

## **Part 2A of Form ADV – Brightscape Brochure**

### **Item 1 Cover Page**

The name of the company is Brightscape Investment Centers, Inc. (BIC). The address of the company is 6910 North Kendall Drive, Suite 200, Miami, FL 33156. The business phone number is 305 233-6222 and 888-888-0967 (toll free). The company's website is [www.brightscape.com](http://www.brightscape.com). The date of this brochure is August 12, 2020.

This brochure provides information about the qualifications and business practices of Brightscape Investment Centers, Inc. If you have any questions about the contents of this brochure, please contact us at 305 233-6222 or at [info@brightscape.com](mailto:info@brightscape.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Brightscape also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and from Brightscape at [ericweiss@brightscape.com](mailto:ericweiss@brightscape.com)

**Registration as an investment advisor does not imply a level of skill or training.**

## **Item 2 Material Changes**

Since BIC's last brochure update in July 2020 there have been no material changes for BIC.

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### **Part 2A**

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#### Item 4 Advisory Business

- A. Brightscape Investment Centers, Inc. (BIC) has been offering investment advisory services since 1999. BIC is 100% owned by Brightscape, Inc. (BI). BI has numerous owners the largest of whom is Eric Weiss owning 52%.
- B. BIC offers financial planning and investment advice. Financial planning services cover the broad range of individual needs including: goal identification, budgeting, taxes, insurance, investments, estate planning, assessment of current resources compared to goals, and recommended alternatives. Financial planning services use a goal identification and prioritization method. Clients are asked to first complete a data information package which contains information about the client's financial and non-financial assets, current income and projected retirement income, a risk questionnaire and a description of desired goals. A financial software program is then used to assess the probability of success i.e., achieving the goal without running out of money using different economic and investment scenarios. The results are then written up in a report and presented to the client in a separate meeting.

Non- discretionary investment management services are offered with respect to a broad range of investments including: individual stocks and bonds, mutual funds and exchange traded funds. Portfolios for clients are structured to be consistent with a client's risk rating and achievement of a desired goal. Index mutual and exchange traded funds are most often used in client portfolios both to reduce investment costs and to ensure that the investment does not stray from its stated objective. Client portfolios are diversified across different investment styles and factors, i.e. large cap vs. small cap and growth vs. value, momentum and low volatility; geographies: U.S. vs. international developed markets vs. emerging markets and equities vs. bonds. In addition, assets which have lower correlations are added to provide further diversification benefits. These assets may include exchange listed real estate investment trusts (REITs), diversified commodity, momentum and managed futures investments through exchange listed funds and mutual funds. Investments held in an interval fund where liquidity is limited to quarterly purchases/sales are also used. Such interval fund investments cover loans to individuals with higher than average credit scores and investments in insurance linked securities.

- The investment management service we offer focuses primarily on the asset allocation most appropriate for the client's risk and to achieve his/her goals.
  - Of secondary importance is the selection of the specific investment which analysis focuses on investment consistency and fees.
  - The asset allocation is contained in an *Investment Policy Statement* which outlines the duties and responsibilities of the advisor, the responsibilities of the client, the return and risk expectations for the portfolio, rebalancing procedures, investments to be used and reports to be provided.
  - On a quarterly basis all portfolios are reviewed to ensure that the asset allocation is within the limits established in the *Investment Policy Statement*.
- C. The investment advice is tailored to each client's needs based upon the risk profile and goals of the client. Clients may impose restrictions on investing in certain types of securities initially in the Investment Policy Statement and thereafter in written notice to BIC.
- D. BIC does not participate in any *wrap fee programs*.
- E. BIC also offers pension consulting services to plan sponsors. BIC does not work directly with plan participants. These services involve acting as a 3(21) advisor where BIC shares fiduciary responsibility for selecting and monitoring plan investments with the sponsor making recommendations to the sponsor who makes the ultimate investment decisions. BIC may also act as a 3(38) advisor where it will exercise

discretionary control over plan investments. As a 3(38) advisor BIC will enter into a written agreement for providing these services to the plan.

- F. As of February 20, 2020 BIC, managed approximately \$ 55,100,000 of assets on a non-discretionary basis and \$0 of assets on a discretionary basis.

## Item 5 Fees and Compensation

Asset Management Fees:

<u>Account Asset Level</u>	<u>Annual Fee Percentage</u>
\$50,000 to \$249,999	2.00%
\$250,000 to \$499,999	1.75%
\$500,000 to \$749,999	1.50%
\$750,000 to \$999,999	1.25%
Over \$1,000,000	1.00%

- A. Fees are negotiable.

