

ELTEKON ADVISORS, LLC
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FORM ADV PART 2A
Uniform Application for Investment Adviser Registration

This brochure provides information about the qualifications and business practices of Eltekon Advisors, LLC. If you have any questions about the content of this brochure, please contact us at 512- 477-3200. 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 Eltekon Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

The use of the term, "registered investment adviser" or being "registered", does not imply a certain level of skill or training.

Item 2: MATERIAL CHANGES

The material changes in his brochure from the last annual updating amendment of Eltekon Advisors, LLC on March 19, 2024, are described below. Material changes relate to Eltekon Advisors, LLC's policies, practices or conflicts of interest.

Eltekon Advisors, LLC has reduced the number of fee agreements to one (1) that encompasses the various services offered by Eltekon Advisors, LLC.

Eltekon Advisors, LLC has edited language throughout the Form ADV regarding refunds based on pro-rata fees for the quarter per the termination date of service.

Eltekon Advisors, LLC has included the following new client service offerings:

- Eltekon Advisors, LLC "CareerPro" has added the Pontera Order Management System ("Pontera") that allows Eltekon Advisors to view and manage assets that are not directly held at a custodian directly accessible ("Held Away Accounts") (Item 13: Held Away Accounts).
- Eltekon Advisors, LLC has added a Real Estate Advisory and Finance ("REAF") division that provides ongoing advice and/or service to clients on real estate assets held outside its primary custodian (Item 4: Advisory Business).

Eltekon Advisors, LLC is a marketer for SkyView1 bank accounts (Item 10: Other Financial Industry Activities and Affiliations).

Eltekon Advisors, LLC has added Charles Schwab & Co., as its primary custodian due to its acquisition of TD Ameritrade (Item 12: Brokerage Practices Through Custodian).

Eltekon Advisors, LLC has updated custody over the funds and securities of trust accounts for which it or its related persons serve as trustee. (Item 15: Custody)

Eltekon Advisors, LLC has retired its wrap fee program. (Items 4, 5 and 8)

Eltekon Advisors, LLC has updated its Fee Schedule. (Item 5: Fees and Compensation)

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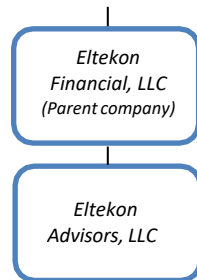
Item 4: ADVISORY BUSINESS

A. DESCRIPTION OF ADVISORY FIRM

Eltekon Advisors, LLC is an investment advisory firm established in 2000. The firm has five advisors not including one operations and administrative employee. Of the five advisors, all perform investment advisory functions with Eltekon Advisors, LLC.

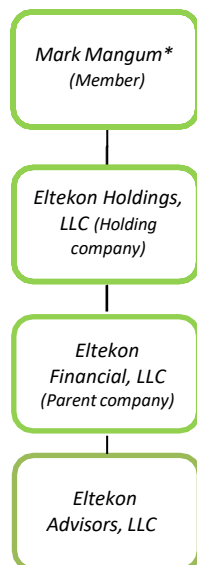
Eltekon Advisors, LLC belongs to the parent company, Eltekon Financial, LLC.

Direct Ownership:



By direct ownership, Eltekon Financial, LLC owns 100% of Eltekon Advisors, LLC as its parent company:

Indirect Ownership:



By indirect ownership, Eltekon Holdings, LLC owns Eltekon Advisors, LLC by way of owning 25% or more of Eltekon Financial, LLC as its parent company:

By indirect ownership, Mark Mangum* owns Eltekon Advisors, LLC by way of owning 25% or more of Eltekon Holdings, LLC as the holding company of all Eltekon entities.

*Mark Mangum directly manages Eltekon Advisors, LLC ... serving as the Managing Principal and Chief Compliance Officer.

Item 4: ADVISORY BUSINESS (cont'd)

B. ADVISORY SERVICES

Eltekon Advisors, LLC offers services through two general mediums, a) portfolio management; and b) financial, business and estate planning and consultation services.

PORTFOLIO MANAGEMENT SERVICES

The Eltekon Asset Management Service (“TEAMS”)

Eltekon Advisors, LLC offers portfolio management services through one (1) customized portfolio construction, discretionary asset management, non-wrap program - The Eltekon Asset Management Service (“TEAMS”) – for a continual comprehensive fee assessed quarterly based upon assets in the account in which custodial, transaction and administrative fees are covered by the client.

Eltekon Advisors, LLC provides ongoing service and/or advice on additional client assets held outside of Eltekon Advisors, LLC.

This may include but not be limited to:

- Recommending strategies to meet personal and/or corporate goals and objectives or needs of a specific asset(s) and/or account(s)
- Serving as the agent or advisor on other household accounts
- Providing ongoing service and advice on alternative investments
- Providing ongoing service and advice on asset management projects

Services will be determined upon the needs of the client and may be adjusted as necessary by the client at the initial and ongoing consultation with the advisor.

Eltekon Career Services (“CareerPro”)

Eltekon Advisors, LLC provides analysis and allocation recommendations of career related investments that include but may not be limited to:

- Retirement plans
- Stock options
- Evaluation of self-directed retirement accounts.

Service will be determined upon the needs of the client and may be adjusted as necessary and/or desired by the client at the initial and ongoing consultation with the advisor.

Item 4: ADVISORY BUSINESS (cont’d)

FINANCIAL PLANNING AND CONSULTING SERVICES

Eltekon Financial Planning and Consulting Services

Eltekon Advisors may also from time to time render investment advice through general financial planning and consulting services. Services may include but not be limited to:

- Retirement Planning: may include but not be limited to analysis of current holdings, identification of retirement timeline, lifestyle needs, education and selection of retirement vehicles/products, and asset allocation
- Investment Planning/Asset Allocation: may include, but not be limited to, analysis of current holdings, identification of existing asset allocation, identify risk tolerance and personal objectives/earning potential, educate and implement allocation plan
- Estate Planning: may include but not be limited to client's assistance in identification of key professional advisors (i.e. legal, tax, etc...), client's assistance in identifying estate members (i.e. trustees, guardians, power of attorney, etc...), beneficiary designations reviews
- Insurance Planning: may include but not be limited to review of risk management coverage (i.e., property/casualty, home, auto, general liability, etc.)
- College Planning: may include but not be limited to identification of college timeline, risk tolerance, school choice, education and selection of college vehicle accounts
- Analysis and Consultation of Retirement Accounts: individual 401(k), 403(b) or other retirement accounts as well as provide consultation services to public and private entities, and charitable organizations
- Risk Analysis: may include but not be limited to analysis and recommendations of holdings, positional portfolios to assess risk tolerance via risk scores

Services will be determined upon the needs of the client and may be adjusted as necessary by the client at the initial and ongoing consultation with the advisor.

