Brightward Financial LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Brightward Financial LLC. If you have any questions about the contents of this brochure, please contact us at (720) 629-9771 or by email at:info@brightwardfinancial.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 Brightward Financial LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Brightward Financial LLC's CRD number is: 341289.

1615 Platte St Suite 200
Denver, CO 80202
(720) 629-9771
info@brightwardfinancial.com
https://brightwardfinancial.com

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

Version Date: 3/27/2026

Item 2: Material Changes

Brightward Financial LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore, there are no material changes to report.

Item 3: Table of Contents

Item 4: Advisory Business

Brightward Financial LLC (hereinafter "BRIFIN") is a Limited Liability Company organized in the State of Colorado. The firm was formed in February 2026 and became registered as an investment adviser in April 2026. The principal owners are Benjamin Don Kirby, Managing Member, CEO, & Investment Officer and William Leonard Kowalski Jr., Managing Member, Chief Compliance Officer, President, & CFO.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college 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.

BRIFIN's financial planning services may be offered as a one-time engagement or in conjunction with portfolio management services.

Portfolio Management Services

BRIFIN provides discretionary portfolio management to individuals and families. Each client engagement begins with the development of an Investment Policy Statement (IPS) that documents the client's financial objectives, time horizon, risk tolerance, tax situation, and any investment restrictions. Portfolios are constructed and managed in accordance with the IPS.

BRIFIN's portfolio management process is organized around three primary functions:

Governance. An investment committee is responsible for all investment recommendations and material changes to model portfolios. The committee meets no less than quarterly and on an ad hoc basis as conditions warrant. All significant decisions are subject to committee review and documented approval.

Portfolio Construction. Rather than a conventional two-asset-class framework, BRIFIN constructs portfolios across three baskets — equities, fixed income, and diversifiers — with the objective of improving risk-adjusted outcomes relative to traditional allocations. The firm employs a "model of models" approach. A set of building-block models are combined in proportions determined by each client's IPS to produce a portfolio tailored to the client's objectives. The diversifier basket targets low correlation to equities and fixed income investments.

Ongoing Monitoring and Rebalancing. Client portfolios are monitored on an ongoing basis and rebalanced systematically to maintain their target allocations. Where applicable, rebalancing incorporates tax-loss harvesting as part of the firm's focus on after-fee, after-tax, after-inflation return as the relevant measure of client outcomes.
BRIFIN seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of BRIFIN's economic, investment or other financial interests. To meet its fiduciary obligations, BRIFIN attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, BRIFIN'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 BRIFIN's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

BRIFIN develops and maintains proprietary investment models on the Schwab platform. These models may incorporate various asset classes, including equities, fixed income, and diversifying strategies, and may be organized as sub-models depending on client needs. BRIFIN uses these models to support portfolio construction and implementation across a range of risk profiles. The firm may update, modify, or replace these models at its discretion as market conditions, research inputs, or investment considerations evolve. Clients are allocated to an appropriate model or sub-model based on their investment objectives, financial situation, and risk tolerance.

BRIFIN may provide financial planning services in conjunction with, and at no additional cost to, its portfolio management services, offering such planning support on a complementary basis and at the firm's discretion.

Pension Consulting Services

BRIFIN offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options

- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Services Limited to Specific Types of Investments

BRIFIN generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds and private placements. BRIFIN may use other securities as well to help diversify a portfolio when applicable.

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);
- Always act in the client's best interest;
- 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 and how we mitigate them.

Client Tailored Services and Client Imposed Restrictions

BRIFIN offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs, which restrictions will be documented in the Investment Policy Statement. However, if the restrictions prevent BRIFIN from properly servicing the client account, or if the restrictions would require BRIFIN to deviate from its standard suite of services, BRIFIN reserves the right to end the relationship.

BRIFIN has the following assets under management:

Discretionary Amounts:	Date Calculated:
$0	March 2026

Item 5: Fees and Compensation

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between $2,500 and $7,500. Financial planning fees are paid via check and wire.

Clients may terminate the agreement without penalty, for full refund of BRIFIN's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

In the case of early termination prior to completion of the plan, BRIFIN will deliver upon termination that portion of the plan that has been prepared. Client will be responsible for paying the earned but unpaid advisory fee based upon the prorated amount of work completed.

Portfolio Management Fees

Total Assets Under Management	Annualized Fees
First $1,000,000	1.00%
Next $1,000,001 - $2,000,000	0.85%
Next $2,000,001 - $5,000,000	0.65%
Next $5,000,001 - $10,000,000	0.55%
Next $10,000,001 - $25,000,000	0.35%
Next $25,000,001 - AND UP	0.25%

The advisory fee is a tiered, blended fee, billed quarterly in advance, using the value of the assets in the Account on the last business day of the prior billing quarter.

