Item 1: Cover page

BLOOMWOOD

730 Starlight Lane NE
Atlanta, GA 30342
803.530.4558
www.bloomwoodcapital.com

Form ADV Part 2A – Firm Brochure

February 24, 2025

This brochure provides information about the qualifications and business practices of Bloomwood Capital Advisors LLC ("Bloomwood Capital Advisors"). If you have any questions about the contents of this brochure, please contact us at 803.530.4558. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Bloomwood Capital Advisors is also available on the SEC's website at www.adviserinfo.sec.gov by searching Firm CRD# 322154.

Item 2: Material Changes

Bloomwood Capital Advisors last filed its annual ADV amendment on March 13, 2024. Since then, we have made the following material changes:

- We have added disclosure regarding our use of Realized Financial, Inc. as a sub-adviser for certain client accounts.
- We have removed our recommendation of Interactive Brokers and our recommendation of John Hancock as a custodian for plan assets.

Full Brochure Available

We will provide a new version of the firm Brochure as necessary when updates or new information are added, at any time, without charge. To request a complete copy of our Firm Brochure, contact us at 803.530.4558.

Item 3: Table of Contents

Item 4: Advisory Business

Description of Advisory Firm

Bloomwood Capital Advisors LLC (the "Firm") is an Investment Adviser. The Firm was founded in 2022 to provide client investment management and financial planning services. The Firm is 100% owned by John ("Billy") Amberg, who is its President and CCO.

Types of Advisory Services

We offer the following services:

Investment Supervisory Services

We offer ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each Client. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Regular and/or continuous portfolio monitoring

We evaluate the current investments of each Client with respect to their risk tolerance levels and time horizon. Additionally, Clients may impose reasonable restrictions on their accounts.

When appropriate, we utilize the services of third-party investment advisers ("Outside Managers") to assist with the management of a portion of Client account(s). Currently, Bloomwood Capital Advisors has an agreement with Realized Financial, Inc., CRD No. 22333 ("Realized"). Realized shall assist the Firm with investments and financial advice, which may include effecting transactions in Delaware Statutory Trusts ("DSTs"), Qualified Opportunity Zone Funds ("QOZFs"), certain real estate investment trusts (including 721 exchanges, also known as UPREITS) (Collectively, "REITS"), and 1031 like exchanges involving such securities. Some of these investments have limited or no liquidity for a period of time. Some also have additional minimum net worth and/or net income requirements for investments. Please see Item 8 of our Brochure for the risks associated with certain types of alternative investments.

Held Away Management

The firm offers portfolio management services on accounts that Clients would like the firm to manage that are not held at one of the Firm's primary custodians.

In cases where the Client chooses to have Bloomwood Capital Advisors advise on assets that are not held at a qualified custodian in which Bloomwood Capital Advisors has an advisory relationship (See Item 12 of this Brochure) referred to as "held-away accounts," Bloomwood Capital Advisors is able to provide investment management services of those held-away accounts through a third-party order management system, Pontera Solutions, Inc ("Pontera"). These held- away accounts include 401(k) accounts, 529 plans, variable annuities, and other similar accounts.

Access to held-away accounts is achieved by the Client giving permission via a provided link through Pontera for the Advisor to make asset allocation changes via the Client's online login credentials. These online credentials are never made available to, held or stored by Bloomwood Capital Advisors. Access is restricted and Advisor will only have permissions to make change to the allocation of funds or other securities in the account and will not at any time be able to adjust, add to or subtract from investment options, or any other plan policies or fees assessed by the plan or the fund providers, access the financial assets in the account, make deposits, withdrawals or distributions. These assets will be monitored using third party account aggregation software where the account values and holdings are transmitted and viewed from the account aggregation software. These assets are included in calculating the total assets under management when assessing the annual advisory fee.

For Clients receiving partial-service portfolio management on held away assets, the Firm will have view-only access to these accounts. The Firm will perform the following services for these accounts:

- The Firm will recommend trades and asset allocation to Client for Client to execute. Client must place trades and adjust asset allocations in these accounts.

If Client has multiple Held Away Management eligible accounts, Client may elect to have each account managed at a different level of service.

Ongoing Financial Planning Services

Financial planning may include but are not limited to investment planning; tax concerns; estate concerns, and debt/credit planning. These services are based on a flat monthly fee, and the final fee structure is documented in the Financial Planning Agreement.

This service involves working one-on-one with a financial planner ("planner") over an extended period of time. Through this ongoing arrangement, Clients are expected to collaborate with the planner to develop and assist in the implementation of their financial plan (the "plan"). The planner will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client's situation, goals, and objectives evolve.

Upon engaging the firm for financial planning, the firm is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the Client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the planner to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives.

