WELLSPRING WEALTH

Distinctive Guidance for Significant Wealth

September 9**, 2021**

Investment Advisor Disclosure Document

Wellspring Wealth Management Form ADV Part 2A and 2B

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This brochure provides information about the qualification and business practices of Wellspring Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us. 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. Financial planning offered through Wellspring Wealth LLC, a Registered Investment Advisor, not affiliated with LPL Financial.

Wellspring Wealth Management LLC ("Wellspring Wealth") is an SEC-registered investment advisor. However, this registration does not imply a certain level of skill or training. Additional information about Wellspring Wealth Management LLC is also available on the Internet at www.adviserinfo.sec.gov.

Item 2 - Material Changes

The Material Changes section of this brochure lists the material changes made since the last release of this brochure. This "summary" of changes will be made available to you at least annually.

If you would like to receive a complete copy of the Form ADV Part 2, you may obtain it by contacting us by telephone at: 770-410-4088, by email at info@wellspringwealth.com or on the internet at www.adviserinfo.sec.gov. You can search for us on this site by a unique identifying number, known as a CRD number. The CRD number for Wellspring Wealth is 134834. Please contact J. David Glover, Managing Director, if you have any questions about the contents of this brochure.

Material changes to the brochure since its last release (March 2021) include:

- There are no material changes since the brochures last release.

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Item 4 - Advisory Business

Wellspring Wealth Management LLC ("Wellspring Wealth"), formerly known as InvestLinc Wealth Management Group LLC, was founded in 2005. We are an investment advisor registered with the Securities and Exchange Commission as required by the Investment Advisers Act of 1940. We have an office located in Alpharetta and Atlanta, Georgia. We are wholly owned by Wellspring Wealth LLC. Wellspring Wealth is owned 24% by JBSGBJ Holdings LLC, 5% by Mark Winston, 20% by Dennis R. Wright, and 51% by J. David Glover. JBSGBJ Holdings LLC has six individual members. Greg A. Raabe is the manager and the only member with more than 25% ownership. We have a business continuity plan in place that provides for the loss of communications, office locations, services or key people.

This brochure provides information about Wellspring Wealth and the following types of advisory services:

- Investment advisory services
- Third party program selection
- Portfolio advisement or monitoring services
- Financial planning services
- Retainer services
- Consulting services

Wealth management services are made available to clients primarily through individuals associated with Wellspring Wealth as Investment Adviser Representatives (IARs). For more information about the IAR providing advisory services, you should refer to the Brochure Supplement for the IAR. The Brochure Supplement, or Form ADV Part 2B, has been added to the end of this document for ease in providing it to you. If you do not receive a Brochure Supplement with your IAR information, you should contact your IAR or Wellspring Wealth at info@wellspringwealth.com.

Our IARs rely on the information obtained from you and your other professionals (attorney, accountant, real estate agent, insurance agent, private banker, trust officer, stockbroker, etc.). We do not verify information received from you or your professionals. You are responsible for notifying us when there is any change in your financial situation and/or objectives that would impact the recommendations or services we provide.

As of March 4, 2021, our firm managed approximately $357,727,000 in assets for approximately 465 accounts, with 1 accounts being managed on a non-discretionary basis with a value of $16,898.

Investment Advisory Services

You provide your investment goals and objectives to us to assist in managing your portfolio. We assist you in establishing the appropriate portfolio objective and suitable asset allocation.

We offer investment advisory services to you through an individually tailored investment portfolio. Your portfolio may consist of one or more accounts. Your portfolio is managed by a designated IAR. You authorize us to purchase and sell open and closed-end mutual funds, exchange traded funds and notes (ETFs and ETNs), Real Estate Investment Trust (REIT) funds, stocks and bonds that have been reviewed by our Investment Policy Committee. You authorize account management on either a discretionary or non-discretionary basis.

We do not custody assets. Accounts are held in your name at an independent custodian which may include LPL Financial and/or Schwab Advisor Services. Account statements are provided to you directly from your account custodian. We will provide periodic performance reports to you. The details of the account relationship are stated in your Advisory Agreement and the custodian's account paperwork.

We may assist you with retirement plan accounts and this assistance may present a conflict of interest. When you leave an employer there are typically four options regarding an existing retirement plan account and you may use a combination of these options; 1) if permitted, leave the funds in your former employer's plan, 2) if

roll overs are permitted and you have new employer with a plan available, roll over the funds to your new employer's plan, 3) roll over to an Individual Retirement Account ("IRA"), or 4) withdraw or cash out your funds from the plan which may have adverse tax consequences depending on your age. When we recommend that you roll over your retirement plan assets into an account to be managed by us, such a recommendation creates a conflict (benefit to us) when we earn an advisory fee on your rolled over funds. You are under no obligation to roll over retirement plan assets to an account managed by us.

Advisory services may be terminated by either party. Termination happens thirty days after receipt of a written notice by the other party. You may terminate the Advisory Agreement within five days of execution without penalty and receive a full refund of fees paid.

Third Party Program Selection

We offer asset management services to you through third party programs. By participating in these programs, you may authorize a third-party manager to purchase and sell mutual funds, equities, fixed income securities and other securities. Third party managers have discretionary authority over program accounts. You may place restrictions on their discretion.

We will assist you in selecting third party investment programs. Discretionary authority to hire and fire third party managers and reallocation of your assets to other investments is assumed by us. In addition to evaluating and recommending programs to you, we will review reports provided to you by the third-party programs. Additionally, we will contact you periodically to review your financial situation and objectives, communicate information to the third-party program manager as warranted, and assist you in understanding and evaluating the services provided by the third-party program.

Performance reports are provided to you by the third-party investment manager. Account relationship details are stated in the third-party investment advisor's Form ADV and your program account agreement.

Termination of a third-party program account is subject to the terms outlined in the program account agreement.

LPL Financial Sponsored Platforms – Strategic Wealth Management (SWM I and SWM II)

We may provide advisory services through certain programs sponsored by LPL Financial LLC (LPL), a registered investment adviser and broker-dealer. Below is a brief description of each LPL advisory program recommended by us.

LPL offers custodial accounts called Strategic Wealth Management to support investment advisory services provided by us. Within a SWM account, our IARs provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds (ETFs), real estate investment trusts (REITs), equities, and fixed income securities. The advice is tailored to your individual needs based on your investment objectives and financial goals. Accounts are reviewed on a regular basis and rebalanced as necessary according to your investment profile. More specific account information and acknowledgements are provided in the account opening documents.

We can offer both SWM I and SWM II accounts. Either account offers the same investment choices and are managed in the same manner, but their fee structure is different. For SWM I, clients are charged transaction fees in addition to the advisory fee. For SWM II, transaction fees are absorbed (or wrapped) as part of the advisory fee. As a result, we offer SWM II as a wrap fee program where our firm acts as the sponsor and portfolio manager. Please see Appendix 1 – Wrap Fee Brochure, which is included as a supplement to this Disclosure Brochure. The advisory fee for SWM II accounts may be higher in percentage terms than SWM I due to account size and including transaction fees. Depending on various factors, such as anticipated trading

levels, whether your account was part of an advisory business acquisition by us, your IAR will work with you to determine the appropriate platform.

