



ADV PART 2A: BROCHURE

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January 16, 2020

This brochure provides information about the qualifications and business practices of Fresh Start Financial, LLC. (dba "BrightTree Financial"). If you have any questions about the contents of this brochure, please contact us at: 808-521 4401 or harold.green@brightfg.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. Registration with the commission does not imply a certain level of skill or training.

Additional information about Fresh Start Financial, LLC. (dba "BrightTree Financial") also is available on the SEC's website at www.adviserinfo.sec.gov.

CRD# 304721

Item 2 Material Changes

Fresh Start Financial, LLC. (dba "BrightTree Financial") is required to comply with the new reporting and filing requirements. Our Firm Brochure, dated 1/16/2020, is our new disclosure document prepared according to those requirements and rules.

After our initial filing of this Brochure, this section will be used to provide our clients with a summary of new and/or updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year.

Material Changes (as of January 16, 2020):

As of January 16, 2020, our firm has approximately \$25,975,137 in assets under management on a discretionary basis. We do not manage accounts on a non-discretionary basis.

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Attachments

Form ADV Part 2B Supplement

Item 4 Advisory Business

Fresh Start Financial, LLC. (dba "BrightTree Financial") is a pending state-registered investment adviser with its principal place of business located in Hawaii. The firm is now registered in Hawaii, California, and Texas.

BrightTree Financial will begin conducting advisory business in 2019.

Harold Green – 100% owner and principal

BrightTree Financial offers the following advisory services to its clients:

Our services consist of: (1) retirement planning, (2) wealth management, (3) pension planning & advising services, (4) 401(k) advice and management services, (5) college financial planning, (6) investment advisory, and (7) financial planning and advising.

Investment Management

Our portfolio management services include the following:

- Assess client's risk tolerance
- Create investment strategy based on goals
- Implement agreed upon strategy
- Ongoing monitoring of strategy and investment performance
- Conduct reviews no less than annually
- Make changes to the portfolio if it is no longer performing according to goals
- 401(k) management – Log in and manage company 401(k)

Financial Planning

Our financial planning services includes the following:

- Reviewing and prioritizing your goals and objectives.
- Developing a summary of your current financial situation, including a net worth statement, cash flow summary, and insurance analysis.
- Reviewing your current investment portfolio and developing an asset management strategy.
- Developing a financial management strategy, including financial projections and analysis.
- Completing a retirement planning assessment, including financial projections of assets required at estimated retirement date.
- Assessing estate net worth and liquidity.
- Identifying tax planning strategies to optimize financial position.
- Presenting a written financial plan that will be reviewed in detail with you. It will contain recommendations designed to meet your stated goals and objectives, supported by relevant financial summaries.
- Developing an action plan to implement the agreed upon recommendations.
- Referral to other professionals, as required, to assist with implementation of the action plan.
- Assisting you with the implementation of the financial plan.
- Determining necessity to revise your financial plan.

College Funding & Planning – See college services agreement for services provided.

Our Firm tailors its advisory services to the individual needs of its clients by analyzing each client's financial situation based on the short-term & long-term goals.

Our firm invests in a wide universe of types of securities and does not offer advice on limited types of investments only.

Clients should be aware that additional compensation by our firm and its management persons or access person may create a material conflict of interest. A conflict of interest may also exist if for the fees we collect through offering additional investment management, insurance, and/or financial planning services.

California Advisors - In accordance with **CCR Section 260.235.2**, we are required to disclose if a conflict exists between the interests of the investment adviser and the interests of the client. If so, the client is under no obligation to act upon the investment advisor's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

In accordance with **CCR § 260.238(k)**, Conflict of Interest Disclosure - In accordance with CCR § 260.238(k), any material conflict of interest relating to you or your representatives and employees that could be reasonably expected to impair the rendering of unbiased and objective advice does not promote "fair, equitable or ethical principles". Conflicts of interest may include, but are not limited to, (a) compensation arrangements connected with advisory services which are in addition to the advisory fees, (b) other financial industry activities or affiliations, or (c) participation of interest in client transactions.

