



marketing name: Quant Portfolio Advisors
(for certain sub-adviser and TAMP services)

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December 2, 2025

**FORM ADV PART 2A
BROCHURE**

DISCLAIMER:

This brochure provides information about the qualifications and business practices of Elysium Wealth Management, LLC (hereinafter “**Elysium Wealth**”). If you have questions about the contents of this brochure, please contact us at financial@myelysium.com or (385) 276-4716. 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 Elysium Wealth also is available on the SEC’s website at www.adviserinfo.sec.gov. The CRD number for Elysium Wealth is 312068.

While Elysium Wealth may refer to itself as a “registered investment advisor” or “RIA,” clients should be aware that registration itself does not imply any level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated March 30, 2025, we have the following material changes to report.

- **Leadership.** Updated Elysium Wealth Management LLC. leadership to John Bergquist, President and Dr. Jill Floden, Chief Compliance Officer & Chief Operations Officer
- **Item 9,** Updated as one Advisor is currently involved in a civil proceeding with a former employer alleging breach of prior contract for non-solicitation.
- **Item 4, 5, 7, 10, 11, 14** Added and updated language for Elysium Strategies named Quant Portfolio Advisors as the doing business as, marketing name for offering as a Subadvisor offered through Turnkey Asset Management Program ("TAMPs").
- **Item 7,** added new type of client- Registered Investment Advisors that engage us on sub-adviser basis
- **Item 4, 10, 14** Updated Promoter language, removed named affiliated promoter Jason Webb and added Jason Haymore and added language to allow for non-affiliated promoter ("solicitor") arrangements.
- **Item 15,** updated custody language to specify limited custody only for the purpose of deducting advisory fees.

Elysium Wealth will continue to file brochures on at least an annual basis within 90 days of the close of its fiscal year. Elysium Wealth will also file updates more frequently in the event there is a material change to Elysium Wealth's activities.

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Item 4 Advisory Business

Introduction

Elysium Wealth Management, LLC (“Elysium Wealth”) is an SEC-registered investment adviser headquartered in South Jordan, UT. Elysium Wealth was formed in September of 2020 and registered with the SEC on February 14, 2024. On January 1, 2024, Elysium Wealth acquired the business of Salt Wealth Partners, LLC, a Colorado limited liability company and investment adviser. Elysium Wealth provides financial planning, consulting, portfolio management, retirement plan advice, and sub-adviser (under the name Quant Portfolio Advisors) services to our clients.

Elysium Wealth is wholly owned by Elysium Holdings, LLC, a Utah limited liability company.

Advisory Services

Financial Planning

We offer personalized financial planning services regarding management of financial resources based upon a client’s individual needs. We meet with you to gather information about your financial circumstances and objectives. After we review your financial condition and objectives, we work with you to create a financial plan designed to help you achieve your financial goals. Financial planning services may include any or all of the following:

- **Cash Flow Analysis**—Assessment of a client’s present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, pension plans, employee benefit statements, etc. The firm advises on ways to reduce risk and how to coordinate and organize records and estate information.
- **Retirement Analysis**—Identification of a client’s long-term financial and personal goals and objectives includes advice for accumulating wealth for retirement income or appropriate distribution of assets following retirement. Potential tax implications are identified and evaluated.
- **Portfolio Analysis/Investment Planning**—We provide investment alternatives asset allocation, and effect on a client’s portfolio. We evaluate economic and tax characteristics of existing investments as well as their suitability for a client’s objectives. We identify and evaluate potential tax implications.
- **Insurance Analysis**—Includes risk management associated with advisory recommendations based on a combination of insurance types to meet a client’s needs, e.g., life, health, disability, and long-term care insurances. This will necessitate an analysis of cash needs of family at death, income needs of surviving dependents, and disability income analysis.
- **Education Savings Analysis**—Alternatives and strategies with respect to the complete or partial funding of college or other post-secondary education.

Financial plans are based on a client’s financial situation based on the information provided to the firm. Recommendations and solutions are designed to achieve the client’s desired goals, subject to periodic evaluation of the financial plan, which may require revision to meet changing circumstances. Clients must promptly notify their Advisor of any change to a client’s financial situation, goals, objectives, or needs. Clients can also request financial planning services that cover a specific topic or area (e.g. retirement, estate planning, or asset allocation analysis). We also offer one time or ongoing consultative services where we set an appointment to meet with you for financial advice for an hourly fee. You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our investment advisory services or by using the advisory/brokerage firm of your choice.

In some cases, our recommendations may involve the purchase, liquidation or exchange of insurance products. Elysium Wealth is affiliated with Elysium Financial Solutions, LLC (“Elysium Financial”), a licensed insurance agency, through common ownership and control. Investment Adviser Representatives (“IAR”) of Elysium Wealth may also be licensed insurance agents. Elysium Financial and our dually licensed IAR can effect transactions in insurance products and earn commission-based compensation for these activities. Clients should be aware that a conflict of interest is inherent in such an arrangement. Clients are instructed that the fees paid to the firm for advisory services are separate and distinct from the commissions earned by Elysium Financial and our dually licensed IAR. Clients of Elysium Wealth are not required to purchase insurance products from Elysium Financial or our dually licensed IAR. Clients may choose to purchase insurance products from any insurance agency and agent of their choice.

