

This brochure provides information about the qualifications and business practices of Brighter Retirement Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (801) 901-0987 or by email at: [office@brighterretirement.com](mailto:office@brighterretirement.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Brighter Retirement Advisors LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Brighter Retirement Advisors LLC's CRD number is: 321746.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 03/26/2026

## Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Brighter Retirement Advisors LLC on 09/26/2025 are described below. Material changes relate to Brighter Retirement Advisors LLC's policies, practices or conflicts of interests.

- Brighter Retirement Advisors LLC offers non-investment related services under the business name Brighter Retirement Consulting. (Item 4)
- Brighter Retirement Advisors LLC has updated its account minimum requirements. (Item 7)
- Brighter Retirement Advisors LLC has updated its conflicts of interest disclosures in Item 10.
- Brighter Retirement Advisors LLC has updated its fees and services in Items 4 and 5.
- Brighter Retirement Advisors LLC added Employee Fiduciary, LLC as a custodian and recordkeeper for client retirement plan accounts (Item 12).
- Brighter Retirement Advisors LLC has added disclosure regarding its receipt of compensation from third parties in Item 14.
- Brighter Retirement Advisors LLC updated its soft dollars disclosure in Item 12.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Brighter Retirement Advisors LLC (hereinafter "Brighter Retirement") is a Limited Liability Company organized in the State of Utah. The firm was formed in March 2022 and became a registered investment adviser in August 2022. The principal owner is Peterson Consulting LLC. Devin Peterson is the Owner of Peterson Consulting LLC.

### B. Types of Advisory Services

#### Financial Planning Services

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; education planning; and debt/credit planning.

Investment planning involves working with clients to make sure their investments match their respective risk tolerance and goals. Tax concerns are addressed by working with the client to determine and compare effective tax rates for income, capital gains and other earnings or investments, then attempting to allocate the client's resources accordingly. Life insurance planning entails reviewing the life insurance and/or disability insurance needs of the client, together with any applicable dependents, spouse or other relatives, and assessing appropriate coverage for these individuals. College planning entails helping clients save for higher education, whether for the client or his/her children or other dependents, in the ideal manner to suit the client's overall financial goals and means. Financial planning to address retirement entails making sure clients are financially equipped for retirement in light of the client's anticipated income and expenses, investments, and other assets. Debt/credit planning consists of breaking down client budgets and aiding clients in decision-making as to current debt, anticipated significant expenses and potential debt, and avoiding excessive debt.

#### Portfolio Management Services

Brighter Retirement offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Brighter Retirement creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Brighter Retirement evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Brighter Retirement will request discretionary authority from clients in order to execute the initial agreed upon investment proposal as well as select/trade/rebalance positions without having to obtain permission from the client prior to each transaction. Discretionary authority is typically granted by the investment management agreement the client will sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. These discretionary actions will remain within the risk tolerance levels that are documented in the Investment Policy Statement, and which is given to each client.

Brighter Retirement seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Brighter Retirement's economic, investment or other financial interests. To meet its fiduciary obligations, Brighter Retirement attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Brighter Retirement's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Brighter Retirement's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

As part of Brighter Retirement's portfolio management services, we may use one or more sub-advisers to manage a portion or the client's accounts on a discretionary basis. In determining the sub-adviser that is most suitable for each client Brighter Retirement looks at client's goals, liquidity, risk tolerance and investment objective. The sub-adviser will have full legal authority to manage accounts and or assets. Brighter Retirement will appoint a sub-adviser that will be responsible for the investment and reinvestment of those assets designated by Brighter Retirement. Through their sub-advisory agreement, Brighter Retirement delegates to the sub-adviser with full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name and for the client's account. Brighter Retirement will regularly monitor the performance of your accounts managed by the sub-adviser(s), and may hire and fire any sub-adviser without your prior approval.