- a. *Asset management fees* (“asset-based” fees) are based upon a percentage of the assets managed and are charged either on a quarterly or monthly basis. Valuation of the assets managed is based upon the average balance for the previous quarter or the month; fees are non-refundable and are all billed in arrears. A flat or periodic fee can also be arranged for asset management services. The fees are negotiable but are not refundable. Periodic fees are used when a client does not want a continuous service and only desires the portfolio to be reviewed at a specific point in time. For example, sometimes a client will ask for a semi-annual or annual review of their portfolio. Such a periodic fee will be in the range of \$500 to \$1,000 per review.
- b. *Financial planning fees* can be: (i) flat or fixed (ii) subscription or (iii) by the hour. The fee and scope of the work is determined in an Engagement Letter at the time the service is provided.

Depending upon the scope of the engagement, the hourly fee can range from \$200 to \$400 per hour. The hourly fee is negotiable, but non-refundable.

The subscription service consists of an upfront charge in the range of \$250 to \$500 and an ongoing monthly fee, in arrears or in advance, at a rate between \$100 to \$300 per month based on the complexity of the client's situation. The fee may be negotiable in certain cases. This service may be terminated with 30 days' written notice. Upon termination of the account, any unearned fee will be refunded to the client. All refunds will be processed using the same method of payment the client used to pay the applicable advance fees. The refund will come directly from Brightscape Investment Centers. Refunds are calculated by determining the number of days in the billing cycle the amount of prepaid fees would compensate Brightscape for including the 30-day notice then refunding the fees collected over that amount.

Fixed or flat fees will be determined on a case by case basis with the fee based on the complexity of the situation and the needs of the client. The fixed fee will be agreed in an Engagement Letter agreed upon before the start of any work. The fixed fee can range between \$ 500 – \$5,000 according to the complexity of the engagement. The fee is negotiable. If a fixed fee program is chosen, a portion of the fee is due at the beginning of the engagement and the remainder is due at completion of work, however, Brightscape will not bill an amount above \$500 more than 6 months in advance.

- c. *Pension consulting fees* are negotiated per each engagement. The fee is a flat fee based upon the specifics of each engagement; it is not related to the number of participants nor the hours. The fee is charged in arrears and can be paid by check or electronically.
- B. For most clients fees for investment management services are charged electronically (an invoice is mailed by BIC indicating the fee amount) by instructing the custodian to deduct the amount from their account at BIC's recommended independent custodian, TD Ameritrade Institutional. In this way BIC receives the fee immediately. For some clients an invoice is mailed, and BIC receives the fee by check within 30-days. Clients may select either paying electronically or by check. Fees for investment management services are charged in arrears at the end of each calendar quarter or month. To charge the fee electronically written authorization is required by the client. TD Ameritrade Institutional sends monthly statements to clients that includes the amount of the fee deduction.
- C. Clients should note that because mutual funds and exchange traded funds pay advisory fees to their investment advisors and such fees are, therefore, indirectly charged to all holders of mutual fund shares, clients with mutual or exchange traded funds in their portfolios are effectively paying both the Advisor and the mutual or exchange traded fund manager for the management of their assets. Clients into whose account BIC places mutual fund shares under the Advisor's management are, therefore, subject to both the Advisor's direct management fee and the indirect management fee of the mutual or exchange traded fund's managers. Clients will incur brokerage costs and mutual fund transaction fees as detailed in Item 12 "Brokerage Practices" below.
- D. No client is required to prepay fees more than \$500 6-months in advance.
- E. No person at BIC receives any compensation for the sale of securities or other investment products or service fees from the sale of mutual funds e.g., no commissions are ever paid to any person at BIC. (1) All mutual funds recommended by BIC are "no-load" meaning no sales charge is paid to any person at BIC or to any related person upon the sale of the fund. (2) All clients have the option to purchase investment products recommended by BIC through other brokers or agents not affiliated with BIC. (3) Zero percent of BIC's revenue is derived from commissions or any other fees from the sale of investment products. (4) Since no commissions are received there is no adjustment to advisory fees.

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

No person at BIC receives performance-based fees or a fee based upon a share of capital gains or capital appreciation of the assets of a client. Neither are any accounts managed in a "side-by-side" arrangement whereby certain accounts are charged a performance-based fee while others an asset-based fee.

**Item 7 Types of Clients**

BIC provides advisory services generally to individuals, trusts and estates. The minimum amount to open an account is \$100,000. The \$100,000 minimum can be spread over one household consisting of various individual accounts.

BIC maintains sole discretion to waive the minimum.