Eltekon Family Office

Eltekon Advisors, LLC provides an analysis and recommendations on a wide scope for a family and/or an individual that may include, but not limited to:

- Family Financial Planning
- Cash Flow Analysis (i.e. budgeting)
- Asset Allocation Analysis, Selection and Execution
- Personal Credit Report Review and Evaluation

- Alternative Investments Evaluation and Review (real estate, business, etc.)
- Existing and Future Earnings Analysis
- Lifestyle Management and Execution
- Wealth Transfer Planning and Advice

Services are ongoing from inception until otherwise notified of client relationship and/or service termination. Annual reviews and meetings provide for a summary of services and discussions of current needs.

Eltekon Family Planner and/or Financial Game Plan

Eltekon Advisors, LLC compiles important documents and information provided to and discussed during consultation with an advisor. A planner and/or financial game plan is then created for the family and/or individual. This service can help to provide a summary of information that may be of use in the event of life changes (i.e. relocation, starting a new job or business, change in marital status, etc.).

This planner may include but not be limited to:

- A summary of current financial condition
- A summary of financial planning categories:
 - Cash Management
 - Portfolio Management
 - Risk Management
 - Estate Planning (will and testament, powers of attorney, etc...) inventory
 - Retirement Planning
 - Alternative Investments
 - Business/Career
- Recommended strategies to meet personal goals and objectives

The advisor may provide advice and recommendation strategies as applicable. Annual reviews of information can provide for ongoing strategy and recommendation and assistance in keeping the planner up to date.

Services will be determined upon the needs of the client and may be adjusted as necessary and/or desired by the client at the initial and ongoing consultation with the advisor.

Eltekon Real Estate Advisory and Finance (“REAF”)

Eltekon Advisors, LLC provides ongoing advice and/or service on real estate assets held outside Eltekon through its Real Estate Advisory and Finance (“REAF”) division. REAF services may include but not be limited to:

- Bill Pay
 - Mortgage(s)
 - Line(s) of Credit

- Taxes
 - Associations (Homeowners, Communities, Properties)
- Vendor Management and Communications
 - Contractors
 - Suppliers
 - Labor
- Financial Reporting
 - Cash Flow Analysis (balance sheets, budgeting)
 - Valuation Tracking
 - Appraisals
- Consulting
 - Allocation, Selection and Execution
 - Improvement and Optimization
 - Exits and Execution
- Succession Planning
 - Estate and Wealth Transfer Planning

Advisable assets may include but not be limited to:

- Primary Residences
- Secondary/Vacation Residences
- Investment Properties
- Ranch/Farmland Properties
- Non-Listed Outside Real Estate Investments

Advisory and Service Fees:

- Fees may be assessed on a portion of AUM (market value of asset, relevant banking/custodial accounts), hourly services, singular projects, or any combination of the three, depending on the asset size, type, and services required. All fees will be agreed upon between client and advisor prior to services rendered and fees assessed. Depending on the applicable asset and its required management services, billing periods will be subject to change.
 - AUM Fee:
 - The Advisory Fee on AUM for the initial period will be paid on a *pro rata* basis based on the number of days in the billing period for which services under this Agreement were provided, in arrears, based on the billing period ending value of the Client's managed assets, in accordance with the fee schedule listed in Schedule B attached to this Agreement.
 - Hourly Fee:
 - The Advisory Fee on Hourly Services will be paid to reflect the number of hours spent and rate determined by the services rendered, on the agreed upon billing period.
 - Singular Projects:
- The Advisory Fee on Singular Projects will be paid to reflect the agreed upon price for services rendered, within 1 month of the completion of the Singular Project.

Service will be determined upon the needs of the client and may be adjusted as necessary and/or desired by the client at the initial and ongoing consultation with the advisor.

C. CUSTOMIZING ADVISORY SERVICES

Eltekon Advisors, LLC customizes advisory and consulting services to the individual needs of the client. Each client completes a comprehensive confidential client and risk profile that provides pertinent financial information, including but not limited to:

- Client's age
- Other investments
- Current financial situation and needs
- Tax status
- Investment objective
- Time horizon
- Risk tolerance
- Investment experience
- Liquidity needs

Clients are able to impose restrictions on types of investments recommended or executed in the investment account for portfolio management services. For discretionary accounts, such request of restriction is required in writing.

Financial planning and consultation services will be determined upon the needs of the client and may be adjusted as necessary and/or desired by the client at the initial and ongoing consultation with the advisor.

Eltekon Advisors, LLC seeks to manage accounts at the best execution while meeting the client's objectives.

D. WRAP FEE PROGRAMS

Eltekon Advisors, LLC does not participate in or sponsor a wrap fee program.

E. MANAGED ASSETS

As of December 31, 2023, Eltekon Advisors, LLC managed \$135,000,000 in client assets on a discretionary basis and \$65,000,000 on a non-discretionary basis.

Item 5: FEES AND COMPENSATION

Eltekon Advisors, LLC has different fee arrangements for each of its services. It may be compensated through the following:

- A percentage of assets under management
- Hourly charges
- Fixed fees
- A percentage of gross income/net worth

A. PORTFOLIO MANAGEMENT SERVICES

The Eltekon Asset Management Service (“TEAMS”)

<u>Account Size</u>	<u>Annualized Percentage</u>
\$ 0.00 - \$ 999,999.99	2.00%
\$ 1,000,000.00 - \$ 4,999,999.99	1.50%
\$ 5,000,000.00 - \$ 9,999,999.99	1.25%
\$10,000,000.00 and over	1.00%

Accounts that fall below \$100,000 value will be assessed a minimum annual fee of \$2,500.

Fees are negotiable at the discretion of the advisor generally, which may result in different fees being charged for accounts similar in makeup and objectives. Other fees and expenses may be assessed in addition to advisory fees.

***Brief Description of Billing:**

- Fees are assessed and due quarterly in advance of the services provided.
- Fees are deducted directly from the investment account unless otherwise arranged and agreed upon by Eltekon Advisors, LLC and the client.
- If funds are received within the quarter period, the pro-rated amount will be calculated and assessed with the following quarter’s fees.

