



elite
RETIREMENT GROUP

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**Form ADV Part 2A Appendix 1
Wrap Fee Brochure**

March 20, 2024

This wrap fee program brochure provides information about the qualifications and business practices of Elite Retirement Group, Inc. If you have any questions about the contents of this Brochure, please contact us at (713) 341-8899 or via email at patrick@retireidea.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Elite Retirement Group, Inc. is a Registered Investment Adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about Elite Retirement Group, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as CRD number. The CRD number for Elite Retirement Group, Inc. is 312178. The SEC's website also provides information about any persons affiliated with Elite Retirement Group, Inc. who are registered, or are required to be registered, as Investment Adviser Representatives of Elite Retirement Group, Inc.

Item 2 – Material Changes

We have made the following changes since our most recent amendment on February 27, 2024:

- We have registered with the SEC.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year end which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting at (713) 341-8899.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Services, Fees and Compensation	4
Wrap Fee Program	4
Assets Under Management.....	7
Item 5 – Account Requirements and Types of Clients	7
Item 6 – Portfolio Manager Selection and Evaluation	7
Portfolio Managers	7
Advisory Business.....	8
Performance-Based Fees and Side-by-Side Management.....	8
Methods of Analysis, Investment Strategies and Risk of Loss	8
Voting Client Securities	11
Item 7 – Client Information Provided to Portfolio Managers.....	12
Item 8 – Client Contact with Portfolio Managers	12
Item 9 – Additional Information	12
Disciplinary Information.....	12
Other Financial Industry Activities and Affiliations.....	12
Other Financial Industry Affiliations	12
Code of Ethics, Participation or Interest in Client Accounts and Personal Trading	12
Review of Accounts	14
Client Referrals and Other Compensation	14
Financial Information	14

Item 4 – Services, Fees and Compensation

Elite Retirement Group, Inc. “Elite Retirement Group” is a Registered Investment Adviser (“Adviser”) which offers this wrap fee program for its advisory clients. Elite Retirement Group is a registered investment adviser with the State of Wisconsin. The Adviser was founded in 2020 by Patrick Marcell, who is the sole owner and CCO.

We provide investment advice through Investment Adviser Representatives (“IAR”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf.

Wrap Fee Program

We provide asset management services to individuals, retirement plans, and businesses. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We currently provide our asset management services in investment programs that bundle or “wrap” services (investment advice, trade execution, custody, etc.) together and charge a single fee based on the value of assets under management.

This is a program that allows us to create an investment model portfolio and manage it within your investment guidelines and financial parameters. This program enables you to pursue your investment objectives with us as manager all in one consolidated portfolio. We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us; we will analyze your situation and recommend an appropriate Wrap Fee Program. You will be provided with a targeted strategic allocation of assets by class.

As part of our asset management services provided with our Wrap Fee Programs, we will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, asset allocation statement, and rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Monitor our portfolios for style drift and benchmark performance, and provide portfolio rebalancing as necessary
- Assist you in setting and monitoring goals and objectives

- Provide personal consultations as necessary upon your request or as needed.

You must notify us promptly when your financial situation, goals, objectives, personal circumstances, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

We manage assets on a discretionary basis, which means you have given us the authority to determine the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker-dealer to be used for a purchase or sale of securities for your account
- Commission rates to be paid to a broker or dealer for your securities transaction.

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professional to assist you with tax planning. You will have the opportunity to meet with us periodically to review the assets in your account.

We will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend Fidelity for 401(K) accounts and Schwab or Altruist for all other accounts (hereinafter referred to as Custodian) as the independent custodian for all accounts that we manage, and at the request of the client will utilize the services of a different custodian of the client's choice.

You will also receive our Advisory Agreement which describes what services you will receive and what fees you will be charged. We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

Fees and Compensation

A wrap fee program allows you to pay a specified fee for portfolio management services and the execution of transactions. The fee is not based directly upon transactions in your account. The fee is bundled with our costs for executing transactions in your account(s).

Elite Retirement Group does not impose a minimum account balance for the opening of an account with the Adviser. The fee charged is based upon the amount of money invested. Multiple accounts of immediately related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged monthly, in arrears. Payments are due and will be assessed on the last day of each month, based on the previous month's average daily balance of the account(s) under management for the preceding month. The Adviser will not pro rate for deposits and withdrawals in the account during the billing period. Fees will be calculated as follows:

Tiered fee Schedule

AUM	Fee
Up to \$500,000 billed at	1.5%
Next \$ to \$500,001-1,000,000 billed at	1%
1,000,001+ billed at	0.5%

Our Advisory Agreement defines what fees are charged and their frequency. The fees shown above are annual fees and may be negotiable based upon certain circumstances. Fees for partial periods will be charged on a pro rata basis based on the number of days remaining in the billing period. No increase in the wrap fee shall be effective without prior written notification to you. We believe our wrap fee is reasonable considering the fees charged by other investment advisers offering similar services/programs. Our fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of your funds.