Model Wealth Portfolios Program (MWP)

MWP is a wrap fee program where LPL serves as the sponsor and portfolio manager. While LPL serves as the wrap fee sponsor and portfolio manager, we manage the allocation of funds between different portfolios and available fund selections. MWP offers clients a professionally managed mutual fund asset allocation program. We will obtain the necessary financial data from you, assist you in determining the suitability of the MWP program and assist you in setting an appropriate investment objective. Your IAR will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with your investment objective. LPL's Research Department or third-party portfolio strategist are responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to the mutual funds or ETFs selected.

For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the program account packet which includes the account agreement and LPL Form ADV program brochure and the Form ADV, Part 2A of LPL or the applicable program.

Portfolio Advisement Service

We offer advisement service for your portfolios or investments held with other custodians. We do not have discretion nor execute the purchase or sale of investments. We will meet with you to determine an appropriate investment strategy that reflects your overall investment objectives and financial situation. We will then assist you in creating an appropriate asset allocation model and determine the various investment selections appropriate for your allocation. The number and type of investments recommended will be determined by you, the limitations of the accounts, and your financial objectives. We will monitor the investment allocation and meet with your periodically to review the appropriateness of the investments and allocations. Although we are not involved in the purchase or sale of these investments, we will supervise your portfolio and make recommendations to you as market factors or your needs dictate.

Portfolio Monitoring Service

We offer monitoring of your portfolios or investments held with other independent registered investment advisors. We are not involved in the purchase or sale of these investments. We will meet with you to review performance, asset allocation, tax issues, and changes in your objectives and/or situation. We will review various investments, including individual stocks and mutual funds, to determine their appropriateness given your financial objectives and situation. Your investments will be monitored quarterly, or as specified by you.

Financial Planning Services

We offer personal financial planning services. Financial plans are based upon your financial goals, objectives, assets, liabilities, income and tax status.

You may select a financial plan that is broad-based or focused on a specific area. The Financial Planning Agreement specifies the planning items included. Available planning items include:

- Account Aggregation
- Asset Protection
- Business Continuity
- Charitable Planning
- Education Planning
- Estate Planning
- Executive Compensation Consulting
- Family Office Consulting

- Income Planning
- Insurance Planning
- Retirement Planning
- Trust Services Consulting
- Investment Policy Statement Creation

IARs gather information through in-depth interviews and related meetings. Information gathered includes your current financial situation, planning activities, future goals and objectives. We assume that the information received from you or from other professionals is complete and accurate.

You receive an analysis of your current situation and recommendations to address your goals and objectives. You may terminate the Financial Planning Agreement without penalty within five days of execution. After the five-day period, you may terminate the Financial Planning Agreement at any time and receive a refund of unearned fees, if any. The Financial Planning Agreement terminates when mutually agreed upon services have been completed to your satisfaction and the final invoice has been delivered.

Retainer Services

We offer retainer services through the Financial Planning Agreement. Retainers are for ongoing services which include assistance in implementation of planning recommendations, planning meetings, service reminders, reviews and updates. Retainer services may be terminated upon notice by either party.

Financial planning recommendations are implemented at your discretion. You are under no obligation to implement recommendations. We recommend you work closely with your attorney, accountant, real estate agent, insurance agent, private banker, trust officer and/or stockbroker in implementing recommendations. At your request, IARs may recommend other professionals to assist you. Other professionals are engaged directly by you. IARs have established business relationships with other professionals that they may recommend to you. IARs will disclose existing relationships to you which, at times, may present a conflict of interest. We monitor potential conflicts of interest with our IARs and other professionals by maintaining reports on their receipt of referrals, gifts, and business entertainment.

Consulting Services

We offer consulting services consistent with your financial status, goals, and objectives. The consulting service may include providing advice regarding the planning items found under the Financial Planning Services above. You may request a written analysis or report from us as part of the consultation.

You may terminate the Financial Planning Agreement for consulting without penalty within five days of execution. Termination after the five-day period will result in a refund of any unearned fees based upon the time invested and work already completed.

Item 5 - Fees and Compensation

Investment Advisory Services

Fees are billed quarterly per account and paid in advance. The fee charged is one quarter of the annual fee percentage. The account value includes cash but excludes restricted or self-directed assets. New accounts are billed the remaining days in the current billing quarter. Accounts at Schwab Advisor Services are billed on a calendar quarter with fees calculated on the actual number of days in the quarter based on the account value as of the last business day of the previous quarterly billing period. Accounts at LPL Financial are billed on a three-month quarter starting with the month the account is opened. The fee is calculated based on the number of days the assets are in the account during the calendar quarter. As a result of the difference in fee calculation, you may pay more or less during a quarterly billing period based on where your account is held. Terminated accounts are entitled to a prorated refund of any pre-paid quarterly fee based upon the number of

days remaining in the billing quarter. Account advisory fees are negotiable and vary by client and range from 0.25% up to 1.50% annually based on several factors, including: the complexity of the services provided, the level of assets to be managed, the amount of assets to be managed, and the overall relationship with us. Advisory relationships with multiple objectives, specific reporting requirements, portfolio restrictions, and other complexities may be charged a higher fee. The exact fee for services will be agreed upon and listed in the Advisory Agreement prior to services being provided.

Account fees are deducted from your brokerage account at the qualified custodian. We facilitate the billing process. You must consent in advance to direct debiting of your fees from your accounts. Custodians deliver your account statements at least quarterly directly to you. Account statements show all disbursements from your account. You are encouraged to review your account statements for accuracy. We will receive electronic access or duplicate copies of your account statements. In instances where direct debit is not obtained, you will be invoiced the account fee.

Your individual accounts, or third-party program accounts, may incur additional charges and fees imposed by third parties. Third parties include custodians, mutual funds, and investment managers. These expenses are in addition to our account fee. Charges vary by third party, type of account, size of account, volume of activity, and type of investment. They are described in the custodian account agreements, investment prospectuses, and plan documents. Charges may include:

- Transaction charges for trade execution
- Mutual fund or money market 12b-1 and sub-transfer agent fees
- Mutual fund and money market management fees and administrative expenses
- Mutual fund transaction fees
- Administrative servicing fees for trust accounts
- Other custodial transaction charges and service fees outlined in the account agreement
- IRA and qualified retirement plan servicing fees
- Other charges required by law

We do not receive a portion of these charges or fees. We include security transaction costs as part of the overall investment advisory fee for Clients participating in the Wellspring Wealth Management Wrap Fee Program. See Item 4 above and Appendix 1 – Wrap Fee Brochure. In addition, all fees paid to us for investment advisory services or part of the Wellspring Wealth Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders. You could invest in these investments directly, without our services, but you would not receive the services we provide which are designed, among other things, to assist you in determining which investments are most appropriate for your financial situation and objective. You should review both the fees charged by the fund(s) and us to fully understand the total fees to be paid. Security transactions fees for client-directed trades (trades requested by you) may be charged back to you. Investment advisory services may cost more, or less, if provided by another investment advisor.

Mutual Fund Share Class Selection

Generally, funds offer multiple share classes available for investment based upon certain eligibility and/or purchase agreements. For example, in addition to retail share classes, such as A shares, funds may also offer institutional share classes or other share classes that are specifically designed for purchase by investors who meet certain specified eligibility criteria, including whether an account meets certain minimum dollar amount thresholds or is enrolled in an eligible fee-based investment advisory program. Institutional share classes usually have a lower expense ratio than other share classes.