***Brief Description of Refund Policy:**

- Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- See Item 5.C: TERMINATION OF SERVICE for more detail.

Eltekon Advisors, LLC is compensated for asset management services based upon a percentage of asset value. In addition, hourly charges and fixed fees may be assessed depending on the scope of the service.

Eltekon Advisors, LLC may bill from the following options as determined by the advisor and the client. Fees and billing periods are negotiable and may be reduced or waived under certain circumstances.

Fee Options:

- Asset management service rate in the range of 1.00% - 2.00% of asset value(s)
- For service period defined asset management projects:
 - Hourly fee ranging from a minimum of \$200 per hour to a maximum of \$500 per hour
 - Negotiable flat rate fee minimum of \$500
 - Combination of hourly fee and flat rate fee

Billing:

- Fees will be billed quarterly in advance based on asset value as of the business close of the prior quarter. Alternative billing arrangements may be agreed upon by Eltekon and client at initiation of client relationship and service period.
- For service period defined asset management projects:
 - Half the applicable fee will be billed upon commencement of the plan
 - Other half due upon delivery to the client

Refund Policy:

- There is no refund of prepaid fees on assets of ongoing servicing.
- For service period defined asset management projects:
 - Initial fees received prior to commencement of services may be refunded within the first three days of dated payment.
 - For services billed in arrears, there is no refund available as services will have been performed.
- Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- See section Item 5.C: TERMINATION OF SERVICE for more detail.

Eltekon Career Services (“CareerPro”)

Eltekon Advisors, LLC may bill from the following options as determined by the advisor and the client. Fees and billing periods are negotiable and may be reduced or waived under certain circumstances.

Fee Options:

- Asset management service rate in the range of 1.00% - 2.00% of the asset value
- For service period defined asset management projects:
 - Hourly fee ranging from a minimum of \$200 per hour to a maximum of \$500 per hour
 - Negotiable flat rate fee minimum of \$1,000
 - Combination of hourly fee and flat rate fee

Billing:

- Fees will be billed quarterly in advance (for ongoing servicing), arrears, or a combination of both. Billing arrangement is agreed to by Eltekon and client at initiation of client relationship and service period.

Refund Policy:

- Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- See section Item 5.C: TERMINATION OF SERVICE for more detail.

Eltekon Advisors, LLC is compensated for financial planning and consulting services based upon hourly charges, fixed fees, and/or a percentage of gross income/net worth.

Other Types of Fees or Expenses

In connection with Eltekon Advisors, LLC services, additional fees and expenses may be incurred separate from the advisory service fees assessed and billed by Eltekon Advisors, LLC. Fees related to client accounts and/or other accounts held at different companies may still be assessed independently and are not considered part of the advisory service fees assessed and billed by Eltekon Advisors, LLC.

Fees include but are not limited to:

- Custodian fees (transaction fees, annual maintenance fees, etc...)
- Check writing capability and related fees
- Fund disbursement fees (i.e., overnight delivery and wiring fees)
- Early termination fees
- Paper surcharge fees
- Alternative investment related fees

Clients may have the option to purchase investment products that Eltekon Advisors, LLC recommends through other brokers or agents that are not affiliated with Eltekon Advisors, LLC.

B. FINANCIAL PLANNING AND CONSULTING SERVICES

Eltekon Financial Planning and Consulting Services

Eltekon Advisors, LLC may bill from the following options as determined by the advisor and the client. Fees and billing periods are negotiable and may be reduced or waived under certain circumstances.

Fee Options:

- Fees in the range of 1.00% - 2.00% of account value, gross income or net worth
- For service period defined asset management projects:
 - Hourly fee ranging from a minimum of \$200 per hour to a maximum of \$500 per hour
 - Negotiable flat rate fee minimum of \$1,000
 - Combination of hourly fee and flat rate fee
- Combination of hourly fee, flat rate fee, or percentage of account value, gross income or net worth

Billing Options:

- The fees will be billed and payable at the time services are rendered or as otherwise agreed upon by the advisor and the client.
- Negotiable flat rate fee:
 - A portion of the negotiated flat rate fee may be required to be paid prior to the initiation of any services.
 - The remaining portion of the negotiated flat fee shall be payable on a payment schedule throughout the period of service or upon completion of consultation.

The actual fee within the range will depend on the scope and level of sophistication of the services provided to the specific client/entity. Details of fees and services to be performed shall be determined and agreed upon by both parties prior to the initiation of any services.

Example of such services offered at a rate of \$2,500: multiple visits with multiple topics such as budgeting, specific retirement planning, education on investments and terminologies.

Refund Policy:

- Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- Initial fees received prior to commencement of services may be refunded within the first three days of dated payment. For services billed in arrears, there is no refund available as services will have been performed.
- See section Item 5.C: TERMINATION OF SERVICE for more detail.

Eltekon Family Office

Eltekon Advisors, LLC may bill from the following options as determined by the advisor and the client. Fees and billing periods are negotiable and may be reduced or waived under certain circumstances.

Fee Options:

- Fees in the range of 0.50% - 2.00% of account value, gross income or net worth with a minimum annual fee of \$25,000.00
- For service period defined asset management projects:
 - Hourly fee ranging from a minimum of \$200 per hour to a maximum of \$500 per hour
 - Negotiable flat rate fee minimum of \$1,000
 - Combination of hourly fee and flat rate fee
- Combination of hourly fee, flat rate fee, or percentage of gross income/net worth

Billing:

- Half the applicable fee will be billed upon commencement of the Family Office
- Other half due upon delivery to the client

Refund Policy:

- Client understands and acknowledges that Eltekton will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- Initial fees received prior to commencement of services may be refunded within the first three days of dated payment. For services billed in arrears, there is no refund available as services will have been performed.
- See section Item 5.C: TERMINATION OF SERVICE for more detail.

Eltekton Family Planner and/or Financial Game Plan

Eltekton Advisors, LLC may bill from the following options as determined by the advisor and the client. Fees and billing periods are negotiable and may be reduced or waived under certain circumstances.