Asset Management for Individuals

Elysium Wealth offers discretionary asset management services to advisory clients. Elysium Wealth will offer clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize Elysium Wealth’s discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Selection of Sub-Advisers for Portfolio Management

Currently, our asset allocation and advisory services are offered in conjunction with one or more sub-advisers. The sub-advisers may assist our firm with back-office support, trading, report preparation, and billing. We use model portfolios developed by sub-advisers and other registered investment advisers. These other advisers are responsible for the research and security selection, and Elysium Wealth is responsible for the supervision of the account and for the direct relationship with the client. Moreover, Elysium Wealth is responsible for developing an overall investment strategy that takes into account a client’s goals and risk tolerance.

Our decision to utilize a given sub-adviser is based on the types of services the sub-adviser offers. In some instances, we may utilize a specific sub-adviser to gain access to certain financial vehicles that we believe best serve a client’s investment objectives and risk tolerance. The decision to place all or a portion of client funds with a sub-adviser depends on a client’s investment objectives and risk tolerance and whether access to a specific fund or financial vehicle requires Elysium Wealth to place the funds with a sub-adviser.

Sub-advisers are managers hired by Elysium Wealth to assist in the management of all or a portion of a client’s portfolio. Elysium Wealth is responsible for all interactions with its sub-advisers; clients do not interact with Elysium Wealth’s sub-advisers. Elysium Wealth has full discretion to hire and fire sub-advisers hired for or clients as it deems suitable. Sub-advisers will maintain the models or investment strategies agreed upon between sub-advisers and Elysium Wealth. Sub-advisers may execute trades on behalf of Elysium Wealth in client accounts. In some instances, Elysium Wealth will exercise its discretion to place client assets with the sub-adviser. Elysium Wealth retains authority to terminate the sub-adviser at Elysium Wealth’s discretion. Elysium Wealth negotiates all terms, fees, and services to be provided by the sub-adviser for a client’s account. Elysium Wealth provides all required disclosures, brochures, and privacy information for the sub-advisers to the client at the time the client signs an advisory agreement with Elysium Wealth and at any time prior to a sub-adviser being engaged to assist in the management of a client’s assets. Sub-advisers may either (i) deduct their fees directly from your account, or (ii) have us deduct their fees along with our advisory fee and remit payment to them. Using a sub-adviser results in higher overall fees than if we managed your account directly as you will be

paying both our fee and the sub-adviser fee. The specific arrangement is outlined in your advisory agreement and/or the sub-adviser's agreement.

Elysium Strategies – Quant Portfolio Advisors

Elysium Wealth offers its investment strategies as a sub-adviser through a Turnkey Asset Management Program ("TAMP") under the marketing name Quant Portfolio Advisors ("Quant Portfolios"). Thus, our own registered investment advisors or other registered investment advisors and investment professionals (the "Primary Advisers") may recommend or hire us to manage your assets. In these arrangements, we will implement and manage an investment strategy in your account; however, we do not serve as your Primary Adviser when solely using Quant Portfolios. The Primary Adviser will retain direct contact with you and will manage the client relationship. We contract directly with the Primary Adviser to provide investment advisory services, or alternatively, depending on the contractual arrangement you have with the Primary Adviser, we may enter into an advisory contract directly with you. We will have exclusive investment discretion as to which securities shall be purchased or sold in your sub-advised account in a manner consistent with your selected product, policies and restrictions (if any) and the capabilities of the broker-dealer. In order to determine whether the strategy is suitable for you, the Primary Adviser and you are responsible for ascertaining the goals and investment objectives of the portfolio in question. It is the responsibility of the Primary Adviser to promptly notify us of any changes in your financial condition that would necessitate a change in your investment objective. Investment Advisor Representatives and Clients are under no obligation to use Quant Portfolio Advisors.

At this time, the sub-advisers used by Elysium Wealth include our own Quant Portfolio Advisors, as well as third-party sub-advisers Townsquare Capital, LLC (CRD #288576), Assetmark Inc. (CRD # 109018) and Equis Capital Management (CRD #126052). While Elysium Wealth utilizes its own experience and expertise to generate an overall investment strategy for a client, Elysium Wealth also utilizes the reports, analysis, and financial vehicles of third-party sub-advisers to implement its investment strategy. All disclosure information about these entities is available on the SEC's public disclosure site, www.adviserinfo.sec.gov. Elysium Wealth will conduct due diligence reviews on all of its sub-advisers prior to establishing a relationship with the sub-advisor and annually thereafter.

Promoter Relationships

In addition to providing the Quant Portfolios through TAMP, Elysium also makes their portfolios available to certain clients who are referred to Elysium through third-party promoter ("solicitor or referral arrangements" ("Promoter Arrangements"). Under these arrangements, an unaffiliated promoter may recommend or introduce prospective clients to Elysium in exchange for a referral fee, as permitted under Rule 206(4)-1 of the Advisers Act (the "Marketing Rule"). Clients who are referred through a Promoter Arrangement engage Elysium directly for advisory services and are not Accounts of a Participating Adviser. Elysium retains discretionary management authority as outlined in the client agreement.

Third Party Investment Advisors

Where Elysium Wealth does not believe it can effectively achieve a client's investment objectives or needs, Elysium Wealth may recommend other investment advisors to clients. Clients are under no obligation to retain the services of the investment advisor recommended by Elysium Wealth. If a client does use the services of the referred advisor, the referred advisor and not Elysium Wealth will be responsible for all reviews with the client, providing all required disclosures, and handling all aspects of the advisory relationship. Elysium Wealth may be compensated for referrals that it sends to other advisers, which may result in a conflict of interest. To mitigate any potential conflict, Elysium Wealth is required to disclose all compensation it may receive by referring

someone to a third-party advisor. At this time, Elysium Wealth has no specific agreements with third-party advisors for the compensation of referral fees.