Some of our IARs who are dually licensed as Registered Representatives of LPL Financial have a financial incentive to recommend or select share classes that have a 12b-1 fee because such share classes generally result in higher compensation. We have taken steps to minimize this conflict of interest by not receiving 12b-1 fees from LPL Financial on mutual funds owned in advisory accounts. All 12b-1 fees incurred by client accounts are retained by LPL as the qualified custodian. 12b-1 fees are typically used to cover marketing expenses and shareholder services, such as support services provided by LPL to offer their platform as well as other expenses such as legal, accounting, and administrative service provided by LPL for firms to utilize.

The more beneficial share class depends on an analysis of all fees including ticket charges and expected 12b-1 fees. Investing in a 12b-1 fee paying share class can be less expensive for a client than investing in a share class with lower expense ratio if the ticket charges on the lower-cost share class exceed the amount of ongoing 12b-1 fees. Depending on the anticipated trading volume, and the asset management fee that is determined based on the account size, complexity, and time requirements, we have a duty to determine the mutual fund share class that is in your best interest as part of an overall fee analysis.

Mutual Fund Share Class Disclosure

We will seek to determine the most advantageous share class available to you. While institutional share classes are usually the lowest cost alternative, under certain circumstances you may be better served to pay a higher annual expense ratio and avoid a transaction fee on each trade. When selecting a mutual fund your advisory account, our IARs have a fiduciary duty to select the share class that helps manage the overall fee structure of your account. Your IAR will perform an analysis to determine which class is most beneficial to you. We will review mutual fund positions that you may transfer "in kind" to be included in the assets managed by us. We will advise you as to alternatives available to you regarding share classes if available. We recognize that in some situations alternative share classes may not be available such as in 401k plans that limit the array of investments or funds that require certain investment amounts, or custodial platforms that do not provide alternative classes.

Mutual Fund Legacy Holdings

When you transfer assets into a managed account, we will review your mutual fund holdings. If a holding is not one of our recommended funds, the mutual fund will generally be sold unless you need to avoid a taxable gain or direct us to hold the position. In some circumstances, if the legacy holding fits into the asset allocation of your portfolio, it may be held going forward. If we determine it is in your best interest to convert to an alternative share class and the position meets the minimum investment and eligibility criteria, we will place instructions for the custodian to convert the position on its next available share class conversion date.

Third Party Program Selection

Asset management fees are based on the value of assets under management through the third-party investment advisor. Fees will vary by program. The amount of the fee will be outlined in the client agreement executed by you at the time the relationship is established. The asset management fee may be negotiable and may be payable quarterly in arrears or in advance. Fees will be based on the account assets as valued by the account custodian.

We typically receive fees ranging from .25% to 1.50% percent of your assets invested in a third-party program. Schwab program asset management fee is charged separately from our fee. Our fee is included in all other third-party program asset management fees. The portion of the advisory fee paid to us does not increase your management fee paid to the third-party program. Your fee schedule related to our service will be disclosed to you in our client agreement. The compensation paid to us from each third-party program may vary depending upon the agreement that we have with the third-party program. We are paid more, or

less, depending on the third-party program. Third party program disclosure documents will further describe billing arrangements and service termination provisions. We do not control the billing features of third-party programs.

Transaction charges related to third party programs will be clearly stated in the client agreement when the relationship is established. You may also incur charges imposed by third parties in connection with investments made through a program account.

A third-party program account may cost you more, or less, than purchasing program services separately. Factors influencing the cost of a service provided through a program in relation to the cost of the same services purchased separately include:

- The type and size of the account
- The historical and/or expected size or number of trades
- The number and range of supplementary advisory and client services provided

Information on brokerage recommendations and practices are found in the third-party program disclosure document. We do not recommend broker dealers for your third-party program accounts.

Portfolio Advisement Service

The annual fee for Portfolio Advisement Services will range from 0.25% to 1.00% of the account value based on the previous quarterly custodial statement for the assets under review. The fee will be based on the nature and complexity of your circumstances, and upon the Advisory Agreement. You will be invoiced quarterly in advance. You may negotiate fees.

Portfolio Monitoring Service

The annual fee for Portfolio Monitoring Services will be charged as a flat fee by us, typically ranging from $2,500 to $25,000 depending on the assets under review, the nature and complexity of your circumstances, and upon the Financial Planning Agreement. You will be invoiced quarterly in advance or arrears. You may negotiate fees.

Financial Planning Services

Fees are negotiable and may vary by client depending on the complexity of the relationship (multiple parties or households), complexity of the planning services, and the number and range of client-related services provided. Your fee is stated in the Financial Planning Agreement. Our Financial Planning Service is a flat rate fee ranging from $0 to $100,000 based on the factors stated above.

When electing a review and analysis of your existing life insurance portfolio or existing variable policy sub-accounts, fees are negotiable and vary by client depending upon the complexity of the portfolio or sub-accounts and level of analysis. Fees may be charged on a per policy or total portfolio review basis. The amount of the fee will be stated in the Financial Planning Agreement. There is no fee charged for policy sub-account review and analysis for policies provided by our affiliated life insurance agency or its representatives.

You may elect to pay the fee upon execution of the Financial Planning Agreement or when mutually agreed upon services have been completed to your satisfaction and the final invoice has been delivered or a combination of up front and in arrears. You are invoiced and payments are made by check to Wellspring Wealth Management LLC.

Retainer Services

Retainer services provide for ongoing financial planning services. Retainers are flat fees that range from $0 to $100,000 annually depending upon the complexity of the ongoing services. Retainer fees are billed in advance either quarterly or semi-annually. The fee is stated in the Financial Planning Agreement.

If the Financial Planning Agreement is terminated, you are entitled to a prorated refund as of the date of termination of any pre-paid fee based upon the number of days remaining in the pre-paid period.

Consulting Services

Consulting services fees are charged either on an hourly basis or as a flat fee. The hourly charge for consulting is payable in arrears. The hourly rate ranges from $250 to $500 per hour based on the complexity of the consultation, resources used and the advisor or personnel required. The flat fee rate for consulting is payable in advance. The flat fee ranges from $0 to $25,000 based on the complexity of the consultation. Fees may be negotiated. The amount of the fee is stated in the Financial Planning Agreement.

Compensation on the Transaction of Financial Products

Our IARs are also registered as representatives of LPL Financial, a registered broker dealer and FINRA member as well as a registered investment adviser. Some IARs are also insurance agents of Wellspring Associates, an independent life insurance agency. See your IARs regulatory disclosure brochure (ADV Part 2B attached) for more information on your IAR. IARs will disclose to you when recommending products and services that will result in compensation being paid to them, our affiliates, our representatives or other third parties. Such compensation will be separate from the advisory fee and independent of the advisory services provided under a Client Agreement. Such non-Wellspring Wealth managed products may have varying compensation. You may purchase the same products or services from non-affiliated professionals for more or less. We monitor the activities of our IARs by tracking compensation and maintaining reports on sales incentives, gifts and business entertainment.

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

This item is not applicable. Wellspring Wealth and its IARs do not accept performance-based fees or perform side-by-side management.

Item 7 - Types of Clients

We provide advisory services to individuals, families, trusts, and estates. Services may extend to entities related to you, such as business entities, partnerships, charitable organizations, and retirement accounts. Your relationship may vary in scope and length of service. A minimum household (related accounts together) value of $1,000,000 generally is required for advisory services. If a prospective client does not meet our advisory minimums, we may decline an advisory relationship and/or recommend a brokerage relationship with a prospective client.

Refer to the third-party program disclosure document for information on minimum account size requirements or any other conditions for managing an account.

