
 - Limited Liability Company (LLC)
 - Limited Partnership (LP)
 - Other (specify):

If you are changing your response to this Item, see Part 1A Instruction 4.

B. In what month does your fiscal year end each year?

DECEMBER

C. Under the laws of what state or country are you organized?

State Country

Virginia United States

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.

If you are changing your response to this Item, see Part 1A Instruction 4.

Item 4 Successions

Yes No

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?

0 0

If "yes", complete Item 4.B. and Section 4 of Schedule D.

B. Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

A. Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.

2

- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
 - (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
 - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
 - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?
 0

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

- C. (1) To approximately how many clients for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 - (2) Approximately what percentage of your *clients* are non-*United States persons*?
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

Indicate the approximate number of your *clients* and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *clients*. If you have fewer than 5 *clients* in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a *client* fits into more than one category, select one category that most accurately represents the *client* to avoid double counting *clients* and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of <i>Client</i>	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	810		\$ 80,729,987
(b) High net worth individuals	17		\$ 34,130,483
(c) Banking or thrift institutions			\$

d) Investment companies			\$
(e) Business development companies		1 –	\$
(f) Pooled investment vehicles (other than investment companies and business development companies)		1 [\$
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	12		\$ 1,468,523
(h) Charitable organizations			\$
(i) State or municipal <i>government entities</i> (including government pension plans)			\$
(j) Other investment advisers			\$
(k) Insurance companies			\$
(I) Sovereign wealth funds and foreign official institutions			\$
(m) Corporations or other businesses not listed above	1		\$ 206
(n) Other:			\$

Cor

⊏.	tou	are co	are compensated for your investment advisory services by (check an that apply):					
	V	(1)	A percentage of assets under your management					
		(2)	Hourly charges					
		(3)	Subscription fees (for a newsletter or periodical)					
	V	(4)	Fixed fees (other than subscription fees)					
		(5)	Commissions					
		(6)	Performance-based fees					
		(7)	Other (specify):					

Regulatory Assets Under Management

Yes No

0

- F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?
 - (2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

U.S. Dollar Amount

Total Number of Accounts

Discretionary: (a) \$116,329,199 (d) 840 Non-Discretionary: (b) \$0 (e) 0 Total: (c) \$116,329,199 (f) 840

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.

(3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to clients who are non-United States persons?

\$ 0

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

- G. What type(s) of advisory services do you provide? Check all that apply.
 - (1) Financial planning services
 - V (2) Portfolio management for individuals and/or small businesses
 - (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
 - Portfolio management for pooled investment vehicles (other than investment companies)
 - (5) Portfolio management for businesses (other than small businesses) or institutional clients (other than registered investment companies and other pooled investment vehicles)
 - V Pension consulting services
 - V (7) Selection of other advisers (including private fund managers)
 - (8) Publication of periodicals or newsletters
 - (9) Security ratings or pricing services
 - (10) Market timing services
 - V (11) Educational seminars/workshops
 - (12) Other(specify):

Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment 4/30/25, 7:44 AM IARD - All Sections [User Name: smushel1894, OrgID: 300619] company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D. H. If you provide financial planning services, to how many clients did you provide these services during your last fiscal year? 0 O 1 - 10 11 - 25 26 - 50 51 - 100 101 - 250 251 - 500 More than 500 If more than 500, how many? (round to the nearest 500) In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors. Yes No (1) Do you participate in a wrap fee program? **(** \circ (2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as: (a) sponsor to a wrap fee program \$ 0 (b) portfolio manager for a wrap fee program? (c) sponsor to and portfolio manager for the same wrap fee program? \$ 113,424,711 If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b). If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.I.(2) of Schedule D. If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). Yes No (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of **(** investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your ⊚ regulatory assets under management? Separately Managed Account Clients Yes No (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately **6**1 0 managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account *clients* that you advise? **(** If yes, complete Section 5.K.(2) of Schedule D. (3) Do you engage in derivative transactions on behalf of any of the separately managed account clients that you advise? ⊚ If yes, complete Section 5.K.(2) of Schedule D. (4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management? If yes, complete Section 5.K.(3) of Schedule D for each custodian. Marketing Activities Yes No

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1985112

(1) Do any of your advertisements include:

(a) Performance results?

	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	0	•
	(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	o	•
	(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
	(e) Third-party ratings?	o	•
	2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	0
(3) Do any of your advertisements include hypothetical performance ?	0	•
(4) Do any of your advertisements include predecessor performance ?	0	•

SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

No Information Filed

SECTION 5.I.(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Section 5.I.(2) for each *wrap fee program* for which you are a portfolio manager.