Fee Options:

- Fees in the range of 1.00% - 2.00% of account value, gross income or net worth
- For service period defined asset management projects:
 - Hourly fee ranging from a minimum of \$200 per hour to a maximum of \$500 per hour
 - Negotiable flat rate fee minimum of \$1,000
 - Combination of hourly fee and flat rate fee
- Combination of hourly fee, flat rate fee, or percentage of account value, gross income or net worth
- As optional follow-up, a flat fee beginning at \$500 for each optional annual meeting

Billing:

- For negotiated flat rate fees, half will be due upon signing the agreement with the remaining due after the delivery of the final planning documentation
- For negotiated percentage of gross income/net worth, an upfront payment will be determined by advisor and client
- For annual meeting, if applicable, fee will be billed upon client/Eltekton meeting.

Refund Policy:

- Client understands and acknowledges that Eltekton will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- Initial fees received prior to commencement of services may be refunded within the first three days of dated payment. For services billed in arrears, there is no refund available as services will have been performed.
- See section Item 5.C: TERMINATION OF SERVICE for more detail.

Eltekton Real Estate Advisory and Finance (“REAF”)

Eltekon Advisors, LLC may bill from the following options as determined by the advisor and the client. Fees and billing periods are negotiable and may be reduced or waived under certain circumstances.

Fee Options:

- Negotiable rate in the range of 0.25% - 2.50% of account value per assessment period with a minimum of \$1,500
- Negotiable rate in the range of 0.25% - 2.00% of net worth with a minimum of \$1,500

Billing:

- Fees will be billed quarterly in advance (for ongoing servicing), arrears, or a combination of both. Billing arrangement is agreed to by Eltekon and client at initiation of client relationship and service period.

Refund Policy:

- Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
- Initial fees received prior to commencement of services may be refunded within the first three days of dated payment. For services billed in arrears, there is no refund available as services will have been performed.
- See section Item 5.C: TERMINATION OF SERVICE for more detail.

C. TERMINATION OF SERVICE

A. PORTFOLIO MANAGEMENT SERVICES

TERMINATION TERMS AND CONDITIONS FOR ELTEKON PROGRAMS: THE ELTEKON ASSET MANAGEMENT SERVICE (“TEAMS”)

- The Eltekon program for portfolio management services shall have an initial term of one year from the Effective Date of the agreement and automatically renew for an unlimited number of terms of one year each.
- Termination due to non-delivery of disclosure brochure(s) and/or agreement: If the appropriate disclosure statement was not delivered to the client at least 48 hours prior or 5 business days after to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract, without a penalty, within thirty (30) calendar days after entering into the contract.
- Termination of existing service:
 - Either party may terminate the account agreement at any time for any reason by providing the other party at least thirty (30) days prior written notice.
 - Provided, that such termination will not affect the liabilities or obligations of the parties under the agreement arising from transactions initiated prior to the date of termination.
- Refund Policy:
 - Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
 - It is encouraged to wait until the last business day of the calendar quarter but before the billing date of the following calendar quarter to terminate the agreement or withdraw substantial assets so that no prepaid fees will be forfeited.
 - See Refund Policy under Item 4: ADVISORY BUSINESS Section B: PORTFOLIO MANAGEMENT SERVICES under The Eltekon Asset Management Service (“TEAMS”) for more detail.

B. FINANCIAL PLANNING AND CONSULTING SERVICES

TERMINATION TERMS AND CONDITIONS FOR:
 ELTEKON CAREER SERVICES (“CAREERPRO”)
 ELTEKON FINANCIAL PLANNING AND CONSULTING SERVICES
 ELTEKON FAMILY PLANNER AND/OR FINANCIAL GAME PLAN
 ELTEKON REAL ESTATE ADVISORY AND FINANCE (“REAF”)

Item 5.C: TERMINATION OF SERVICE (cont’d)

- Termination due to non-delivery of disclosure brochure(s) and/or agreement: If the appropriate disclosure statement was not delivered to the client at least 48 hours prior or 5 business days after to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the

contract, without a penalty, within thirty (30) calendar days after entering into the contract.

- Termination of existing service:
 - Either party may terminate the account agreement at any time for any reason by providing the other party written notice.
 - Provided, that such termination will not affect the liabilities or obligations of the parties under the agreement arising from transactions initiated prior to the date of termination.
 - Financial planning and consultation fees agreed at an hourly rate will be assessed a final billing for service hours performed.
- No refund due to termination from assets of ongoing servicing:
 - In the event the agreement is terminated in writing or substantial assets withdrawn on a date other than the last day of the calendar quarter, no prepaid fees will be refunded that would have applied for the remaining days in the calendar quarter.
 - It is encouraged to wait until the last business day of the calendar quarter but before the billing date of the following calendar quarter to terminate the agreement or withdraw substantial assets so that no prepaid fees will be forfeited.
- Refund Policy:
 - Initial fees received prior to commencement of services may be refunded within the first three days of dated payment.
 - For services billed in arrears, there is no refund available as services will have been performed.
 - Client understands and acknowledges that Eltekton will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
 - It is encouraged to wait until the last business day of the calendar quarter but before the billing date of the following calendar quarter to terminate the agreement or withdraw substantial assets so that no prepaid fees will be forfeited.
 - See Refund Policy under Item 4: ADVISORY BUSINESS Section B: FINANCIAL PLANNING AND CONSULTING SERVICES under each Eltekton service offering for more detail.

Item 5.C: TERMINATION OF SERVICE (cont'd)

TERMINATION TERMS AND CONDITIONS FOR: ELTEKON FAMILY OFFICE

- The financial planning and consulting services, Eltekon Family Office, shall have an initial term of one (1) year from the Effective Date of the agreement and shall automatically renew for an unlimited number of terms of one (1) year each.
- Termination due to non-delivery of disclosure brochure(s) and/or agreement: If the appropriate disclosure statement was not delivered to the client at least 48 hours prior or 5 business days after to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract, without a penalty, within thirty (30) calendar days after entering into the contract.
- Termination of existing service:
 - Either party may terminate the account agreement at any time for any reason by providing the other party written notice.
 - Provided, that such termination will not affect the liabilities or obligations of the parties under the agreement arising from transactions initiated prior to the date of termination.
 - Termination of client relationship by either party will halt all pending service transactions at time of termination unless otherwise agreed upon by Eltekon Advisors, LLC, and the client.
 - Final invoicing will be assessed based on the number of days in the existing servicing period that has not been invoiced yet services have been provided.
- No refund due to termination:
 - Initial fees received prior to commencement of services may be refunded within the first three days of dated payment.
 - For services billed in arrears, there is no refund available as services will have been performed.
 - Client understands and acknowledges that Eltekon will refund fees assessed in accounts based on pro-rata fees earned for the quarter per the termination date of the service.
 - It is encouraged to wait until the last business day of the calendar quarter but before the billing date of the following calendar quarter to terminate the agreement or withdraw substantial assets so that no prepaid fees will be forfeited.