Our firm does not participate in any wrap fee accounts.

As of January 16, 2020, our firm has approximately \$25,975,137 in assets under management on a discretionary basis. We do not manage accounts on a non-discretionary basis.

Item 5 Fees and Compensation

Investment Management Fee Schedule

For: (1) retirement planning, (2) wealth management, (3) pension planning & advising services

Amount	% of Assets (Annual Fee)	% of Assets (Quarterly Fee)
Under \$100,000	2.41%	.6025%
\$100,000 - \$249,000	2.31%	.5775%
\$250,000 - \$499,999	2.21%	.5525%
\$500,000 - \$749,999	2.11%	.5275%
\$750,000 - \$999,999	2.01%	.5025%
\$1,000,000 - \$1,999,999	1.95%	.4875%
\$2,000,000 - \$2,999,999	1.85%	.4625%
\$3,000,000 and above	1.10%	.275%

For: (3) pension planning & advising services

Amount	% of Assets (Annual Fee)	% of Assets (Quarterly Fee)
Under \$100,000		
\$100,000 - \$249,000		
\$250,000 - \$499,999		
\$500,000 - \$749,999		
\$750,000 - \$999,999		
\$1,000,000 - \$1,999,999		
\$2,000,000 - \$2,999,999		
\$3,000,000 and above		

401(k) Investment Management Fixed Fees: \$1500/annually - paid a quarterly basis.

College Planning Services: \$2500/initial payment; \$585/each year thereafter.

Billing for Investment Management Services

Beginning fees - Advisor's fees for the first calendar quarter during which this agreement is in effect shall be due and payable on the effective date. Advisory fees are payable quarterly based on the formula and schedule of rates set forth on the attached (see *Addendum A*).

Billed in Advance - Advisor's fees for each subsequent calendar quarter during the term of this agreement shall be due and payable at the **beginning of each following quarter**. Fees shall be deducted at the discretion of the client.

Financial Planning Fees Schedule

- Flat Fee: \$2500/annual
- Hourly Fee: \$375

Billing for Financial Planning Services

Billed in Advance - Advisor's fees for each subsequent calendar quarter during the term of this agreement shall be due and payable at the **beginning of each following quarter**.

Flat/Hourly fees will depend on the size and scope of financial planning projects.

Fixed fees will be billed directly from the account and broken down by quarter. Example:
Fee = \$500/4 = \$125 per quarter.

Direct Debiting of Fees for investment management and financial planning

Client hereby authorizes Advisor to charge the Account for the full amount of Advisor's fees as such fees become due and payable, provided that Advisor maintains records showing (a)

the amount of the fee, (b) the Account value (as defined herein) on which the fee was based and (c) the specific manner in which the fee was calculated; provided, further, that

Client shall direct the Custodian to send to Client Monthly a statement indicating all amounts disbursed from the Account, including the amount of all fees paid to Advisor. Refer to Item 15 for our firm's full custody safeguarding requirements.

Termination of Services

Client may terminate this Agreement upon notice to the Advisor at any time within five (5) days from the date hereof. Thereafter, either Client or Advisor may terminate this Agreement by giving thirty (30) days prior written notice of termination to the other. Upon termination, any fees owed to the Advisor shall be paid by the Client on a prorated basis as of the effective date of termination.

Refund Policy

If this agreement is terminated as of any day other than the last day of a calendar quarter or the effective date is any day other than the first day of a calendar quarter, where applicable, Advisor's fees shall be prorated to reflect the number of days in such calendar quarter that this agreement will be or was in effect. In the case that this agreement is terminated as of any day other than the last day of a calendar quarter, Advisor shall refund client by an amount equal to the difference between (a) the fees prepaid to Advisor for such calendar quarter and (b) the fees Advisor is entitled to retain pursuant to this paragraph.