If the Wrap Fee Brochure is not delivered to the Client at least 48 hours prior to entering into the management agreement, the Client may terminate the agreement for services within five business days of execution without penalty. After the five-day period, either party, upon 30 day written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the month in which the cancellation notice was given, and any unearned fees will be returned to the client via check.

You will authorize the custodian to directly debit fees from your account held at the custodian and to pay us. Management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter (with the exception of small inconsequential contributions and withdrawals). You will be provided with a quarterly statement reflecting deduction of the advisory fees.

By participating in a wrap fee program, Clients may end up paying more or less than they would through a non-wrap fee program. The relative cost of the program includes trade execution costs that would typically be passed directly through to the Client by the executing broker. Clients could invest in debt and equities directly, without the Adviser's services. In that case, Clients would not receive the services provided by the Adviser which are designed, among other things, to assist in determining which funds are appropriate for the portfolio and the Client's Account.

In our wrap fee program, we include all trade charges for your account; however, our fees do not include other related costs and expenses. You may incur certain charges imposed by custodians, and other third parties. These include custodial fees, fees for trades executed away from your Custodian at another broker-dealer, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as "12(b)(1) fees". These 12(b)(1) fees come from fund assets, and thus indirectly from clients' assets. We do not receive any compensation from these fees. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge.

Since the Adviser does not charge Clients fees based on trading activity, the Adviser may have an incentive to limit trading activities in Client account(s) because the Adviser is charged for executing trades. In addition, the amount of compensation received by the Adviser may be more than what the Adviser would receive if the Client paid separately ("unbundled") for investment advice, brokerage, and other services. Therefore, the Adviser may have a financial incentive to recommend the wrap fee program over other programs or services. The Adviser monitors all Client accounts to ensure that the Adviser's fiduciary duty is met for all Clients. Any breaches of the Adviser's fiduciary duty are noted, and appropriate repercussions are initiated to deter such behavior.

Assets Under Management

As of December 31, 2023, we had \$115,166,667 in discretionary assets under management. We do not have any non-discretionary assets under management.

Item 5 – Account Requirements and Types of Clients

There are no minimum account size requirements. The Adviser provides portfolio management services to individuals, high net worth individuals, charitable organizations, foundations, and small businesses.

Item 6 – Portfolio Manager Selection and Evaluation

Portfolio Managers

Patrick Marcell serves as the portfolio manager for all Client accounts for the wrap fee program. All client accounts are managed in-house by Patrick Marcell and IARs of Elite Retirement Group. The portfolio manager's background information can be found in the Form ADV Part 2B Brochure Supplement attached.

Patrick Marcell reviews performance information provided through the Custodian.

Advisory Business

Elite Retirement Group offers asset management on a wrap fee basis, financial planning, and consulting services, with an emphasis on building portfolios designed to meet the needs of our clients. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

With respect to the wrap program, the Client has the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks, or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction requested.

If such investment restrictions are implemented, the Client will experience a different investment return than what will be realized by the particular model itself. Such performance may be better or worse than the particular model. For these reasons, if a Client wishes to make a request concerning restrictions based on specific securities, it may be more appropriate for the Client to participate in other portfolio management programs. It should be noted, any standardized reports of model performance will not reflect the performance of the particular model with restrictions applied. However, performance reports of the Client's account will accurately reflect the Client's actual account performance with restrictions.

Performance-Based Fees and Side-by-Side Management

The Adviser does not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a Client. The Adviser does not perform side-by-side management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

We use multiple investment strategies as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

Technical Analysis

Technical Analysis is a technique that attempts to determine a security's value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market's price reflects all relevant information so the analysis focuses on the history of a security's trading behavior

rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act upon relevant information rather than focusing on the information itself. Ultimately, technical analysts develop trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future return.

Cyclical Analysis

While we do not attempt to time the market, we may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in your investment strategies depending upon long and short-term trends in financial markets and the performance of the overall national and global economy.

Investment Strategies and Models

In order to perform this analysis, we use many resources, such as:

- Onsite visits,
- Online financial resources, and
- Sherman Sheets.