Item 6: PERFORMANCE-BASED FEES/SIDE-BY-SIDE MANAGEMENT

Eltekon Advisors, LLC does not accept performance-based fees; defined as fees based on a share of capital gains on or capital appreciation of the assets of a client.

Eltekon Advisors, LLC does not assess a performance-based fee in addition to any other compensation arrangement as side-by-side management.

Item 7: TYPES OF CLIENTS/TYPES OF INVESTMENTS

Eltekon Advisors, LLC generally provides investment advice to:

- Individuals (other than high net worth individuals)
- High net worth individuals

- Employee Benefit Plans, Pension and Profit-Sharing Plans (other than plan participants)
- Trusts/estates
- Corporations or other businesses not listed above

There is not a minimum account size to open and maintain an account under The Eltekon Asset Management Service (“TEAMS”) program.

Eltekon Advisors, LLC provides limited investment advice on the following investment categories within its portfolio management services:

- Exchange-listed securities (individual stocks, bonds, ETFs, mutual funds)
- Securities traded over-the-counter
- Unit Investment Trusts (UIT’s)
- Structured Notes
- Private Markets (equity, credit and real estate)
- Foreign Issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper and/or certificates of deposit (CDs)
- Municipal securities
- Investment company securities (including variable life insurance, variable annuities, and mutual fund shares)
- United States government securities
- Secondaries (including listed and non-listed)

Eltekon Advisors, LLC may also provide investment advice on, recommend and include in a client’s account, alternative and/or private market investments when appropriate to the unique portfolio of an account based on the suitability and needs of the client.

Item 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS

Eltekon Advisors, LLC uses the following methods of analysis:

- Fundamental: the evaluation of a security by attempting to measure its value through the review of economic conditions that affect the security and other qualitative and quantitative factors. Risk in using this technique may be that the evaluation could be wrong and/or inaccurate, which would affect recommendations and/or timing of transactions in the account.
- Technical/Charting: the evaluation of historical performance of a security and the market in which it is traded in search of information which may indicate future performance. Risk in using this technique may be that the evaluation could be wrong and/or inaccurate, which would affect recommendations and/or timing of transactions in the account.
- Independent 3rd party research: the valuation of a security using a variety of research reports, analyst feedback and ratings.

B. INVESTMENT STRATEGIES

Eltekon Advisors, LLC may use the following investment strategies:

- Long term purchases (securities held at least a year)
- Short term purchases (securities sold within a year)
- Trading (securities sold within 30 days)
- Options Execution (including short sales and margin transactions)

C. RISK OF LOSS

Investing in securities involves risk of loss that clients should be prepared to bear.

Eltekon Advisors, LLC does not guarantee the positive performance of any recommendation and a security recommended may result in a loss in the short term and/or long term. It utilizes a variety of methods of analysis and investment strategies in formulating investment advice and/or managed assets.

Risk in using this technique may be that the evaluation could be wrong and/or inaccurate, which would affect recommendations and/or timing of transactions in the account.

Item 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS (cont'd)

Eltekon Advisors, LLC does not restrict recommendations of other types of securities as portfolio management; however, there may be restrictions identified within client portfolios as

determined between client and advisor. It may also recommend Unit Investment Trusts, Exchange Traded Funds, Structured Notes, Private Markets, Private Placements/Special Purpose Vehicles and Digital Assets/Cryptocurrency.

The material risks involved in primarily recommending these types of securities include but may not be limited to:

- Limited mutual fund settlement timeframes
- Market fluctuation
- Loss of principal balance
- Value of UIT may be more or less than principal balance depending on the timing of expiration
- Low trading volumes in Exchange Traded Funds
- Private Placements/Special Purpose Vehicles (SPV) carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

Cryptocurrency investing refers to trading in digital/virtual currencies, such as Bitcoin, that are not backed by real assets or tangible securities and are more volatile than traditional currencies and financial assets. Investing in digital currency comes with significant risk of loss that a client should be prepared to bear and, due to the nature of cryptocurrencies, clients are exposed to the risks normally associated with investing but also unique risks not typical of investing in traditional securities. These, include, but are not limited to, volatile market price swings or flash crashes, market manipulation, economic, regulatory, technical, and cybersecurity risks.

Item 9: DISCIPLINARY INFORMATION

On April 17, 2017, Mark Thomas Mangum was issued an Undertaking by the Texas State Securities Board. Mark Thomas Mangum was selling a Pension Income Stream and did not receive any further discipline other than an order to stop selling the investment.

Item 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. ELTEKON ENTITY AFFILIATIONS

Eltekon Advisors, LLC has arrangements that are material with a business services entity, insurance company or agency, and a life planning professional service firm as follows:

Business Services: Eltekon Business Services, LLC

Eltekon Advisors, LLC is affiliated with the business services entity, Eltekon Business Services, LLC under the holding company, Eltekon Holdings, LLC.

Eltekon Business Services, LLC is managed by Mark T Mangum.

Eltekon Advisors, LLC is able to refer clients to this affiliated business services entity to offer business services when applicable. In addition, the two may share client information for purposes of servicing mutual clients.

Eltekon Advisors, LLC does not have a revenue or compensation sharing agreement with Eltekon Business Services, LLC.

Insurance Company or Agency: Eltekon Insurance Agency, LLC

Eltekon Advisors, LLC is affiliated with the insurance agency, Eltekon Insurance Agency, LLC under the holding company, Eltekon Holdings, LLC.

Eltekon Advisors, LLC has three advisors who are advisors of the firm and also dually registered as insurance agents of Eltekon Insurance Agency, LLC: Mark T Mangum, Brent T Beesley and Lewis K Guilbeau.

Eltekon Advisors, LLC is able to refer clients to this affiliated insurance agency to offer insurance products when applicable. In addition, the two may share client information for purposes of servicing mutual clients.

Eltekon Advisors, LLC does not have a revenue or compensation sharing agreement with Eltekon Insurance Agency, LLC.

Other Affiliation: Eltekon Sports Group, LLC

Eltekon Advisors, LLC is affiliated with the life planning professional service firm, Eltekon Sports Group, LLC under the holding company, Eltekon Holdings, LLC.