Other Fees

Our custodians may charge for these expenses and other brokerage transactional costs, such as load charges, 12B-1 fees and other administrative charges. The client will be responsible for any other miscellaneous charges incurred by our custodians. Please see review to Item 12: Brokerage Practices for an overview of other assessable fees.

Advisory Fees in General: clients should note that lower fees for comparable services may be available from other sources. (CCR 260.238(j)).

BrightTree Financial does not require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered.

Compensation from other investment products

Clients should be aware that additional compensation by our firm and its management persons or access person may create a material conflict of interest.

A conflict of interest may also exist if for the fees we collect through offering additional investment management, insurance, and/or financial planning services. Our principals may have an incentive to recommend investment products based on compensation rather than the clients' needs.

Our firm will take these additional steps to address any material conflicts of interest:

- We will disclose to clients the existence of all material conflicts of interest to our clients.
- We will disclose to clients that they are not obligated to purchase any recommended investment products that we offer to our clients.
- We will collect and maintain accurate, complete and relevant client information with involves our client's financial goals, investment objectives and risk tolerance;
- Our supervised persons will conduct regular reviews of each client account;
- Our employees must receive approval for outside business activities;

Clients are not obligated to implement nor purchase any securities based on the recommendations of advisor. They may choose to implement the recommendations of other brokers or agents that are not affiliated with our firm.

BrightTree Financial does not receive 50% or more of its revenue from advisory clients results from commissions and other compensation for the sale of investment products you recommend to your clients, including asset-based distribution fees from the sale of mutual funds, disclose that commissions provide your primary or, if applicable, your exclusive compensation.

BrightTree Financial does not charge advisory fees in additional to commission or markups for financial Planning and/or investment management services. We may receive insurance commissions in addition to the advisory fees that we charge to our clients. Clients are not obligated to purchase insurance, investment advisory, and/or financial advisory services from our firm.

Our fees are negotiable based on the size and complexity of a clients' account.

Total fees charged by our firm will not exceed 3% of assets under management.

Pursuant to Board Rule 116.13(a), Any registered investment adviser who wishes to charge 3.0% or greater of the assets under management must disclose that such fee is in excess of the industry norm and that similar advisory services can be obtained for less.

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

BrightTree Financial does not charge any performance-based fees (or any other fees based on a share of capital appreciation or gains above a set benchmark).

Performance fees to "qualified clients" in accordance to Rule 205-3 (or similar state rules, which state a minimum requirement of \$1 million in managed assets and/or \$2.1 million in household net worth).

Item 7 Types of Clients

BrightTree Financial provides advisory services to the following types of clients

- Individuals
- High Net Worth
- Pension/Profit Sharing Plan

- Charitable Organizations
- Corporations/Other Businesses

The minimum account size is \$100,000 and is negotiable on a case by case basis with firm approval.

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

Advisor is responsible for monitoring investment securities for each asset class.

The main sources of information used to analyze securities are Portfolio X-Ray® by Morningstar. Portfolio X-Ray is a sophisticated analytical tool that allows you to dissect your portfolio and gain a clear view of your holdings.

Portfolio X-Ray allows you to evaluate your overall asset allocation and sector weightings as well as uncover concentrated positions, view the stock holdings behind your mutual funds, measure performance against benchmarks and industry indexes, and stay up to date on the latest news and corporate actions relating to your holdings. There are no additional costs to clients for use of this service.

Investment Strategies

Advisor bases its primary investment strategy on the Rapid Retire program's retirement date

Describe Investment Strategy used: The strategy used is based on a combination of the flooring technique and bucket strategy. Rapid Retire consist of three components. Cash Flow Management – Cash Reserve Systems – Income Generation. Each indivial client receives a risk assessment and goals evaluation.