Wealth Consulting

We offer wealth consulting to assist our clients solely with a specific need or objective that could be either as a one-time occurrence, or as an ongoing engagement. We will identify and gather information pertaining to the client's objectives and goals, provide recommendations, and assist the client with the administration of the recommendations which can include meeting with outside professionals or preparing third-party documentation.

Publications and Newsletters

From time to time, Elysium Wealth will publish blogs, articles, and newsletters with the intent to inform its clients and the general public about topics related to asset management or financial planning. These publications are provided at no cost to the public or to Elysium Wealth's clients.

Educational Seminars

From time to time, Elysium Wealth may provide educational seminars and materials related to financial, tax, estate and other areas of planning. These education events are provided at no cost to the public or to Elysium Wealth's clients.

Wrap Fee Programs

Wrap fees tend to only benefit clients with investment strategies that involve high trade volume. At this time, Elysium Wealth does not utilize strategies that depend on a high trade volume. As such, Elysium Wealth does not sponsor any wrap fee programs and does not intend to utilize any wrap fee programs of a sub-advisor. In the unlikely event that Elysium Wealth identifies a client who would benefit from high trade volume, Elysium Wealth may engage a sub-advisor that utilized a wrap fee program. Any fees associated with the program would be included as part of Elysium Wealth's portfolio management fees.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Client Assets Under Management

As of December 31, 2024, we provide continuous management services for \$159,175,815 in client assets on a discretionary basis.

Item 5 Fees and Compensation

Financial Planning Fees

Elysium Wealth charges an hourly fee of up to \$350 for financial planning for clients who request such services. Prior to the planning process, the client will be provided with an estimated plan fee. Fees for financial plans are due upon delivery of the completed plan. Elysium Wealth may, in its discretion, negotiate, reduce, or waive financial planning fees for any client, including but not limited to employees, their family members, friends, and legacy clients, based on factors such as the scope and complexity of the engagement, overall relationship with Elysium Holdings, LLC, and its subsidiaries, and anticipated future assets.

Asset Management Fees

Elysium Wealth offers discretionary asset management services to clients for an annual fee based on total assets under management. Depending on the arrangements made at the inception of the engagement, we may agree to charge an annual asset based fee to be billed quarterly in advance based on the end of the quarter balance, or we may charge an annual asset based fee to be billed monthly in advance based on the end of the month balance. The specific manner in which your fees are calculated and charged will be disclosed in your Advisory Agreement. Fees will be assessed pro rata in the event where a portfolio management account is opened or closed on a day other than the first day of a calendar month. Elysium Wealth does not require any prepayment of fees of more than \$1200 per client and six months or more in advance.

The fee is deducted from the client's account held at the custodian at the time it is billed. The client must authorize Elysium Wealth to debit the fee from the client's account. If insufficient cash is available to pay such fees, securities in an amount equal to the balance of unpaid fees will be liquidated to pay for the unpaid balance. The fees for asset management services are set forth in the following fee schedule:

Portfolio Size	Annualized Fees
\$0 to \$500,000	1.50%
\$500,001 to \$1,000,000	1.35%
\$1,000,001 to \$2,000,000	1.20%
\$2,000,001 to \$5,000,000	1.05%
Over \$5,000,000	0.90%

Fees are calculated on a breakpoint basis, meaning the same annualized fee is charged on all assets being managed. For example, a client with \$1,000,000 under management would be charged a management fee equal to 1.35% on the entire investment, and not just on the investment that was greater than \$500,000.

The fees listed above do not include all fees paid to other advisers, including sub-advisers as part of the portfolio management service. In other words, when using sub-advisers, the client will pay additional portfolio management fees. For example, if a client invests \$500,000, the annual fee is 1.50%. If a sub-advisor charges an annual fee of 0.25%, then the total advisor fee will be 1.75% annually. Sub-advisers may either (i) deduct their fees directly from your account, or (ii) have us deduct their fees along with our advisory fee and remit payment to them. Using a sub-adviser may result in higher overall fees than if we managed your account directly as you will be paying both our fee and the sub-adviser fee. The specific arrangement is outlined in your advisory agreement and/or the sub-adviser's agreement.

Elysium Wealth may, in its discretion, negotiate, reduce or waive asset management fees for any client, including but not limited to employees, their family members, friends, and legacy clients, based on factors such as the scope and complexity of the engagement, overall relationship with Elysium Wealth, and anticipated future assets.

You may terminate the asset management agreement upon written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the asset management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter or month (depending on how you are being billed) for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Quant Portfolio Advisors ("Quant Portfolio")

For accounts using the Quant Portfolio strategies, Elysium Wealth is compensated by billing client accounts with a portfolio management fee associated with the strategy chosen, with the fee ranging from 0.20% - 0.50% per year calculated as a percentage of assets allocated to the chosen strategy. Clients will also pay separate and in-addition fees to the Primary Advisor, as well as any sponsor company or custodial fees and any underlying product expenses (e.g. ETF expense ratios). As a result, Clients who use Quant Portfolios will generally pay higher fees than if they invested in lower-cost strategies that do not involve Quant Portfolios or that use lower-cost underlying investments. Elysium Wealth does not control the total fee for Clients utilizing other professionals outside of Elysium Wealth Management, LLC.

