



MCGILL ADVISORS
A DIVISION OF BRIGHTWORTH

McGill Advisors,
a Division of Brightworth, LLC
Part 2A of Form ADV
The Brochure

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Updated: March 26, 2021

This brochure provides information about the qualifications and business practices of Brightworth, LLC ("Brightworth"), which also does business under the name McGill Advisors, a division of Brightworth, LLC ("McGill Advisors Division"). This Brochure has been prepared for clients interested in the services provided under the name McGill Advisors. Brightworth's services and fees are described in a separate Brochure which is available upon request.

If you have any questions about the contents of this brochure, please contact us at (404) 760- 9000 or (866) 727-6100. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Brightworth, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our Firm's CRD number is 109569.

Item 2 - Material Changes

McGill Advisors, a division of Brightworth, LLC, has updated Form ADV Part 2 (brochure) as part of the annual amendment process. There have been no material changes made to this brochure since the last annual updating amendment on March 27, 2020.

Board of Directors (formerly known as the Management Committee) Members include: Raymond Padron, David Polstra, Sherry Hodor, Donald Wilson, Charles Jordan, Brett Miller, K. Warren Poe, and Dean Harbry.

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Item 4 - Advisory Business

McGill Advisors, a division of Brightworth, LLC, is a fee only advisor that provides investment management services to dental clients, as well as individuals, including high net worth individuals, pension and profit sharing plans, trusts, estates, corporations and other businesses. Brightworth, LLC was founded in 1997 as Polstra & Dardaman, LLC. The McGill Advisors division of Brightworth has an office located in Charlotte, North Carolina. More information on Brightworth, LLC is available in their separate brochure.

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

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

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

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

Seminars

McGill Advisors Division offers educational seminars on various wealth topics including retirement planning, investment planning, or other similar topics at the request of the seminar sponsor. The investment information provided under this service is educational in nature and does not purport to meet the objectives or needs of any particular attendee. McGill Advisors Division seminars are typically sponsored by and provided for select groups or organizations but are sometimes open to the public. We do not typically charge fees for presenting seminars. In addition, we frequently donate time and materials and can assume other expenses related to a seminar sponsored by a third party. Seminar sponsors will sometimes reimburse us for reasonable expenses.

Amount of Managed Assets

As of 12/31/2020, the McGill Advisors Division managed approximately \$2.25 billion on a discretionary basis. As of 12/31/2020, the total discretionary assets under management of Brightworth, including the McGill Advisors Division, was approximately \$4.58 billion.

Item 5 - Fees and Compensation

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

0.35%	per annum for amounts greater than \$10,000,000
0.45%	per annum for amounts greater than \$7,000,000 up to \$10,000,000
0.55%	per annum for amounts greater than \$5,000,000 up to \$7,000,000
0.65%	per annum for amounts greater than \$3,000,000 up to \$5,000,000
0.75%	per annum for amounts greater than \$2,000,000 up to \$3,000,000
0.85%	per annum for amounts greater than \$1,000,000 up to \$2,000,000
1.00%	per annum for the first \$1,000,000

Clients will be billed in advance at the beginning of each rolling 3-month billing period adjusted for material cash inflows and outflows. The fee will be a percentage of the market value of assets in the client's accounts on the last trading day prior to the billing date, according to the fee schedule above. Fees for the time-period preceding the initial billing date, will be pro-rated on the basis of the number of days the assets are in the account.

McGill Advisors' fee is negotiable, in limited circumstances only. Certain existing clients have engaged the McGill Advisors Division under previously applicable fee schedules which are generally lower and/or contain different breakpoints than those disclosed above. These legacy fee schedules are no longer offered or available to new clients. Additionally, family members and limited approved acquaintances of the associated persons of our firm have received discounts to our investment advisory fee.

Each client's specific annual fee schedule will be identified in the investment management agreement between the advisor and the individual client. Clients typically authorize McGill Advisors to deduct fees automatically from their investment accounts.