### **Selection of Other Advisers**

Brighter Retirement may direct clients to third-party money manager (TPMM) to manage all or a portion of the client's assets. Before selecting other advisers for clients, Brighter Retirement will always ensure those other advisers are properly licensed or registered as an investment adviser. Brighter Retirement then makes investments with a TPMM by referring the client to the TPMM. Brighter Retirement may also allocate among one or more private equity funds or private equity

fund advisers. Brighter Retirement will continue to review the ongoing performance of the TPMM as a portion of the client's portfolio.

Brighter Retirement examines the experience, expertise, investment philosophies, and past performance of independent TPMMs in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. Brighter Retirement will not perform quantitative or qualitative analysis of individual securities. Instead, we will advise a client on how to allocate their assets among various classes of securities or TPMMs. We primarily rely on investment model portfolios and strategies developed by the TPMM and their portfolio managers. We may replace/recommend replacing a TPMM if there is a significant deviation in characteristics or performance from the stated strategy and or benchmark. Clients will enter into a separate agreement with the TPMM.

### **Selection of Other Advisers (Precious Metals)**

Brighter Retirement may recommend that clients establish accounts with third-party financial institutions, including Alpine Gold Exchange Bank, for the purpose of purchasing precious metals such as gold, silver, or gold-backed currency products ("Goldbacks").

In connection with these recommendations, Brighter Retirement may receive compensation from the third-party institution, which creates a conflict of interest. Additional details regarding this compensation are described in Items 5 and 14.

### **Educational Courses & Content**

Brighter Retirement provides educational courses and content to the general public that may include, but are not limited to: social security, Roth IRA conversion, risk management, and charitable giving strategies.

The length and complexity of a digital course, and the amount of worksheets provided, will determine the fee for each course. For example: The Taxation Master Class includes 4 hours of content and worksheets. This class may be offered for as much as \$500. The Charitable Giving mini course shorter in length and discusses three examples of The length and complexity of a digital course, and the amount of worksheets provided, will determine the fee for each course. For example: The Taxation Master Class includes 4 hours of content and worksheets. This class may be offered for as much as \$500. The Charitable Giving mini course shorter in length and discusses three examples of charitable giving tax strategies and educates clients on how to implement on their own. This class may be offered for as much as \$50. Existing clients will not be charged a fee for these courses.

### **Non-Investment Related Supplemental Services**

Brighter Retirement Advisors, LLC offers non-investment-related supplemental services under the name Brighter Retirement Consulting. These services include tax, estate planning, and Medicare consulting.

**Tax Consulting:** Brighter Retirement provides tax planning and consulting services to its clients. These services may include analysis of tax strategies, identification of potential tax-saving opportunities, and coordination with a client's certified public accountant ("CPA") or tax preparer for implementation.

**Estate Planning (Wealth.com):** Brighter Retirement offers estate planning guidance services through a third-party technology provider, Wealth, Inc. ("Wealth"). These services include facilitating access to estate planning document preparation tools and assisting clients in navigating the platform.

Wealth is an independent third-party provider. Brighter Retirement does not provide legal advice, and clients seeking legal advice may engage a licensed attorney through Wealth or independently.

**Medicare Consulting:** Individuals registered with Brighter Retirement may be licensed Medicare agent providing Medicare insurance guidance to clients. Please see Item 10 for more information regarding this activity.

### **Services Limited to Specific Types of Investments**

Brighter Retirement generally limits its investment advice to individual equities (SMA Accounts), individual bonds (Bond ladders), mutual funds, fixed income securities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities and Fixed Index Annuities. Brighter Retirement will not use leverage or inverse ETFs.

### **Written Acknowledgement of Fiduciary Status**

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### C. Client Tailored Services and Client Imposed Restrictions

Brighter Retirement will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Brighter Retirement on behalf of the client. Brighter Retirement may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Brighter Retirement from properly servicing the client account, or if the restrictions would require Brighter Retirement to deviate from its standard suite of services, Brighter Retirement reserves the right to end the relationship.