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

Methods of Analysis

Your IAR utilizes the following sources of information for analysis and recommendations:

- Morningstar reports
- Fund prospectuses
- Financial newspapers and magazines
- Research materials prepared by third parties
- Corporate ratings services
- Company filings including annual reports, press releases, and SEC filings.

Your IAR chooses his own research methods, investment style and management philosophy. It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable.

We utilize an Investment Policy Committee (IPC) see the attached Brochure Supplement for more information on its members. The IPC governs the investment advisory process. IPC members participate in conference calls, industry conferences, and meetings with fund and investment portfolio managers. IPC makes recommendations regarding asset allocation, mutual funds, ETFs and other investments. IARs may or may not follow these recommendations in providing investment advice. IPC also constructs asset allocation model portfolios and provides recommendations on the funds to populate the models.

Investment Strategies

Your IAR obtains detailed financial and other pertinent information from you. The investment strategy for you is based upon your financial goals and objectives. You may change these objectives at any time. Your investment strategy is constructed for you and managed for your needs.

Your IAR will use strategic asset allocation as the primary investment strategy for your account. He may use open- and closed-end mutual funds, exchange traded funds and notes (ETFs and ETNs), Real Estate Investment Trust (REIT) funds, stocks and bonds as part of your asset allocation. Various investments are utilized when opportunities exist. Accounts may be globally diversified to control the risk associated with traditional markets. He may also recommend unrelated, third party investment managers who have a greater expertise in certain disciplines when appropriate for you. He may advise you on other types of investments that are deemed appropriate, based on your financial objectives, income needs, investment time horizon, risk attitude, and investment experience.

Risk of Loss

We do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. Investment risks involve the following:

- Systematic Risk: market or economic factors
- Interest Rate Risk: change in value and yield
- Inflation Risk: loss of value or buying power
- Currency Risk: loss due to monetary exchange rates with international investments
- Liquidity risk: inability to buy or sell an investment
- Sociopolitical Risk: instability in regions of the world can affect investment markets
- Management Risk: impact of bad company management decisions
- Credit Risk: default risk on borrowing
- Assessment Risk: ability to understand, determine and evaluate an investment

In addition to general risks associated with investing, certain products also have additional risks.

Alternative Strategy and Real Estate Investment Trust (REIT) Funds

Certain mutual funds used in account allocations invest primarily in alternative investments and/or strategies (Alternatives). Investing in alternatives may not be suitable for all investors and involve special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.

Closed-End Funds

Closed-end funds (CEFs) are investment vehicles actively managed by investment advisors. They are distinguished by their unique features and benefits. Shares of CEFs are created through an initial public offering (IPO), after which they trade on an exchange, similar to stocks. As a result of trading on an exchange, CEFs will have both a market price and a net asset value (NAV). Market prices fluctuate based on supply and demand and typically trade above (premium) or below (discount) the fund's NAV. The primary negative effect of the closed-end structure is the possibility of illiquidity. Since shares cannot be purchased or sold directly through the fund company, there are limitations on trading volume. If an order is placed that would materially increase the day's trading volume above the average, the price rises to correct this increase in demand. Likewise, if an investor wishes to sell an unusually large number of shares, the price will drop to a level where there are enough investors willing to purchase this large number of shares. The potential effect of reduced liquidity is that CEFs can experience share price volatility above that of mutual funds.

Exchange Traded Funds (ETFs)

ETFs are typically investment companies that are legally classified as open-end mutual funds or unit investment trusts. However, they differ from traditional mutual funds in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the selling and buying price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity. The spread is generally lower if the ETF has a lot of trading volume and market liquidity. Although many ETFs are registered with the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company. Certain ETFs may be subject to unique tax consequences such as K-1 tax reporting and tax treatment for collectibles.

Exchange Traded Notes (ETNs)

An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency, and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought and sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value. The ETN trades at the prevailing market price. The risks associated with a particular ETN are described in the prospectus. They include the issuer's ability to pay the principal, interest, or returns. The ETNs trading price can be adversely affected by credit ratings.

Hedge Funds

Hedge funds may be used when investors meet certain qualification standards. Hedge funds are not liquid. Investing in hedge funds involves additional risks including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and the lack of liquidity. In addition,

hedge funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing important tax information.

Item 9 - Disciplinary Information

As an investment advisor regulated by the SEC, Wellspring Wealth has not been subject to an SEC disciplinary event.

Item 10 - Other Financial Industry Activities and Affiliations

We receive operational support from our parent company, Wellspring Wealth LLC. Wellspring Wealth LLC employs our associated persons.

We offer advisory and financial planning services through Wellspring Wealth Management LLC as discussed throughout this Form ADV. To the extent that we recommend you open an advisory account for which compensation is received by us, you are under no obligation to use our advisory services. Planmark Capital Management, LLC operates as a DBA for Wellspring Wealth Management's advisory and financial planning services as well as for LPL Financial brokerage and Retirement Plan Consulting Program services.

Our IARs are also registered representatives and investment adviser representatives with LPL Financial. In such capacity, they may transact securities as well as provide the Retirement Plan Consulting Program ("RPCP") through LPL Financial and receive normal and customary commissions and fees. See Compensation on the Transaction of Financial Products in Item 5 of this document for more information. You are under no obligation to purchase products from our IARs. LPL Financial is not affiliated with Wellspring Wealth or Wellspring Wealth Management. However, LPL Financial has regulatory oversight and supervisory obligations for their registered representatives. As a result, they monitor the advisory activities of our IARs.

Some of our IARs are also licensed insurance agents of Wellspring Associates LLC, a registered insurance agency (see Supplemental Brochure Form ADV Part 2B attached). In such capacity, they may transact insurance products and receive normal and customary commissions. See Compensation on the Transaction of Financial Products in Item 5 of this document for more information. You are under no obligation to purchase products from our IARs. Wellspring Wealth is affiliated with Wellspring Associates through TWG Wellspring LLC. TWG Wellspring LLC is the majority owner of Wellspring Associates LLC, a life insurance agency; Wellspring Planning Group LLC, a state registered investment adviser providing financial planning; and Family Office Forums, a conference provider for the family office industry. JBSGBJ Holdings LLC, a minority owner of Wellspring Wealth LLC, is the majority owner of TWG Wellspring LLC.

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

Code of Ethics and Personal Trading

We have adopted a Code of Ethics that covers our employees, directors, and advisory representatives. Our Code requires that we conduct all business dealings in an ethical fashion and encourages us to meet not only the technical requirements but also the spirit of the Code. We have a duty of care, loyalty, and honesty. We must act in your best interest.

Our Code requires us to comply with all federal securities laws. In addition, we are prohibited from defrauding, misleading, or manipulating you in providing our services. Further, we may not favor the interests of one client over another.

Our Code has guidelines regarding personal securities transactions, designed to prevent us from profiting personally, directly or indirectly, as a result of knowledge about a security or transactions. We are prohibited from acquiring securities in an initial public offering without prior written approval. We may at times buy or sell securities that are also held by you. Your orders are given priority over ours. Our personal trading is reviewed by our compliance department as well as the compliance department of LPL Financial. A copy of our Code of Ethics is available to you upon request.

Participation or Interest in Client Transactions

We neither advise nor act on class actions, bankruptcies or other legal proceedings involving companies whose securities are held, or previously held, in your advisory account. This includes the filing of "Proofs of Claim" in class action settlements. You may direct us to transmit copies of class action notices to you or a designated third party. Upon such direction, we will forward notices promptly.

See Compensation on the Sale of Financial Products in Item 5 and the Code of Ethics and Personal Trading section above for more information.