Our investments included but are not limited to stocks, bonds, mutual funds, and REITS. Risks are reduced using the fiduciary approach to investing as part of the Rapid Retire® Program.

Flooring Technique

Flooring is classifying retirement expenses as essential or discretionary. Low-risk investments or annuity guarantees are selected to fund essential expenses. A mix of medium- and high-risk investments is selected to fund discretionary expenses. Income is drawn from the respective pools to cover essential and discretionary expenses. By annuitizing a portion of the portfolio to pay for everyday expenses, a fixed income is created to simulate a defined-benefit pension plan.

Bucket Strategy:

The Bucket Strategy consists of setting up separate pools of investments with lowest-risk investments in the near-term segment, somewhat higher-risk investments in the next segment, and the riskiest portfolio (highest reward) in the longest-term segment. Income is then drawn down from one segment at a time, and when assets from one segment are depleted, assets from the second segment are used for income.

Types of Risk

- **Market-related** events can affect all financial and/or securities industries. In these occurrences, often based on data with global implications, many companies, regardless of its size, structure, and financial condition, can experience swings in market valuation and securities pricing.
- **Interest-rate changes** may cause a swing in security pricing and market valuations. For example, when bond yields increase, increase rates typically decrease. As such, this may make investors less incentivized, or similarly in inverse bond yield conditions, to hold onto certain security types.
- **Inflation levels**, due to an increase in the prices of goods and services, may cause swings in certain securities pricing.
- **Deflation levels**, due to a decrease in the prices of goods and services, may cause swings in certain securities pricing.
- **Currency fluctuations**, due to global micro or macro-economic conditions, can bring added risk to an underlying security. Certain security types may have more or less risk given its ties to a certain currency, especially if a company's operations, taxes or profit margins are dependent on exchange rates. This level of risk is largely due to the fact that many currencies are pegged against other world currencies.
- **Credit/Debt changes**, due to a company/securities exposure to debt or other related defaults, can cause a swing in equity/market valuations. The ability of a debt holder to pay a debt may be factored into the pricing on the security/investments (e.g. bond, credit based mutual funds). In addition, the amount of credit available to an underlying company, may factor into its ability to grow, and thus could affect securities/market valuation and earnings.
- **Commodity risk** may occur if/when a security pricing or company is prone to seasonal or cyclical market conditions associated with a certain commodity. For example, a security with that purchases steel, rubber, or other commodities for its underlying companies, may pose an added risk to an investment position.
- **Industry Specific issues** may occur if/when a security or company is prone to seasonal or cyclical market dynamics associated with a certain industry. For example, a company with ties to the retail space may have swings associated with earnings season or a holiday projections.
- **Equity/Liquidity issues** may arise if an investment manager experiences difficulty when attempting to exit a position due to a security within a limited market of buyers and sellers (e.g. illiquid securities, secondary market securities, low float stocks).
- **Management level** risks can occur based on the performance of management. For example, financial mistakes due to management decisions or frequent changes senior level staff (e.g. CEO exits due to improprieties or internal strife) can cause swings in securities/market valuations.
- **Premium Risk** is associated the minimum amount of money by which the expected return on a risky asset must exceed the known return on a risk-free asset in order to induce an individual to hold the risky asset rather than the risk-free asset.

Security/Products Types of Risk

- **Mutual Fund and Exchange Traded Fund (“ETF”)** risks may be associated with the Fund’s NAV/market price, trading price, yield, costs, and ability to meet its investment objectives.
- **Real Estate Investment Trusts (“REITs”) risks** may be associated with changes in real estate prices, credit markets, interest rates, and overall market condition as mentioned above.

Risk associated with Rapid Retire Product

- Rapid Retire consist of three components. Cash Flow Management – Cash Reserve Systems – Income Generation. Each induvial client receives a risk assessment and goals evaluation.

The risk are mitigated through a balance of short-term, intermediate, & long-term investments.