### D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. Brighter Retirement does not participate in wrap fee programs.

### E. Assets Under Management

Brighter Retirement has the following assets under management (AUM):

Discretionary AUM Amount:	Non-Discretionary Amount:	Date Calculated:
\$58,356,362.00	\$0	December 2025

## Item 5: Fees and Compensation

### A. Fee Schedule

#### Portfolio Management Fee

Assets Under Management	Households <\$1mm	Households <\$1mm-\$3mm	Households <\$3mm-\$5mm	Households <\$5mm+
Annual Fees	1.00%	.90%	.70%	.50%

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

The Portfolio Management fee includes all Financial Planning services provided by Brighter Retirement as all clients will receive both financial planning and portfolio management services. These fees are non-negotiable. The final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Brighter Retirement's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Clients will pay Brighter Retirement its base portfolio management fee in addition to the investment strategy fee for the sub-adviser(s) to which it directs those clients. This relationship will be memorialized in each contract between Brighter Retirement and each sub-adviser as well as disclosed in the Investment Management Agreement for each client. The total assets under management fee will not exceed 2%.

The client may obtain the same or similar services from other advisers for a lower percentage of assets under management.

#### **Selection of Other Adviser Fees**

Brighter Retirement may direct clients to TPMMs. Brighter Retirement will receive its standard fee on top of the fee paid to the TPMM. The fees are negotiable and will not exceed 2%. The notice of termination requirement and payment of fees for TPMMs will depend on the specific TPMM selected.

#### **Selection of Other Adviser Fees (Precious Metals)**

If a client chooses to establish an account and purchase such products, Brighter Retirement may receive a one-time commission typically ranging from approximately 1% to 3% of the amount invested. This compensation is paid by the third-party institution and is not charged directly to the client. This arrangement creates a conflict of interest, as Brighter Retirement has a financial incentive to recommend these products and this institution over other alternatives.

#### **Educational Courses & Content Fees**

The fixed fee for education courses and content is between \$50 and \$500. This fee will vary based on complexity and materials provided through the courses. Existing clients will not be charged a fee for access to these educational resources.

#### **Tax Consulting Fees**

While clients do not pay Brighter Retirement directly for these consulting services, Brighter Retirement may receive compensation from the CPA firm for its consulting work.

This compensation is typically structured as a revenue-sharing arrangement, whereby

Brighter Retirement receives a portion of the revenue generated by the CPA firm from services provided to the referred client. Such compensation is indirectly derived from fees associated with the implementation of the strategy and is not billed separately to the client.

In addition, Brighter Retirement may recommend that clients consider implementing specific tax strategies, including charitable contribution structures or other tax-advantaged planning arrangements. If a client elects to implement such a strategy through a third-party provider or in coordination with their CPA, a fee may be generated in connection with the implementation of that strategy. In some instances, a portion of that fee is shared with Brighter Retirement by the CPA or other third-party provider. This compensation is not paid directly by the client to Brighter Retirement but is derived from fees associated with the strategy. Accordingly, Brighter Retirement has a financial incentive for clients to implement such strategies.

### **Estate Planning Fees**

Brighter Retirement charges clients a flat fee, not to exceed \$3,000, for these services. This fee is separate from advisory fees and is disclosed to clients in advance. While Brighter Retirement does not receive compensation from Wealth for referring clients, the firm has a financial incentive to recommend these services because it charges clients directly for the guidance provided. This creates a potential conflict of interest. Clients are under no obligation to use these services and may obtain estate planning services from other providers.

## **B. Payment of Fees**

### **Payment of Portfolio Management Fees**

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

### **Payment of Selection of Other Adviser Fees**

The timing, frequency, and method of paying fees for selection of TPMMs will depend on the specific TPMM selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

### **Payment of Educational Courses & Content Fees**

Advance payment will be required for the educational courses and content. The fee will be paid via credit card through a third-party credit card service.