You should understand that Wellspring Wealth and your IAR may perform advisory, brokerage, and/or insurance services for various other clients, and that Wellspring Wealth and your IAR may give advice or take actions for those other clients that differ from the advice given to you. The timing and nature of any action taken for an account may also be different.

Item 12 - Brokerage Practices

Selecting Brokers

We participate in the Strategic Wealth Management and Model Wealth Portfolio platforms offered to investment advisors by LPL Financial ("LPL"), a FINRA-registered broker dealer.

Strategic Wealth Management Program (SWM) and Strategic Wealth Management Program II (SWM II)

SWM and SWMII offer clients an asset management account that allows Wellspring Wealth to direct and manage specified client assets. The SWM and SWM II programs also allow you to select third-party investment advisors (Portfolio Manager), other than Wellspring, to direct and manage specified assets. The difference between SWM and SWM II is the type of fee charged. In the SWM program you pay an asset-based management fee and separate transaction costs. In the SWM II program, you pay a single wrap fee for advisory services and execution of transactions, see Appendix 1 – Wrap Fee Brochure. A wrap fee program is an advisory program where a specified fee not based directly upon transactions in a client's account is charged for the execution of client transactions and investment advisory service, such as portfolio management or selection of investment managers. From an asset management perspective, there is not a fundamental difference in the way we manage non-wrap and wrap accounts. The only significant difference is the way in which transaction services are paid. Our Investment Committee evaluates the various investment vehicles available in the Programs. Your IAR will choose investment models within the SWM and SWM II program to meet the objectives of your individual investment strategy.

Model Wealth Portfolios Program (MWP)

MWP offers clients a professionally managed asset allocation program. When considering this program, we obtain the necessary financial data from you, assist you in determining the suitability of the MWP program and assist you in setting appropriate investment objectives. We initiate the steps necessary to open an MWP account and have discretion to select a model portfolio of funds designed by LPL's Research Department consistent with your stated investment objectives. LPL's Research Department or third-party portfolio

strategist is responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to the mutual funds or ETFs selected. You authorize LPL to act on a discretionary basis to purchase and sell mutual funds and ETFs in the account and to liquidate previously purchased securities. You also authorize LPL to effect rebalancing for the MWP accounts.

We participate in the Schwab Advisor Services program offered to independent investment advisors by Charles Schwab & Company, Inc., a FINRA-registered broker dealer.

We recommend you establish brokerage accounts with the qualified custodians listed above. We are not affiliated with the custodians. Schwab and LPL generally do not charge separately for custody. They are compensated by you through commissions or other transaction-related fees from trades executed on their trading platforms or settled in your account. We evaluate the firms' brokerage based on execution services, investment offering and quality of service. Schwab and LPL also make available to us other products and services that benefit us but may not benefit your accounts. These other services include:

- Access to client account data (such as trade confirmations and account statements)
- Trade execution software
- Investment research, pricing information and market data
- Direct debit of fees from accounts
- Recordkeeping (account paperwork, trade memorandums and statements)
- Practice management consulting, publications, and conferences
- Regulatory compliance assistance
- Technology and marketing assistance

These services are available to us on an unsolicited basis. They are intended to help manage and develop our advisory business. We pay five percent of our investment advisory fees to LPL and its clearing firm for our accounts custodied at Schwab. The fee is for regulatory oversight of those accounts. The fee is paid on a quarterly basis. You are not charged additional fees for this administrative service.

Soft Dollar Practices

We do not receive soft dollar benefits from custodians. We have implemented a policy that requires approval, reporting, and monitoring of soft dollar benefits.

Directed Brokerage

We will evaluate the use of any broker dealer not mentioned above on a case-by-case basis. If you direct us to use a particular broker dealer not mentioned above, we may not be able to achieve best execution such as negotiated commissions. Commissions charged may be more or less than those charged to other clients.

You may direct transactions for services or products to other professionals. IARs may also provide those services or products. See Compensation on the Sale of Financial Products in Item 5 of this document for more information.

Trade Aggregation

Since your account is managed individually, we do not aggregate your trades with others. Mutual fund trades do not provide an aggregation benefit. Non-aggregated trades in equity stocks may result in your paying higher brokerage costs.

Item 13 - Review of Accounts

Your IAR conducts internal reviews of your account on a regular basis. Our Investment Policy Committee establishes and manages the general asset allocation models of our firm. The committee reviews, approves, and manages the investments available in the asset allocation models. Your IAR determines which investments from the model allocation become part of your account. The frequency of your account review is tailored to your individual needs. You may request a quarterly, semi-annual, or annual review. More frequent reviews may be triggered by material changes in your financial goals, objectives or status or in the market, political, or economic environment.

We may produce performance reports that consist of a breakdown of unrealized gains/losses, performance net of fees, performance history by asset class net of fees, and other items as you may request. Account custodians will transmit to you required trade confirmations and monthly or quarterly account statements. Such statements will typically show all transactions in cash and securities and all deposits and withdrawals of principal and income during the preceding calendar month or quarter depending on activity.

Portfolio monitoring client relationships will be reviewed periodically as agreed upon at the inception of the relationship. Additional reviews may be provided to you at your request, subject to an additional fee.

Item 14 - Client Referrals and Other Compensation

Client Referrals

We receive a number of referrals from existing clients and other professionals. These existing client and professional referrals have served as a basis for adding new clients. We do not pay clients for referrals.

We have entered into referral agreements with other professionals for compensation. The majority of these compensated referral sources are former IARs of Wellspring Wealth Management LLC. Many of these former IARs are currently IARs of Wellspring Planning Group LLC. We pay Wellspring Planning Group LLC, a related entity, a portion of our advisory fee associated with referrals from these former IARs. These Wellspring Planning Group IARs also hold a minority interest in the holding company of Wellspring Wealth Management. As a result, in addition to the compensation they would receive for referring new clients, they would also benefit through indirect ownership in the growth of Wellspring Wealth Management's business value. Paid referrals are conducted in accordance with regulatory rules. Paid referrals are subject to a written agreement with us and disclosed to you in writing. When referring prospects to us, referrers are required to provide this disclosure document and a fee disclosure statement to each prospect. Referrers are paid a portion of the ongoing investment advisory account fee charged to the client by us. The referral portion is not in addition to the normal account fee. It is paid from it.

We may enter into referral agreements with independent third-party investment advisors. IARs may receive compensation from the third-party investment advisor in return for the referral account. Referrals that include compensation will be disclosed to clients at the time the referral is made.

Other Compensation

We, our employees, and IARs may receive additional compensation from advisory product sponsors. IARs registered to transact brokerage and insurance products may also receive compensation from those product sponsors. Compensation may include such items as gifts valued at less than $100 annually, an occasional dinner, a ticket to a sporting event, or reimbursement in connection with education or training meetings or co-sponsoring a client event. Our employees are required to report their gifts and business entertainment as part of our Code of Ethics.

Item 15 - Custody

Your accounts are held at qualified custodians. The custodians provide statements directly to you. You should carefully review your account statements to confirm holdings and transactions. If you do not receive your account statement, contact our Chief Compliance Officer.

We may provide you with financial statements and reports as part of our service. We do not verify values outside of the advisory accounts we manage. Those values are based on what is provided to us by you or your other professionals.

We are deemed to have custody of your funds if certain conditions are met. Since we debit your advisory fees directly from your accounts, we have custody for that purpose. We do not have custody for any other purpose. We would be subject to additional regulatory requirements if we had custody beyond the debiting of advisory fees.