Eltekon Advisors, LLC is able to utilize this affiliated life planning professional firm to offer servicing needs to professional athletes when applicable. In addition, the two may share client information for purposes of servicing mutual clients.

Eltekon Advisors, LLC pays Eltekon Sports Group, LLC marketing and service fees for the execution of lifestyle management services if/when necessary.

Item 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (cont'd)

B. OTHER AFFILIATIONS

Eltekon Advisors, LLC has arrangements that are material with other investment advisers.

Third Party Vendors

It maintains relationships with third party vendors for client portfolio management (i.e. Blackstone, Ares Management, Nationwide, American Funds, etc...). The arrangement is entered into by Eltekon Advisors, LLC and the third party vendors that allow Eltekon Advisors, LLC to solicit business of the vendor to clients and then may act as the advisor or servicing agent of the account.

By entering into such arrangements, Eltekon Advisors, LLC may share in the fees assessed to the client. Fees may be captured by third party vendor(s) and are paid to Eltekon Advisors, LLC on a quarterly basis per the instructions of the client authorized agreement. In addition, the parties may share client information for purposes of servicing mutual clients.

Bank Account Marketer.

- Eltekon Advisors, LLC is a marketer for SkyView1 bank accounts.
- Conflict of Interest: The recommendation by an Eltekon Advisors, LLC representative that clients use certain bank accounts presents a conflict of interest, as an Eltekon Advisors, LLC representative has an incentive (including financial) to recommend the use of certain bank accounts rather than on a particular client's need. No client is under any obligation to use the SkyView1 bank account(s). Clients are reminded that they may patronize any bank and are not required to use accounts recommended by the representative. The Registrant's Chief Compliance Officer, Mark Mangum, remains available to address any questions that a client or prospective client may have regarding above conflict of interest.

Line of Credit Marketer.

- Eltekon Advisors, LLC is a marketer for collateralized lines of credit.
- Conflict of Interest: When clients seek a line of credit collateralized by an investment account managed by Eltekon Advisors, at times we refer the business to third parties (i.e. TriState Capital Bank). When doing so, third parties (such as TriState Capital Bank) prepare documentation for clients to sign/establish a line of credit, approve the collateralization, etc... As part of service to clients, Eltekon tracks, manages, administers payments to the lines of credit. In addition, Eltekon Business Services receives fees on a monthly basis, from TriState paid by the interest rate assessed to the client, based on the outstanding balance of the line of credit each month. In regards to this service, clients enter agreements directly with the third party (i.e. TriState Capital Bank).

Eltekon IARs directly serve clients and their accounts while relying on a "team" approach to investment management. Prior to IARs sending recommendations to clients for approval, such recommendations have been designed in collaboration with IARs and Eltekon investment committee personnel.

Item 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. CODE OF ETHICS

Eltekon Advisors, LLC will provide a copy of its code of ethics to any clients or prospective client upon written request.

B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Financial Interest through Recommendations

Eltekon Advisors, LLC, or any associated person(s) may have an interest or position in a certain security (ies) which it may also recommend to a client. A recommendation of a security in which either Eltekon Advisors, LLC or its associated persons may have a financial interest is purely coincidental and applicant would fully disclose any such interest to clients.

As a result of client approvals and the likely differentiated timing of each client response prior to trades in discretionary accounts, pricing and timing of similar position trades in client accounts may differ and remedial action will not be taken by Eltekon.

Personal Trading

Associated person(s) of Eltekon Advisors, LLC may buy or sell for itself securities that it also recommends to clients. Eltekon Advisors, LLC and/or their officers, directors or employees may purchase or sell for themselves similar or different securities as are purchased or recommended for clients of Eltekon Advisors, LLC.

No security may be bought or sold by a principal or employee of Eltekon Advisors on the same day Eltekon Advisors, LLC clients' accounts have had the opportunity to make such transactions as appropriate.

Given this, principals and employees will not receive a more favorable execution price on a particular day than those received by their investment advisory clients. To prevent conflicts of interest, trades are reviewed on a daily basis.

Item 12: BROKERAGE PRACTICES THROUGH CUSTODIAN

A. CUSTODY OF ACCOUNTS

The custody of accounts may be held by several custodians, such as Charles Schwab & Co., Inc., Blackstone, Ares Management, Nationwide, American Funds, Vida Capital, Strata Trust Company, etc... It is structured such that each client's securities are held in nominee name only for ministerial purposes and each client's account is maintained as a separate account. The client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities in the account.

Further, each client retains any/all rights afforded under the federal securities laws to proceed directly against the issuer of any underlying security in the client's account.

Eltekon Advisors, LLC maintains a primary custodian arrangement with Charles Schwab & Co., Inc. whereby it will execute transactions by the authorization of advisory clients.

B. HELD AWAY ACCOUNTS

Eltekon Advisors, LLC "CareerPro" has added the Pontera Order Management System ("Pontera") that allows Eltekon Advisors to view, manage and fee on assets that are not directly held at a custodian directly accessible ("Held Away Accounts").

Certain Client Accounts subject to Eltekon Advisors, LLC services under this Agreement may be held at a custodian that is not directly accessible by Eltekon ("Held Away Accounts"). Eltekon may, but is not required to, manage these Held Away Accounts using the Pontera Order Management System ("Pontera") that allows Eltekon to view and manage these assets.

- Services. Client appoints Eltekon to act as its investment advisor for the accounts agreed to between Client and Eltekon from time to time. Investment advisory services (the "Services") will be provided on a discretionary basis, which means that by executing this Agreement, Client grants Eltekon the limited discretionary power and authority to invest and reinvest the Accounts as Advisor deems appropriate given Client's investment objectives. Eltekon is authorized to purchase, sell, exchange, convert, trade, allocate, reallocate, invest or reinvest assets held in the Accounts and otherwise make investment decisions for the Accounts. These investments will likely include mutual funds, stocks, and exchange traded funds (ETFs), but may also include money market accounts, structured notes, investments with third party managers or private placement funds. Eltekon is limited by the universe of investments offered by the Account's Custodian (defined below). For the avoidance of doubt, Eltekon is granted with the authority to place trades in the Accounts without prior consultation with the Client.
- Custodian. Client will establish or otherwise provide the Eltekon with authorization to manage Accounts in Client's name held by a custodian ("Custodian"). The assets in the Accounts will be referred to as the "managed assets." Any Custodian the Client is authorizing Eltekon to deduct its Advisory Fee (defined below) will be a "qualified

custodian,” as defined in Rule 206(4)-2 under the Investment Advisers Act of 1940, as amended (the “Advisers Act”). Client may at any time increase or decrease Client’s assets in the Accounts with the Custodian. Eltekon may, after consulting with Client, recommend a Custodian, except for Held Away Accounts. The Client acknowledges that the recommendation made by Eltekon of certain Custodians is a conflict of interest because the Custodian provides certain software, research and administrative and technical support services to Eltekon which assist Eltekon in servicing and benefit the Client’s Accounts, and the Eltekon anticipates continual operational relationships with the Custodian. Eltekon shall not be liable for any acts or omissions of the Custodian.