McGill Advisors minimum annual investment management fee is typically \$3,000 (1% * \$300,000). In limited circumstances this minimum is negotiable. When multiple related-party interests are managed, we group certain related client accounts for the purposes of achieving the minimum account size and determining the annual fee.

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

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

materials, form ADV, mutual fund prospectus, private placement memorandum and/or other documents. Clients should carefully review all documentation to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

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

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

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

McGill Advisors Division does not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because McGill Advisors Division does not have performance-based fee accounts, Side-by-Side Management is not applicable.

Item 7 - Types of Clients

McGill Advisors Division primarily provides advisory services to individuals, including high net worth individuals, pension and profit-sharing plans, trusts, estates, corporations and other businesses. McGill Advisors Division's standard minimum account size is \$300,000 or a minimum annual fee of \$3,000 for establishing and for maintaining a Portfolio Management Services account.

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

Methods of Analysis

Our Investment Committee and investment analysts conduct research and due diligence on third party money managers that we recommend for client accounts. We use independent money managers who specialize in the different components of our clients' portfolios. We evaluate, select, and monitor these managers using a combination of quantitative and qualitative methods. We generally use multiple managers in each client account to allow for focused expertise in each asset class or sector (such as small cap U.S. stocks or international stocks).

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

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

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

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

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

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

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

Investment Strategies

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

Depending on each client’s situation, we use different types of investment vehicles to implement a client’s portfolio, including but not limited to individual stocks and/or bonds, mutual funds, exchange traded funds, separate stock and bond accounts, limited partnerships, as well as hedge funds and private investments. We manage portfolios on an enterprise level to provide our current thinking across our clients and to create consistency for clients with similar objectives. In general, we invest each client’s portfolio in a model

portfolio and will further customize the client's investments, as applicable, based on the specific goals and objectives for each account (based on factors including the size of the account, the net worth of the client, risk tolerance of the client, the specific goals and objectives of the client, legacy positions with taxable gains, as well as any restrictions the client places on the account, if applicable).

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

Risk of Loss

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Most of the investments in our Client Portfolios allow settlement within two business days. The Brightworth Dynamic Investment Portfolios currently utilize two funds that invest in long-term assets such as commercial real-estate, infrastructure, timber, and farmland. Due to the long-term nature of the underlying assets, these funds, known as interval funds, offer to repurchase a portion of their outstanding shares each quarter. There is no guarantee that clients will be able to fully redeem all of the shares they wish to sell in any given quarter. While this is not typical, investors need to be aware that in certain market environments it may take multiple quarters for an investor to completely liquidate his/her position in these funds.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Political Risk:** Stock and bond markets can be positively or negatively affected by world political events.

- **ETF Risks:** The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments.
- **Mutual Fund Risks:** The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds.

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

Item 9 - Disciplinary Information

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

Item 10 - Other Financial Industry Activities and Affiliations

Neither the McGill Advisors Division nor its Partners and Staff, have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

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

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

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

We have adopted a written code of ethics that is applicable to all Partners and Staff, including the McGill Advisors Division. Among other things, the code requires the McGill Advisors Division and its Partners and Staff to act in clients' best interests, abide by all applicable regulations, and avoid even the appearance of insider trading.

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

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of

our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

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

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

A copy of firm's Code of Ethics is available upon request.

Item 12 - Brokerage Practices

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

Soft Dollar Benefits

The McGill Advisors Division does not have soft dollar arrangements with any brokerage firms based on volumes of transactions.