Promoter ("Solicitor")

Elysium Wealth may enter into written agreements with unaffiliated Promoters who refer prospective clients to Elysium Wealth. When a referred client engages Elysium Wealth, Elysium Wealth pays the Promoter compensation that:

- Is paid solely by Elysium from its own resources;
- Is not an additional charge to the client;
- Is not paid from TAMP Fees, and
- Is paid in compliance with the Marketing Rule's promoter compensation requirements.

Promoters are required to provide prospective clients with the necessary disclosures at or before the time of referral, as required under the Marketing Rule.

Clients referred by Promoters pay the same advisory fees as clients who engage Elysium directly.

Wealth Consultation

If the wealth consulting service is specific to a specific project, our fee will be charged as a one-time flat fee dependent on the complexity of the engagement. Our wealth consulting services can also be charged a fixed

flat rate either monthly, quarterly or yearly depending on the type of involvement the client would request. The billing will occur at the end of the month in which the consulting agreement has been signed. The client can choose to have the consulting fee deducted from the client's account held at the custodian or client can select to receive an invoice. Payment for invoiced services is due within 30 days of the invoice date.

Other Fees

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Elysium Wealth does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Elysium Wealth. For more details on the brokerage practices, see the "Brokerage Practices" section of this brochure.

Third Party Compensation

Investment advisor representatives of Elysium Wealth may receive external compensation from sales of investment-related products, such as insurance as licensed insurance agents. Insurance sales and services represent a conflict of interest because they give incentives to recommend products based on the commission received. This conflict of interest is mitigated by disclosures, procedures, and fiduciary obligations to place the best interest of the client first. Clients are not required to purchase any products or services through our agents or firm. Clients have the option to purchase these products through any insurance agent of their choosing.

Moreover, as explained in Item 4, where Elysium Wealth does not believe it can effectively achieve a client's investment objectives, Elysium Wealth or its supervised persons may recommend other investment advisors to clients. These referrals may result in commissions or other compensation being paid to Elysium Wealth's supervised persons. This presents a conflict of interest because it creates an incentive for Elysium Wealth's supervised persons to recommend other advisors based on expected compensation. To mitigate this conflict, Elysium Wealth requires all of its supervised persons to disclose any potential compensation connected with the referral. Clients are under no obligation to retain the services of the investment advisor recommended by Elysium Wealth.

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

Fees are not based on a share of the capital gains or capital structure of managed securities.

Elysium Wealth does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for Elysium Wealth to recommend investments that carry a higher degree of risk to the client.

Item 7 Types of Clients

Elysium Wealth offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, charitable organizations and other registered investment advisers. We do not require a minimum amount to open an account. When referring clients to sub-advisers, account minimums are determined by the sub-adviser. Elysium Wealth will not refer clients to sub-advisers for which the client is not eligible.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns. Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Prior to entering into an agreement with a sub-adviser, Elysium Wealth will conduct a due diligence investigation into their business practices. Elysium Wealth will conduct and document the initial and annual due diligence review of each sub-adviser. The investigation may include the following:

- Verify the firm and its associates are properly registered as an investment advisor and investment advisor representatives; ensure they are registered in the states that Elysium Wealth conducts business (notice filed for SEC registered firms);
- Review sub-advisers Form ADV, disclosure brochures, marketing material, and client agreements;
- If the sub-adviser has a pre-determined minimum amount for assets under management, verify that Elysium Wealth meets this requirement;
- Verify that the sub-adviser maintains errors and omissions insurance, a fidelity bond and/or an ERISA fiduciary bond;
- Review Form U4 disclosures of the sub-adviser's officers, directors and portfolio managers to analyze any reported regulatory actions, criminal actions, civil actions, customer complaints, arbitrations and financial disclosures;
- Review the sub-advisers' past performance and measure that performance against indexes;
- Verify that the sub-adviser has proper disclosure regarding its past performance;
- Verify that the sub-adviser is Global Investment Performance Standards (GIPS) certified, or if the sub-advisor is not GIPS certified, verify that the sub-advisor aims to achieve GIPS compliance; and
- Verify the sub-adviser has a business continuity plan in place.

In developing a financial plan for a Client, Elysium Wealth analysis may include cash flow analysis, investment

planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation. The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategies

Elysium Wealth will work with its clients to establish an investment strategy that is tailored to each client's goals and risk tolerance. Clients' investment strategies will be updated where a client expresses different goals and a change in risk tolerance. Moreover, each client's investment strategy will be reviewed on at least an annual basis with the client. After establishing an investment strategy with a client, Elysium Wealth will utilize research and models created or produced by its sub-advisers (including the sub-advisers listed in Item 4) to recommend different financial vehicles that correspond with the decided upon investment strategy. The financial vehicles have not been created by Elysium Wealth; however, Elysium Wealth has researched the various financial vehicles it recommends in order to establish whether they meet a client's investment strategy, goals, and risk tolerance. In some instances, Elysium Wealth will place all or a portion of client funds with a sub-adviser in order to gain access to certain investment products that Elysium Wealth believes will best suit the client's investment objectives and risk tolerance.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. Clients should fully understand the nature of the contractual relationship(s) into which they are entering and the extent of their exposure to risk. Certain investment strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources, and other relevant circumstances.