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Please see Item 15 for additional information regarding direct fee deduction.

These fees are generally negotiable and 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 BRIFIN's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

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 annualized asset-based fee rate by 365.)

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Standard Annualized Fee
All Assets	0.50%

The advisory fee is a single rate, billed quarterly in arrears, using the value of the assets in the Account on the last business day of the quarter.

Asset-based pension consulting fees are paid via check or wire on a quarterly basis.

These fees are generally negotiable and 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 BRIFIN's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 30 days' written notice.

For contracts terminated mid-quarter, clients will be responsible for paying the prorated advisory fee (earned but unpaid), which will be equal to the daily rate* times the number of days in the quarter up to and including the effective date of termination. (*The daily rate is calculated by dividing the annualized asset-based fee by 365.)

Payment of Other Fees and Expenses

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 BRIFIN. Please see Item 12 of this brochure regarding broker-dealer/custodian.

Neither BRIFIN nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

BRIFIN does not accept performance-based fees and therefore does not engage in side-by-side management.

Item 7: Types of Clients

BRIFIN generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Corporations or Business Entities

There is no account minimum for any of BRIFIN's services.

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

Methods of Analysis

BRIFIN's methods of analysis include Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

BRIFIN primarily utilizes long-term investment strategies designed to align with client goals, time horizon, and risk tolerance. In certain circumstances, BRIFIN may also employ short-term trading strategies and options strategies, including covered options, uncovered options, and spreading strategies, where appropriate and consistent with client suitability. In addition, BRIFIN may develop and utilize proprietary investment models, which may incorporate various asset classes and portfolio construction techniques, and may be updated or modified at the firm's discretion. Since these models depend on changing market conditions and assumptions, their performance may vary over time.

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

Material Risks Involved- Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

BRIFIN employs the following investment strategies on behalf of clients:

Goals-based asset allocation. Portfolios are constructed around each client's financial objectives, time horizon, and risk capacity as documented in their IPS. Asset allocation is the primary driver of long-term returns and risk.

Multi-asset diversification. The firm allocates across equities, fixed income, and diversifiers (investments, such as options and commodities, designed to maintain low correlation to traditional asset classes), to improve portfolio risk-adjusted characteristics.

Tax-efficient total return. The firm manages portfolios with explicit attention to after-fee, after-tax, and after-inflation returns. This includes asset location, investment vehicle selection, and, where applicable, systematic tax-loss harvesting.

Factor-aware manager and vehicle selection. The firm favors passive vehicles where markets are broadly efficient and active managers where specific factor exposures, duration management, or return characteristics justify the incremental cost.

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

General Risks

Inflation Risk, also known as **Purchasing Power Risk**, arises from the decline in value of securities cash flow due to inflation, which is measured in terms of purchasing power. Inflation Protection Bonds such as TIPS are the only protection offered against this risk. Floaters, the resetting of the interest rates, can help reduce inflation risk. All other bonds have fixed interest rates for the life of the bond, which exposes the investor to this risk.

Interest Rate Risk is the risk that an investment's value will change due to a change in the absolute level of interest rates, spread between two rates, shape of the yield curve, or in any other interest rate relationship. These changes can be reduced by diversifying or hedging, since the changes usually affect securities inversely.

Economic Risk is the chance that macroeconomic conditions like exchange rates, government regulation, or political stability will affect an investment, usually one in a foreign country.

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.

Political Risk, also known as geopolitical risk, is risk an investment's returns could suffer as a result of political changes or instability in a country. This becomes more of a factor as the time horizon of an investment gets longer. Instability affecting investment returns could stem from a change in government, legislative bodies, other foreign policy makers or military control.

Regulatory Risk is the risk that a change in laws and/or regulations will materially impact a security, business, sector or market. These changes can increase the costs of operating a business, reduce the attractiveness of an investment, or change the competitive landscape, and are made by either the government or a regulatory body.

Liquidity Risk stems from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss. It is typically reflected in unusually wide bid-ask spreads or large price movements. Typically, the smaller the size of the security or its issuer, the larger the liquidity risk.

Credit Risk traditionally refers to the risk that a lender may not receive the owed principal and interest, which results in an interruption of cash flows and increased costs for collection. Credit risk is the probable risk of loss resulting from a borrower's failure to repay a loan or meet contractual obligations. While impossible to know exactly who will default on obligations, with proper assessment and credit risk management, the severity of loss can be lessened. A lender's or investor's reward for assuming credit risk include the interest payments from the borrower or issuer of a debt obligation.