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

- A. Analysis begins with the current state of the economy and the stage of the business cycle the economy is moving towards: expansion moving from trough to peak or contraction moving from peak to trough. This is used as an overlay to adjust the asset class percentages for client portfolios described below. For instance, if the economy is contracting portfolio allocations are scaled to a less aggressive stance. A

moderate portfolio may have 40% allocated to bonds during an expansion; this percentage is increased to perhaps 45 or 50% during a contraction.

Investment portfolios are developed to conform to different risk categories: aggressive, moderate, conservative and gradations of each, e.g. moderate aggressive or moderate conservative. Each client portfolio contains core positions in the major asset classes or factors: US stocks – large/small, value/growth, momentum, low volatility; international developed stocks – large/small, value/growth, emerging market stocks – large/small, value/growth; bonds, commodities, and real estate investment trusts (REITS). The portfolio's risk is adjusted by varying the percentage of bonds, small, value and international stock allocations; e.g., more bonds are added and lower allocations to more volatile equity asset classes will lessen the portfolio's volatility e.g., risk.

BIC uses alternative investments because they have low correlations to a client's core equity positions. By adding such alternative investments, we can either increase the expected return without increasing risk or reduce risk without sacrificing return.

Some of the alternative investments, and associated risks, we use are:

- **Interval funds** – These are investment funds with limited liquidity e.g., client has limited ability to sell investment according to periodic share repurchases by the issuer of the fund. Interval funds hold investments in insurance related securities and loans to individuals. Insurance related securities will suffer when there is a plethora of natural catastrophes. Consumer loans will experience high delinquencies during periods of high unemployment.
- **REITs** – We use diversified publicly traded real estate investment trusts. The value of the underlying real estate will generally decline with increases in interest rates. A severe economic recession will also depress the value of the underlying real estate assets.
- **Commodities** – We use diversified publicly traded commodity funds as both a hedge against inflation and as a low-correlated diversifier. Specific commodities can experience significant downside price moves caused by supply shocks e.g., oil during March 2020. We do not use single investment commodity funds.
- **Managed futures** – These publicly traded funds are based upon trend following. They benefit when there are persistent market moves, either up or down. Prior to the Spring of 2020 there was a lack of such moves causing the investment to underperform.
- **Momentum investments** – We use these funds as a diversifier against core value stock positions held in client portfolios. Historical data shows that when value stocks do well momentum stocks do not, while when value stocks falter momentum stocks tend to outperform.

The investment strategy and portfolio composition for an individual client is based upon the client's risk rating in conjunction with their goals. For example, two clients rated as conservative one forty and the other sixty-seven years of age would both have conservative portfolios, but the older client would have more income producing investments.

Though a portfolio may be structured as conservative all securities fluctuate in value and, therefore, all clients should be prepared to bear the risk of loss.

- B. For any portfolio, the material risks relate to the percentage invested in equities, which value will generally decline during market downturns. Portfolios holding stocks issued by companies in countries outside the U.S. will bear an additional risk when the foreign currency of that country depreciates relative to the U.S. dollar, e.g. the U.S. dollar gets stronger. Portfolios with a large percentage invested in bonds may also not grow at a level equal to the rate of inflation thereby reducing the client's purchasing power over time. Bonds in a client portfolio will lose value during a period of rising interest rates. The longer is the maturity of the bond the greater will be the decline in value for a given increase in interest rates. Bonds issued by companies which are financially weak will decline in value during an economic contraction.

- C. All portfolios predominantly use either mutual or exchange traded funds. Material risks of mutual and exchange traded funds which hold stocks is that their value will decline during a market downturn. Mutual or exchange traded funds holding bonds, even of the highest quality, can decline in value such that the client will receive less at the point when the fund is sold or redeemed than what was purchased. In addition, when mutual funds are held in taxable accounts clients may have increased tax liabilities: mutual funds may be forced to liquidate positions during times of high redemptions resulting in capital gains being distributed to all shareholders, for which taxes will be owed, though any individual shareholder did not sell his/her position. Some portfolios hold individual stocks which are more volatile than a fund because of the lack of diversification. Some portfolios may hold individual bonds which may default causing a loss to the client. Exchange traded funds may trade at a premium or discount. An exchange traded fund may be purchased at a premium and be later sold at a discount causing a loss.

**Item 9      Disciplinary Information**

No person at BIC has ever been subject to any legal or disciplinary event.

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

- A. No person at BIC is registered, or has an application pending to register, as a registered representative of a broker-dealer. BIC is not registered, nor does it have an application pending to register, as a broker-dealer.
- B. No person at BIC is registered, or has an application pending to register, as a futures commission merchant.
- C. BIC has no relationships with any related persons which would create a conflict of interest with clients.
- D. BIC does not recommend or select other investment advisers for clients.