General Investment Risk

All investments come with the risk of loss. Investing may involve substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk, and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value

There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by changes in exchange control regulation, tax laws, withholding taxes, international, political, and economic developments, and government, economic or monetary policies.

Interest Rate Risk

Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk

Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Risks Associated with Utilizing Sub-Advisers

Risks associated with utilizing a sub-adviser include specific risks associated with the sub-adviser's strategy and operations, which are disclosed in each sub-adviser's ADV Part 2. In addition, clients are also at risk if a sub-adviser fails to execute an investment strategy or if the sub-adviser has financial or regulatory problems.

Item 9 Disciplinary Information

In the last ten years, neither Elysium Wealth, its investment adviser representatives, its owners, nor its managers have been the subject of any criminal or administrative action that would be material to a client's evaluation of the integrity of Elysium Wealth, its investment adviser representatives, its owners, or its managers.

In 2025, one Advisor is currently involved in a civil proceeding with a former employer alleging breach of prior contract for non-solicitation. This matter is pending and has not been resolved. The advisor has denied the allegations and is actively defending the case. Additional details are available upon request.

Other than the matter described above, Elysium Wealth, its owners, its managers, and all other investment adviser representatives have not been subject to any civil proceedings or actions that would be material to a client's evaluation of our services.

Item 10 Other Financial Industry Activities and Affiliations

Affiliated Services and Proprietary Strategies

Elysium Wealth's affiliates may provide other services (such as tax, legal, real estate services, consulting) to certain clients. Where permitted by law and properly disclosed, Advisers may refer their clients to these affiliates for their services or may utilize the services at the same time with other affiliated offerings.

Elysium Wealth or its affiliates receives additional compensation when clients utilize Elysium Wealth or other affiliated services, Elysium Wealth and its affiliates has a financial incentive to recommend or favor these proprietary or affiliated options over unaffiliated alternatives that may be available at lower cost. This is a conflict of interest. Clients are always able to choose their own service provider and not obliged to use Elysium Wealth nor its affiliates.

Elysium Wealth seeks to address these conflicts through disclosure in this Brochure and in any applicable affiliate disclosures, through firm policies and procedures, and by reminding Participating Advisers that they remain responsible for evaluating the totality of fees and services and for making recommendations that are in their clients' best interests.

Broker Dealer and Registered Representatives

Neither Elysium Wealth nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Registrations

Neither Elysium Wealth nor any of its management persons are registered or have an application pending to register as a futures commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Related Persons

Elysium Wealth is owned by Elysium Holdings LLC where Carson Pearson serves as Chief Executive Officer. Elysium Holdings LLC is the parent company of the following affiliated entities: Elysium Financial Solutions, Elysium Legal LLC, Elysium Tax Services, LLC and Elysium Real Estate and Prime Residential Broker.

Persons providing investment advice on behalf of our firm may be licensed as insurance agents with Elysium Financial. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. See the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm. This affiliated firm is otherwise regulated by the professional organizations to which it belongs and must comply with the rules of those organizations.

We are also affiliated with Elysium Legal LLC, Elysium Tax Services, LLC and Elysium Real Estate and Prime Residential Broker through common control and ownership by Elysium Holdings LLC. If you require legal, accounting, real estate and mortgage services, we will recommend that you use the services of our affiliated entities. Our advisory services are separate and distinct from the compensation paid to our affiliates for their services. These affiliated firms are otherwise regulated by the professional organizations to which they belong and must comply with the rules of those organizations. These rules may prohibit paying or receiving referral fees to or from investment advisers that are not members of the same organization.

As part of Elysium Wealth's internal practices and procedures, all conflicts of interest and potential conflicts of interest must be disclosed to the client. Moreover, any fee sharing, or other compensatory arrangements must be disclosed to the client before the referral is made. The client must sign documentation that the disclosures regarding the conflict of interest have been made and that the client has received information regarding any compensation to Elysium Wealth as a result of any referral. Clients have no obligation to use the services recommended or referred by Elysium Wealth.

Elysium Wealth may make referrals to other investment advisers or providers of financial services. These referrals may result in compensation to Elysium Wealth or its investment adviser representatives. This creates an inherent conflict of interest. Elysium Wealth will mitigate the conflict through disclosures, procedures, and

fiduciary obligations that place the best interest of the client first. Clients have no obligation to use the services recommended or referred by Elysium Wealth.

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

Elysium Wealth has adopted a Code of Ethics (the “**Code**”) to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Elysium Wealth’s policies and procedures developed to protect clients’ interests in relation to the following topics:

- The duty at all times to place interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code of Ethics;
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee’s position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Elysium Wealth’s Code of Ethics is available upon request to Jill Floden, Chief Compliance Officer, at financial@myelysium.com or (385) 276-4716.

PERSONAL TRADING PRACTICES

Elysium Wealth and its supervised persons may buy or sell, for their personal accounts, the same securities that are held in, or recommended for, client accounts, including securities that are components of the proprietary strategies (“Quant Portfolios”). This creates actual conflicts of interest, including the risk that a supervised person could benefit from knowledge of pending client trades or allocations within the Quant Portfolios.