Item 16 - Investment Discretion

You acknowledge and grant to us discretionary authority to manage certain accounts in the Investment Advisory Agreement. You also indicate any account restrictions, self-directed assets, and non-discretionary assets. You must sign a limited power of attorney before we have discretionary authority over an account. The limited power of attorney is included in the custodian's account application. For accounts not held with our main custodians, you may need to sign a separate limited power of attorney to grant discretionary authority. Discretionary authority facilitates our placing trades in your account on your behalf. This allows us the ability to determine the securities to be bought or sold and the amount without obtaining your consent. In a non-discretionary capacity, we will consult with you prior to each trade for approval.

Third party program managers have full discretion over trades in their programs. They do not consult with us or you before placing trades.

Item 17 - Voting Client Securities

We do not vote proxies for you. You retain the responsibility for receiving and voting proxies for securities held in your accounts. Your account custodian will send these to you or your designee. We may provide advice to you at your request regarding a securities proxy.

Item 18 - Financial Information

We do not have a financial impairment that would preclude us from meeting our contractual commitments to you.

In addition, we do not act as custodian, have access to client account distributions beyond the direct debit of fees, or require the prepayment of fees from you of more than $1,200 six months or more in advance. As a result, we are not required to provide you with our balance sheet.

Form ADV 2B - Supplemental Brochure

Investment Committee

David Glover, AIF®

Dennis Wright, AEP®, ChFC®, CLU®

Mark Winston, CFP®, AIF®,

Valeri Bishop, AIF®,

Michael Roy, CFP®,

Andrew Wright, AIF® and

11720 Amber Park Drive, Suite 150
Alpharetta, GA 30009
Phone: (770) 410-4088
www.wellspringwealth.com

March 30, 2021

This brochure supplement provides information about David Glover, Dennis Wright, Mark Winston, Valeri Bishop, Michael Roy, and Andrew Wright that supplements the Wellspring Wealth Management LLC ("Wellspring Wealth") brochure. You should have received a copy of the brochure. Please contact Wellspring Wealth at 770-410-4088 if you did not receive the firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Glover, Mr. Wright, Mr. Winston, Mrs. Bishop, Mr. Roy, and Mr. Wright are available on the SEC website at www.adviserinfo.sec.gov. Financial Planning offered through Wellspring Wealth Management, LLC, a Registered Investment Advisor, not affiliated with LPL Financial.

John David Glover, Jr., AIF® (b. 1957)

Education

- Fi360, Accredited Investment Fiduciary, 2017
- University of New Orleans, M.B.A., 1984.
- Georgia Institute of Technology, B.S., Industrial Management, 1980.

Business Background for the Previous Five Years:

- Wellspring Wealth Management LLC, Managing Director, Investment Advisor Representative, Investment Policy Committee Chairman, August 2005 – Present
- Planmark Financial Group, Managing Partner, January 2017 - Present
- LPL Financial, Registered Representative, September 2009 – Present
- Wellspring Associates, Insurance Agent, August 1999 – Present
- The Wellspring Group LLC, Managing Director, May 2009 – March 2018

Disciplinary Information

Mr. Glover does not have a legal or disciplinary event to report. Clients and prospective clients can view the CRD record (registration records) for Mr. Glover through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck. The CRD number for Mr. Glover is 1355757.

Other Business Activities

In addition to being an investment advisor representative ("IAR"), Mr. Glover is licensed as an independent insurance agent and registered as a representative of LPL Financial, a FINRA member broker/dealer.

Mr. Glover may make, while providing service under the activities mentioned above, recommendations and utilize insurance products and securities for advisory clients. When such recommendations or sales are made, Mr. Glover may earn insurance or securities commissions on the placement of such products. Wellspring Wealth requires Mr. Glover to disclose when products or services are recommended that will result in compensation being paid. Also, Wellspring Wealth requires Mr. Glover to disclose that advisory clients may purchase recommended insurance and securities products from other agents or registered representatives not affiliated with Wellspring Wealth. Mr. Glover may be awarded or called upon to attend meetings and participate in trips provided by insurance carriers and service providers depending on the level of business and ongoing relationship. Wellspring Wealth monitors these activities by tracking compensation and maintaining reports on sales incentives, gifts, and business entertainment.

Additional Compensation

Aside from the brokerage commissions and RPCP fees paid by LPL Financial and commissions from insurance companies to Mr. Glover (see the "Other Business Activities" section above), Mr. Glover does not receive any additional compensation from non-clients for providing advisory services.

Supervision

As Managing Director of Wellspring Wealth Management LLC, Mr. Glover is primarily responsible for the supervision of Wellspring Wealth and its Investment Advisor Representatives. As Mr. Glover is an IAR

himself, his activities are supervised by the members of Wellspring Wealth, LLC. Mr. Glover's compliance activities are supervised by Wellspring Wealth's Chief Compliance Officer, Valeri Bishop. As a registered representative of LPL Financial, his activities are also supervised by LPL Financial.

Advisory Clients may contact any of Wellspring Wealth's members see Item 4 of Form ADV 2A above or Valeri Bishop directly.

Wellspring Wealth	770-410-4088	info@wellspringwealth.com
Valeri Bishop, Chief Compliance Officer	770-410-4088	vbishop@wellspringwealth.com

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Dennis Ray Wright, AEP®, ChFC®, CLU® (b. 1956)

Education

- The National Association of Estate Planners & Councils, Accredited Estate Planner®, 2015
- The American College, Chartered Financial Consultant®, 2003
- The American College, Chartered Life Underwriter®, 2001
- Rockhurst University, M.B.A., 1993
- University of Southern Mississippi, Bachelor of Science with Special Honors, 1982

Business Background for the Previous Five Years:

- Wellspring Wealth LLC, Managing Partner, April 2018 - Present
- Wellspring Wealth Management LLC, Investment Adviser Representative, May 2009 – April 2016, April 2018 - Present
- LPL Financial, Registered Representative, September 2009–April 2016, April 2018 - Present
- Wellspring Associates, Insurance Agent, August 1994 – Present
- Wellspring Planning Group LLC, Manager, April 2016 – April 2018
- The Leaders Group, Registered Representative, April 2016 – April 2018
- The Wellspring Group LLC, Managing Director, May 2009 – April 2018

Disciplinary Information

Mr. Wright does not have a legal or disciplinary event to report. Clients and prospective clients can view the CRD record (registration records) for Mr. Wright through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck. The CRD number for Mr. Wright is 2611479.

Other Business Activities

In addition to being an investment advisor representative ("IAR"), Mr. Wright is licensed as an independent insurance agent and registered as a representative of LPL Financial, a FINRA member broker/dealer.

Mr. Wright may make, while providing service under the activities mentioned above, recommendations and utilize insurance products and securities for advisory clients. When such recommendations or sales are made, Mr. Wright may earn insurance or securities commissions on the placement of such products. Wellspring Wealth requires Mr. Wright to disclose when products or services are recommended that will result in compensation being paid. Also, Wellspring Wealth requires Mr. Wright to disclose that advisory clients may purchase recommended insurance and securities products from other agents or registered representatives not

affiliated with Wellspring Wealth. Mr. Wright may be awarded or called upon to attend meetings and participate in trips provided by insurance carriers and service providers depending on the level of business and ongoing relationship. Wellspring Wealth monitors these activities by tracking compensation and maintaining reports on sales incentives, gifts, and business entertainment.