DISCLOSURE: Investing in securities does involve risk of loss that clients should be prepared to bear. The risks can range from failing to keep pace with inflation to losing some or all of the money you invest.

Item 9 Disciplinary Information

We are required to disclose if there are legal or disciplinary events that are material to a client’s or prospective client’s evaluation of our business or the integrity of your management. BrightTree Financial has no disciplinary history to report.

Item 10 Other Financial Industry Activities and Affiliations

Applications for registration as a broker-dealer/registered representative

BrightTree Financial, nor any of its management persons, has a registration, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Applications for futures/commodity/other merchants

BrightTree Financial, nor any of its management persons, has a registration or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities

Relationships/Affiliations

Harold A. Green is the founder and President of HG Capital Advisors which was established in 2005. The firm underwent a name change in 2019 and is now known as BrightTree Financial. They provide college admissions and college funding planning. BrightTree Financial also provides financial aid planning. College Planning Services Fee: \$2500/first year (and then \$585 each year thereafter).

He spends approximately 15 hours per week on these activities.

In addition to these activities, Harold may be compensated directly by an insurance carrier for fixed products such as annuities, life insurance, long term care and Medicare Supplements. He spends approximately 5 hours per week on these activities.

Other Investment Managers

BrightTree Financial, and its management persons, may select other investment advisers for our clients and may receive compensation directly or indirectly from those advisers. Our firm will make sure the third-party adviser is properly licensed or reported in the state the client resides. We understand that creates a material conflict of interest.

How we handle conflict of interests

Clients should be aware that any additional compensation by our firm and its management persons or access person may create a material conflict of interest. A conflict of interest may also exist if for the fees we collect through offering additional investment management, insurance, and/or financial planning services.

Our firm will take the following steps to address any material conflicts of interest:

- We will disclose to clients the existence of all material conflicts of interest to our clients.
- We will disclose to clients that they are not obligated to purchase any recommended investment products that we offer to our clients.
- We will collect and maintain accurate, complete and relevant client information with involves our client's financial goals, investment objectives and risk tolerance;
- Our supervised persons will conduct regular reviews of each client account;
- Our employees must receive approval for outside business activities;

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

BrightTree Financial has adopted a Code of Ethics, the full text of which is available to any (or prospective) clients upon request. The firm has several goals in adopting this Code. First, desires to comply with all applicable laws and regulations governing its practice. Second, the firm believes that compliance with such regulations is a signal to its clients that exists to serve them, and that supports the efforts of those organizations dedicated to upholding the law.

Furthermore, BrightTree Financial has determined to set forth guidelines for professional standards, under which all associated persons of are to conduct themselves. has set high standards, the intention of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with clients. All associated persons are expected to strictly adhere to these guidelines, as well as the procedures for approval and reporting established in the Code of Ethics primarily related to personal securities transactions, and violations of the Code. This will serve to educate associated persons regarding appropriate activities. Advisor Name has instituted, as a deterrent, a policy of disciplinary actions to be taken with respect to any associated person who violates the Code.

Mr. Green, and its associated persons, does not make any recommends to clients, or buys or sells for client accounts, securities in which you or a related person has a material financial interest, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

Mr. Green and/or its associated persons may take positions in the same securities as clients, and in all such cases will seek to avoid conflicts with clients. In accordance with our fiduciary responsibilities to our clients, our associated persons will generally be "last in" and "last out" for any trading that may occur in securities that are not exempt from federal reporting.

Mr. Green and/or its associated persons may also make recommendations in the same securities as clients, or buy or sells securities for client accounts, at or about the same time that a client or a related person buys or sells the same securities. In all such cases will seek to avoid conflicts that could harm our clients.