Project-Based Financial Planning Services

We provide project-based financial planning services on a limited scope one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from a range of topics to cover or other areas as requested and agreed to by the Firm. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

Pension Consulting Services

We advise Pension Plan sponsors and help companies and non-profits set up 401k, 403b, or pension plans. We are typically paid an advisory fee based on the assets in the plan; however, we can be paid a flat consulting fee instead.

Assets Under Management

As of December 31, 2024, Bloomwood Capital Advisors LLC had $18,871,801 in discretionary assets under management and $0 in non-discretionary assets under management.

Item 5: Fees and Compensation

How we are paid depends on the type of advisory service we are performing. Please see below for fee and compensation information for each of our services.

Standard Advisory Fee

Our standard advisory fee is calculated as a tiered fee schedule as referenced below, based on the market value of the assets under management as of the end of each calendar month. The annual fees are negotiable in certain cases and are charged in arrears on a monthly basis. The first advisory fee will be assessed on a pro-rated basis considering the time for which the account was not managed, and the time left in the month. No increase in the annual fee shall be effective without prior written notification to the Client.

Clients may elect to be billed directly for fees or to authorize us to directly debit fees from their account. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee. Clients may terminate the account by providing written notice 30 days before termination. Upon termination of any account, any prepaid fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Assets under Management	Annual Advisory Fee
$0 - $1,000,000	Less than or Equal to 1.50%
$1,000,001 and above	Less than or Equal to 1.00%

Held Away Management Fee

The firm charges a flat 0.50% of assets under advisement for this service, with a valuation method mutually agreed upon by the Client. Fees are negotiable and are billed either monthly, quarterly, or annually in arrears, as agreed upon by the Client. Clients may elect to be billed directly for fees or to authorize us to directly debit fees from their account. The Advisory Contract may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination.

Ongoing Financial Planning Fee

We charge a recurring fixed fee for Ongoing Financial Planning. Fees are paid monthly in arrears, ranging from $150 with no upper limit. The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract.

Fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

The Advisory Contract may be terminated with written notice at least 30 calendar days in advance. In the event of early termination prior to the initial plan being delivered, fees will be prorated and any unearned fees will be refunded to the Client. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination, based on the percentage of work completed by the Advisor.

Project-Based Financial Planning Fee

Depending upon the complexity of the situation and the needs of the client, the fixed fee for financial planning services may range between $125.00 and $750.00 per hour, due upon completion of the service. The fee may be negotiable in certain cases.

Fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

This service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the percentage of the work done up to the date of termination.

Pension Consulting Fee

The firm charges up to 1.00% of assets under management for this service, depending on complexity and the amount of assets being managed. The annual fees are negotiable and are charged in arrears on a monthly basis. Clients may elect to be billed directly for fees or to authorize us to directly debit fees from their account. The Advisory Contract may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, third party investment advisors and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, corporations, institutions, middle market businesses and charitable organizations. There is no minimum account size requirement to open or maintain an account under our management.

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

Our primary method of investment analysis is fundamental value, but we also review technical, chart-based analysis and cyclical, macroeconomic considerations as part of the investment decision. We employ simple but effective algorithms and advanced order types.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. The risk of fundamental analysis is that the 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.

Chart-based analysis involves the use of patterns in performance charts. Bloomwood Capital Advisors uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. Current prices of securities may not reflect all information 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.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. 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.

We conduct our own primary research and use a variety of documentary sources including issuer filings, annual reports, press, periodicals, rating agency reports, management discussions, and research reports produced by other investment managers or brokers.

Use of Outside Managers: We may refer Clients to Third Party Investment Advisers or advisory programs ("Outside Managers"). Our analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Managers in an attempt to determine if that Outside Manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the Outside Manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the Outside Manager's compliance and business enterprise risks. A risk of investing with an Outside Manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that an Outside Manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the Outside Manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of investment regardless of the operational success of the issuer's operations or its financial condition.

Investment Strategy: The adviser's strategy may fail to produce the intended results.

Style Risk: Any of our strategies may invest in both "value" investments and "growth" investments. With respect to securities and investments we consider undervalued, the market may not agree with our determination that the security is undervalued, and its price may not increase to what we believe to be its full value. It may even decrease in value. With respect to "growth" investments, the underlying earnings or operational growth we anticipate may not occur, or the market price of the security may not increase as we expect it to.

Defensive Risk: To the extent that the strategy attempts to hedge its portfolio stocks or takes defensive measures such as holding a significant portion of its assets in cash or cash equivalents, the objective may not be achieved.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Developing Market Countries: The strategies' investments in developing market countries are subject to all of the risks of foreign investing generally, and may have additional heightened risks due to a lack of established legal, political, business and social frameworks to support securities markets, including: delays in settling portfolio securities transactions; currency and capital controls; greater sensitivity to interest rate changes; pervasiveness of corruption and crime; currency exchange rate volatility; and inflation, deflation or currency devaluation.