Additional Compensation

Aside from the sales commissions paid by LPL Financial and insurance companies to Mr. Wright (see the "Other Business Activities" section above), Mr. Wright does not receive additional compensation from non-clients for providing advisory services.

Supervision

Mr. Wright's activities are supervised by Wellspring Wealth's Managing Director, David Glover. Mr. Wright's compliance activities are supervised by Wellspring Wealth's Chief Compliance Officer, Valeri Bishop.

Advisory Clients may contact David Glover or Valeri Bishop directly.

David Glover, Managing Director	770-410-4088	dglover@wellspringwealth.com
Valeri Bishop, Chief Compliance Officer	770-410-4088	vbishop@wellspringwealth.com

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Mark Howell Winston, CFP®, AIF® (b. 1960)

Education

- Certified Financial Planner Board of Standards, Certified Financial Planner™, 2014.
- Fi360, Accredited Investment Fiduciary, 2012
- University North Carolina, B.S., Business Administration, 1983.

Business Background for the Previous Five Years:

- Wellspring Wealth Management LLC, Investment Advisor Representative, Investment Policy Committee Member, January 2017 – Present
- LPL Financial, Registered Representative, March 2010 – Present
- Planmark Financial Group, Inc., Representative, April 2010 – Present.
- Planmark Capital Management, LLC, Investment Advisor Representative, February 2012 – January 2017.

Disciplinary Information

Mr. Winston does not have a legal or disciplinary event to report. Clients and prospective clients can view the CRD record (registration records) for Mr. Winston through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck. The CRD number for Mr. Winston is 1996412.

Other Business Activities

In addition to being an investment advisor representative ("IAR"), Mr. Winston is registered as a representative of LPL Financial, a FINRA member broker/dealer and registered investment adviser of the Retirement Plan Consulting Program. Mr. Winston is also a representative of Planmark Financial Group, Inc. a company that provides third party plan administration services.

Mr. Winston may make, while providing service under the activities mentioned above, recommendations and utilize insurance products and securities for advisory clients. When such recommendations or sales are made, Mr. Winston may earn insurance or securities commissions on the placement of such products. Wellspring Wealth requires Mr. Winston to disclose when products or services are recommended that will result in compensation being paid. Also, Wellspring Wealth requires Mr. Winston to disclose that advisory clients may purchase recommended insurance and securities products from other agents or registered representatives not affiliated with Wellspring Wealth. Mr. Winston may be awarded or called upon to attend meetings and participate in trips provided by service providers depending on the level of business and ongoing relationship. Wellspring Wealth monitors these activities by tracking compensation and maintaining reports on sales incentives, gifts, and business entertainment.

Additional Compensation

Aside from the brokerage commissions paid by LPL Financial to Mr. Winston (see the "Other Business Activities" section above), Mr. Winston does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Winston's activities are supervised by Wellspring Wealth's Managing Director, David Glover. Mr. Winston's compliance activities are supervised by Wellspring Wealth's Chief Compliance Officer, Valeri Bishop.

Advisory Clients may contact David Glover or Valeri Bishop directly.

David Glover, Managing Director	770-410-4088	dglover@wellspringwealth.com
Valeri Bishop, Chief Compliance Officer	770-410-4088	vbishop@wellspringwealth.com

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Valeri Jan Bishop, AIF® (b. 1961)

Educational Background

- Fi360, Accredited Investment Fiduciary, 2019
- Casper College, Bachelor of Business Administration, 1983

Business Background for the Previous Five Years:

- Wellspring Wealth Management LLC, Senior Wealth Adviser, Investment Advisor Representative, Investment Policy Committee Member, April 2018 – Present
- E*Trade Financial Corporation, Client Development Team Manager, May 2016 – September 2017
- Charles Schwab & Co., Inc., Vice President, Branch Manager, April 1996 – April 2016

Disciplinary Information

Mrs. Bishop does not have a legal or disciplinary event to report. Clients and prospective clients can view the CRD record (registration record) for Mrs. Bishop through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov. The CRD number for Mrs. Bishop is 2408291.

Other Business Activities

In addition to being an investment advisor representative ("IAR"), Mrs. Bishop is registered as a representative of LPL Financial, a FINRA member broker/dealer.

Mrs. Bishop may make, while providing service under the activity mentioned above, recommendations and utilize securities for advisory clients. When such recommendations or sales are made, Mrs. Bishop may earn securities commissions on the sale of such products. Wellspring Wealth requires Mrs. Bishop to disclose when products or services are recommended that will result in compensation being paid. Also, Wellspring Wealth requires Mrs. Bishop to disclose that advisory clients may purchase recommended securities products from other registered representatives not affiliated with Wellspring Wealth. Mrs. Bishop may be awarded or called upon to attend meetings and participate in trips provided by service providers depending on the level of business and ongoing relationship. Wellspring Wealth monitors these activities by tracking compensation and maintaining reports on sales incentives, gifts, and business entertainment.

Additional Compensation

Aside from the brokerage commissions paid by LPL Financial to Mrs. Bishop (see the "Other Business Activities" section above), Mrs. Bishop does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mrs. Bishop's activities are supervised by Wellspring Wealth's Managing Director, David Glover.

Advisory Clients may contact David Glover directly.

David Glover, Managing Director 770-410-4088 dglover@wellspringwealth.com

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Michael Hubert Roy, CFP® (b. 1957)

Educational Background

- Certified Financial Planner Board of Standards, Certified Financial Planner™, 2006.
- Georgia State University, M.B.A., 1995
- Georgia Institute of Technology, Bachelor of Civil Engineering, 1979

Business Background for the Previous Five Years:

- Wellspring Wealth Management LLC, Investment Advisor Representative, Investment Policy Committee Member, August 2005 – Present
- Wellspring Wealth Management LLC, Investment / Research Assistant, March 2006 – Present

Disciplinary Information

Mr. Roy does not have a legal or disciplinary event to report. Clients and prospective clients can view the CRD record (registration record) for Mr. Roy through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov. The CRD number for Mr. Roy is 2752428.

Other Business Activities

Mr. Roy does not have any other business activities.

Additional Compensation

Aside from salary and bonus paid to Mr. Roy (see the "Other Business Activities" section above), Mr. Roy may also receive a portion of Wellspring Wealth's client advisory fee as additional compensation for supporting certain advisory clients. The portion of the fee paid to Mr. Roy is from Wellspring Wealth's total fee collected and does not increase the fee paid by the client.

Supervision

Mr. Roy's activities are supervised by Wellspring Wealth's Managing Director, David Glover. Mr. Roy's compliance activities are supervised by Wellspring Wealth's Chief Compliance Officer, Valeri Bishop.

Advisory Clients may contact David Glover or Valeri Bishop directly.

David Glover, Managing Director	770-410-4088	dglover@wellspringwealth.com
Valeri Bishop, Chief Compliance Officer	770-410-4088	vbishop@wellspringwealth.com

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Andrew Blake Wright, AIF® (b. 1991)

Education

- Fi360, Accredited Investment Fiduciary, 2019
- Auburn University, B.S., Major in Entrepreneurship & Family Business, 2013

Business Background for the Previous Five Years:

- Wellspring Wealth Management LLC, Investment Advisor Representative, May 2018 – Present
- LPL Financial, Registered Representative, April 2018 – Present
- Wellspring Associates, Insurance Agent, August 2016 – April 2018,
- The Leaders Group, Registered Representative, April 2016 – April 2018
- MML Investors Services, LLC, Registered Representative, July 2015 – April 2016
- Massachusetts Mutual Life Insurance Co., Insurance Agent, September 2014 – April 2016

Disciplinary Information

Mr. Wright does not have a legal or disciplinary event to report. Clients and prospective clients can view the CRD record (registration records) for Mr. Wright through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck. The CRD number for Mr. Wright is 1355757.