Name of Wrap Fee Program

BRIGHTER FINANCIAL CAPITAL MANAGEMENT WRAP PROGRAM

Name of Sponsor

BRIGHTER FINANCIAL CAPITAL MANAGEMENT, LLC

Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

Sponsor's CRD Number (if any):

300619

SECTION 5.K.(1) Separately Managed Accounts

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

(a) Asset Type Mid-year End of year

(i)	Exchange-Traded Equity Securities	%	%
(ii)	Non Exchange-Traded Equity Securities	%	%
(iii)	U.S. Government/Agency Bonds	%	%
(iv)	U.S. State and Local Bonds	%	%
(v)	Sovereign Bonds	%	%
(vi)	Investment Grade Corporate Bonds	%	%
(vii)	Non-Investment Grade Corporate Bonds	%	%
(viii)	Derivatives	%	%
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	%	%
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business	%	%
	Development Companies)		
(xi)	Cash and Cash Equivalents	%	%
(xii)	Other	%	%

Generally describe any assets included in "Other"

Asse	et Type	End of year
(i)	Exchange-Traded Equity Securities	72 %
(ii)	Non Exchange-Traded Equity Securities	0 %
(iii)	U.S. Government/Agency Bonds	0 %
(iv)	U.S. State and Local Bonds	0 %
(v)	Sovereign Bonds	0 %
(vi)	Investment Grade Corporate Bonds	1 %
(vii)	Non-Investment Grade Corporate Bonds	0 %
(viii)	Derivatives	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	27 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %
(xi)	Cash and Cash Equivalents	0 %
(xii)	Other	0 %

Generally describe any assets included in "Other"

SECTION 5.K.(2) Separately Managed Accounts - Use of Borrowingsand Derivatives

☐ No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of borrowings for the accounts included in column 1.

In column 3, provide aggregate gross notional value of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(3)	Derivative E	xposures		
	(a) Interest Rate Derivative					(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(3) Derivative Exposures						
		(a) Interest (b) Foreign Rate Exchange (c) Credit (d) Equity (e) Derivative Derivative Derivative					(f) Other Derivative			
Less than 10%	\$	\$	%	%	%	%	%	%		
10-149%	\$	\$	%	%	%	%	%	%		
150% or more	\$	\$	%	%	%	%	%	%		

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of borrowings for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$	\$
10-149%	\$	\$
150% or more	\$	\$

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

SECTION 5.K.(3) Custodians for Separately Managed Accounts

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately managed account regulatory assets under management.

- (a) Legal name of custodian: EQUITY TRUST COMPANY
- (b) Primary business name of custodian:

	EQUITY TRUST COMPANY							
(c)	The location(s) of the custodian's office(s) responsib	le for <i>custody</i> of the assets :						
	City: WEST LAKE	State: Ohio	Country: United States					
			Yes No					
(d)	Is the custodian a related person of your firm?		0.0					
(e)	If the custodian is a broker-dealer, provide its SEC re	egistration number (if any)						
(f)	If the custodian is not a broker-dealer, or is a broker	-dealer but does not have an SE	C registration number, provide its legal entity identifier (if any)					
(g)	What amount of your regulatory assets under manages 4,307,612	gement attributable to separately	managed accounts is held at the custodian?					
(a)	Legal name of custodian:							
	CHARLES SCHWAB & CO., INC.							
(b)	Primary business name of custodian:							
	CHARLES SCHWAB & CO., INC.							
(c)	The location(s) of the custodian's office(s) responsible	e for <i>custody</i> of the assets :						
	City:	State:	Country:					
	WESTLAKE	Texas	United States					
			Yes No					
(d)	Is the custodian a related person of your firm?		၀ စ					
(e)	e) If the custodian is a broker-dealer, provide its SEC registration number (if any) 8 - 16514							
(f)	If the custodian is not a broker-dealer, or is a broker-	dealer but does not have an SEC	C registration number, provide its legal entity identifier (if any)					
(g)	If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entity identifier</i> (if any) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 112,021,587							