How we handle conflicts of interest

Our firm will take these additional steps to address any material conflicts of interest:

- We will disclose to clients the existence of all material conflicts of interest to our clients.
- We will disclose to clients that they are not obligated to purchase any recommended investment products that we offer to our clients.
- We will collect and maintain accurate, complete and relevant client information with involves our client's financial goals, investment objectives and risk tolerance;
- Our supervised persons will conduct regular reviews of each client account;
- Our employees must receive approval for outside business activities;

Item 12 Brokerage Practices

BrightTree Financial participates in Folio, client program for custody and brokerage services. Folio Institutional delivers complete solutions to financial advisors, professionals, institutions, and their clients. Their focus on investment innovation has enabled them to build a leading platform for low-cost diversification, suitable for clients of any size.

Folio Institutional was founded to provide advisors and other professionals with the tools they need to deliver better solutions to their clients. With the Folio platform:

- Investors of all sizes and investment styles can enjoy the advantages of a flexible and diversified portfolio, with
- Transparency and direct control over the securities they own, and
- Reduced costs from commission free-trading, fee-free portfolios, and better control of capital gains taxes.

Factors Used to Select Broker-Dealer Custodians

We prefer that our portfolio management clients use the custodial and brokerage services of Folio Investments, Inc. ("Folio"), which is a, SEC-registered online broker-dealer, and FINRA and SIPC member firm.¹ In recommending Folio, we have taken into account Folio's ability to provide professional services, our experience with Folio, their reputation, their quality of

execution services, and the cost of such services. Among other factors, as part of the standard packages of services available to all advisers and their clients who use Folio as a custodian, Folio offers a unique “window trading” methodology for executing orders (described in detail on www.foliodclient.com); a model manager exchange; advisory fee billing services; online access to the Folio platform to enter orders, view account information and use tax management functionality; and performance reports. Our firm conducts periodic assessments of custodians involving a review of the range and quality of services, reasonableness of fees, among other items, in comparison to industry peers. While we recommend that you use Folio, it is your decision whether to do so. You open your account directly with Folio by entering into an account agreement. We do not open a Folio account for you, although we will assist you in doing so.

Research and Other Soft Dollar Benefits

The commissions and/or transaction fees charged by Folio may be higher or lower than those charged by other custodians. Clients engaging for portfolio management services authorize the Advisor to determine the securities to be bought and sold, including the number of shares and/or dollar value.

We do not receive any soft dollar benefits.

The firm did not direct any client transactions or offer any products/services in the previous fiscal year.

Brokerage for Client Referrals

The commissions and/or transaction fees charged by Folio may be higher or lower than those charged by other custodians.

We do not receive any client referrals from a broker-dealer and/or third parties.

Therefore, we do not have any incentives to select or recommend a broker-dealer based on our interest in receiving client referrals, rather than on our clients’ interest in receiving most favorable execution.

Please review our summary of “How we handle potential conflicts of interest in our summary provided in Item 4 and Item 11 of our ADV. The firm did not direct any client transactions in the previous fiscal year.

Directed Brokerage

Client assets must be held at a qualified custodian which is generally a broker-dealer or bank.

BrightTree Financial will recommend client assets to be held at Folio Institutional. Folio is unique in that it offers trading in fractional shares.

Our clients should understand that that by directing our clients to use brokerage services provided by Folio, we may be unable to achieve most favorable execution of client transactions, and that this practice may cost our clients more money.

We do not require our clients to open a brokerage account with Folio and have no economic relationship nor any other conflict of interests to disclose with Folio.

Our clients may direct its accounts to another brokerage but may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, and ultimately, they may receive less favorable prices.

Aggregating Securities Transactions

Our firm does not aggregate purchases and sales for various client accounts. However, orders are aggregated by Folio as part of its patented "Window Trade" process. Instead of being executed immediately, Folio Window orders are processed one or more times per day and executed generally around 11 a.m. ET and 2 p.m. ET. In the Window Trade process, Folio aggregates orders designated for trading in the Window based on the ticker symbol of each security and whether it is a buy or sell order. An aggregated order may include any combination of orders from your accounts, other customer accounts, and Folio's firm account. Folio generally routes aggregated orders to a market maker for execution or to a mutual fund company for fulfillment. Folio may also execute Window orders entirely by using its own inventory of securities. All Folio customers receive the same execution price for any given Window trade.