### **Payment of Estate Planning Fees**

Advance payment will be required for the educational courses and content. The fee will be paid via credit card through a third-party credit card service.

### C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Brighter Retirement. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### D. Prepayment of Fees

Brighter Retirement collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

### E. Outside Compensation For the Sale of Securities to Clients

Devin Ray Peterson and Mary Amelia Carbine in their outside business activities (see Item 10 below) are licensed to accept compensation for the sale of insurance products to Brighter Retirement clients. This presents a conflict of interest and gives the supervised persons an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of insurance products for which the supervised persons receives compensation, Brighter Retirement will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase Brighter Retirement -recommended products and, if purchasing, have the right to purchase those products through other insurance agents that are not affiliated with Brighter Retirement.

Commissions are not Brighter Retirement's primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on insurance products recommended to clients.

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

Brighter Retirement does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

Brighter Retirement generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Charitable Organizations

There is an account minimum of \$300,000, which may be waived by Brighter Retirement in its discretion.

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### A. Methods of Analysis and Investment Strategies

#### Methods of Analysis

Brighter Retirement's methods of analysis include Fundamental analysis.

**Charting Analysis-** involves the gathering and processing of price and volume pattern information for a particular security sector broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern in correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

**Technical Analysis-** involves studying past price patterns trends and interrelationships in the financial markets to assess risk adjusted performance and predict the direction of both the overall market and specific securities.

**Fundamental Analysis-** involves analyzing individual companies and their industry groups such as a company's financial statements details regarding the company's product line the experience and expertise of the company's management and the outlook of the company and its industry. The resulting data is used to measure the true value of the company stock compared to the current market value.

**Cyclical Analysis-** A type of technical analysis that involves evaluating recurring price patterns and trends. Economic slash business cycles may not be predictable and may have many fluctuations between long term expansions and contractions.

**Long-Term Purchases-** securities purchase with the expectation that the value of those securities will grow over a relatively long period of time generally greater than one year.

**Short-Term Purchases-** securities purchased with the expectation that they will be sold within a relatively short period of time generally less than one year to take advantage of the security short term price fluctuations.

**Trading-** We may use frequent trading (in general selling securities within 30 days of purchasing the same securities as an investment strategy when managing a client's accounts. Frequent trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given our stated investment objectives and risk tolerance of risk. This may include buying and selling securities frequently in an effort to capture significant market gains and avoid significant losses.

### **Investment Strategies**

Brighter Retirement uses long term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### **Methods of Analysis**

**Charting Analysis-** Risk: Our charting analysis may not accurately detect anomalies and predict future price movements. current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Technical Analysis-** Risk: The risk of market timing based on technical analysis is our analysis may not accurately detect anomalies or predict future price movements current prices of securities may reflect all information known about the security and day-to-day changes in the market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis-** Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings which may be the basis for a stock's value. if securities prices adjust rapidly to new information utilizing fundamental analysis may not result in favorable performance.

**Cyclical Analysis-** Risk: the lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Long-Term Purchases- Risk** - using a long-term purchase strategy generally assumes the financial markets will go up in the long term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down overtime even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking up" assets that may be better utilized in the short-term and other investments.

**Short-Term Purchases- Risk:** using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to a long-term trading. There are many factors that can affect financial market performance in the short term (such as short-term interest rate changes cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of time.

**Trading- Risk:** When a frequent trading policy is in effect there is a risk that investment performance within your account may be negatively affected particularly through increased brokerage and other transactional costs and taxes.

### **Tax Considerations**

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of client assets. Regardless of the account size or any other factors, we strongly recommend that the client consult with a tax professional regarding the investing of their assets.

### **Investment Strategies**

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** Although Brighter Retirement will seek to select only TPMMs who will invest clients' assets with the highest level of integrity, Brighter Retirement's selection process cannot ensure that TPMMs will perform as desired and Brighter Retirement will have no control over the day-to-day operations of any of its selected money managers. Brighter Retirement would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## C. Risks of Specific Securities Utilized

### Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that our client's financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### Other Risk Considerations

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective client before retaining our services.