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Ite	m 6 C	Other Business Activities								
In t	his It	em, we request information about your firm's other business activities.								
Α.	You	are actively engaged in business as a (check all that apply):								
		(1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm								
		(14) other financial product salesperson (specify):								
	If yo	ou engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedu	e D							
В.	(1)	Are you actively engaged in any other hydroge net listed in Item 6.A. (other than giving investment advise)?								
J.	• •	If you is this other hydrogen your primary hydroge?		⊙						
	(2)			0						
		If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide the name.								
		Yo	s	No						
	(3)	Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?)	⊙						
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide the name.	at							
SEC	TION	6.A. Names of Your Other Businesses								
		No Information Filed								
SEC	TION	6.B.(2) Description of Primary Business								
		your primary business (not your investment advisory business):								
If y	ou er	ngage in that business under a different name, provide that name:								
SEC	TION	6.B.(3) Description of Other Products and Services								
_		other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.								
If y	ou engage in that business under a different name, provide that name:									

[te	m 7 Financial Industry Affiliations					
	this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may ur between you and your <i>clients</i> .					
A.	This part of Item 7 requires you to provide information about you and your related persons, including foreign affiliates. Your related persons are all of your advisory affiliates and any person that is under common control with you. You have a related person that is a (check all that apply): (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) (2) other investment adviser (including financial planners) (3) registered municipal advisor (4) registered security-based swap dealer (5) major security-based swap participant (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (7) futures commission merchant (8) banking or thrift institution (9) trust company					
	(9) trust company (10) accountant or accounting firm (11) lawyer or law firm (12) insurance company or agency (13) pension consultant (14) real estate broker or dealer (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles					
	Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2). Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to					
	complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser. For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.					
	You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.					
	You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.					
SEC	CTION 7.A. Financial Industry Affiliations					
Cor	mplete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.					
1.	Legal Name of <i>Related Person</i> : CLARK & ASSOCIATES, INC. FINANCIAL SOLUTIONS					
2.	Primary Business Name of <i>Related Person</i> : CLARK & ASSOCIATES, INC. FINANCIAL SOLUTIONS					
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or					
	Other					
4.	Related Person's					

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. Related Person is: (check all that apply)

(a) $\ \square$ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

	(c)		registered municipal advisor		
	(d)		registered security-based swap dealer		
	(e) (f)		major security-based swap participant commodity trading advisor (whether registered or exempt from registration)		
	(g)		futures commission merchant		
	(h)		banking or thrift institution		
	(i)		trust company		
	(j)		accountant or accounting firm		
	(k) (l)		lawyer or law firm insurance company or agency		
	(n)		pension consultant		
	(n)		real estate broker or dealer		
	(o)		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
_6	Dox	,OU C	control or are you controlled by the related person?	Yes	
6.	DO	ou c	control or are you controlled by the related person?	0	•
7.	Are	you a	and the related person under common control?	0	•
					٠
8.	(a)	Doe	es the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b)	If y	ou are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0
		•	sumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not		
	(c)	-	uired to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ? Ou have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clien</i>	tc'	
	(0)		ets:		
		Nu	mber and Street 1: Number and Street 2:		
		City	· · · · · · · · · · · · · · · · · · ·		
		11 (this address is a private residence, check this box: \square	Yes	No
9.	(a)	If th	he <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If th	he answer is yes, under what exemption?	~	~
10			the related person registered with a foreign financial regulatory authority ?	О	•
	(b)	If th	he answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is reg No Information Filed	jister	ed.
11	. Do v	ou a	and the related person share any supervised persons?	_	_
				⊚	0
12	. Do y	ou a	and the <i>related person</i> share the same physical location?	•	0
Ite	m 7 F	riva	te Fund Reporting		
				Yes	No
В.	Are y	ou ar	n adviser to any <i>private fund</i> ?	\circ	\odot
	•	-	then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances describe		
			ence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an Porting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such		
			ction 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect		
	privat	e fur	nd. You must, instead, complete Section 7.B.(2) of Schedule D.		
	In eit	her c	ase, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or		
			al code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D		g
	the sa	ame (code or designation in place of the fund's name.		
SE	CTIO	N 7.B	3.(1) Private Fund Reporting		
			No Information Filed		

SECTION 7.B.(2) Private Fund Reporting

Item 8 Participation or Interest in Client Transactions

In this Item, we request information about your participation and interest in your *clients*' transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the next year.

Like Item 7, Item 8 requires you to provide information about you and your related persons, including foreign affiliates.