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

- A. BIC has adopted a code of ethics that will be provided to any client or prospective client upon request. BIC's code of ethics covers the following topics: all professionals at BIC are held to a fiduciary standard whereby the interests of the client are paramount, personal securities transactions are conducted in a way to avoid an actual or perceived conflict of interest with the client, diligence and care are used in maintaining and protecting a client's nonpublic confidential information, non-divulgence of client security holdings to any individual outside of BIC, non-acceptance of gifts with value greater than \$100 from any entity doing business with BIC, limitations on serving as a director of an outside company (public or private), limitations on outside business interests and annual acknowledgement by all BIC professionals that they have received, read and understand BIC's Code of Ethics and Personal Trading Policy.
- B. BIC does not recommend any securities to clients in which any person at BIC or a related person has a material financial interest.
- C. Persons at BIC invest in the same securities which are recommended to clients. Acceptable personal trades by persons at BIC include: (i) shares of non-exchange traded open-end mutual funds, (ii) shares of any money market fund, (iii) direct obligations of the U.S. Government, (iv) shares of companies traded on the NYSE, AMEX or NASDAQ National Market System, (v) publicly traded corporate bonds and (vi) publicly traded municipal bonds. Affiliates may not front-run and affiliates are prohibited from activity that disadvantages clients in some security.
- D. While securities may be purchased or sold for client accounts at the same time persons at BIC may buy or sell the same securities for their accounts, BIC believes that no conflict of interest is present because the size of the purchases or sales are de-minimis compared to the market value of such securities so to have no impact upon the prices or markets of such securities. Security sales or purchases are done based on the individual needs of the client or the person at BIC. While we believe that sufficient steps have been taken

to avoid a conflict of interest BIC understands that certain situations may give rise to a perceived conflict of interest. In those cases, BIC will share with the client the specific reasons why the security trade was made by the person at BIC in order to demonstrate it was driven by the individual's specific need rather than a perceived advantage of taking the opposite position of the security in the client's portfolio. BIC prevents affiliates from disadvantaging the client trading in the same security.

## **Item 12 Brokerage Practices**

- A. BIC recommends the brokerage services of TD Ameritrade Institutional to clients. BIC recommends and uses the brokerage services of TD Ameritrade because:
- i. Securities Investor Protection Corporation (SIPC) and other insurances protect client accounts against loss, up to \$149.5 million, due to the insolvency of TD Ameritrade Institutional;
  - ii. The investment options offered which include any: stock, exchange traded fund or bond, and more than 17,000 mutual funds as well as options;
  - iii. TD Ameritrade offers 100 commission-free exchange traded funds;
  - iv. TD Ameritrade Institutional does not manage nor sell proprietary investment products, thereby reducing any perceived conflict of interests;
  - v. Technology provided for clients to access their accounts and for BIC to manage the accounts.

Brokerage commissions and mutual fund transaction fees charged by TD Ameritrade Institutional are competitive within the industry.

While TD Ameritrade does make available third-party research, this does not present a conflict of interest because BIC does not use research from TD Ameritrade. All research used by BIC in formulating its investment strategies is purchased from a third party and is independent of our relationship with TD Ameritrade Institutional. Such research is purchased from Morningstar through its "Office" product, Bespoke Investment Group, and YCharts.

BIC receives no client referrals from TD Ameritrade Institutional.

BIC does not require a client to execute transactions through any specified broker-dealer.

- B. BIC strives to treat all clients in a fair manner. The purchase and sale of securities for client accounts are aggregated when such purchase would result in a lower commission. This will occur when accounts are purchasing the same securities and when each order on its own is not of sufficient size to warrant the lower rate. When securities are aggregated for purchase or sale:
- i. Client orders are attempted to be completed by day-end;
  - ii. If the order is not completed shares will be allocated to the underlying accounts on a pro-rata basis;
  - iii. If the order is filled at several prices an average price and commission will be used for all trades;
  - iv. All clients receiving securities from the aggregated trade will receive the average price;
  - v. Only trades executed within the aggregation trade on the single day may be combined for purposes of calculating the average price.

## **Item 13 Review of Accounts**

- A. Client accounts are reviewed periodically on a quarterly basis. The nature of the review is to: (i) assess progress vs. the client's goals, (ii) measure the account performance during the immediately preceding quarter and compare it to the performance of the market and (iii) ensure that the account's asset allocation is in line with the client's risk rating and strategic asset allocation percentages. The year-end review also contains measures of the account's previous one, three and five-year performance also compared to the market. All reviews are conducted by Eric Weiss, Chief Investment Officer.