Elysium Wealth has adopted a written Code of Ethics, including personal trading policies, to detect, prevent, and mitigate these conflicts. These policies require, among other things:

- Restrictions on trading in securities that are part of model updates or strategy changes
- Prohibition on front-running, trading ahead of client accounts, or otherwise using client information for personal benefit
- Trade aggregation and allocation procedures designed to ensure that similarly situated accounts are treated fairly over time
- Supervisory review of personal assets, securities reports and holdings.

Supervised persons are prohibited from engaging in personal trading that disadvantages clients or otherwise violates Elysium Wealth’s fiduciary duty. To the extent personal trading occurs in securities also held within the Quant Portfolios, such activity must comply with Elysium’s Code of Ethics, allocation procedures, blackout periods (where applicable), and reporting requirements.

Elysium Wealth and its supervised persons do not execute personal trades in a manner intended to influence model weights, strategy decisions, or execution within the Quant Portfolios. Elysium does not permit supervised persons to trade on nonpublic information regarding model rebalance timing or pending allocation changes. Elysium Wealth may, when appropriate, disclose specific conflicts to affected clients if a situation arises that cannot be fully mitigated through internal controls.

PROPRIETARY STRATEGIES, FEE SPLITS AND RELATED CONFLICTS

Elysium and its supervised persons have an economic interest in the proprietary investment strategies and model portfolios offered through the TAMP (the “Quant Portfolio Advisors”). Elysium does not share or split the TAMP Fee with Participating Advisers or their supervised persons. Participating Advisers and program sponsors charge their own separate advisory, program, or platform fees, which they retain.

However, certain members of Elysium’s portfolio management team (the “PM Team”) receive variable compensation that is tied, in part, to the revenue or asset levels associated with the Quant Portfolios. In other words, a portion of the TAMP revenue generated by the Elysium Strategies is used when determining PM Team compensation. This internal fee split creates several material conflicts of interest, including:

- Incentive to increase assets in Quant Portfolios. Because PM Team compensation is influenced by the TAMP assets, Elysium and the PM Team have a financial incentive to encourage Participating Advisers and platforms to use, retain, or increase Quant Portfolio allocations instead of unaffiliated strategies or lower-cost options that do not generate a TAMP Fee for Elysium.
- Incentive to avoid recommending liquidation or reductions. Elysium has an incentive to avoid changes that would materially reduce assets in the Quant Portfolios (for example, recommending a move to a third-party manager, cash, or a materially lower-cost solution), even where such a change may reduce the total fees paid by the client.
- Incentive to favor higher-fee strategies or programs. To the extent TAMP fees or internal payout levels differ among Quant Portfolios or other sub-advisers, Elysium and the PM Team has an incentive to favor strategies or structures that generate higher fees or revenue.

Dual Roles – Portfolio Management Personnel Who Also Serve as Client Advisers

Certain members of the PM Team also serve as investment adviser representatives to their own clients (the “Advisory Clients”) and receive compensation, directly or indirectly, from the advisory fees paid by those Advisory Clients. When an individual both (i) participates in the TAMP revenue associated with the Quant Portfolios and (ii) advises clients, additional conflicts of interest arise, including:

- Allocation of time, focus, and investment opportunities. Dual-role personnel may have an incentive to devote greater time and attention, or allocate certain investment opportunities, to their own Clients or to accounts invested in the Quant Portfolios, particularly where those accounts are expected to generate higher revenue for Elysium or higher compensation for the individual.
- Incentive to recommend Quant Portfolios to their own clients. When dual-role personnel recommend that their Clients invest in strategies utilizing the Quant Portfolios, they can benefit in more than one way (for example, through the advisory fee paid by the Advisory Client and through compensation tied to TAMP revenue from the Quant Portfolios). This creates an incentive to recommend the Quant Portfolio instead of unaffiliated managers or lower-cost alternatives that may not result in the same level of compensation.
- Side-by-side management conflicts. Dual-role personnel may manage or advise multiple accounts with different fee rates, sizes, or strategies, including Advisory Clients and TAMP Accounts using the same or similar approaches. This creates a conflict and an incentive to favor certain accounts (for example, higher-fee or larger accounts) with respect to the timing and allocation of trades, investment opportunities, or other actions.

These conflicts do not remove Elysium’s fiduciary duty to any client, but they are real and may influence Elysium’s recommendations or decisions. Elysium seeks to mitigate these conflicts through:

- A written Code of Ethics and policies and procedures that address portfolio management, strategy/product selection, best execution, and personal trading;

- Trade aggregation and allocation policies designed to ensure that similarly situated clients are treated fairly over time with respect to the timing and allocation of investment opportunities;
- Investment committee oversight of the design and ongoing management of the Quant Portfolios, including review of performance and cost characteristics relative to reasonably available alternatives;
- Supervisory review of recommendations made by dual-role personnel to help ensure appropriateness in light of the client's circumstances;
- Periodic review of the reasonableness of fee schedules and TAMP arrangements; and
- Full and fair disclosure of these conflicts of interest in this Brochure and related client or TAMP documents.

Participating Advisers remain responsible for determining whether the Quant Portfolios, and the associated total costs and conflicts, are appropriate for their clients based on each client's investment objectives, risk tolerance, and overall circumstances.

Item 12 Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

In selecting a broker dealer based on discretionary authority, Elysium Wealth will endeavor to select those brokers or dealers that will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on several factors, including the broker's ability to provide professional services, competitive commission rates, volume discounts, execution price negotiations, the broker's reputation, experience, and financial stability of the broker or dealer, and the quality of service rendered by the broker or dealer in other transactions. Elysium Wealth will not factor research and soft dollar benefits, client referrals, or directed brokerage benefits in its decision to utilize a specific broker-dealer.