Pro	priet	ary Interest in <i>Client</i> Transactions				
Α.	Do y	you or any related person:	Yes	No		
	(1)	buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	0	•		
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	•	0		
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	0	•		
Sal	es In	sterest in <i>Client</i> Transactions				
В.	Do y	you or any related person:	Yes	No		
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory client securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•		
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	0	•		
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•		
Inv	estm	nent or Brokerage Discretion				
C.	Do y	you or any related person have discretionary authority to determine the:	Yes	No		
	(1)	securities to be bought or sold for a <i>client's</i> account?	\odot	0		
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	•	0		
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's account?	0	•		
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	0	•		
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	0		
E.	Do y	you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?	•	0		
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ?	0	•		
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	0	•		
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	0	0		
н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	0	•		
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	0	•		
I.		you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any ted person) for client referrals?	•	0		
	In your response to Item 8.I., do not include the regular salary you pay to an employee.					
In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.F received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the nuamount of client referrals.						

Iter	n 9 C	ustody			
		em, we ask you whether you or a <i>related person</i> ent Company Act of 1940) assets and about your	has <i>custody</i> of <i>client</i> (other than <i>clients</i> that are investment companies registered under the r custodial practices.	ıe	
A.	(1)	Do you have <i>custody</i> of any advisory <i>clients</i> ':		Yes	No
		(a) cash or bank accounts?		0	\odot
		(b) securities?		0	•
	advi to c	isory fees directly from your clients' accounts, or	nswer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your r (ii) a related person has custody of client assets in connection with advisory services you p that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) fr	rovic	
	(2)	If you checked "yes" to Item 9.A.(1)(a) or (b), you have <i>custody</i> :	what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for	or wh	nich
		U.S. Dollar Amount To	otal Number of <i>Clients</i>		
		(a) \$ 0	0) 0		
	acco cust	ounts, do not include the amount of those assets rody of client assets in connection with advisory s	d you have custody solely because you deduct your advisory fees directly from your clients' and the number of those clients in your response to Item 9.A.(2). If your related person has services you provide to clients, do not include the amount of those assets and number of the that information in your response to Item 9.B.(2).		
В.	(1)	In connection with advisory services you provid	de to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of your advisory <i>clients</i> ':	Yes	No
		(a) cash or bank accounts?		\circ	\odot
		(b) securities?		\circ	\odot
	You	are required to answer this item regardless of ho	now you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(1)(a) or (b), your <i>related persons</i> have <i>custody</i> :	what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for	or wh	nich
		U.S. Dollar Amount To	otal Number of <i>Clients</i>		
		(a) \$ (b)	o)		
C.	-	ou or your related persons have custody of client wing that apply:	t funds or securities in connection with advisory services you provide to clients, check all the	<u> </u>	
	(1)	A qualified custodian(s) sends account statemen	ents at least quarterly to the investors in the pooled investment vehicle(s) you manage.		
	(2)	An <i>independent public accountant</i> audits annua statements are distributed to the investors in the	, p		
	(3)		·		
			internal control report with respect to custodial services when you or your <i>related persons</i>		
	prep	pare an internal control report. (If you checked It	Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examinated from 9.C. (2), you do not have to list auditor information in Section 9.C. of Schedule D if you are funds you advise in Section 7.B.(1) of Schedule D).		
D.			stodians for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	Yes	No
		you act as a qualified custodian		О	⊙
	(2)	your related person(s) act as qualified custodian	ın(s)	0	⊚
	206		rsons that act as qualified custodians (other than any mutual fund transfer agent pursuant to if Schedule D, regardless of whether you have determined the related person to be operation t.		
E.		ou are filing your annual updating amendment are all year, provide the date (MM/YYYY) the examination	nd you were subject to a surprise examination by an <i>independent public accountant</i> during yation commenced:	your	last
F.			t funds or securities, how many <i>persons</i> , including, but not limited to, you and your <i>related</i> in the strong services you provide to <i>clients?</i>	perso	ons,

SECTION 9.C. Independent Public Accountant

Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

Yes No

A. Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies?

 \circ

If yes, complete Section 10.A. of Schedule D.

B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the *filing adviser* and all *relying advisers* under an *umbrella registration*.