We recommend various types of securities and we do not primarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Clients should be aware that there is a material risk of loss using any investment strategy. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all the specific risks of every type of investment period even within the same type of investment, risks may vary widely. However, in very general terms, the higher than anticipated return of an investment, the higher the risk of loss associated with the investment period a description of the types of securities we may recommend to our clients and some other inherent risks are provided below.

The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Market Risk**, also called systematic risk, is the possibility of an investor experiencing losses due to factors that affect the overall performance of the financial markets in which they are involved. This type of risk can be hedged against, but cannot be eliminated through diversification. Sources of market risk include recessions, political turmoil, changes in interest rates, natural disasters and terrorist attacks.

**Stocks:** There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; end, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller startup companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

**Bonds:** Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; When the bond is set to mature; and whether or not the bond can be "called" prior to maturity. When called, it may not be possible to replace it with a bond of equal character pain the same rate of return.

**Municipal Securities:** Municipal securities, while generally thought of as safe, can have significant risk associated with them including, but not limited to: the creditworthiness of the governmental entity that issued the bond; This stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; End, whether or not the bond can be "called" prior to the maturity. When a bond is called, it may not be possible to replace it with a bond of equal character pain the same amount of interest or yield to maturity.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity:** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the

index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions. Brighter Retirement will not use leverage or inverse ETFs.

**Real Estate:** Real estate is increasingly being used as a part of a long-term core strategy due to increased market efficiencies and increased concerns about the future long-term variability of stock and bond returns. In fact, real estate is known for its ability to serve as a portfolio diversifier and inflation hedge. However, the asset class still bears a considerable amount of market risk. Real estate has shown itself to be very cyclical, somewhat mirroring the ups and downs of the overall economy. In addition to employment and demographic changes, real estate is also influenced by changes in interest rates and the credit markets, which affect the demand and supply of capital and thus real estate values. Along with changes in market fundamentals, investors wishing to add real estate as part of their core investment portfolios need to look for property concentrations by area or by property type. Because property returns are directly affected by local markets, real estate portfolios are too heavily concentrated in one area or property type can lose their risk mitigation attributes and bear additional risk by being too influenced by local or sector market changes.

**Real Estate Investment Trust:** A real estate investment trust ("REIT") is a corporate entity which invests in real estate and or engages in real estate financing. A REIT reduces or eliminates corporate income taxes. REITs Can be publicly or privately held. Public REITs may be listed on public stock exchanges. REITs are required to declare 90% of their taxable income as dividends, but they actually paid dividends out of funds from operations, so cash flow has to be strong or the REIT must either dip into reserves, or borrow to pay dividends, or distribute them in stock (which causes dilution). After 2012 the IRS stopped permitting stock dividends. Most REITs must refinance or erase large balloon debts periodically. The credit markets are no longer frozen, but banks are demanding, and getting, harsher terms to re extend REIT debt. Some REITs may be forced to make secondary stock offerings to repay debt, which will lead to additional dilution of the stockholders. Fluctuations in real estate market can affect the rates value and dividends.

**Annuities** are retirement products for those who may have the ability to pay a premium now and want to guarantee they receive certain payments or a return on investment in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy.

**Private equity** funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither Brighter Retirement nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Brighter Retirement nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Certain supervised persons of Brighter Retirement are licensed insurance agents and may provide Medicare and other insurance-related consulting services to clients. In their separate capacity as insurance agents, these individuals may receive commissions and other compensation from insurance companies in connection with the sale of insurance products. This compensation varies depending on the specific product recommended and the insurance provider, which creates a conflict of interest by providing an incentive to recommend products that result in higher compensation. These services are provided in a separate capacity and are not part of Brighter Retirement's investment advisory services. Clients are not required to purchase insurance products through Brighter Retirement or its associated persons and may obtain such products through other unaffiliated agents. Brighter Retirement seeks to mitigate these conflicts by disclosing them to clients and by requiring its supervised persons to act in the best interest of clients when making recommendations.