Availability of information: Certain issuers, including municipalities, private companies, and foreign issuers may not be subject to the same disclosure, accounting, auditing and financial reporting standards and practices as companies publicly-listed in U.S. stock markets. Thus, there may be less information publicly available about these issuers and their current financial condition.

Limited markets: Certain securities may be less liquid (harder to sell) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

Concentration Risk: To the extent that the strategy focuses on particular asset-classes, countries, regions, industries, sectors or types of investment from time to time, the strategy may be subject to greater risks of adverse developments in such areas of focus than a strategy that invests is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes.

Credit Risk: An issuer of debt securities may fail to make interest payments and repay principal when due, in whole or in part. Changes in an issuer's financial strength or in a security's credit rating may affect a security's value.

Holding Period Risks: Significant benefits attributable to tax deferred investments, including QOZs, DSTs, and other 1031 exchange property investments are dependent upon the client continuing to hold the investment for an extended period of time. The value of Opportunity Zone investments could depend upon the gentrification of the community in which the property is located within the tax deferral period. Early disposition of tax deferred investments could have adverse federal and state income tax consequences to the client and result in a significant economic loss to the client. Changes in tax laws could also negatively impact such investments.

Prepayment or Call Risk: The issuer of a debt security may prepay or call the debt in whole or in part prior to the security's maturity date. We may be unable to reinvest the proceeds in a security of equivalent quality or paying a similar yield or coupon.

Trading practices: Brokerage commissions and other fees may be higher in certain markets or for foreign securities. Government supervision and regulation of foreign securities markets, currency markets, trading systems and brokers may be less than those in the U.S. stock markets. The procedures and rules governing foreign transactions and custody also may involve delays in payment, delivery or recovery of money or investments.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Municipal/Government bonds are susceptible to events in the municipality that issued the bond, or the security posted for the bond. These events may include economic or political policy changes, changes in law, tax base erosion, state constitutional limits on tax increases, budget deficits or other financial difficulties, and changes in the credit rating assigned to municipal issues.

Corporate bonds may lose all value in the event of the issuer's bankruptcy or restructuring.

Common stocks have often outperformed other types of investments at certain times; however, individual stock prices may go up and down more dramatically. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Foreign Securities including American Depositary Receipts (ADRs) may involve more risk than investing in U.S. securities. These risks include currency exchange rates and policies, country or government specific issues, less favorable trading practices or regulation and greater price volatility.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are highly dependent on short-term interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Non-traded REIT or Institutional REIT Funds is subject to risks such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Mutual Funds are meant to be long-term investments and may be subject to fees, charges or restrictions if redeemed within certain time periods as outlined in the prospectus. Proceeds from mutual fund sales may be credited with a delay. Mutual Funds are bought and sold based on a net asset value calculated at the end of each day based on end of day prices. As markets may move significantly over the course of a day, your purchase or sale price may differ significantly from intra-day prices. Mutual Funds may value illiquid portfolio holdings based on a modeled price.

Alternative Investments Risks. Alternative investments, including (but not limited to) investment partnerships, alternative mutual funds, non-traditional ETFs, managed futures, and/or real estate (related) investments may also present unique risks, such as decreased liquidity and transparency and increased complexity. Alternative investments typically use derivative instruments (such as options, futures, or index-based instruments) and/or leveraging strategies. The use of derivative instruments involves multiple risks, as discussed in more detail above. In addition, to the extent that the alternative investment uses commodities (or commodity-based derivatives) as part of its investment strategy, the investment return may also vary as a result of fluctuations in the supply and demand of the underlying commodities. Certain alternative investments may be less tax efficient than others. Additional risks may include style-specific risk, speculative investment risk, concentration risk, correlation risk, credit risk and lower-quality debt securities risk, equity securities risk, financial services companies' risk, interest rate risk, non-diversification risk, small- and mid-cap company risk, and special risks of mutual funds and/or ETFs, among others.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Bloomwood Capital Advisors or the integrity of our management. We have no information to disclose that is applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

Neither Bloomwood Capital Advisors or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Bloomwood Capital Advisors employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

John William Amberg, II is also a private equity investor and owns minority stakes in privately held businesses. There are no conflicts of interest to disclose, as Mr. Amberg does not simultaneously operate as a shareholder and investment adviser to the owners of the companies in which he has invested. He is a minority owner of Aries Adaptive Media. He spends approximately 5 hours a month of this outside business activity.