Your advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.B.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1) (a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

You	must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
		Yes	s No
Do	any of the events below involve you or any of your supervised persons?	0	•
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
A.	In the past ten years, have you or any advisory affiliate:	Yes	s No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	•
	(2) been charged with any felony?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item to charges that are currently pending.	11.A.	(2)
В.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been charged with a misdemeanor listed in Item 11.B.(1)?	О	⊙
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item to charges that are currently pending.	11.B.	(2)
For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	s No
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	•
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	•
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	О	•
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	•
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	•
	(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	Ö	•
	(4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	0	•
	(5) ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate's</i> activity?	o	•
E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	⊙
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	0	•
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•

-, - 0,	,		
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•
F.	Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•
G.	-, -, -, -, -, -, -, -, -, -, -, -, -, -	0	•
	11.D., or 11.E.?		
<u>For</u>	r "yes" answers to the following questions, complete a Civil Judicial Action DRP:		
For H.	r "yes" answers to the following questions, complete a Civil Judicial Action DRP:	Yes	No
	r "yes" answers to the following questions, complete a Civil Judicial Action DRP:	Yes	No ⊙
	r "yes" answers to the following questions, complete a Civil Judicial Action DRP: (1) Has any domestic or foreign court:		
	r "yes" answers to the following questions, complete a Civil Judicial Action DRP: (1) Has any domestic or foreign court: (a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	O	•

Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- Control means the power to direct or cause the direction of the management or policies of a person, whether through ownership of securities, by contract, or otherwise. Any person that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another person is presumed to control the other person.

		Yes	No
Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	О
If '	yes," you do not need to answer Items 12.B. and 12.C.		
В.	Do you:		
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0

Schedule A

Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
 - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions:
 - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act); Direct owners include any person that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a person beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-inlaw, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (c) if you are organized as a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
 - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
 - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? Yes O No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5%
- B 10% but less than 25% D 50% but less than 75%
- A 5% but less than 10% $\,$ C 25% but less than 50% $\,$ E 75% or more
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

• • • • • • • • • • • • • • • • • • • •								
FULL LEGAL NAME DE/FE/I		Title or Status	Date Title or	Ownership	Control	PR	R CRD No. If None: S.S. No.	
(Individuals: Last Name,			Status Acquired	Code	Person		and Date of Birth, IRS Tax	
First Name, Middle Name)			MM/YYYY				No. or Employer ID No.	
CLARK, MEGAN, LEE	I	CHIEF COMPLIANCE OFFICER/INVESTMENT ADVISOR REPRESENTATIVE	12/2018	NA	Y	N	5733655	
MLC CLARK FAMILY LLC	DE	OWNER	12/2018	E	Υ	N	83-3443160	

Schedule B

Indirect Owners

- 1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

- (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: C 25% but less than 50% E 75% or more
 - D 50% but less than 75% F Other (general partner, trustee, or elected manager)
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)		Entity in Which Interest is Owned		Date Status Acquired MM/YYYY		Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
CLARK, MEGAN, LEE	I	MLC CLARK	OWNER	12/2018	E	Υ	N	5733655
		FAMILY LLC						

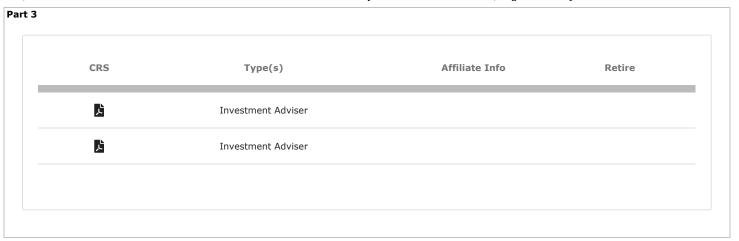
Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

Schedule R
No Information Filed

DRP Pages
CRIMINAL DISCLOSURE REPORTING PAGE (ADV)
No Information Filed
REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)
No Information Filed
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV) No Information Filed

Part 2								
Exemption from brochure delivery requirem	ents for SEC-registered advisers							
SEC rules exempt SEC-registered advisers from brochure to <i>all</i> of your advisory clients, you do n	_	clients. If these exemptions excuse you from delivering a						
		Yes No						
Are you exempt from delivering a brochure to all	Are you exempt from delivering a brochure to all of your clients under these rules?							
If no, complete the ADV Part 2 filing below. Amend, retire or file new brochures:								
Brochure ID	Brochure Name	Brochure Type(s)						
404059	FORM ADV2A/2B - SEC	Individuals, High net worth individuals, Pension consulting, Financial Planning Services, Selection of Other Advisers/Solicitors, Includes material about supervised persons that would otherwise be in a supplement (state-registered advisers only)						



Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SFC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: Date: MM/DD/YYYY
MEGAN CLARK 04/30/2025

Printed Name: Title:

MEGAN CLARK CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

300619

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. Non-Resident Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits

and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

300619

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