Research and Soft Dollar Benefits

While not a factor in Elysium Wealth's recommendation of Schwab as custodian, Schwab does offer proprietary research tools and publications created by Schwab to their account holders. Elysium Wealth will have access to these research tools and publications, which may be considered "soft dollar benefits" and constitute a conflict of interest. As Elysium Wealth and its investment adviser representatives have accounts at Schwab, the benefit of the research tools and publications are already available to Elysium Wealth regardless of the Client's decision to invest with Elysium Wealth or use Schwab. Elysium Wealth will use Schwab's research tools and publications to service all advisory clients regardless of the broker-dealer/custodian they choose to use, but clients who invest using Schwab will also have their own access to the research tools and publications as Schwab account holders. Clients have no obligation to use Schwab for their broker-dealer and custodian.

Clients should understand the potential conflicts of interest involved with these "soft dollar benefits," whether with Schwab or any future recommended broker-dealer. When Elysium Wealth uses client brokerage commissions to obtain research or other products or services, it receives a benefit because it does not have to produce or pay for the research, products, or services. Elysium Wealth may have an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on the client's interest in receiving favorable execution. Elysium Wealth may cause clients to pay commissions higher than those charged by other broker-dealers in return for soft dollar benefits. Elysium Wealth has no policy or procedure for allocating soft dollar benefits to client accounts.

Brokerage for Client Referrals

Elysium Wealth does not expect to receive client referrals from Schwab or any other broker-dealer. Any such referrals may be viewed as providing an incentive to Elysium Wealth to select or recommend a broker-dealer based on its interest in receiving client referrals rather than on the client's interest in receiving favorable execution. In selecting a broker-dealer based on discretionary authority, Elysium Wealth will not consider the potential for client referrals. The decision to select a particular broker-dealer

Directed Brokerage

Elysium Wealth relies on custodians such as Schwab (or the broker-dealer selected by the client) for the execution of transactions and will not direct trades to specific brokers. As such, clients may not receive the lowest price possible if they were to have their trades directed to specific brokers. However, Elysium Wealth anticipates using the services of Schwab for the majority of Clients because of perceived superior trade execution for stock and option trades.

While Elysium Wealth may make the same recommendations for similarly situated clients, it may occasionally aggregate clients' orders in order to receive a uniform price execution for clients. Since Elysium Wealth does not receive any commissions on such sales, there is no cost advantage to Elysium Wealth in aggregating orders.

A client may at any time direct brokerage to another broker-dealer. If a client exercises their right to direct brokerage to another firm, Elysium Wealth may not achieve the most favorable execution for the client transactions which may cost the client more money.

Item 13 Review of Accounts

Financial Plans

A financial plan agreement may be a one-time plan or ongoing planning if signing a financial planning agreement addendum in conjunction with asset management. After the presentation of the one-time plan, there are no further reports. Ongoing planning is generally in conjunction with asset management and allows for annual updates. One-time planning clients may request additional planning services under a new engagement. We recommend clients engage us, as their needs and circumstances change, to review and update their financial plan.

Portfolio Management

All client portfolios are reviewed by Elysium Wealth, whether managed directly by Elysium Wealth or through the aid of its sub-advisers. Specifically, each portfolio is reviewed by a Elysium Wealth investment advisor representative. The chief compliance officer supervises all of Elysium Wealth's investment advisors as they conduct portfolio reviews. The frequency of review is determined based on the client's investment objectives, but reviews are conducted no less frequently than annually. Reviews of client accounts include, but are not limited to, examination of account performance against the investment policy established for each client, a review of client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target bans of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Additional reviews, whether an account is managed directly by Elysium Wealth or by one of its sub-advisers, are usually triggered by a change in the client's investment objectives, tax considerations, large deposits or withdrawals, large purchases or sales, loss of confidence in corporate management, or changes in macroeconomic climate.

Other Advisers

Elysium Wealth also reviews the practices and performance of its sub-advisers. Review of Elysium Wealth's sub-advisers is conducted by the investment committee. In evaluating its sub-advisers, Elysium Wealth reviews account performance against the investment policy established for each client, changes in the actual and perceived risks of sub-adviser strategies and how they relate to a client's risk tolerance, and investment time horizon amongst other criteria. Elysium Wealth also reviews disclosure documents for its sub-advisers for changes in their business practices and updates regarding disciplinary information. Review of sub-advisers is conducted on a regular basis and no less than annually with the sub-adviser's release of their annual ADV updates.

Client Provided Reports

Elysium Wealth does not send written account reports to clients. However, a client's independent custodian provides account statements directly to the client no less frequently than quarterly. The custodian's statement is the official record of the client's securities account. Statements provided by the custodian typically include a portfolio summary, cash activity summary, income and expense summary, retirement account summary, required minimum distribution information, performance summary, account positions, and account activity. Statements are delivered by mail or electronically as selected by the client.

