

BLUESPRING WEALTH MANAGEMENT CLIENT RELATIONSHIP SUMMARY DISCLOSURE

BLUESPRING WEALTH MANAGEMENT, LLC (“Bluespring”) is an investment adviser registered with the Securities and Exchange Commission (SEC) which provides investment advisory services. We feel that it is important for you to understand how investment advisory services provided through an investment adviser differ from brokerage services provided through a broker-dealer and how the compensation these types of companies receive differs in order for you to determine which type of service is appropriate for you.

There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Conversation Starters

Ask your Financial Professional:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean*

Bluespring offers investment advisory services to retail investors in the form of comprehensive wealth management. We provide a broad range of services including advisor managed accounts, the use of third-party investment managers, financial planning, individual retirement planning services, qualified and non-qualified retirement plan services, and tax services. If you open an investment advisory account with us, we’ll meet with you to understand your current financial situation, existing resources, values, and goals. Based on what we learn, we will recommend a portfolio of investments that we monitor and, if necessary, rebalance to meet your changing needs, stated goals and objectives. We’ll offer you advice on a regular basis around your plan and portfolio.

You decide whether we manage your Advisor Managed Account on a “discretionary” or “non-discretionary” basis. “Discretionary” means you grant us authority to buy and sell securities in your advisory account without asking for your consent in advance, while “non-discretionary” means you authorize each decision regarding the purchase or sale of investments. Most of the accounts we manage are on a discretionary basis allowing us to place investment trades without your permission. However, if non-discretionary is selected, we will look to you, the account holder, to make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. Bluespring’s advisory services, including both discretionary and non-discretionary portfolio management, will be available to you until the Advisor Agreement is terminated by you or our firm.

As a condition for starting and maintaining a relationship, Bluespring requires a minimum portfolio size of \$500,000. Bluespring, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including, for example, anticipated future earning capacity or anticipated future additional assets. If a client does not meet the minimum portfolio size, we can charge a flat fee.

As part of our standard services, Bluespring monitors Advisor Managed Accounts and accounts with third-party investment managers on an ongoing basis. While we offer advice on a wide variety of investments, we do not offer advice on every product available in the marketplace. Bluespring’s financial professionals are not registered with FINRA and cannot offer brokerage services.

For more information about Bluespring’s advisory services, please visit our website and Review our Form ADV Part 2A.

What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Additional information related to fees you will pay may be found in ADV, Part 2A (Item 5), investment management agreements and other applicable documents.

For investment advisory services, we charge a percentage of assets under management, hourly charges, and fixed fees. The advisory fees you pay can be asset-based or fixed. “Asset-based” fees are calculated as a percentage of the value of the assets in your advisory account. Asset-based fees incentivize Bluespring to encourage you to increase your advisory

account assets since the increase in assets will increase our compensation. “Fixed” fees are negotiated fees that do not fluctuate with account value.

You will also pay charges imposed by the custodian holding your accounts for certain investments and maintaining your account. These include miscellaneous custodial fees such as transaction charges, account termination, and other operational fees. Some investments such as mutual funds, index funds, exchange traded funds, and variable annuities charge additional fees that will reduce the value of your investments over time. Bluespring does not receive any incentive or compensation from these fees.

Fees for financial planning or financial consulting services are negotiated and are typically based on the scope of the engagement.

Conversation Starters

Ask your Financial Professional: *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we are a fiduciary. This means that we are required to act in your best interest and not put our interests ahead of yours. At the same time, the way Bluespring makes money creates some conflicts with your interests. You should understand and ask about these conflicts because they can affect the recommendations provided to you.

Here are some examples to help you understand what this means:

- We have an incentive to increase the assets that we manage for you because we bill on the assets under management.
- We have a financial incentive to encourage you to roll 401(k) assets into an IRA that we will manage because we bill on the assets under management.
- **Kestra Affiliates:** Our parent company, Kestra Financial, Inc., owns other investment advisors, insurance agencies, and service providers (Kestra Affiliates). The recommendation of a Kestra affiliate creates a conflict of interest since our affiliate would receive increased compensation. For a list of affiliates, please visit <https://www.kestrafinancial.com/disclosures> to view our Privacy Policy and Disclosures.

For additional information regarding our conflicts of interest, please visit our website at www.bluespringwealth.com.

Conversation Starter

Ask your Financial Professional: *How might your conflicts of interest affect me, and how will you address them?*

How do your Financial Professionals make money?

Our financial professionals are compensated with a salary. They also receive incentive compensation based on new assets brought into the Firm. This incentivizes your financial professional to recommend you open an advisory account or increase the amount of assets in your account. Some third-party investment managers make payments to financial professionals for marketing support. These payments incentivize the financial professional to maintain or place more business with specific managers.

Do you or your Financial Professionals have legal or disciplinary history?

Yes. For information about our legal or disciplinary history, please visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter

Ask your Financial Professional: *As a Financial Professional, do you have any disciplinary history? For what type of conduct?*

For additional information about our services or to request up-to-date information or a copy of this disclosure, please call (888) 665-0237 or visit our website.

Conversation Starter

Ask your Financial Professional: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*