Correlation Risk may occur as relationships between asset classes are estimated using historical data, which may not recur in the future. Correlations are not stable over time and have historically increased across asset classes during periods of acute market stress. As a result, the diversifier basket may underperform, and clients may experience losses across all three baskets simultaneously. Past correlation patterns are not indicative of future relationships, and no portfolio construction methodology eliminates the risk of loss.

Risks of Specific Securities Utilized

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 their 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.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

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

There are no criminal, civil, administrative, or self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither BRIFIN nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

BRIFIN does not utilize nor select third-party investment advisers.

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

BRIFIN has a written Code of Ethics that covers the following areas:

- Prohibited Purchases and Sales
- Compliance Procedures
- Insider Trading
- Personal Securities Transactions
- Exempted Transactions
- Prohibited Activities
- Conflicts of Interest
- Gifts and Entertainment
- Confidentiality
- Service on a Board of Directors
- Compliance with Laws and Regulations
- Procedures and Reporting
- Certification of Compliance
- Reporting Violations
- Compliance Officer Duties
- Training and Education
- Recordkeeping
- Annual Review
- Sanctions

BRIFIN will mitigate conflicts of interest by (i) disclosing to the client any conflict of interest and (ii) always acting in the best interest of the client consistent with its fiduciary duty. ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE THIS CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK US AT ANY TIME.

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

From time to time, representatives of BRIFIN may buy or sell securities for themselves at or around the same time they recommend those securities to clients. This may provide an opportunity for representatives of BRIFIN 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 create a conflict of interest. BRIFIN will always document any transactions that could be construed as conflicts of interest and will never engage in trading or front running that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

The recommendation or requirement of a custodian is based on the services that the custodian provides and the fees that are charged. BRIFIN may also consider the market expertise and research access provided by the 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 BRIFIN 's research efforts.

BRIFIN will require clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc..

While BRIFIN has no formal soft dollars program in which soft dollars are used to pay for third party services, BRIFIN may receive research, products, or other services from custodians in connection with client securities transactions ("soft dollar benefits"). BRIFIN may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and BRIFIN does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. BRIFIN benefits by not having to produce or pay for the research, products or services, and BRIFIN will have an incentive to recommend a custodian based on receiving research or services. This constitutes a conflict of interest; however, this conflict is mitigated because soft dollar benefits can help BRIFIN in its portfolio management and BRIFIN will always act in the best interest of its clients, including in connection with selecting custodians. Clients should be aware that BRIFIN's acceptance of soft dollar benefits may result in higher commissions charged to the client.

Research and Other Soft-Dollar Benefits

BRIFIN does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Charles Schwab may provide us with certain services and products that may benefit us. All such soft-dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services™

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first.

Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. **Services that benefit you.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.

2. **Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
    - provide access to Client account data (such as duplicate trade confirmations and account statements)
    - facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
    - provide pricing and other market data
    - facilitate payment of our fees from our Clients' accounts

- assist with back-office functions, recordkeeping, and Client reporting

3. **Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
   - Educational conferences and events
   - Consulting on technology, compliance, legal, and business needs
   - Publications and conferences on practice management and business succession

4. **Your brokerage and custody costs.** For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

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

BRIFIN will require clients to use Schwab to execute transactions. Not all advisers require clients to use a particular broker-dealer.

If BRIFIN buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, BRIFIN would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. BRIFIN would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

Item 13: Review of Accounts

All client accounts for BRIFIN's advisory services provided on an ongoing basis are reviewed at least quarterly by Benjamin Kirby, Managing Member, CEO & Chief Investment Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts are reviewed with client at least annually. All accounts at BRIFIN are assigned to this reviewer.

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).

Each client will receive a quarterly statement detailing the client's account, including assets held, asset value, and calculation of fees, which will come from the custodian.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Benjamin Kirby, Managing Member, CEO & Chief Investment Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

With respect to financial plans, BRIFIN's services will generally conclude upon delivery of the financial plan.

Each financial planning client will receive the written financial plan upon completion.

Item 14: Client Referrals and Other Compensation

Other than soft dollar benefits as described in Item 12 above and below, BRIFIN does not receive any economic benefit, directly or indirectly from any third party for advice rendered to BRIFIN's clients.

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

Item 15: Custody

BRIFIN does not have physical custody of client funds or securities. However, when advisory fees are deducted directly from client accounts at client's custodian, BRIFIN will be deemed to have limited custody of a client's assets. For fees deducted directly from client accounts, in states that require it, BRIFIN will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.

(B) Require a custodian that sends at least quarterly statements reflecting all additions and deductions, including the amount of advisory fees.

(C) Send the client a written invoice upon or prior to fee deduction itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

Clients will receive all account statements from the custodian and billing invoices from BRIFIN that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

BRIFIN provides 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, BRIFIN 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. In some instances, BRIFIN'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 BRIFIN).