Item 14 Client Referrals and Other Compensation

As disclosed in other sections of ADV Part 1, this Brochure, and the Brochure Supplement, some of Elysium Wealth's investment adviser representatives are also insurance agents of Elysium Financial Solutions, LLC ("Elysium Financial"). This could present a conflict of interest because the insurance agents of Elysium Financial may be incentivized to refer their insurance clients to Elysium Wealth for investment advisory services and vice versa based on expected commissions, marketing allowances, and other benefits rather than a client's actual needs. To mitigate this concern, Elysium Wealth requires that all compensation for referrals to be disclosed to potential clients by Elysium Wealth in writing prior to signing any advisory agreement with the client. Moreover, clients are not required to retain the services of Elysium Wealth or any insurance agent or agency we recommend.

John Rice and Jason Haymore are promoters for Elysium Wealth and are registered as investment advisor representatives of Elysium Wealth. They work for the law offices of Pearson & Butler, PLLC and Elysium Legal which are affiliates under common control. This could present a conflict of interest because the representatives may be incentivized to refer legal matters to these affiliate legal entities. Elysium Wealth has disclosed this conflict to mitigate this concern. You are under no obligation to retain the services of these or any law firm Elysium Wealth's representatives may recommend.

Elliot Smith is a promoter for Elysium Wealth and is registered as an investment advisor representative of Elysium Wealth per state requirements. He is also a lawyer for York Howell & Guymon. He is also an equity partner at Pearson & Butler, PLLC, ("Pearson Butler") which is under common control via Elysium Holdings, LLC. This creates a conflict of interest where Elliot Smith may refer clients to York Howell & Guymon or Pearson Butler for legal services. To mitigate this concern, Elysium Wealth has disclosed this conflict to you. Moreover, you are not required to retain the services of Elysium Wealth or any lawyer or law firm we recommend.

Elysium Wealth may compensate unaffiliated Promoters for introducing prospective clients. These arrangements are conducted under written agreements that comply with Rule 206(4)-1 of the Advisers Act (the

Marketing Rule). A Promoter may receive a percentage of the advisory fee paid by the referred client, a fixed referral fee, or another arrangement permitted under the rule.

Promoters must provide referred clients with clear written disclosure describing:

- The nature and amount of compensation,
- The Promoter's relationship with Elysium Wealth, and
- Any material conflicts of interest.
- No Relationship to Elysium Wealth TAMP Revenue

Promoters do not receive:

- Any compensation from assets invested in TAMP, Quant Portfolios
- Any increase or adjustment to advisory fees. Referred clients pay the same fees they would pay if they engaged Elysium directly.

Elysium Wealth may make referrals to other investment advisers or providers of financial services. These referrals may result in compensation to Elysium Wealth or its investment adviser representatives. This creates an inherent conflict of interest. Elysium Wealth will mitigate the conflict through disclosures, procedures, and fiduciary obligations that place the best interest of the client first. Clients have no obligation to use the services recommended or referred by Elysium Wealth.

Charles Schwab & Co., Inc - Institutional

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. You should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Item 15 Custody

Elysium Wealth has limited custody of client assets solely because we have the authority to deduct advisory fees from client accounts. We do not otherwise maintain custody of client funds or securities.

Qualified Custodian - Client assets are held by an independent qualified custodian. The custodian(s) sends account statements directly to clients at least quarterly.

Scope of Custody

- We do not accept client checks, securities, or have physical possession of client assets.
- We do not have authority to move funds to third parties except as permitted under standing letters of authorization (SLOAs), which are handled in accordance with SEC no-action relief and custodian controls.

Surprise Examination - Because our custody is limited to fee deduction and/or SLOAs under SEC guidance, we rely on the applicable exemptions and do not undergo an annual surprise examination.

Client Responsibility - Please promptly notify us and your custodian if you notice any discrepancies in account statements.

Item 16 Investment Discretion

Elysium Wealth has discretionary authority to conduct the following:

Discretionary Authority for Managing Individual Accounts

Elysium Wealth's asset management services are offered on a discretionary basis. This authority is granted to Elysium Wealth by the client in the advisory agreement. This allows Elysium Wealth and its sub-advisers to choose the quantity of the securities to be purchased or sold and whether to place buy or sell orders for the client's account without obtaining approval for each transaction.

Clients may limit Elysium Wealth's discretionary authority by, for example, setting a limit on the type of securities that can be purchased for their account. All restrictions or guidelines must be provided in writing.

Discretionary Authority for Choosing other Advisors

Elysium Wealth has discretionary authority to choose sub-advisers to assist it in managing client accounts. This authority is granted to Elysium Wealth by the client in the advisory agreement sub-adviser addendum. When a sub-adviser is used, the sub-adviser receives discretionary authority to execute trades in the client's account as explained above.

Discretionary Authority for Choosing Broker Dealers

Elysium Wealth has discretionary authority to choose broker dealers for client accounts. This authority is granted to Elysium Wealth by the client in the advisory agreement. This authority allows Elysium Wealth to select broker dealers to execute client transactions.

Item 17 Voting Client Securities

Elysium Wealth does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page of this brochure.

Item 18 Financial Information

A balance sheet is not required to be provided because Elysium Wealth does not serve as a custodian for client funds or securities. Elysium Wealth has limited custody solely because we deduct advisory fees from client accounts. This limited custody does not trigger additional financial reporting requirements. Moreover, Elysium Wealth does not require prepayment of fees of more than \$1,200 per client paid six months or more in advance. Elysium Wealth has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients. Elysium Wealth has not had any bankruptcy petitions in the last ten years.

Item 19 Requirements for State-Registered Advisers

Elysium Wealth Management is a federally registered investment adviser; and therefore, is not required to respond to this item.