- B. A non-periodic review will be conducted if there has been a major change in the circumstances (death of spouse, divorce, etc.) of the client or a goal has changed (retire at an earlier date). A non-periodic review will also be done in the event of a major market movement, e.g. market indexes decline by more than 8% on a single day.
- C. Quarterly reports are provided to clients by BIC which show: performance of the account, a comparison to market performance, the beginning balance, additions, withdrawals, management fees, investment gains/losses and ending balance. For any set of goals if the client has more than one account the accounts are aggregated into a household for all performance measures. At the quarterly review the aggregated account's asset allocation is compared to the client's strategic allocation, as per their risk rating, to determine if any rebalancing adjustments are necessary. Taking into consideration the stage of the business cycle and current asset allocation vs. the strategic target, recommendations are provided for any adjustments. The year-end report also contains information on the historical performance of the account's largest security holdings covering the past one, three and five years. All reports are written and sent to the client's account address.

Securities are monitored weekly. Securities in client accounts are monitored quarterly. An annual review is conducted to see if changes in the client profile require changes to the account.

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

- A. No person at BIC receives any economic benefit from a person who is not a client in return for BIC providing investment advice to its clients.
- B. BIC nor any related person does not compensate any person for client referrals.

#### **Item 15 Custody**

- A. BIC does not have physical custody of client funds or securities. Clients receive monthly account statements from BIC's independent custodian, TD Ameritrade Institutional, which they should carefully review.

Clients are urged to compare the month-end account statements from TD Ameritrade to the quarterly Account Summary report and invoices received from BIC.

- B. Because of BIC's direct fee deduction it is deemed to have constructive custody of client assets. Please see Item 5B for more information on direct fee deduction.

#### **Item 16 Investment Discretion**

BIC only manages accounts on a non-discretionary basis.

#### **Item 17 Voting Client Securities**

- A. BIC will vote client securities according to management's recommendations unless BIC determines such recommendation to not maximize shareholder value. Clients can vote their securities by requesting to receive the proxy statements when they complete their account application. If BIC is voting the client's securities any conflict of interest will be resolved by: (i) engaging an independent third party to determine how to vote the proxy, (ii) vote in proportion to other shareholders, (iii) refer the proxy to a client or a representative of the client for voting and (iv) disclose the conflict to the affected clients and seek their consent to vote the proxy prior to casting the vote. Clients can request to receive information as to how BIC voted their securities. Clients may obtain a copy of BIC's proxy voting policies upon written request.

- B. BIC obtains authority to vote client securities at the time the account is opened by the client indicating on the account application to have all proxy materials sent to BIC rather than the client.

**Item 18      Financial Information**

- A. BIC does not require nor solicit the prepayment of any client fees more than \$500 6-months in advance.
- B. BIC does not have discretionary authority over client funds and does not require the prepayment of any fees. Because of BIC's direct fee deduction it is deemed to have custody of client assets.
- C. BIC has never been the subject of a bankruptcy petition.

**Item 19 Requirements for State-Registered Advisers**

A. Management persons of BIC

**Eric J. Weiss**

**DOB:** 07/31/53

**Education Background**

George Washington University  
Washington, DC

1975 – B.A.  
International Affairs

Columbia University  
New York, NY

1976 – M.A.  
Economics

University of Chicago  
Chicago, Illinois

1979 – M.B.A.  
Finance

**Professional Designations**

Certified Financial Planner™ PROFESSIONAL  
Accredited Investment Fiduciary®

5/06 - Present  
4/10 – 4/13

**Business Background**

Brightscape Investment Centers, Inc.  
President/Director

10/99 - Present

Granite Park Capital, LLC  
Manager and Registered Agent  
(entity holding private personal  
investment made by Eric Weiss)

1/13 – Present

Wander, LLC  
Manager and Registered Agent  
(entity holding private personal  
investment made by Eric Weiss)

12/19 – Present

Brightscape, Inc. (parent of BIC)  
Chief Executive Officer/Director

01/00 - Present

**Richard Scott Boyles**

**DOB:** 12/20/77

**Education Background**

Southern Methodist University  
Dallas, TX

2000 – BA  
Finance

**Professional Designations**

Certified Financial Planner™ PROFESSIONAL 1/07 - Present

**Business Background**

Brightscape Investment Centers, Inc.  
Director  
Designated Principal & Branch Mgr./Texas

8/04 – Present

**Kenneth R. Turner**

**DOB:** 6/24/65

Mr. Turner does not have a college degree.