Bloomwood Capital Advisors recommends Clients to Outside Managers to manage a portion of their accounts. In the event that we recommend an Outside Manager, Bloomwood Capital Advisors absorbs any fees owed to the Outside Managers. Clients will receive a copy of the Outside Manager's Form ADV 2A, Firm Brochure and Form CRS, if applicable. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Moreover, Bloomwood Capital Advisors will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

Item 11:Code of Ethics

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, a prohibition of rumor-mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All members of the Firm must acknowledge the terms of the Code of Ethics annually, or as it is amended.

We anticipate that, in appropriate circumstances, consistent with Clients' investment objectives, the Firm may cause accounts over which we have management authority, and may recommend to investment advisory Clients or prospective Clients, the purchase or sale of securities in which we, our Clients, or employees may, directly or indirectly, have a position of interest. Our employees are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, we may trade for their own accounts in securities which are recommended to and/or purchased for our Clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of these parties will not interfere with (i) making decisions in the best interest of advisory Clients, and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our Clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to Client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as Clients, there is a possibility that employees might benefit from market activity by a Client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between our firm and its Clients.

Certain affiliated accounts may trade in the same securities with Client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, the affiliated and Client accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro-rated basis. Any exceptions will be explained on the Order.

It is our policy that the firm will not affect any principal or agency cross securities transactions for Client accounts. We will also not cross trades between Client accounts.

Our Clients or prospective Clients may request a copy of the firm's Code of Ethics by contacting John

William Amberg, II, President and CEO.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker/Dealers

Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our Clients.

With this in consideration, our firm recommends Charles Schwab & Co., Inc. ("Schwab"), an independent and unaffiliated SEC registered broker-dealer firm and members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In addition, our Firm may recommend John Hancock Trust Company LLC, which provides trust and custodial services to retirement plans.

Charles Schwab

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

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.

Research and Other Soft-Dollar Benefits
We do 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 platforms, Charles Schwab and Interactive Brokers may provide us with certain services that may benefit us.

Brokerage for Client Referrals
We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use
We do not allow Clients to direct us to use a specific broker-dealer to execute transactions. Clients must use our recommended custodian (broker-dealer) unless we agree to an exception. Not all investment advisers require their Clients to direct brokerage. By requiring Clients to use our specific custodian, we may be able to achieve most favorable execution of Client transactions and that this may save Clients money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts
Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment. While block trading may benefit Clients by purchasing larger blocks in groups, we do not feel that the Clients are at a disadvantage due to the best execution practices of our custodian.

Item 13: Review of Accounts

Client accounts will be reviewed regularly on a monthly basis by Mr. Amberg. During the regular review, the account's performance is compared against like-managed accounts to identify any unacceptable performance deviation.

Additionally, Client-imposed restrictions will be reviewed to confirm that they are being enforced. Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the Firm or per Client's needs. Mr. Amberg performs a one-time review of financial plans as a part of the hourly financial planning service, but does not conduct periodic reviews unless requested by Clients.

Clients will receive confirmations from the broker(s) for each transaction in their accounts as well as monthly statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our Clients.

Item 15: Custody

When it deducts fees directly from Client accounts at a selected custodian, we will be deemed to have limited custody of Client's assets and must have written authorization from the Client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge the Client to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Custody is also disclosed in Form ADV because Bloomwood Capital Advisors LLC has authority to transfer money from Client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, Bloomwood Capital Advisors LLC will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

For those Client accounts where we provide ongoing money management or investment advice with ongoing supervision, we maintain limited power of authority over Client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold. All buying and selling of securities is explained to Clients in detail before an advisory relationship has commenced.

Item 17: Voting Client Securities

We do not vote Client proxies with regard to any securities held in their account. However, money managers we select may vote proxies for Clients. Therefore, except in the event a money manager votes proxies, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. Therefore (except for proxies that may be voted by a money manager), the Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets.

Item 18: Financial Information

Registered investment advisers are required in this Item to provide you under certain circumstances with certain financial information or disclosures about our financial condition only if certain conditions exist, which are not applicable to the Firm. As a consequence, no financial information about the Firm is required to be disclosed.

There is no financial condition that is reasonably likely to impair our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding at any time.

Item 19: Requirements for State- Registered Advisers

Principal Officers

John ("Billy") Amberg serves as Bloomwood Capital Advisors's sole principal and CCO. Information about Mr. Amberg's education, business background, and outside business activities can be found in his ADV Part 2B, Brochure Supplement.

Other Business Activities

Mr. Amberg is a private equity investor and investment banker. This activity accounts for approximately 20% of his time.

Performance Based Fees

Performance based fees, and conflicts associated with them, are described in Item 6 of this Brochure.

Material Disciplinary Disclosures

No management person at Bloomwood Capital Advisors has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have with Issuers of Securities

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