Item 13: REVIEW OF ACCOUNTS

Eltekon Advisors offers managed account programs to its customers. These managed accounts are monitored on a systematic basis reviewed no less than quarterly. More frequent reviews may be performed as needed and triggered by the account size, re-allocation of a specific position, high market volatility (as measured by the VIX Index), at a client’s request, a change in client’s investment objectives and/or high volatility in client portfolio balance.

With respect to account performance, Eltekon Advisors reviews each account on a quarterly basis, and compares each investment on a transaction basis to insure that each transaction:

- Maintains suitable to the respective client’s investment objectives
- Meets that client’s risk tolerance in accordance with risk profile and asset allocation model
- Confirms that the investment objectives are still pertinent to the managed account arrangement.

Mark Mangum, Principal, is responsible for the account reviews. He may designate others for assistance as applicable.

The nature and frequency of reports to clients are determined primarily by the particular needs of each client.

All Clients of The Eltekon Asset Management Service (“TEAMS”) receive no less than quarterly account statements from the respective custodian detailing all activity in the client’s account.

Item 14: CLIENT REFERRALS AND OTHER COMPENSATION

Compensation for Client Referrals

Eltekon Advisors, LLC may enter into referral arrangements. Licensed advisors may receive a minimum of 50% of the fee to a maximum of 85% of the fee.

Unlicensed/nonregistered individuals may receive a minimum of 15% to a maximum 50% of the fee through an approved solicitor's agreement. Eltekon does not currently have any active agreements.

Additional Compensation: Mutual Funds Charges.

To the extent of mutual funds are selected by Eltekon Advisors, LLC to fill components of the overall investment strategy, Eltekon Advisors, LLC seeks to purchase such mutual fund shares at Net Asset Value ("NAV") or no load. Thus, the client will not be subject to any initial distribution cost (front-end salescharge) or redemption fee (back-end sales charge), if any, that might normally be incurred upon the purchase or sale of shares of mutual fund shares.

Additional Compensation: Selling Agreements.

Eltekon Advisors, LLC may also be compensated in cash or receives some economic benefit (including service fees, equipment or non-research services) from a nonclient in connection with giving advice to clients and/or referring clients.

Item 15: CUSTODY

Eltekon Advisors, LLC does deduct portfolio management fees for The Eltekon Asset Management Service (“TEAMS”) directly from client investment account as agreed upon by the client. It does not have the authority to withdraw funds otherwise unless authorized by the client at each transaction.

Eltekon Advisors, LLC does have the power to dispose of select client funds or securities for purposes other than authorized trading and therefore, has a standing letter of authorization (“SLOA”) with each respective client for which such services are provided. In accordance with Section 206(4) of, and Rule 206(4)-2 under, the Advisers Act against an investment adviser if that adviser does not obtain a surprise examination where it acts pursuant to such an arrangement under the following circumstances:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client’s qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

In addition, Mark Mangum does act as Trustee and/or has Power of Attorney for a select few clients.

Clients will receive quarterly, or more frequent, account statement directly from respective custodians. Clients should carefully review those statements.

Item 16: INVESTMENT DISCRETION

Eltekon Advisors, LLC does accept discretionary authority to manage accounts. In such cases, advisors receive discretionary authorization on file; however, advisors may still seek prior approval for certain portfolio management transactions when deemed appropriate by the individual advisor. In an effort to encourage client engagement, Eltekon will initially seek client approval prior to executing trades in discretionary accounts and seeks only to utilize discretion in client accounts in limited situations (i.e. market conditions, time sensitivity, client unavailability, generating cash for quarterly fees, etc...).

Some factors the advisor may consider when providing ongoing, continuous asset management include but are not limited to:

- Recent changes in client's financial related information: liquidity needs, risk tolerance, investment objectives, etc.
- The size of the transaction
- The type of investment
- The extent of involvement the client desires or requests
- Any other special requests made by the client
- See Item 4: ADVISORY BUSINESS Section E. CUSOMIZING ADVISORY SERVICES for more detail.

Eltekon Advisors, LLC will supervise and direct the investments of the client accounts subject to such limitations as the client may impose in writing. Eltekon Advisors, as agent and attorney-in-fact with respect to the client's account, without prior consultation with the client, may:

- Direct the purchase, sell, exchange, conversion, and otherwise trade in stocks, bonds and other securities including money market instruments
- Direct the amount of securities purchased, sold, exchanged, and otherwise traded
- Place orders for the execution of such securities transactions with other third-party broker/dealers
- Determine the rates paid

Eltekon Advisors will allocate brokerage transactions in a manner it believes to be fair and responsible to its clients, and consistent with client objectives. Adhering to a strict formula will not be practicable given the variation in client objectives and guidelines.

Item 17: VOTING SECURITIES

Eltekon Advisors, LLC does not accept authority to vote client securities. Clients receive voting notices directly from appropriate parties. Eltekon Advisors, LLC may assist clients by providing information as requested.

Item 18: FINANCIAL INFORMATION

Eltekon Advisors, LLC is not required to provide a balance sheet or disclose any financial conditions as it does not require a prepayment of \$1,200 in fees per client, six months or more in advance.

Eltekon Advisors, LLC has discretionary authority; however, does not have any financial conditions that would likely impair the ability to meet contractual commitments to clients.