The investment strategies and models we use to implement any investment advice given to you include, but are not limited to:

Elite Stock Model

The Elite Stock model is a higher-activity model which provides exposure to the top ranked stocks.

The ranking is achieved by comparing longer term performance with shorter term performance. The greater the difference, the higher the ranking. The greater the difference, the more a stock is "breaking away" from the anchoring of its longer-term performance. This comparison method is our exclusive adaptation of "MAD", for Moving Average Distance. This model is rebalanced 1/4ly. Adjustments are made as per recommendations of Sherman Sheets and confirmed by advisors.

Elite Bear Model

This portfolio uses the LHA Market State Tactical Beta ETF to be an all-weather investment. This portfolio is designed to capture the majority of the upside of the S&P500 while using the VXX ETF to counter significant market volatility. This strategy is not designed to be a standalone. The Elite Bear is to be used in coordination with other Elite models. Some exceptions might apply based upon client time horizon and risk tolerance.

Elite ETF Model

The Elite ETF Model is our core strategy and other strategies are added to this model to enhance diversification. This model uses the BOSS model strategy to determine market states relative equity holdings and cash holding. We base our ETF selections upon ranking from Sherman Sheets. Sherman Sheets provides daily updated ETF rankings along with a grading of sector performance. This gives us a

three pronged approach to our evaluation to select top rated ETFs for this portfolio. Our goal with this portfolio is to remain diversified amid Large, Mid and small cap ETFs. The goal of this model is to be fully invested in equities during Bull Markets, and only exposed to the relatively few days with the highest probability of profit during bear markets. During bull markets, activity occurs on quarterly intervals. This portfolio is rebalanced 1/4ly. Adjustments are made as per recommendations of Sherman Sheets and confirmed by advisors.

Elite Sector Rotation Model

The Elite Sector Rotation II Model is a shorter-term, higher-activity Model designed When either the Bull-Bear indicator or the BOSS indicator is negative, the Sector Rotation II Model is 100% invested according to the Calendar Effects strategy. See the Calendar Effects Model page for current holdings. Other choices for risk management and for negative-period investments are 1 See Legal & Disclaimer for qualifiers regarding historical data. 2 CAGR = Compound Annual Growth Rate. 3 Max DD = Maximum Drawdown, or the maximum peak to trough decline using daily data. CAGR and Maximum Drawdown values in the Historical Data table are updated quarterly, and include data from 2001 thru the last-updated quarter. 4 Cash Index for negative-period investments are available in the Portfolio Toolkit. available in the Portfolio Toolkit. Historical Data1 (%) exposure by approximately 75%. Other choices for risk management and When both the Bull-Bear Indicator and the Balance of Strength Signal (BOSS) to provide exposure to stock market sectors while limiting downside risk indicator is positive, the top four highest-ranked sectors are held with monthly reselection. Ranking of the sectors is shown on page 1 Asset Class Ranking Risk management is implemented by utilizing the longer-term Bull-Bear Table. indicator in conjunction with the multi-timeframe BOSS indicator. When both are positive, the Sector Rotation II Model is invested in the four top-ranked sectors. When either of the indicators is negative, the Model is invested using the Calendar Effects strategy, which reduces time-weighted market. This model is rebalanced 1/4ly. Adjustments are made as per recommendations of Sherman Sheets and confirmed by advisors.

Elite Tech Model

The Elite Tech Model is a blend of leading technology stocks and ETFs. This strategy is focused on investing in break out technology companies and ETFs. This strategy seeks to maximize returns and is considered a long-term growth position. This model is rebalanced 1/4ly. Adjustments are made as per recommendations of Sherman Sheets and confirmed by advisors.

Elite Breakaway Stock Model

The Breakaway Stock Model is a higher-activity model which provides Risk in the Breakaway Stock Model is managed in two ways: one, the exposure to the top seven ranked stocks in the S&P 500. selections are reconstituted monthly, and two, deployment requires the agreement of two indicators - the Bull/Bear Indicator and the BOSS Indicator. The "Top Seven" ranking is achieved by comparing longer term performance Both must be positive for the stock selections to be deployed. with shorter term performance. The greater the difference, the higher the ranking. The greater the difference, the more a stock is "breaking away" from When either the Bull-Bear Indicator or the BOSS Indicator is negative, the the anchoring of its longer-term performance. This comparison method is Breakaway Stock Model is 100% invested in the Calendar Effects Model called "MAD", or "Moving Average Distance". holdings (see the Calendar Effects Model page). See the "Portfolio Construction" text for risk-management information. This description is for the "standard" version of the model as shown on this page; see the Portfolio Toolkit

for other risk-management options. This model is rebalanced 1/4ly. Adjustments are made as per recommendations of Sherman Sheets and confirmed by advisors