Item 13 Review of Accounts

Periodic Review

Harold Green reviews all investment accounts no less than a quarterly/monthly basis following receipt of account information from our custodian. The nature of the review will include general market conditions as well as a client's investment objective, risk tolerance, goals, and overall performance among other things. Mr. Green, the firm's principal will be conducting reviews of behalf of its clients.

Factors that Trigger a Review

Harold Green will periodically review accounts to ensure that the portfolios meet client objectives. Mr. Green will review accounts more frequently should a change in client's objectives or a market event warrant a course of action.

Frequency of reports

Client will receive an updated report annually in their E-Wealth portal. The report content will include a summary of a clients' investments, performance, portfolio allocations, and risk tolerance. assets.

Item 14 Client Referrals and Other Compensation

BrightTree Financial does not either directly or indirectly, compensate any person (defined as a natural person or an entity) for client referrals.

Item 15 Custody

We do not take constructive custody of any client assets. As a discretionary advisor, we may have a form of custody and will follow, and applicable net worth and/or financial requirements based on our home state.

Custody: Safeguarding of Client Assets:

BrightTree Financial has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

Each time a fee is directly deducted from a client account, firm concurrently:

- Sends a copy of your invoice to the custodian or trustee at the same time that we send a copy to the client; and/or
- Sends the client a quarterly invoice or statement showing all disbursements for the custodian account. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.
- Maintains written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- Notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided above.

Clients will receive account statements from the broker-dealer, bank or other qualified custodian and that clients should carefully review those statements. Clients that receive an account statements for us should also compare with the account statements they receive from the qualified custodian.

Item 16 Investment Discretion

BrightTree Financial accepts discretionary authority for its client accounts. Firm shall have limited power of attorney to direct, manage, and change the investment and reinvestment of all assets in the Account, and to take other action with respect to the accounts, *without prior permission from client*. Before assuming discretionary authority, our firm will have our clients enter into a signed investment advisory agreement, which includes a disclosure that grants our firm a limited power of attorney.

Item 17 Voting Client Securities

BrightTree Financial does not vote proxies for its client accounts. There are no conflicts of interest to report at this time. Clients, who elect to vote their own proxies, may contact their custodian for its proxy voting delivery procedures and practices.

Item 18 Financial Information

BrightTree Financial does not require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered.

BrightTree Financial is also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. BrightTree Financial has no additional financial circumstances to report.

BrightTree Financial has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

Harold Green – 100% owner and principal

Harold A. Green is the founder and President of HG Capital Advisors which was established in 2005. The firm underwent a name change in 2019 and is now known as BrightTree Financial. They provide college admissions and college funding planning. BrightTree Financial also provides financial aid planning. He spends approximately 15 hours per week on these activities.

In addition to these activities, Harold may be compensated directly by an insurance carrier for fixed products such as annuities, life insurance, long term care and Medicare Supplements. He spends approximately 5 hours per week on these activities.

More information on his "Other Business Activities" is listed on Item 10 and Item 4 of the attached ADV Part 2B Supplement.

No representatives of the firm are compensated for advisory services with performance-based fees.

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory or administrative proceedings in which our firm or management personnel were found liable or against whom an award was granted.

We have no disciplinary actions or complaints to disclose or report.

The firm will maintain a written business continuity plan to address standard business disruptions ("SBDs") and emergency procedures.

Please refer to Item 10 "Financial Affiliations and Activities" for any information related to our other business activities and affiliations.

Please refer to the Part 2B brochure of Form ADV regarding Mr. Green's educational and business background.