Other Business Activities

In addition to being an investment advisor representative ("IAR"), Mr. Wright is registered as a representative of LPL Financial, a FINRA member broker/dealer.

Mr. Wright may make, while providing service under the activities mentioned above, recommendations and utilize securities for advisory clients. When such recommendations or sales are made, Mr. Wright may earn securities commissions on the placement of such products. Wellspring Wealth requires Mr. Wright to disclose when products or services are recommended that will result in compensation being paid. Also, Wellspring Wealth requires Mr. Wright to disclose that advisory clients may purchase securities products from other registered representatives not affiliated with Wellspring Wealth. Mr. Wright may be awarded or called

upon to attend meetings and participate in trips provided by service providers depending on the level of business and ongoing relationship. Wellspring Wealth monitors these activities by tracking compensation and maintaining reports on sales incentives, gifts, and business entertainment.

Additional Compensation

Aside from the brokerage commissions paid by LPL Financial to Mr. Wright (see the "Other Business Activities" section above), Mr. Wright does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Wright's activities are supervised by Wellspring Wealth's Managing Director, David Glover. Mr. Wright's compliance activities are supervised by Wellspring Wealth's Chief Compliance Officer, Valeri Bishop.

Advisory Clients may contact David Glover or Valeri Bishop directly.

David Glover, Managing Director	770-410-4088	dglover@wellspringwealth.com
Valeri Bishop, Chief Compliance Officer	770-410-4088	vbishop@wellspringwealth.com

Professional Certification

Representatives of Wellspring Wealth Management have earned the professional certifications that are required to be explained in further detail in this brochure supplement.

Accredited Estate Planner ®

The Accredited Estate Planner® ("AEP®") designation is a graduate-level specialization in estate planning, obtained in addition to already recognized professional credentials within the various disciplines of estate planning. It is awarded by the National Association of Estate Planners & Councils (NAEPC) to professionals who meet stringent requirements and who support the team concept of estate planning.

The AEP® designation is a voluntary designation; no federal or state law or regulation requires individuals to obtain an AEP® designation. It is recognized as an advanced comprehensive estate planning education.

To attain the right to use the AEP® designation, an individual must satisfactorily fulfill the following requirements:

- Credentials – Currently hold a designation as a Chartered Life Underwriter® (CLU®), Chartered Financial Consultant® (ChFC®), Certified Financial Planner™ (CFP®), or Certified Trust and Financial Advisor (CTFA), or be licensed to practice as an Attorney (JD) or as a Certified Public Accountant (CPA);
- Education – Complete two approved graduate level courses in estate planning or alternative equivalent education, or have at least 15 years of experience engaged in estate planning and estate planning activities;
- Experience – Be presently and significantly engaged in estate planning activities and have a minimum of five years of experience in estate planning and estate planning activities; and
- Ethics – Sign a declaration statement to continuously abide by the *NAEPC Code of Ethics*.

Individuals who earn the designation must complete the following ongoing education in order to maintain the right to continue to use the designation.

Accredited Investment Fiduciary ®

The Accredited Investment Fiduciary ("AIF®") designation is a voluntary designation; no federal or state law or regulation requires individuals to obtain an AIF® designation. It is recognized as an advanced instruction covering pertinent legislation and best practices of investment fiduciaries and professionals.

To attain the right to use the AIF® designation, an individual must satisfactorily fulfill the following requirements:

- Education – Complete required training and pass examination;
- Experience – Have a minimum of two years of relevant experience, a bachelor's degree or higher, and a professional credential; or minimum five years of relevant experience, a bachelor's degree or higher, or a professional credential; or a minimum of eight years of relevant experience;
- Apply - Submit an application and dues; and
- Ethics – Satisfy the Code of Ethics and Conduct Standards.

Individuals who earn the designation must complete the following ongoing education in order to maintain the right to continue to use the designation:

- Continuing Education – Individuals with the designation must satisfy a minimum of 6 hours of continuing education every year.

AIF® professionals who fail to comply with the above standards and requirements will either lose or have their designation suspended.

Certified Financial Planner™

The Certified Financial Planner™, CFP® and federally-registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to

test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Financial Consultant®

The CHARTERED fINANCIAL coNSULTANT® ("ChFC®") is a professional designation earned by individuals who specialize in insurance and financial planning. The Chartered Financial Consultant® designation was created by and is administered through The American College. Since 1982, more than 41,000 ChFC® designations have been awarded.

The ChFC® designation is a voluntary designation; no federal or state law or regulation requires insurance agents or financial planners to obtain a ChFC® designation. It is recognized as an advanced comprehensive financial planning-based education.

To attain the right to use the ChFC® designation, an individual must satisfactorily fulfill the following requirements:

- Education – Complete seven core courses and two elective courses. The seven core courses are: financial planning: process and environment, fundamentals of insurance planning, income taxation, planning for retirement needs, investments, fundamentals of estate planning, and financial planning applications; elective courses include the financial system in the economy, estate planning applications, executive compensation, and financial decisions for retirement;
- Examination – Pass all nine primarily two-hour, 100-question examinations on the educational course material;
- Experience – Complete at least three years of full-time business experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to comply with The American College *Code of Ethics and Procedures*, a code that includes a Professional Pledge and eight Canons.

Individuals who earn the designation must complete the following ongoing education in order to maintain the right to continue to use the designation:

- Continuing Education – Individuals with the designation are subject to Professional Achievement in Continuing Education (PACE) recertification every two years and must complete 30 hours of continuing education.

ChFC® professionals who fail to comply with the above standards and requirements will lose their certification. Individuals may apply for recertification subject to Certification Committee approval.

Chartered Life Underwriter®

The CHARTERED LIFE UNDERWRITER® ("CLU®") is a professional designation earned by individuals who specialize in life insurance and estate planning. The Chartered Life Underwriter® designation was created by and is administered through The American College.

The CLU® designation is a voluntary designation; no federal or state law or regulation requires insurance agents to obtain a CLU® designation. It is recognized as an advanced comprehensive insurance-based education. Over 94,000 agents carry this designation.

To attain the right to use the CLU® designation, an individual must satisfactorily fulfill the following requirements:

- Education – Complete five core courses and three elective courses. The five core courses are: fundamentals of insurance planning, individual life insurance, life insurance law, fundamentals of estate planning, and planning for business owners and professionals; elective courses include financial planning: process and environment, individual health insurance, income taxation, group benefits, planning for retirement needs, investments, and estate planning applications;
- Examination – Pass all eight two-hour, 100-question examinations on the educational course material;
- Experience – Complete at least three years of full-time business experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to comply with The American College *Code of Ethics and Procedures*, a code that includes a Professional Pledge and eight Canons.

Individuals who earn the designation must complete the following ongoing education in order to maintain the right to continue to use the designation:

- Continuing Education – Individuals with the designation are subject to Professional Achievement in Continuing Education (PACE) recertification every two years and must complete 30 hours of continuing education.

CLU® professionals who fail to comply with the above standards and requirements will lose their certification. Individuals may apply for recertification subject to Certification Committee approval.