



January 16, 2026

**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](mailto: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](http://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 29, 2024, we have the following material changes to report.

- We have updated our website to <https://www.elysiumwealthmanagement.com>.
- In order to provide better transparency and processing efficiency, we will no longer charge an annual asset-based fee billed quarterly in advance based on the average daily balance of assets through the previous quarter. Our annual asset-based fees are billed quarterly in advance based on the quarter-end market value of the previous quarter. Please note that subadvisor fees charged by the subadvisor remain separate and unchanged.
- We have added a Wealth Consultation service which allows us to offer advice on a one-time or ongoing engagement. See Item 4 Advisory Business for additional details of our advisory services. The fees and compensation for our Wealth Consultation service can be billed as a one-time flat fee, or a flat rate billed periodically, which can be found in Item 5 Fees and Compensation.
- The hourly fee for our financial planning service was increased to \$350 per hour for clients who request this service. Information on our fees can be found in Item 5 Fees and Compensation.
- We are affiliated with Elysium Real Estate and Prime Residential Broker by common ownership and control through Elysium Holdings, Inc. Should you require real estate or mortgage services we will recommend that you use the services of our affiliated entity. This creates a conflict of interest. You are under no obligation to use the services of our affiliated entities and are free to seek your own provider.
- We have updated the Custody section language, including adding standing letters of authorization

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 is a Utah limited liability company, first organized in September 2020 under the name Lift Wealth Management, LLC. Elysium Wealth first began offering advisory services in March of 2021, when it was approved by the Utah Securities Division as an investment adviser. On January 1, 2024, Elysium Wealth acquired the business of Salt Wealth Partners, LLC, a Colorado limited liability company and investment adviser. On February 1, 2024, we applied and became an SEC registered investment adviser.

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

### Advisory Services

#### *Financial Planning*

We offer a broad range of 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, including 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. The 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. We should be notified promptly of any change to a client's financial situation, goals, objectives, or needs. Clients can also request financial planning services that cover a specific area, such as retirement, estate planning, or asset allocation analysis. We offer consultative services where we set an appointment to meet with you for financial planning 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 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 of Elysium Wealth may also be licensed insurance agents. Elysium Financial and our dually licensed Investment Adviser Representatives 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 investment advisor representatives. Clients of Elysium Wealth are not required to purchase insurance products from Elysium Financial or our dually licensed investment advisor representatives. 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 Portfolio Management Advisers*

#### **SUB-ADVISORS**

Currently, our asset allocation and advisory services are offered in conjunction with one or more subadvisors. The sub advisers 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-advisor is based on the types of services the sub-adviser offers. In some instances, we may utilize a specific sub-advisor 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 as it deems suitable. Sub-advisers will maintain the models or investment strategies agreed upon between sub-advisors 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 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.

At this time, the sub-adviser used by Elysium Wealth include Townsquare Capital, LLC (CRD #288576), Assetmark Inc. (CRD # 109018) and Eqis Capital Management (CRD #126052). While Elysium Wealth utilizes its own experience and expertise to generate an overall investment strategy for a client, Elysium Wealth utilizes the reports, analysis, and financial vehicles of its 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](http://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.

### THIRD PARTY INVESTMENT ADVISORS

Where Elysium Wealth does not believe it can effectively achieve a client's investment objectives, 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 payment 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 and retirement 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 waive the fee where a client chooses to implement their plan with Elysium Wealth.

#### 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 quarter 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:

<b>Portfolio Size</b>	<b>Annualized Fees</b>
\$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.

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.). Employees, legacy clients, friends and family may be offered discounted or waived fees for services.

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.

### 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, and charitable organizations. 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-advisor, 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-advisor. 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-advisors Form ADV, disclosure brochures, marketing material, and client agreements;
- If the sub-advisor has a pre-determined minimum amount for assets under management, verify that Elysium Wealth meets this requirement;
- Verify that the sub-advisor maintains errors and omissions insurance, a fidelity bond and/or an ERISA fiduciary bond;
- Review Form U4 disclosures of the sub-advisor'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-advisor's past performance and measure that performance against indexes;
- Verify that the sub-advisor has proper disclosure regarding its past performance;
- Verify that the sub-advisor 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-advisor 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 investing 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 any 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-Advisors*

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

### 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 Solutions. 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](mailto:financial@myelysium.com) or (385) 276-4716.

### Personal Trading Practices

Neither Elysium Wealth, nor its related persons may recommend to clients securities in which we have a material financial interest. However, at times, Elysium Wealth and/or its investment adviser representatives may take positions in the same securities as clients where we have no material financial interest, which may pose a conflict of interest with clients. We are prohibited from violating our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a material conflict occur, disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

## **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 anticipates relying on 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 exclusively 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-advisors. Specifically, each portfolio is reviewed by a Elysium Wealth investment advisor representative. As chief compliance officer, Jill Floden 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 subadvisors is conducted by John Bergquist. In evaluating its sub-advisors, 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-advisors for changes in their business practices and updates regarding disciplinary information. Review of sub-advisors is conducted on a regular basis and no less than annually with the sub-advisor'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. 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 & Jason Webb are promoters for Elysium Wealth and are registered as investment advisor representatives of Elysium Wealth per state requirements. They both work for the law office of Pearson & Butler, PLLC which is under common control. This could present a conflict of interest because the representatives may be incentivized to refer legal matters to Pearson & Butler, PLLC. Elysium Wealth has disclosed this conflict to mitigate this concern. You are under no obligation to retain the services of this 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"). 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 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 custody of client assets because we have the authority to deduct advisory fees from client accounts and for when you authorize movement of funds using existing standing letters of authorization that you set up with your custodian. 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.

### Standing Letter of Authorization (SLOAs)

Our firm, or persons associated with our firm, may effect wire transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, or we may have signatory and check writing authority for client accounts, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization. An adviser with authority to conduct such third-party wire transfers or to sign checks on a client's behalf has access to the client's assets and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### 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.