**Professional Designations**

Certified Financial Planner™ PROFESSIONAL 2/07 - Present

**Business Background**

Brightscape Investment Centers, Inc.  
Investment Advisor Representative

1/07 – Present

Tech Marine  
Part time employee  
Budget and Planning Analyst  
Department of Navy – Dahlgren  
Warfare Center

8/10 – Present

**Amanda Wray**

**DOB:** 8/5/1978

**Education Background**

University of Texas, Cum Laude  
Arlington, TX

2005 – BBA  
Business Administration

**Professional Designations**

Behavioral Financial Advisor 8/19 - Present

**Business Background**

Brightscape Investment Centers, Inc. 8/20 – Present  
Investment Advisor Representative

Amanda Wray LLC 8/18 – Present  
Principal

Releve Financial Group 6/18 – 8/20  
Private Wealth Advisor

Strategic Asset Conservation, Inc. 9/15 – 2/18  
Business Director

Tailor Made Plans 8/08 – 8/18  
Principal/Owner

Kaplan’s Behavioral Financial Advisor program integrates traditional finance practices with psychology and neuroscience to improve emotional competency and decision-making behavior that increases effective usage of the financial plan.

- B. BIC is not engaged in any other business other than providing investment advice and financial planning services.
- C. No person at BIC is compensated for advisory services with performance-based fees.
- D. No person at BIC has ever been involved in a reportable event.
- E. No person at BIC has a relationship or arrangement with any issuer of securities.

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 62,000 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 hours 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.

**Part 2B of Form ADV – Brightscape Brochure**

**Item 1 Cover Page**

A.

Supervised person: Eric Weiss  
6910 North Kendall Drive, Suite 200  
Miami, FL 33156  
305 233-6222

Firm name: Brightscape Investment Centers, Inc.  
6910 North Kendall Drive, Suite 200  
Miami, FL 33156  
305 233-6222

The date of this supplement is Aug 10, 2020.

B.

This brochure supplement provides information about Eric Weiss that supplements the BIC brochure. You should have received a copy of that brochure. Please contact Eric Weiss, President at 305 233-6222 if you did not receive BIC’s brochure or if you have any questions about the contents of this supplement.

Additional information about Eric Weiss is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 Educational Background and Business Experience**

**Eric J. Weiss**

**DOB:** 07/31/53

**Education Background**

George Washington University  
Washington, DC

1975 – B.A.  
International Affairs

Columbia University New York, NY	1976 – M.A. Economics
University of Chicago Chicago, Illinois	1979 – M.B.A. Finance

**Professional Designations**

Certified Financial Planner™ PROFESSIONAL Accredited Investment Fiduciary®	5/06 - Present 4/10 – 4/13
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**Business Background**

Brightscape Investment Centers, Inc. President/Director	10/99 - Present
Granite Park Capital, LLC Manager and Registered Agent (entity holding private personal investment made by Eric Weiss)	1/13 – Present
Wander, LLC Manager and Registered Agent (entity holding private personal investment made by Eric Weiss)	12/19 – Present
Brightscape, Inc. (parent of BIC) Chief Executive Officer/Director	01/00 - Present

**Item 3 Disciplinary Information**

Eric Weiss has never been subject to any legal or disciplinary event.

**Item 4 Other Business Activities**

- A. Eric Weiss is not registered, nor has an application pending to register, as a registered representative of a broker-dealer

Eric Weiss is not registered, nor has an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of any of these entities.

Eric Weiss has no relationships with any related persons which would create a conflict of interest.

Eric Weiss does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products including distribution or service (“trail”) fees from the sale of mutual funds.

- B. Eric Weiss is the manager and registered agent of Granite Park Capital, LLC. Granite Park Capital is a private company 100% owned by Eric Weiss to hold his private personal investments.

#### **Item 5 Additional Compensation**

Eric Weiss does not receive any compensation from a person who is not a client in return for providing advisory services.

#### **Item 6 Supervision**

Eric Weiss, President, is responsible for supervising the financial planning and investment management services for all BIC professionals; Mr. Weiss's phone number is 305 233-6222.

#### **Item 7 Requirements of State-Registered Advisers**

- A. Eric Weiss has never been involved in an award or found liable in any arbitration claim.
- B. Eric Weiss has never been the subject of a bankruptcy petition.

**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 62,000 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 hours 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.**

## Item 1 Cover Page

A.

Supervised person: Richard Scott Boyles, CFP  
3090 Nowitzki Way  
3<sup>rd</sup> Floor  
Dallas, TX 75219  
Phone: (214) 932-3449

Firm name: Brightscape Investment Centers, Inc.  
6910 North Kendall Drive, Suite 200  
Miami, FL 33156  
305 233-6222

The date of this supplement is August 10, 2020.