Other Benefits

The McGill Advisors Division, does receive certain products and services from Charles Schwab, Fidelity Investments and TD Ameritrade (our Recommended Custodians) free of charge or at discounted rates including:

- Access to institutional brokerage – trading, custody, reporting and related services;
- Duplicate client confirmations, statements, and other account information;
- Direct advisory fee debiting capabilities;
- Access to on-line investment research;
- Access to business consulting services, publications and presentations on various investment, financial planning and practice management topics

- Discounts on Alternative Investment Transaction fees, Annual Custody Fee and the Annual Custody Cap (with Charles Schwab)
- Discount pricing on Educational Conferences

The McGill Advisors Division has an incentive to use Recommended Custodians because their services enable us to more efficiently serve clients. We do not believe that clients whose accounts are held by Recommended Custodians incur any additional costs in connection with our receipt of the products and services described above. There is no affiliation or fee sharing arrangement between the McGill Advisors Division and the Recommended Custodians. However, the McGill Advisors Division would not receive the operational and economic benefits described above if we did not have an established relationship with these companies. These benefits do not depend on the amount of transactions directed by the McGill Advisors Division to the Recommended Custodians.

Trading & Best Execution

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

In general, on an annual basis, Brightworth/McGill Advisors' Investment Operations Department reviews and evaluates the pricing and services offered by the custodians we use with our clients, including Charles Schwab, Fidelity Investments and TD Ameritrade.

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

Item 13 - Review of Accounts

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

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

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

In addition to the custodial statement, McGill Advisors also provides clients with performance reports periodically, generally quarterly.

Item 14 - Client Referrals and Other Compensation

Brightworth has a policy that allows certain Partners and Staff, including individuals in the McGill Advisors Division, to be eligible to receive additional compensation for referring new clients to the firm. The compensation is a cash payment calculated as a percentage of the fees generated by the assets under management referred to Brightworth and the McGill Advisors Division. This policy could potentially create a conflict of interest in that an individual could be motivated to refer potential clients to the firm to earn compensation. The firm addresses this potential conflict by having the Wealth Advisor who will manage the new client relationship, review the prospective client's situation to determine if the potential client is a good fit for the firm's services. The firm is not obligated to accept as a client any prospective client referred by any Partner or Staff.

John K. McGill & Company (JKMC) has entered into a Consulting Agreement to which JKMC solicits potential clients for Brightworth/the McGill Advisor's investment advisory business. JKMC will receive compensation of up to 25% of the annual fees paid by the client to Brightworth for additional assets added. Consultants' specific compensation is detailed in the Solicitor Disclosure Statement which the Consultant shall provide to prospective clients prior to the start of their relationship with the McGill Advisors division of Brightworth.

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

Item 15 - Custody

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

Item 16 - Investment Discretion

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

Item 17 - Voting Client Securities

Clients can elect to have McGill Advisors vote proxies for the securities held in client investment accounts. This will be authorized by the client, in the clients' Investment Management Agreement as well as in the custodial paperwork signed by the client.

Clients can also choose to personally retain proxy-voting authority for their accounts and in these instances, Brightworth and the McGill Division do not have proxy voting responsibility and will not take any action regarding these clients' proxies. Clients will receive proxies directly from their custodian, the fund company transfer agent (in the case of a mutual fund) or by a third-party vendor hired by the fund company or custodian.

We have engaged the services of Broadridge's ProxyEdge platform to vote and maintain records of proxy votes. Brightworth will maintain relevant and appropriate proxy records as part of the firm's Proxy Voting Policy & Procedures. This information is available to clients upon written request. To receive this information, please send a written request to the Atlanta address listed on the cover page of this brochure or by calling us at (866)-727-6100.

Item 18 - Financial Information

The McGill Advisors Division does not require prepayment of fees more than six months in advance. Neither Brightworth nor the McGill Advisors Division has ever filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.

Brightworth has a significant, material financing arrangement with Fiduciary Network (FN) to provide financing for term shareholder loans and interest-only company loans used for the repurchase of retiring and terminated shareholder equity as well as certain mergers and acquisitions activities. This financing arrangement has allowed us to stay independent and to significantly expand the firm's employee ownership. FN owns non-voting shares representing approximately 0.04% of Brightworth's total outstanding equity ownership. FN's company loans have a non-voting equity conversion option that will become effective on the earlier of an event of default under the credit agreement or December 31, 2031. We believe this financing arrangement has allowed and will continue to allow Brightworth to provide our clients independent wealth management.

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

www.mcgilladvisors.com www.brightworth.com