The CPA firm tax consulting arrangements create a conflict of interest, as Brighter Retirement has a financial incentive to recommend CPA firms and/or specific tax strategies that result in compensation to the firm. Clients are not obligated to use any CPA firm or implement any recommended strategy and are encouraged to consult with independent tax and legal professionals prior to doing so. Brighter Retirement seeks to mitigate these conflicts by acting in the best interest of the client and by fully disclosing these arrangements.

Brighter Retirement has a business relationship with certain third-party financial institutions, including Alpine Gold Exchange Bank, from which it may receive compensation for client referrals. This creates a conflict of interest, as the firm has an incentive to recommend such institutions.

## **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

Brighter Retirement may direct clients to third-party investment advisers. Clients will pay Brighter Retirement its portfolio management fee in addition to the investment strategy fee for the advisers to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. Brighter Retirement will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. Brighter Retirement will ensure that all recommended advisers are exempt, licensed or notice filed in the states in which Brighter Retirement is recommending them to clients.

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

### **A. Code of Ethics**

Brighter Retirement has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Brighter Retirement's Code of Ethics is free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

Brighter Retirement does not recommend that clients buy or sell any security in which a related person to Brighter Retirement or Brighter Retirement has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of Brighter Retirement may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Brighter Retirement to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Brighter Retirement will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Brighter Retirement may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Brighter Retirement to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Brighter Retirement will never engage in trading that operates to the client's disadvantage if representatives of Brighter Retirement buy or sell securities at or around the same time as clients.

## Item 12: Brokerage Practices

### A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Brighter Retirement's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Brighter Retirement may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Brighter Retirement's research efforts. Brighter Retirement will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Brighter Retirement will require portfolio management clients to use Charles Schwab & Co., Inc. Advisor Services Institutional, a division of Charles Schwab & Co., Inc. Advisor Services Member FINRA/SIPC and Schwab Institutional, a division of Charles Schwab & Co., Inc.

In addition to Charles Schwab & Co., Inc., Brighter Retirement may recommend and utilize Employee Fiduciary, LLC as a custodian and recordkeeper for client retirement plan accounts, including 401(k) plans.

Employee Fiduciary provides recordkeeping, administrative, and custodial services for employer-sponsored retirement plans. Clients establishing retirement plans will enter into a separate agreement with Employee Fiduciary for these services.

Brighter Retirement does not receive compensation from Employee Fiduciary for recommending its services. The selection of Employee Fiduciary is based on factors including cost, service offerings, and suitability for retirement plan administration.

### **1. Research and Other Soft-Dollar Benefits**

While Brighter Retirement does not currently utilize soft dollar arrangements, the firm may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits") consistent with Section 28(e) of the Securities Exchange Act of 1934.

### **2. Brokerage for Client Referrals**

Brighter Retirement receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **3. Clients Directing Which Broker/Dealer/Custodian to Use**

Brighter Retirement will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

Brighter Retirement does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for Brighter Retirement's advisory services provided on an ongoing basis are reviewed at least annually by Devin Peterson, Managing Member and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Brighter Retirement are assigned to this reviewer.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance). Clients may request a review at any time.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of Brighter Retirement's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Brighter Retirement participates in the institutional advisor program (the "Program") offered by Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Brighter Retirement receives some benefits from Charles Schwab & Co., Inc. Advisor Services through its participation in the Program.