B.

This brochure supplement provides information about Richard Scott Boyles that supplements the BIC brochure. You should have received a copy of that brochure. Please contact Eric Weiss, President at 305 233-6222 if you did not receive BIC's brochure or if you have any questions about the contents of this supplement.

Additional information about Richard Scott Boyles is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

### **Richard Scott Boyles**

**DOB:** 12/20/77

### **Education Background**

Southern Methodist University  
Dallas, TX

2000 – BA  
Finance

### **Professional Designations**

Certified Financial Planner™ PROFESSIONAL

1/07 - Present

### **Business Background**

Brightscape Investment Centers, Inc.  
Director  
Designated Principal & Branch Mgr./Texas

8/04 – Present

## Item 3 Disciplinary Information

Richard Scott Boyles has never been subject to any legal or disciplinary event.

## Item 4 Other Business Activities

- A. Richard Scott Boyles is not registered, nor has an application pending to register, as a registered representative of a broker-dealer

Richard Scott Boyles is not registered, nor has an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of any of these entities.

Richard Scott Boyles has no relationships with any related persons which would create a conflict of interest.

Richard Scott Boyles does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products including distribution or service (“trail”) fees from the sale of mutual funds.

- B. Richard Scott Boyles has a business interest in Gameday Cloth, LLC. Gameday Cloth is a private company partially owned by Richard Scott Boyles holding his private personal investments.

#### **Item 5 Additional Compensation**

Richard Scott Boyles does not receive any compensation from a person who is not a client in return for providing advisory services.

#### **Item 6 Supervision**

All client specific investment advice provided to clients by Richard Scott Boyles is first discussed and approved by Eric Weiss. Specific investment recommendations and financial plans are prepared at head office, according to procedures outlined in Item 8 of Part 2A, based upon information gathered by Mr. Boyles in speaking with the client. After discussing specific investment and financial planning recommendations with head office Mr. Boyles delivers these recommendations and suggestions to clients.

All account reviews are performed at head office according to procedures outlined in Item 13 of Part 2A. The reviews are then discussed with Mr. Boyles who presents them to the client.

BIC maintains a compliance manual for which Mr. Boyles must read, understand and annually attest that he is in compliance with all of its provisions.

Eric Weiss, President, is responsible for supervising Mr. Boyles’ advisory activities; Mr. Weiss’s phone number is 305 233-6222.

#### **Item 7 Requirements of State-Registered Advisers**

- C. Richard Scott Boyles has never been involved in an award or found liable in any arbitration claim.  
D. Richard Scott Boyles has never been the subject of a bankruptcy petition.

#### **Item 1 Cover Page**

A.

Supervised person: Kenneth Turner  
8444 Gray Fox Lane  
King George, VA 22485  
540 775-6463

Firm name: Brightscape Investment Centers, Inc.  
6910 North Kendall Drive, Suite 200

Miami, FL 33156  
305 233-6222

The date of this supplement is August 10, 2020.

B.

This brochure supplement provides information about Kenneth Turner that supplements the BIC brochure. You should have received a copy of that brochure. Please contact Eric Weiss, President at 305 233-6222 if you did not receive BIC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kenneth Turner is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Educational Background and Business Experience**

**Kenneth R. Turner**

**DOB:** 6/24/65

Mr. Turner does not have a college degree.

### **Professional Designations**

Certified Financial Planner™ PROFESSIONAL 2/07 - Present

### **Business Background**

Brightscape Investment Centers, Inc. 1/07 – Present  
Investment Advisor Representative

Tech Marine 8/10 – Present  
Part-time employee  
Budget and Planning Analyst  
Department of Navy – Dahlgren  
Warfare Center

## **Item 3 Disciplinary Information**

Kenneth Turner has never been subject to any legal or disciplinary event.

## **Item 4 Other Business Activities**

- A. Kenneth Turner is not registered, nor has an application pending to register, as a registered representative of a broker-dealer

Kenneth Turner is not registered, nor has an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of any of these entities.

Kenneth Turner has no relationships with any related persons which would create a conflict of interest.

Kenneth Turner does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products including distribution or service ("trail") fees from the sale of mutual funds.

- B. Kenneth Turner is a full-time employee of TMB, Inc. at the Dahlgren Naval Warfare Center in Dahlgren, VA. Mr. Turner is a financial analyst and spends 30-40 hours per week in this job. These hours overlap

with security trading hours. This job is not investment related. This job provides Mr. Turner with a substantial source of his income.