Texas/Hawaii Advisors - Client acknowledges receipt of Part 2 of Form ADV; a disclosure statement containing the equivalent information; or a disclosure statement containing at least the information required by Part 2A Appendix 1 of Form ADV, if the client is entering into a wrap fee program sponsored by the investment adviser. If the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the

right to terminate the contract without penalty within five business days after entering into the contract. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or, in the case of an oral contract, otherwise signified their acceptance, any other provisions of this contract notwithstanding.



ADV PART 2B: BROCHURE SUPPLEMENT

Harold Green

1221 Kapiolani Blvd. Suite 320
Honolulu, HI 96814
808-521-4401

<https://brightfg.com>

January 16, 2020

This brochure supplement provides information about Harold Green (CRD# 6712300) that supplements the BrightTree Financial brochure. You should have received a copy of that brochure.

Please contact Harold Green, if you did not receive Mr. Green's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Green is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Harold A. Green, (CRD# 6712300) is an Investment Advisor Representative

Business Background/Education:

Harold was born in 1973. He has over 22 years of industry experience since November 1996 and continuing course education along with holding his Series 63 and 65. He also holds the following industry designations; Chartered Life Underwriter® (CLU®) and Chartered Advisor in Philanthropy® (CAP®). In addition, he also holds his life and health insurance license.

Positions held for the preceding ten years:

- Founder and President of BrightTree Financial., 06/2019 - Present
- Investment Advisor Representative, Guardian Point Private Wealth Management., - 06/2017 – 07/2019
- Founder and President of HG Capital Advisors, Inc. 07/2005 – Present

Professional Designations:

- Chartered Life Underwriter®, CLU®
- Chartered Advisor in Philanthropy®, CAP®

A Chartered Life Underwriter® (CLU®) has earned the premier credential in the insurance profession, representing eight or more comprehensive college-level courses covering all aspects of insurance planning, estate and retirement issues, taxation, business insurance, and risk management. For more than 80 years consumers have trusted this mark, which is conferred by The American College, a non-profit educator with the highest level of accreditation. The average study time for the program is over 400 hours and can take years to earn. Each CLU® must also complete a minimum of 30 hours of continuing education every two years, adhere to strict ethical standards, and meet extensive experience requirements, ensuring the knowledge you're counting on is both comprehensive and current.

The Chartered Advisor in Philanthropy® (CAP®) program provides financial advisors and planners with the knowledge and tools to provide high-level philanthropic and charitable planning to clients. It prepares advisors for advanced design, implementation, and management of charitable gift techniques, as well as philanthropic tools including charitable trusts, private foundations, donor-advised funds, pooled income funds, and charitable annuities.

Item 3 Disciplinary History

There has been no criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Harold A. Green has been involved.

There has been no administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign regulatory authority in which Harold A. Green has been involved.

Harold A. Green has not been involved in any self-regulatory organization proceeding.

Harold A. Green has not been a part of any hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 Other Business Activities

Investment Related Business

Harold A. Green is the founder and President of HG Capital Advisors which was established in 2005. They provide college admissions and college funding planning. HG Capital also provides financial aid planning. He spends approximately 15 hours per week on these activities.

In addition to these activities, Harold may be compensated directly by an insurance carrier for fixed products such as annuities, life insurance, long term care and Medicare Supplements. He spends approximately 5 hours per week on these activities.

Item 5 Additional Compensation

Harold A. Green has never accepted economic benefits which include sales awards and other prizes. In addition, Harold A. Green has never accepted any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts for advisory services or assets under management.

Item 6 Supervision

Harold Green is responsible for all supervision, formulation and monitoring of investment advice offered to clients. Mr. Green may be reached at: 808-521-4401.

Harold Green reviews and oversees all material investment policy changes and conducts periodic to determine whether client objectives and mandates are met.

Item 7 Requirements for State-Registered Advisers

Harold Green has never been the subject of a bankruptcy petition nor has she ever been involved in any of the following events;

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or

(e) dishonest, unfair, or unethical practices.