Elite Fixed Model

This strategy is an income focused strategy for clients with a risk tolerance lower than the Elite Dividend Model. This strategy can be a combination of bonds varying from Government issued to corporate bonds and preferred stock. This strategy may also employ the use of Structured notes During low interest rate environments. This portfolio is not rebalanced as we aim to hold positions till maturity. When positions mature it will be at the advisor committee's discretion as to what to replace matured positions with. These securities are not bank deposits and are not insured by the Federal Deposit Insurance Corporation (FDIC) or any other governmental agency, nor are they obligations of, or guaranteed by a bank.

Structured Notes

Structured Notes may help investors meet their specific financial goals and provide greater diversification to their investment portfolios. Structured Notes encompass a variety of structures and terms. The Notes consist of a debt security linked to the performance of a reference asset (equity, basket of equities, equity index, commodity, commodity index or foreign currency). Among the variety of structures available, most aim to help investors to achieve the following primary objectives: minimize the loss of principal, generate higher yields, or participate in enhanced returns. These securities are not bank deposits and are not insured by the Federal Deposit Insurance Corporation (FDIC) or any other governmental agency, nor are they obligations of, or guaranteed by a bank.

On a monthly basis we offer a variety of Structured Notes. These Notes are selected at the beginning of the month and due to the nature of this product, each Note has limited availability and may close to investors before the specified closing date and no longer be available

Risk of Loss

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and does not vote proxies on behalf of Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We are authorized to instruct the custodian to forward you copies of all proxies and shareholder communications relating to your account assets. Further, the Adviser will not be required to take any action or render any advice with respect to any securities held in the Account, which are named in or subject to class action lawsuits. The Adviser will, however, forward to the Client any information the Firm receives regarding class action legal matters involving any security held in the Account and discuss such information if the Client so desires.

Item 7 – Client Information Provided to Portfolio Managers

The Adviser has access to all Client information obtained by the Adviser with respect to the particular Client accounts that they manage. The Adviser does not provide Client information to any other portfolio managers.

Item 8 – Client Contact with Portfolio Managers

The primary point of contact for Clients with respect to this wrap fee program is Patrick Marcell. Clients are always free to directly contact Patrick Marcell. with any questions or concerns they have about their portfolios or other matters.

Item 9 – Additional Information

Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning Elite Retirement Group or any of our IARs. We adhere to high ethical standards for all IARs and associates. We strive to do what is in your best interests.

Other Financial Industry Activities and Affiliations

Neither Elite Retirement Group nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither Elite Retirement Group nor its management persons are affiliated with any broker-dealer.

Other Financial Industry Affiliations

Patrick Marcell and other IARs may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to clients. When such recommendations or sales are made, a conflict of interest exists as the insurance licensed IARs earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

This activity accounts for 30% of Patrick Marcell's time. Please see the ADV Part 2B of your representative for additional details.

Code of Ethics, Participation or Interest in Client Accounts and Personal Trading General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to

the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Accounts

We may recommend securities to you that we have purchased for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices
- Participating in client accounts

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the Chief Compliance Officer.

Personal Trading

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IAR(s) of Elite Retirement Group, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

Elite Retirement Group, Inc. has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

Conflicts of Interest

Elite Retirement Group, Inc. representatives may employ the same strategy for personal investment account as they do for clients. However, orders will not be placed in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Review of Accounts

Reviews will be conducted at least annually or as agreed to by us. Reviews will be conducted by our Chief Compliance Officer Patrick Marcell. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

Reports

You will be provided with account statements reflecting the transactions occurring in the account on at least a quarterly basis. These statements will be written or electronic depending upon what you selected when you opened the account. You will be provided with paper confirmations for each securities transaction executed in the account. You are obligated to notify us of any discrepancies in the account(s) or any concerns you have about the account(s).

Client Referrals and Other Compensation

We may receive economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients. Elite Retirement Group will be compensated by the third-party manager(s) from the advisory fees collected from the client. This may cause a conflict of interest in recommending certain third-party managers since we may receive compensation for referring clients to these vendors. In order to mitigate this conflict of interest, we require all IARs to inform the client that they are under no obligation to implement any recommendations made by us or the third-party manager.

Financial Information

We do not solicit fees of more than \$500, per client, six months or more in advance. We are required to provide you with certain financial information or disclosures about our financial condition. We have no

financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings.