

**Item 1. Cover Page**

**Part 2A of Form  
ADV Firm  
Brochure**

March 9, 2024



**Elevate Capital Advisors**

Firm CRD #288190

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This brochure provides information about the qualifications and business practices of Elevate Capital Advisors. If you have any questions about the contents of this brochure, please contact us at 970.328.7526 or [cco@elevatecapitaladvisors.com](mailto:cco@elevatecapitaladvisors.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 Elevate Capital Advisors also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration does not imply a certain level of skill or training.

## **Item 2. Summary of Material Changes**

The following material changes have been made to this Disclosure Brochure since the filing dated March 16, 2023:

- Item 5: Portfolio Management Fees have been amended.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and when material changes occur in the business practices of Elevate Capital Advisors.

At any time, you may view the current Disclosure Brochure online at the Elevate Capital Advisors website at <https://www.elevatecapitaladvisors.com/disclosures>.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 970.328.752

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## **Item 4. Advisory Business**

### **1. Describe your advisory firm, including how long you have been in business. Identify your principal owner(s).**

Elevate Capital Advisors (“Elevate”, “Elevate Capital”, “the firm”, “our firm”, “we”, “us”, “our”) is a Corporation in Eagle, Colorado, USA. The firm was founded in March 2017 by our principal owners Ken Armstrong and Shane Fleury and started operations in July 2017.

### **2. Describe the types of advisory services you offer.**

Elevate provides advisory services related to Portfolio Management, Pension Consulting, and Financial Planning. Our services cover various types of investments, investment vehicles, and methods of analysis.

#### **A. Portfolio Management Services**

Elevate offers discretionary and non-discretionary portfolio management services.

##### **a. Discretionary Agreements:**

Elevate is responsible for production and execution of the Investment Policy Statement (IPS). A risk analysis is performed to produce an IPS for each client.

##### **i. Portfolio Management Process:**

- Identify and specify investment objectives and constraints
  - Detailed risk analysis.
- Develop and maintain investment strategy
  - The firm maintains several primary investment strategies which are often combined in some form to align with each investor’s willingness and ability to take risk and the size of their portfolio.
- Determine portfolio composition
  - Generally composed of proprietary investment strategies developed and maintained by Elevate (See Item 8, Section 1).
  - Custom-designed strategies are also available.
- Execute transactions to bring portfolio into alignment with target allocations
  - Consideration is given to taxes, transaction costs and market conditions
- Measure and evaluate portfolio performance
  - Clients are provided online access to robust performance reporting software
- Monitor investor behavior and market conditions
  - Using internally generated and independent third- party research, commentary, analysis, and software
- Rebalance as necessary to maintain alignment with objectives and constraints
  - Consideration is given to taxes and transaction costs

**b. Investment Policy Statement:**

The Investment Policy Statement (IPS) formalizes the scope of the engagement and sets guidelines for risk, return, allocations, review, rebalancing, restrictions, performance reporting and ongoing monitoring and management of accounts. At this time, we will also produce all forms required to open any new accounts and arrange for transfer of assets from existing accounts. We manage assets held with Charles Schwab due to our existing business relationship.

In addition to providing information regarding their personal financial circumstances, investment objectives, risk tolerance, time-horizon and any other constraints, clients are obligated to provide to the firm timely notifications of any changes to these circumstances. Monthly, we send an email encouraging clients to review their accounts, allocations, and performance via our online performance portal. We also contact clients at least annually to conduct a review meeting to determine whether there have been any changes in a client's financial circumstances, investment objectives, risk tolerance, time-horizon, or any other considerations.

Market conditions will continuously cause a portfolio's investments to vary from the original allocations that were established. To remain consistent with the overall guidelines established in the IPS, each security in which the portfolio is invested will be continually monitored for variance and rebalanced back toward the target weighting when appropriate. The Chief Investment Officer will determine the amount of variance allowed.

**c. Non-Discretionary Agreements:**

In our non-discretionary accounts, the client retains ultimate responsibility for portfolio decisions. No market actions are taken in non-discretionary accounts without verbally confirmed instructions from the client. Elevate's proprietary investment strategies are not available under non-discretionary agreements and no investment policy statement will be created or maintained by the firm for these accounts. Elevate may from time to time make recommendations to Client but the client retains responsibility for deciding what securities are to be bought and sold. Elevate will track non-discretionary account holdings with trailing stops and alert the client when particular levels are hit. All other firm services such as advice on position size, fundamental value, technical analysis, entry and exit prices, financial planning services, and trade execution, are included. Using third party software, Elevate monitors positions in non-discretionary accounts and advises clients accordingly. The client always has the right to disregard our advice.

## **B. Pension Consulting Services**

- a. General Consulting Services** – Elevate assists plan sponsors in managing their fiduciary obligations to defined contribution plans. We schedule and keep minutes from trustee meetings. We work directly with various vendors that come together to make a retirement plan work, while serving as a single point of contact for plan sponsors. In this capacity, we advocate for plan sponsors and bring them ideas for changes or improvements to plan documents or IPS based on changes in law or industry developments. Finally, we assist with participant and eligible-employee education regarding plan options, general investment concepts, and benefits of participation.
- b. Requests for Proposals** – Elevate assists plan sponsors in requesting new proposals from plan providers, third-party administrators, fiduciary service providers, and others. Through consultations with plan sponsors, we identify desirable plan characteristics and find vendors who can meet those goals. We generally identify alternatives for each decision point and after acquiring relevant data from potential vendors arrange presentations from those vendors to plan sponsors/plan trustees. We provide advice related to final decision-making and vendor selection.

## **C. Financial Planning**

- a. Financial Planning Services** – Services offered to 'Portfolio Management' clients at no additional cost. It is our opinion that a comprehensive understanding of a clients' complete financial plan allows us to do a better job of constructing portfolios that meet client objectives.

### **3. Explain whether you tailor your advisory services to the individual needs of clients and whether clients may impose restrictions on certain securities or types of securities.**

Elevate offers investment advisory services that are tailored to the specific needs of our clients. Our client may be an individual, family, or entity and may engage us for Portfolio Management, Pension Consulting, and/or Financial Planning Services.

#### **A. Portfolio Management**

We maintain an active management approach to markets. Our proprietary investment strategies are used either as standalone portfolios or in various combinations that most closely align with our client's investment goal and risk tolerance. If an optimal portfolio cannot be designed using any of these approaches a custom strategy may be designed and implemented. Clients may impose reasonable restrictions on securities owned in their accounts. Restrictions must be imposed by providing the symbol for each security to be restricted from investment.

#### **B. Pension Consulting**

Each company, benefit plan, and census are unique. Our compensation is not dependent on the selection of any vendor, product, or investment. Each time we are engaged by a plan sponsor, our analysis and service are specifically tailored to that engagement.

### **C. Financial Planning**

Elevate offers financial planning, which may include project-based analysis, market research and consulting services, that are not tied directly to managing assets. Using our state-of-the-art financial planning software and decades of experience and professional education, we will identify areas where there may be opportunity to improve your situation and ways to optimize the efficiency and effectiveness of your financial plan.

#### **a. Elevate Planning Process:**

- i. **Discovery:** We ask questions and listen carefully. Two sets of information are involved. First are your desires and goals, and second are the facts and data.
- ii. **Clarification:** Once a first draft of your plan is created, we meet to feed back to you what we heard you say and refine the information until it is accurate.
- iii. **Share Ideas:** We will make specific recommendations on actions to take and explain the pros and cons of each recommendation.
- iv. **Implementation:** This is the process of executing on the recommendations we make. We will prepare all necessary forms for signature. Execute transactions to bring portfolio into alignment with target allocations.
- v. **Periodic Review:** Review the financial plan and IPS and adjust the plan and portfolio as needed.

*Elevate is neither a law firm nor a tax advisor, and we do not provide legal or tax advice of any kind. To the extent requested by a client, we may recommend the services of professionals in these areas of expertise. The client is always free to choose to work with any professional they wish, regardless of our recommendation. The client retains absolute discretion over all decisions. The recommendation that a client engage the services of an Elevate representative in his/her capacity as an insurance agent represents a conflict of interest, as the payment of commissions for insurance sales may provide an incentive to recommend such products based on said compensation rather than the client's need. Clients may implement our recommendations with anyone they wish, including other non-affiliated professionals.*

### **4. Wrap Fee Programs**

Elevate does not participate in any wrap fee programs. Wrap fee programs offer services for one all-inclusive fee.

### **5. Assets Under Management**

As of December 31, 2023, Elevate managed \$139,761,945 with \$126,294,906 managed on a discretionary basis and \$13,467,039 managed on a non-discretionary basis.

## **Item 5. Fees and Compensation**

### **1. Describe how you are compensated for your advisory services.**

Elevate's advisory services are divided into three areas: Portfolio Management, Pension Consulting, and Fee-Based Financial Planning.

#### **A. Portfolio Management**

Elevate typically charges an annual percentage-based fee for portfolio management services.

The annual fee is based on the fair market value of the client's account assets determined as of the last day of each calendar month. Advisory fees are annualized and applied monthly in arrears, based on the number of calendar days in a month. The management fee is debited proportionately and directly from the account(s) within each portfolio unless the client directs Elevate to debit the fee for one account from another account owned by the same client.

Elevate's minimum investment for investment management services is \$500,000. Elevate may elect to waive the minimum investment based on certain criteria which include but are not limited to: anticipated future investments, existing relationships/related accounts, and historical relationships. Should Elevate elect to waive its \$500,000 minimum, a flat rate fee not to exceed 2% may be charged. Such portfolios will be evaluated at least annually for purposes of determining the management fee and if such a portfolio subsequently reaches the minimum, the management fee will be changed to the standard schedule.

If you terminate services with Elevate, a prorated fee will be due for the number of days you were a client in the month. Management fees related to contributions and distributions during the month are pro-rated.

Fees will be calculated using the following blended schedule:

From	To	Rate
\$0	\$250,000	1.50%
\$250,000	\$500,000	1.25%
\$500,000	\$750,000	1.00%
\$750,000	\$1,000,000	0.90%
\$1,000,000	\$1,500,000	0.80%
\$1,500,000	\$2,500,000	0.70%
\$2,500,000	\$5,000,000	0.60%
\$5,000,000	\$10,000,000	0.55%
\$10,000,000	and up	0.50%

At our discretion, we may charge a lesser investment advisory fee, charge a flat fee, offer a discount from the standard fee schedule, or waive a fee entirely based upon specific facts and circumstances including, but not limited to: the client's financial situation and circumstances, the volume of assets under management and anticipated to be under management, account householding arrangements, the complexity of the services provided, related accounts, account composition, grandfathered fee schedules, employees and family members, and negotiations with the client as fees are negotiable.

Unless expressly excluded, management fees are calculated using all assets in the investment portfolio/account, including cash, money market funds, short-term treasury instruments, ETFs, mutual funds, and the market value of any short positions (if any). However, Elevate does not charge a fee on any assets for which it values manually or internally. Elevate relies on third-party software and account custodians for pricing information of account holdings.



Elevate makes management fee statements available each month. Your custodian will also send you a statement each month (or quarterly). From time to time, the statement from the custodian and the statement from Elevate will differ slightly in value typically due to differences in the treatment of accrued interest, or some other methodology. Clients are encouraged to compare these statements. While many transactions carry no transaction fee or commission paid to your custodian, occasionally transaction fees do apply and will be incurred by the client directly in the account where the transaction takes place.

For non-discretionary accounts, our fee may range from 0.25% to 1.00%.

**Advisory Fee Deduction Requirements:**

- i. Client provides Elevate with written authorization permitting the fees to be paid directly from a client's account held by the qualified custodian.
- ii. The qualified custodian agrees to send client a monthly statement indicating all amounts dispersed from a client's account including the amount of the advisory fee paid directly to Elevate.

*Clients may terminate the portfolio management agreement upon 7-days written notice to Elevate. Clients will incur a pro-rata charge for services rendered prior to the termination of the portfolio management agreement. We encourage clients to reconcile the statement(s) received from the qualified custodian. If clients find any inconsistent information within the statement(s) received from the qualified custodian, they should call our main office number.*

**B. Pension Consulting**

Elevate's fee for Pension Consulting Services is based on a percentage of assets in the plan. We do not use a standard fee schedule. Annual fees are negotiated, are generally in the range of .25%, and will not exceed 1.00% annually. Fees will be listed in your investment management agreement. Our fee is billed, payable and deducted monthly, in- arrears, based on the value of all accounts under the agreement on the last business day of the prior calendar month. We may negotiate other fee-paying arrangements depending on a client's individual circumstance. If the pension consulting services agreement is executed at any time other than the first day of a calendar month our fees will apply on a pro-rata basis, which means that the advisory fee is payable in proportion to the number of days in the month for which clients are receiving services. Our advisory fee is negotiable depending on individual plan circumstances. Unless we agree to invoice clients directly, in which case payment is due upon receipt of the invoice, clients agree to authorize the qualified custodian to deduct our fee from the Plan Expense Account (PEA) or similar account and remit to Elevate.

*Clients may terminate the pension consulting services agreement upon 7-days written notice to Elevate. Clients will incur a pro-rata charge for services rendered prior to the termination of the pension consulting agreement, which means clients will incur consulting fees only in proportion to the number of days in the month for which clients receive services.*

**C. Financial Planning Services**

Elevate offers financial planning services on either an hourly or fixed fee basis. Our hourly fee for financial planning services ranges up to \$500 and our fixed fees vary depending on the complexity and scope of the project. A common fee for financial planning is \$300/hr. with a total cost of \$1500. Generally, our hourly fee is billed for general consulting services and our fixed fees are billed for broad-based or project based

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financial planning. Our financial planning fees - both hourly and fixed fees - are negotiable depending upon the complexity and scope of the service to be performed, a client's financial situation, and a client's objective. Hourly fees are generally due upon completion of services rendered. For fixed fees, we require that clients pay 50% of the fee in advance with the remaining portion due upon completion of services rendered. In instances where we collect payments in advance, such advance payments are associated with services to be performed within 6 months from the engagement date. All terms of the engagement will be evidenced in the agreement that clients sign with Elevate. Clients may terminate the agreement by providing us with written notice. Clients will incur a charge for services rendered prior to the termination of the agreement. If advanced fee-paying arrangements are negotiated and Elevate has received pre-paid advisory fees that we have not yet earned, we will issue a prorated refund of those fees.

#### **D. Other Fees and Expenses**

As part of Elevate's investment advisory services, we may invest, or recommend that clients invest, in closed-end mutual funds and exchange traded funds. The fees that clients pay for portfolio management services are separate and distinct from the fees and expenses charged by closed-end mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. Clients may also incur transaction charges and/or brokerage fees, including commissions, when purchasing or selling securities. These charges and fees are imposed by the custodian through whom a client's account transactions are executed. Elevate does not share in any portion of the brokerage fees/transaction charges imposed by the custodian. To fully understand the total cost clients will incur, clients should review all the fees charged by custodians, mutual funds, exchange traded funds, Elevate, and others. For information on our brokerage practices, refer to the Brokerage Practices section of this Disclosure Brochure.

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

Elevate Insurance Advisors, LLC. (EIA) is the brand name dealing in fixed or indexed life, long-term care, annuities, and disability income insurance products. EIA generates commission-based compensation for selling insurance products. Such commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of Elevate who are insurance agents have a financial incentive to recommend insurance products to clients based on the ability to earn commission-based compensation rather than acting in a client's best interest as a fiduciary. Clients are always welcome to purchase insurance and annuity products from other insurance agents.

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## **Item 6. Performance-Based Fees and Side-by-Side Management**

Elevate may charge performance-based fees to "qualified clients" having a net worth greater than \$2,200,000 exclusive of equity in their primary residence, or for whom we manage at least \$1,200,000 immediately after entering an agreement for our services. Performance-based fees are fees based on a share of capital gains or capital appreciation of a client's account. The fixed portion of the fee (management fee) will not exceed 0.50% per annum of current portfolio equity, payable monthly in arrears. The performance fee is generally equal to a maximum of 20% of the annual gross profits subject to a high-water mark. The performance fee is deducted from performance-based fee-paying accounts annually, in arrears, on the 15th day of each new calendar year (January 15th or the preceding business day if the 15th is not a business day).

The high-water mark is the highest peak closing value that an account has achieved on the last day of a calendar year. It ensures that investors do not pay performance-based fees twice for the same gains. It is possible that an account will have gains for a given period but not be subject to a performance fee because the final value remains below the "high-water mark". Fees will be adjusted for deposits and withdrawals made during the 12-month period. In the event the client makes a complete withdrawal from the account on a date other than year-end, fees will be due at the time of withdrawal. Please refer to Item 5: Fees and Compensation section for additional information on this topic. Elevate manages accounts that are charged performance-based fees while at the same time managing accounts (perhaps with similar objectives) that are not charged performance-based fees ("side-by-side management"). Performance-based fees and side-by-side management create conflicts of interest, which we have identified and described in the following paragraphs.

A conflict of interest for side-by-side management is the financial incentive to allocate relatively lower cost-basis shares of securities bought in our block account to accounts that are charged performance fees. We mitigate this risk by using computer software to allocate shares proportionately across all accounts using the same average cost basis regardless of whether or not the account is subject to performance fees.

## **Item 7. Types of Clients**

Elevate's clients may include individuals, high net worth individuals, families, business entities, pension & profit-sharing plans, trusts, estates, and charitable organizations.

Elevate's minimum investment for investment management services is \$500,000. Elevate may elect to waive the minimum investment based on certain criteria which include but are not limited to: anticipated future investments, existing relationships/related accounts, and historical relationships.

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

**1. Describe the methods of analysis and investment strategies used in formulating investment advice or managing assets.**

**Investing in securities involves risk of loss that clients should be prepared to bear.** Elevate constructs and manages proprietary strategies using equity securities, fixed-income securities, exchange traded funds (ETFs), closed-end mutual funds (CEFs) and derivatives. Proprietary strategies are designed to generate the highest possible return for risk being taken and without regard for any individual investor's goals, risk tolerance or constraints. Progress toward the goal of highest "risk-adjusted" return is measured using several statistics including the Information Ratio and Sharpe Ratio, among others.

Securities are evaluated and selected in a portfolio context. The number of proprietary strategies we maintain is dynamic and will expand or contract to meet demand and market conditions. Any changes to security selection or security weighting within a given proprietary strategy are reflected in all applicable investor portfolios simultaneously using block- trading functionality. Generally, we seek to be long of companies, industries, sectors, countries, and commodities via their derivatives when they meet the following criteria:

- Undervalued or “cheap” (fundamentally and/or technically)
- Price is going up (technical uptrend)
- Sentiment is negative (fundamentally and/or technically)

Elevate relies on both fundamental and technical analysis when evaluating investments. When implementing a fundamental investment idea, we use technical analysis to help us determine entry, target, and exit prices.

- **Fundamental Analysis**
  - the examination of publicly available information and the formulation of forecasts to estimate the intrinsic value of securities. If the security is determined to be trading in the market for less (more) than its determined intrinsic value, it is undervalued (overvalued) and should be bought(sold).
- **Technical Analysis**
  - a form of security analysis that uses price and volume data, which is often graphically displayed, indecision making. Technical analysis can be used in any freely traded market around the globe.

Prices are the result of a buyer and seller coming together to make an exchange. With the use of computer-based trading algorithms we are seeing more non-human executed trades than ever. However, many of these algorithms executing these trades are based on the same technical analysis methods that traders have used successfully for many years. There can be no assurance that either fundamental analysis or technical analysis will produce gains. The news is unpredictable and often has more influence on prices than anything else. Neither fundamental nor technical analysis methods can accurately predict prices, timing, or the news. The news represents a material risk to these and all other methods of analysis. The information on which we trade is believed to be from reliable sources but may include rumors, misstatements, omissions, and/or pure speculation. Accuracy cannot be guaranteed nor can the success of any trade or strategy.

Rather than being short of securities that meet the exact opposite criteria we generally seek to hedge our long investments using cash, covered calls, protective puts, and inverse ETFs. We use a variety of sources such as financial newspapers and magazines, research reports prepared by independent 3rd parties, company conference calls, press releases and financial statements and other financial media, to evaluate our portfolios and investments. No amount of research can guarantee success or positive returns; **investing in securities involves risk of loss that clients should be prepared to bear.**

Elevate constructs and manages client portfolios using combinations of proprietary strategies. In some cases where the target risk and return profile cannot be achieved solely using combinations of proprietary strategies, or at the client’s request, we will design a custom strategy using the same methods as we use to construct and manage proprietary strategies. Investors may choose to restrict the use of any specific strategy, security or type of security within reason, from inclusion in their portfolio - although we would generally advise against restrictions as any dollars that were to be invested in restricted securities or strategies will be instead allocated to other strategies, securities or held in cash, thus changing materially the risk profile of our initial recommendation. We may not be able to

proactively exclude all potential undesirable securities from inclusion in any client's portfolio. Because of technological limitations and the subjective nature of some restrictions, they can only be honored at the security-level after the fact – meaning once a client notices a security in their account that they do not wish to hold or buy, they can notify our firm and we will immediately sell the security and restrict it from further purchases. We may not be able to fully utilize block trading capabilities when clients place restrictions on our ability to trade in certain securities.

Such client accounts are frequently but not always traded and rebalanced manually and on a different frequency and sometimes receive different prices than portfolios with no restrictions. A client requesting a custom portfolio design may incur additional expense; such additional expense will vary depending on the scope of work involved. Restrictions will not constitute a custom portfolio. We may use margin as a tool in managing the allocation during the rebalancing of client accounts.

**2. For each significant investment strategy or method of analysis you use, explain the material risks involved.**

**A. Fundamental Analysis** - The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**B. Technical Analysis** - The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**C. Frequent Trading** - Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**3. If you primarily recommend a particular type of security, explain the material risks involved.**

**A. Equity Securities:** Equity securities get their value from their residual claim on assets and cash flows. Equity holders are last in line to get paid a dividend or to get their money back in the event of a bankruptcy. Major risks then, broadly relate to the company's ability to generate revenue, manage expenses, innovate new products or services, obtain economies of scale, uncover operational efficiencies, execute, manage debt, and repay debts. Further, there also political, geographic, currency, interest rate, and competition risks along with numerous other risks involved with investing in equities.

**B. Exchange Traded Funds:** Exchange Traded Funds (ETFs) generally provide diversification. We tend to include ETFs that offer diversification within an industry, sector, or other segment of the market. Less frequently do we use broad-focused ETFs. Some ETFs use leverage to produce returns that are either higher than, or inverse to, a given index. The use of leverage through derivatives by ETFs significantly increases the risk of investing in a given fund. ETFs are required to offer daily liquidity while simultaneously being required to invest most of their assets according to their stated strategy, which sets them up for a liquidity crisis in times of investor panic.

**C. Closed-End Mutual Funds:** Closed-End funds have a finite number of shares that trade in the secondary market. Unlike open-end mutual funds which must invest and redeem investor funds daily and trade at their Net Asset Value (NAV) at the close of

business each day, these funds can trade at a premium or discount to their NAVs, which generally leads to higher relative volatility than a comparable open- end fund.

**D. Options:** Options can be used to execute speculative and protective strategies. When speculating in options on the long side, the risk is losing 100% of the premium paid for the contract whether a call or a put. On the short side, the risk is literally unlimited when selling a call option but known with certainty in the case of selling a put option. When protecting an existing position with options, the risk in the case of a covered call is limited or reduced upside potential, but by a known amount.

**E. Fixed Income Securities:** All fixed income securities share material risks related to the level of interest rates in the overall economy, the shape of the yield curve, the ratings awarded from ratings agencies, and the existence or absence of insurance and other features.

## **Item 9. Disciplinary Information**

### **1. Criminal or Civil Actions**

There is nothing to report on this item.

### **2. Administrative Proceedings**

There is nothing to report on this item.

### **3. Self-Regulatory Organization Proceedings**

There is nothing to report on this item.

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

### **1. Broker-Dealer or Registered Representative**

Elevate is not registered as a broker-dealer and has no intention to do so. Further, our representatives are not permitted to become registered representatives affiliated with a broker-dealer.

### **2. Futures Commission Merchant, Commodity Pool Operator or Commodity Trading Advisor**

Elevate is not registered as a Futures Commission Merchant, Commodity Pool Operator or Commodity Trading Advisor and has no intention to do so. Further, our representatives are not permitted to affiliate with any of these types of entities.

### **3. Material Relationships**

**A.** No Elevate employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

**B.** No Elevate employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

**C.** Mr. Armstrong and Mr. Fleury are each 50% owners and managing members of Elevate Insurance Advisors, LLC. of Eagle, Colorado.

**a.** Elevate Insurance Advisors, LLC. (EIA) generates commission- based compensation for selling insurance products. Such commissions are separate and in addition to our advisory fees.

b. This practice presents a conflict of interest because persons providing investment advice on behalf of Elevate who are insurance agents have a financial incentive to recommend insurance products to clients based on the ability to earn commission-based compensation rather than acting in a client's best interest as a fiduciary.

A client always has the right to decide if they want to implement any insurance recommendations Elevate provides to clients. If a client decides to act on an Elevate recommendation, the client always has the right to choose the insurance agent and company with whom to conduct said business.

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

Elevate has adopted a Code of Ethics requiring high standards of professional conduct of every person associated with our firm. Further, CFA Institute Candidates and CFA Institute Charter holders have elected to comply with the CFA Institute's "Code of Ethics and Standards of Professional Conduct" (Code & Standards). The Code & Standards are the ethical benchmark for investment professionals around the globe. As CFA Charterholders, Mr. Shane Fleury, and Mr. Kyle Lottman are required to follow the Code & Standards.

Elevate has also elected to comply with the CFA Institute's "Asset Manager Code" (the Code). The Code outlines the ethical and professional responsibilities of firms that manage assets on behalf of clients. The principles and provisions address six broad categories: 1) loyalty to clients, 2) investment process and actions, 3) trading, 4) risk management, compliance, and support, 5) performance reporting and valuation and 6) disclosures.

#### **Participation or Interest in Client Transactions**

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. We maintain the required personal securities transaction records per regulation.

#### **Personal Trading**

Elevate and its associated persons may buy or sell securities for clients at the same time Elevate or its associated persons buy or sell such securities for Elevate or its associated person's own accounts. A conflict of interest exists in such cases because Elevate has the ability to trade ahead of clients and potentially receive more favorable prices than clients receive. To mitigate this conflict of interest, it is our policy that we shall not have priority over client accounts in the purchase or sale of securities which is enforced using block trading.

Elevate and its associated persons may elect to enter into a portfolio management agreement in the exact same manner as clients of the firm. In this case, these accounts are invested and rebalanced alongside other clients of the firm with no difference in treatment. The timing and pricing of all securities transactions are identical and allocated to each client account (including accounts of the firm or its associated persons) algorithmically with no preferential treatment for any account or portfolio.

### **Item 12. Brokerage Practices**

#### **Broker-Dealer Selection**

For clients engaging our firm for portfolio management services, we require clients to open one or more accounts at a qualified custodian. For clients in need of brokerage or custodial services, we

recommend the use of Charles Schwab. For clients wanting to make private investments with retirement plan assets, we recommend the use of Entrust. Pension Consulting clients are welcome to choose any record keeper and custodian they like but Elevate typically recommends Empower Retirement.

### **Research and Other Benefits**

As a registered investment adviser, Elevate may have access to research products and services from a client's account custodian. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the service platforms of these firms.

The receipt of such products and/or services creates a conflict of interest since our firm may benefit from such products and/or services. It is our policy to act in our clients' best interest, and to use these products and/or services for the benefit of all our clients. Clients should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

### **Directed Brokerage**

Elevate generally recommends clients utilize Charles Schwab for brokerage and custodial services. When clients direct brokerage, Elevate may or may not be able to achieve the most favorable execution of client transactions and this practice may or may not cost clients more money.

We permit the client to direct the custodian with which we open their brokerage accounts, within reason. If a client already has a relationship with a custodian, or if they are prohibited from moving their assets from a given custodian for any reason, we may seek to advise and execute on the client's behalf with their existing custodian. Clients may pay higher transaction fees or receive less favorable prices in these accounts as we will be unable to negotiate discounts.

### **Aggregate Transactions**

Elevate combines orders of the same type in the same security placed during the same session unless a new trade is placed after the initial allocation for the day has been completed. We have no obligation to combine non-discretionary trades into one order or to combine them with discretionary trades but if we have all the necessary information at the time of the trade submission, we will combine the order(s) to obtain the best execution for all clients. There are no guarantees that combining trades into "block trades" will yield better performance.

At Charles Schwab, we utilize block trading, via our master account, to execute book- level trades and allocate shares algorithmically to individual accounts at the end of each day ensuring clients receive the same pricing for each respective trade.

## **Item 13. Review of Accounts**

### **1. Indicate whether you periodically review client accounts or financial plans.**

Client accounts/portfolios are reviewed continually using portfolio management software. At least annually, we offer to meet with each client to review their financial plan (if we created one for them) and investment accounts. Our Chief Compliance Officer (CCO) Ken Armstrong oversees the review of financial plans and the target allocations for any accounts we manage together with the Chief Investment Officer (CIO) Shane Fleury. The CIO is additionally responsible for ensuring that the



account/portfolio allocations stay in alignment with the targets.

**2. If you review client accounts on other than a periodic basis, describe the factors that trigger a review.**

Material changes to a client's investment objectives, risk tolerance or time-horizon would trigger a review. Additionally, we will agree to review a client's accounts or financial plan any time a client requests such review or if we materially change the way we formulate investment advice.

**3. Describe the content and indicate the frequency of regular reports you provide to clients regarding their accounts.**

Using third party portfolio management software, we provide a monthly report. This pdf report contains detailed information related to performance, asset allocations, and benchmarks. It also contains detailed information about management fees. We send an email to all clients each month prompting them to login to their secure online portal to review the report(s). The online portal also provides current data related to performance, asset allocations, transactions (including management fees), gains and losses, income projections, benchmarks and other valuable data which is often more up-to-date than the monthly reports. The data is updated in the morning (usually by 8:30 AM Eastern Time) on each regular business day as of the prior business days close of business.

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

Elevate does not receive any economic benefit from any person or entity that is not a client for providing investment advice or other advisory services to our clients. Elevate also does not compensate any person or entity that is not employed by Elevate for client referrals.

**Item 15. Custody**

Clients may choose a qualified custodian of their own preference. If a client has no preference of a qualified custodian, we will recommend a qualified custodian to clients (i.e. Charles Schwab). Qualified custodians allow for the direct debit of advisory fees.

A client may choose to have the custodian directly debit the client's account(s) for the payment of our advisory fees. Client funds and securities are held with a bank, broker- dealer, or other independent, qualified custodian.

Clients will receive account statements from the independent, qualified custodian(s) holding their funds and securities at least quarterly. The account statements from client's custodian(s) will indicate the amount of our advisory fees deducted from clients account(s) each billing period.

Clients should carefully review account statements for accuracy. If a client has a question regarding an account statement or if a client does not receive a statement from the custodian, client should contact us using the information on the front page of this brochure.

**Item 16. Investment Discretion**

Elevate can and will accept discretionary trading authority to manage investment accounts on behalf of clients. In these cases, we have the authority to determine, without obtaining specific client consent, the investments to be bought or sold, and the amount of the securities to be bought or sold. Discretionary authority is granted via a limited power of attorney executed by the client.

Clients that engage us on a non-discretionary basis for investment advisory services must be willing to accept that we cannot affect account transactions without obtaining prior consent to such transaction(s)

from the client. Thus, if we wish to make a trade in the client's account, but the client is unavailable to provide verbal confirmation, we will not be able to act.

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

#### **1. Proxy Votes**

Elevate will not vote proxies on behalf of advisory accounts. At a client's request, we may offer clients information regarding corporate actions and the exercise of a client's proxy voting rights. In most cases, clients will receive proxy materials directly from the account custodian. However, in the event Elevate were to receive any written or electronic proxy materials, the materials would be forwarded directly to clients by mail, unless clients have authorized the firm to contact them by electronic mail. In such case, we would forward any electronic solicitation to vote proxies. To contact for information about voting your proxies, please contact us using the information on the Cover Page.

#### **2. Class Action Lawsuits**

Elevate does not determine if securities held by clients are the subject of a class action lawsuit or whether clients are eligible to participate in said class action settlement or litigation. Further, we do not initiate or participate in litigation to recover damages on a client's behalf resulting from actions, misconduct, or negligence of said party.

### **Item 18. Financial Information**

Elevate does not solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Elevate has no financial commitments that may impair its ability to meet contractual commitments to clients. We have never been the subject of a bankruptcy petition.