Item 17: Voting Client Securities (Proxy Voting)

BRIFIN 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

BRIFIN 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.

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

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

Item 19: Requirements For State Registered Advisers

BRIFIN currently has two management persons: William Leonard Kowalski Jr. and Benjamin Don Kirby. Education, business background, and other business activities can be found on the Form ADV Part 2B brochure supplements.

BRIFIN 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.

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

Neither BRIFIN, nor its management persons, has any relationship or arrangement with issuers of securities.

This brochure supplement provides information about Benjamin Don Kirby that supplements the Brightward Financial LLC brochure. You should have received a copy of that brochure. Please contact Benjamin Don Kirby if you did not receive Brightward Financial LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Benjamin Don Kirby is also available on the SEC's website at www.adviserinfo.sec.gov.

Brightward Financial LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Benjamin Don Kirby

Personal CRD Number: 5168016

Investment Adviser Representative

Brightward Financial LLC
1615 Platte St Suite 20
Denver, CO 80202
(505) 927-0988
ben@brightwardfinancial.com

UPDATED: 03/26/2026

Item 2: Educational Background and Business Experience

Name: Benjamin Don Kirby **Born:** 1979

Educational Background and Professional Designations:

Education:

Master of Business Administration, Duke University - The Fuqua School of Business - 2008
Bachelor of Arts Computer Science, Fort Lewis College - 2000

Designations:

CFA – Chartered Financial Analyst

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards
The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition
Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly

evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge
The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Business Background:

02/2026 - Present	Managing Member, CEO, & Chief Investment Officer Brightward Financial LLC
08/2025 - 01/2026	Chief Investment Officer The Millstone Evans Group, LLC
02/2013 - 09/2024	Portfolio Manager Thornburg Investment Management
10/2019 - 09/2024	Head of Investments Thornburg Investment Management

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Benjamin Don Kirby is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

Benjamin Don Kirby does not receive any economic benefit from any person, company, or organization, other than Brightward Financial LLC in exchange for providing clients advisory services through Brightward Financial LLC.

Item 6: Supervision

As a representative of Brightward Financial LLC, Benjamin Don Kirby is supervised by William Leonard Kowalski Jr., the firm's Chief Compliance Officer. William Leonard Kowalski Jr. is responsible for ensuring that Benjamin Don Kirby adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for William Leonard Kowalski Jr. is (720) 629-9771.

Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

Benjamin Don Kirby has no civil, administrative, or self-regulatory organization proceedings or arbitrations to report. Benjamin Don Kirby has not been the subject of a bankruptcy in the past ten years.

This brochure supplement provides information about William Leonard Kowalski Jr. that supplements the Brightward Financial LLC brochure. You should have received a copy of that brochure. Please contact William Leonard Kowalski Jr. if you did not receive Brightward Financial LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about William Leonard Kowalski Jr. is also available on the SEC's website at www.adviserinfo.sec.gov.

Brightward Financial LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

William Leonard Kowalski Jr.

Personal CRD Number: 6308695

Investment Adviser Representative

Brightward Financial LLC
1615 Platte St Suite 200
Denver, CO 80202
(720) 629-9771
william@brightwardfinancial.com

UPDATED: 03/26/2026

Item 2: Educational Background and Business Experience

Name: William Leonard Kowalski Jr. **Born:** 1986

Educational Background and Professional Designations:

Education:

Bachelor of Science Finance, Empire State University - 2014
Associate of Applied Science Mortuary Science, Nassau Community College - 2006

Business Background:

02/2026 - Present	Managing Member, CCO, President & CFO Brightward Financial LLC
02/2025 - 02/2026	Chief Financial Officer The Millstone Evans Group, LLC
05/2018 - 02/2025	Chief Operating Officer Atomos Nuclear and Space Corporation
02/2014 - 05/2018	Financial Advisor Raymond James & Associates

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

William Leonard Kowalski Jr. is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

William Leonard Kowalski Jr. does not receive any economic benefit from any person, company, or organization, other than Brightward Financial LLC in exchange for providing clients advisory services through Brightward Financial LLC.

Item 6: Supervision

As the Chief Compliance Officer of Brightward Financial LLC, William Leonard Kowalski Jr. supervises all activities of the firm. William Leonard Kowalski Jr.'s contact information is on the cover page of this disclosure document. William Leonard Kowalski Jr. adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. The phone number for William Leonard Kowalski Jr. is (720) 629-9771.

Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

William Leonard Kowalski Jr. has no civil, administrative, or self-regulatory organization proceedings or arbitrations to report. William Leonard Kowalski Jr. has not been the subject of a bankruptcy in the past ten years.