#### **Item 5 Additional Compensation**

Kenneth Turner does not receive any compensation from a person who is not a client in return for providing advisory services.

#### **Item 6 Supervision**

All client specific investment advice provided to clients by Kenneth Turner is first discussed and approved by Eric Weiss. Specific investment recommendations and financial plans are prepared at head office, according to procedures outlined in Item 8 of Part 2A, based upon information gathered by Mr. Turner in speaking with the client. After discussing specific investment and financial planning recommendations with head office Mr. Turner delivers these recommendations and suggestions to clients.

All account reviews are performed at head office according to procedures outlined in Item 13 of Part 2A. The reviews are then discussed with Mr. Turner who presents them to the client.

BIC maintains a compliance manual for which Mr. Turner must read, understand and annually attest that he is in compliance with all of its provisions.

Eric Weiss, President, is responsible for supervising Mr. Turner's advisory activities; Mr. Weiss's phone number is 305 233-6222.

#### **Item 7 Requirements of State-Registered Advisers**

- C. Kenneth Turner has never been involved in an award or found liable in any arbitration claim.
- D. Kenneth Turner has never been the subject of a bankruptcy petition.

This brochure supplement provides information about Amanda Wray that supplements the BIC brochure. You should have received a copy of that brochure. Please contact Eric Weiss, President at 305 233-6222 if you did not receive BIC's brochure or if you have any questions about the contents of this supplement.

Additional information about Amanda Wray is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### **Item 1 Cover Page**

A.

Supervised person: Amanda Wray  
9400 E. Shea Blvd., Suite 100  
Scottsdale, AZ 85260  
480 445-9122

Firm name: Brightscape Investment Centers, Inc.  
6910 North Kendall Drive, Suite 200  
Miami, FL 33156  
305 233-6222

The date of this supplement is August 10, 2020.

## Item 2 Educational Background and Business Experience

<b>Amanda Wray</b>	<b>DOB:</b> 8/5/1978
<b>Education Background</b> University of Texas, Cum Laude Arlington, TX	2005 – BBA Business Administration
<b>Professional Designations</b>	
Behavioral Financial Advisor	8/19 - Present
<b>Business Background</b> Strategic Asset Conservation, Inc. Advisor Business Director	9/15 – 2/18
Tailor Made Plans Principal/Owner	8/08 – 8/18
Amanda Wray LLC Principal	8/18 - Present
Releve Financial Group Private Wealth Advisor	6/18 – 8/20
Brightscape Investment Centers, Inc. Investment Advisor Representative	8/2020 – Present

Kaplan’s Behavioral Financial Advisor program integrates traditional finance practices with psychology and neuroscience to improve emotional competency and decision-making behavior that increases effective usage of the financial plan.

## Item 3 Disciplinary Information

Amanda Wray has never been subject to any legal or disciplinary event.

## Item 4 Other Business Activities

- A. Amanda Wray is not registered, nor has an application pending to register, as a registered representative of a broker-dealer.

Amanda Wray is not registered, nor has an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of any of these entities.

Amanda Wray has no relationships with any related persons which would create a conflict of interest.

Amanda Wray does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products including distribution or service (“trail”) fees from the sale of mutual funds.

- B. Amanda Wray – Amanda Wray receives trail commissions for insurance products sold prior to August 2020 when registered with a “fee-based” advisory firm. Those commissions will stop in July 2021 and all state life and health insurance licenses will not be renewed upon expiration.

#### **Item 5 Additional Compensation**

Amanda Wray does not receive any compensation from a person who is not a client in return for providing advisory services.

#### **Item 6 Supervision**

All client specific investment advice provided to clients by Amanda Wray is first discussed and approved by Eric Weiss. Specific investment recommendations and financial plans are prepared jointly with head office, according to procedures outlined in Item 8 of Part 2A, based upon information gathered by Ms. Wray in speaking with the client. After discussing specific investment and financial planning recommendations with head office Ms. Wray delivers these recommendations and suggestions to clients.

All account reviews are performed at head office according to procedures outlined in Item 13 of Part 2A. The reviews are then discussed with Ms. Wray who presents them to the client.

BIC maintains a compliance manual for which Ms. Wray must read, understand and annually attest that he is in compliance with all of its provisions.

Eric Weiss, President, is responsible for supervising Ms. Wray’s advisory activities; Mr. Weiss’s phone number is 305 233-6222.

#### **Item 7 Requirements of State-Registered Advisers**

- E. Amanda Wray has never been involved in an award or found liable in any arbitration claim.
- F. Amanda Wray has never been the subject of a bankruptcy petition.