As disclosed above, Brighter Retirement participates in Charles Schwab & Co., Inc. Advisor Services' institutional advisor program and Brighter Retirement may recommend Charles Schwab & Co., Inc. Advisor Services to clients for custody and brokerage services. There is no direct link between Brighter Retirement's participation in the Program and the investment advice it gives to its clients, although Brighter Retirement receives economic benefits through its participation in the Program that are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Brighter Retirement participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have Brighter Retirement's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Brighter Retirement by third party vendors. Charles Schwab & Co., Inc. Advisor Services may also pay for business consulting and professional services received by Brighter Retirement's related persons. Some of the products and services made available by Charles Schwab & Co., Inc. Advisor Services through the Program may benefit Brighter Retirement but may not benefit its client accounts. These products or services may assist Brighter Retirement in managing and administering client accounts, including accounts not maintained at Charles Schwab & Co., Inc. Advisor Services. Other services made available by Charles Schwab & Co., Inc. Advisor Services are intended to help Brighter Retirement manage and further develop its business enterprise. The benefits received by Brighter Retirement or its personnel through

participation in the Program do not depend on the amount of brokerage transactions directed to Charles Schwab & Co., Inc. Advisor Services. As part of its fiduciary duties to clients, Brighter Retirement endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Brighter Retirement or its related persons in and of itself creates a conflict of interest and may indirectly influence the Brighter Retirement's choice of Charles Schwab & Co., Inc. Advisor Services for custody and brokerage services.

With respect to Schwab, Brighter Retirement receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Brighter Retirement client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Brighter Retirement other products and services that benefit Brighter Retirement but may not benefit its clients' accounts. These benefits may include national, regional or Brighter Retirement specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Brighter Retirement by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Brighter Retirement in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Brighter accounts. Retirement's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Brighter Retirement's accounts. Schwab Advisor Services also makes available to Brighter Retirement other services intended to help Brighter Retirement manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Brighter Retirement by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of

a third-party providing these services to Brighter Retirement. Brighter Retirement is independently owned and operated and not affiliated with Schwab.

Brighter Retirement receives compensation from certain third parties, including Alpine Gold Exchange Bank, in connection with referring clients to their services. This compensation is typically a one-time commission based on the amount of client assets placed with the third party. This creates a conflict of interest because Brighter Retirement has an incentive to recommend these third parties. Clients are not required to use any recommended provider and may choose alternative providers.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

Brighter Retirement does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

The independent custodian will directly debit the clients' accounts for the payment of our advisory fees period this ability to deduct our advisory fees from the accounts causes our firm to exercise limited custody over client funds or securities. We do not have physical custody of any of these funds and or securities. Client funds and securities will be held at a bank, broker dealer, or other qualified custodian(s). At the time that the client opens an account with a custodian they will be able to opt in to receive either paper or electronic statements and document delivery. The Client will receive account statements from the qualified custodian(s) holding their funds and securities at least quarterly. The account statements from client's custodian(s) will indicate the amount of our advisory fees deducted from client accounts each billing period. Clients should carefully review account statements for accuracy.

## **Item 16: Investment Discretion**

Brighter Retirement provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Brighter Retirement generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. In some instances, Brighter Retirement's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Brighter Retirement.)

Brighter Retirement will also have discretionary authority to determine the sub-adviser to be used for a purchase or sale of securities for a client's account.

## **Item 17: Voting Client Securities (Proxy Voting)**

Brighter Retirement will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

Brighter Retirement neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Brighter Retirement nor its management has any financial condition that is likely to reasonably impair Brighter Retirement's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Brighter Retirement has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

Brighter Retirement currently has only one management person: Devin Ray Peterson. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Brighter Retirement is not engaged in other business activities. Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### **C Calculation of Performance-Based Fees and Degree of Risk to Clients**

Brighter Retirement does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. Supervised person(s) of Brighter Retirement are not compensated by performance-based fees.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Devin Peterson is a licensed insurance agent; however, Brighter Retirement does not recommend that clients buy or sell any security in which a related person to Brighter Retirement or Brighter Retirement has a material financial interest.

See Item 10.C and 11.B.