Part 2B SUPPLEMENT – MARK T MANGUM

A. EDUCATION AND BACKGROUND

- Born in 1968
- Received BBA in Finance: Investments and Banking from University of Wisconsin, Madison in 1991 and Student-Athlete as a member of the Wisconsin Football team from 1987-1990
- Business background for preceding five (5) years:
 - Eltekon Holdings, LLC, Founder, Managing Principal from 08/2000 to present
 - Eltekon Financial, LLC, Managing Principal from 10/2000 to present
 - Eltekon Advisors, LLC, Managing Principal from 12/2000 to present
 - Eltekon Insurance Agency, LLC, Managing Principal from 01/2001 to present
 - Eltekon Business Services, LLC, Managing Principal from 03/2001 to present

B. DISCIPLINARY INFORMATION

On April 17, 2017, Mr. Mangum was issued an Undertaking by the Texas State Securities Board. Mr. Mangum was selling a Pension Income Stream and did not receive any further discipline other than an order to stop selling the investment.

C. OTHER BUSINESS ACTIVITIES

In addition to serving as Managing Principal of Eltekon Advisors, LLC, Mr. Mangum is also the Managing Principal of Eltekon Business Services, LLC. These activities are estimated to utilize approximately five (5) percent of Mr. Mangum's time.

Mr. Mangum is also the Managing Principal of Eltekon Insurance Agency, LLC and the Principal of Eltekon Holdings, LLC. These activities are cumulatively estimated to utilize approximately ten (10) percent of Mr. Mangum's time.

Mr. Mangum is the Co-Founder of APTUS Sports, LLC, a non- investment related business. These activities are estimated to utilize approximately five (5) percent of Mr. Mangum's time.

Mr. Mangum is a Board Member of Prime Bank, a community bank with which Eltekon Advisors has a strategic relationship. These activities are estimated to utilize approximately five (5) percent of Mr. Mangum's time.

D. SUPERVISION

Eltekon Advisors, LLC supervises Mr. Mangum by way of monitoring trades executed via trade reports. Eltekon Advisors, LLC also monitors correspondence to/from clients.

A. EDUCATION AND BACKGROUND

- Born in 1965
- Received BA in Psychology from Trinity University in 1987 and MBA in Business Management from St. Edward's University in 1990
- Business background for preceding five (5) years:
 - Eltekon Advisors, LLC, Director of Private Wealth Management from 10/2002 until present
 - Eltekon Advisors, LLC, Principal from 02/2004 until present
 - Eltekon Financial, LLC
 - Director of Private Wealth Management from 10/2002 to Present
 - Principal from 02/2004 to present

B. DISCIPLINARY INFORMATION

Mr. Beesley to date has not been the subject of disciplinary action.

C. OTHER BUSINESS ACTIVITIES

In addition to serving as Direct of Private Wealth Management and Principal of Eltekon Advisors, LLC, Mr. Beesley is a licensed insurance broker and will on occasion sell insurance related products to the clients of Eltekon Advisors. These activities are cumulatively estimated to utilize approximately five (5) percent of Mr. Beesley's time.

Mr. Beesley is the founder of El Toro Carmesi, LLC dba Fit4U and dba Jebez, of which both are non-investment related businesses. These activities are expected to utilize approximately fifteen (15) percent of Mr. Beesley's time.

Mr. Beesley is the founder and sole owner of Holiday 'N Pets, a non-investment related business. These activities are expected to utilize approximately two (2) percent of Mr. Beesley's time.

D. SUPERVISION

Eltekon Advisors, LLC supervises Mr. Beesley by way of monitoring trades executed via trade reports. Accounts are reviewed by the Managing Principal, Mark T Mangum. Eltekon Advisors, LLC also monitors correspondence to/from clients.

A. EDUCATION AND BACKGROUND

- Born in 1994
- Received BA in Finance as well as a BA in management from McNeese State University in 2017.
- Business background for preceding five (5) years:
 - Student athlete as part of the McNeese State baseball team from 2012-2015
 - Asset management intern at Vida Capital Investments during summer of 2016
 - Sales intern with American Family Life Assurance Company during 2017
 - Investment Advisor Representative with Eltekon Advisors from 5/2017 to present

B. DISCIPLINARY INFORMATION

Mr. Guilbeau to date has not been the subject of disciplinary action.

C. OTHER BUSINESS ACTIVITIES

Mr. Guilbeau is a coach for the Lonestar Baseball Club, non-investment related business. These activities are expected to utilize approximately ten (10) percent of Mr. Guilbeau's time.

D. SUPERVISION

Eltekon Advisors, LLC supervises Mr. Guilbeau by way of monitoring trades executed via trade reports. Accounts are reviewed by the Managing Principal, Mark T Mangum. Eltekon Advisors, LLC also monitors correspondence to/from clients.

A. EDUCATION AND BACKGROUND

- Born in 1998
- Received Applied Baccalaureate Degree in Economics from Harvard University in 2020
- Business background for preceding five (5) years:
 - Student-athlete as a member of the Harvard Football team from 2016-2019
 - Private Equity Summer Intern with Trilantic Capital Partners from 6/2017 to 8/2017
 - Land and Ranch Management Role with a private land and cattle management operation in Colorado from 6/2018 to 8/2018
 - Investment Research Analyst with Eltekon Advisors, LLC from 5/2019 to present
- Investment Advisor Representative with Eltekon Advisors, LLC from 12/2020 to present
 - CEO with Terra Primera, LLC from 09/2020 to present

B. DISCIPLINARY INFORMATION

Mr. Mangum to date has not been the subject of disciplinary action.

C. OTHER BUSINESS ACTIVITIES

Mr. Mangum is the Co-Founder of Terra Primera, LLC, a non-investment related business. These activities are expected to utilize approximately five (5) percent of Mr. Mangum's time.

D. SUPERVISION

Eltekon Advisors, LLC supervises Mr. Mangum by way of monitoring trades executed via trade reports. Eltekon Advisors, LLC also monitors correspondence to/from clients.

A. EDUCATION AND BACKGROUND

- Born in 2004
- Has not received any higher education degrees after high school.
- Business background for preceding five (5) years:
 - Nutrition Specialist with Nutrition 512 from 05/2023 to 08/2021
 - Student from 08/2008 to present
 - Investment Advisor Representative with Eltekon Advisors, LLC from 01/2023 to present

B. DISCIPLINARY INFORMATION

Mr. Sbrocco to date has not been the subject of disciplinary action.

C. OTHER BUSINESS ACTIVITIES

Mr. Sbrocco is not engaged in any investment-related business or occupation (other than this advisory firm).

D. SUPERVISION

Eltekon Advisors, LLC supervises Mr. Sbrocco by way of monitoring trades executed via trade reports. Eltekon Advisors, LLC also monitors correspondence to/from clients.