

Part 2A & 2B of Form ADV: Firm Brochure



ELITE WEALTH MANAGEMENT, INC.

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This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Elite Wealth Management, Inc. ("**Elite**" or the "**Advisor**"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (425) 828-4300 or by email at Fariba.Ronnasi@elitewm.com. You may also visit our website at www.elitewm.com.

The information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority.

Elite is a registered investment advisor. Registration of an investment advisor does not imply that Elite or any of its principals or employees possess a particular level of skill or training in the investment advisory business or any other business. The oral and written communications of an investment advisor provide you with information about which you determine to hire or retain an investment advisor.

Additional information about Elite is also available on the SEC's website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD# **132122**.

Item 2 - Material changes

The following material changes have been made to Elite's Form ADV Part 2A since the last amendment filed in March 2017:

- Elite no longer offers the Core Strategy and Equity Opportunity Strategy as of May 2019. Elite now offers the Core Select Strategy and Core All Cap Strategy.

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Item 4 - Advisory Business

A. Firm Information

Elite Wealth Management, Inc. (“Elite”, the “Firm”, or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is located in the State of Washington, which is organized as a corporation under the laws of Washington in 2004. Elite is owned and operated by Fariba Ronnasi, President, Chief Investment Officer, and Chief Compliance Officer. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services

provided by Elite.

B. Advisory Services Offered

Elite offers investment advisory services to individuals, high net worth individuals and other financial services (each referred to as a “Client”).

Elite integrates the goals and objectives of the Client using assumptions that they provide to us in order to develop our investment strategies for each Client. An investor questionnaire is completed by the Client as part of the discovery process. Recommendations to accomplish the Client’s goals based on the information provided by the Client are then shared with each Client and implemented if approved.

Once an investment account is established, management of the account is done through an interactive process with the Client. Depending upon the needs of the Client, each Client is encouraged to meet with their investment advisor representative at least quarterly, semi-annually, or annually.

Investment Management Services

Elite manages several proprietary investment strategies as listed below. Elite will work with each Client to determine their investment goals and tolerance for risk and develop a portfolio that may include one or more of the Advisor’s strategies. Elite may customize the investment portfolio for the Client depending on the Client’s needs. Elite’s investment strategies are comprised investments in exchange-traded funds (“ETFs”), individual equity securities, alternative investments, and options. Elite may also employ other types of investments, consistent with the mandate for each strategy.

In certain situations, Elite will select individual securities, including ETFs, and form individually managed investment portfolios to match the investment objectives as stated by the Client.

Clients are responsible for all transaction, custody and exchange costs associated with their investments.

Investment Strategies:

- Dynamic ETF Option Strategy
- Tactical Long/Short Strategy
- Core Select Strategy
- Core All Cap Strategy Global Portfolio
- Global Strategy
- Core Strategy
- Equity Opportunity Strategy

As appropriate for the investment objectives of the Client, Elite may recommend to accredited investors shares of, or partnership interests in, funds offered by Lattice Capital Management LLC (“Lattice”) where Lattice is also the General Partner of those funds. Lattice Capital Management LLC is an SEC-registered investment advisory firm that is affiliated with Elite by ownership and operations. Please see Item 10 for more information and also refer to the Lattice Capital Management LLC ADV Part 2A – Disclosure Brochure and other disclosures for the respective Lattice funds for a complete disclosure of strategies, fees, risks and other pertinent information.

White Labeling

Elite may also enter into arrangements with other independent third party investment advisory firms permitting them to “White-Label” (or re-brand) any of Elite’s investment strategies, and Elite will charge fees depending on the type of securities and style of investment management implemented in these managed portfolios (see Item 5: Fees & Compensation section for details).

Financial Planning

Clients are generally provided a written plan that includes a personal balance sheet and certain projections. All reports, financial statement projections and analyses are intended exclusively for your use in developing and implementing your financial plan. In view of this limited purpose, the statements should not be considered complete financial statements. Accordingly, you should understand that such statements cannot be used to obtain credit or for any purpose other than developing your personal financial plan. We will not audit (examine), review or compile such statements and, accordingly we will not express an opinion or other form of assurance on them, including the reasonableness of assumptions and other data on which any prospective financial statements are based. It is likely that there will be differences between projected and actual results because events and circumstances frequently do not occur as expected and such differences may be material.

Our analyses will be highly dependent on certain economic assumptions that you must make about the future. Therefore, another important step in the process is establishing your familiarity with historical data regarding key assumptions such as inflation and investment rates of return, as well as an understanding of how significantly these assumptions affect the results of our analyses. We may counsel you as to the consistency of your assumptions with relevant historical data, but we will not express any assurance as to the accuracy or reasonableness of your specific data and assumptions. You are ultimately responsible for the assumptions and personal data upon which our procedures and projections are based.

From time to time, Elite may sponsor or provide educational seminars. Elite will not charge a fee for attending the seminar. The seminars may also discuss strategies or services that are provided by Elite or its affiliates.

C. Client Account Management

Prior to engaging Elite to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Asset Allocation – Elite will develop or select an existing strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client. Generally, Clients may not impose restrictions on investing in certain securities or types of securities.
- Portfolio Construction – Elite will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client, or utilize one or more of Elite's strategies.
- Investment Management and Supervision – Elite will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

Elite does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Elite.

E. Assets Under Management

Elite's calculation of its assets under management includes the value of private funds that Elite recommends to its Clients, including those funds sponsored by its affiliate, Lattice Capital Management LLC. In its investment advisory agreement with Clients, Elite agrees to provide on-going management services for the private fund investments that Elite recommends to its Clients. Elite has on-going responsibility to select or make private fund recommendations, based upon

the financial circumstances and investment objectives of its Clients, and is responsible for arranging the purchase or sale of these private funds if such recommendations are approved by the Client. Elite continually evaluates the private fund's investments and recommends appropriate allocation changes to Clients based on any changes to a Client's financial circumstances and investment objectives. Accordingly Elite has included the value of private fund investments recommended by Elite in its calculation of its assets under management.

As of February 28, 2019 Elite manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$390,493,156
Non-Discretionary Assets	\$23,762,974
Total	\$404,795,306

Clients may request more current information at any time by contacting the Advisor.

Item 5 - Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of Elite and the Client.

A. Fees for Advisory Services

Elite integrates the goals and objectives of each Client using assumptions that they provide to us in order to develop our investment strategies for each Client. Normally an in-depth risk tolerance questionnaire is completed by the Client as part of the discovery process. Recommendations to accomplish the Client's goals based on the information provided by the Client are then shared with each Client and implemented.

Once an investment account is established, management of the account is done through an interactive process with the Client. Depending upon the needs of the Client, each Client is encouraged to meet with their investment advisor representative at least quarterly, semi-annually, or annually.

We may also offer advice on investments including, but not limited to, equity securities, warrants, corporate debt, commercial paper, certificates of deposit, variable annuities, mutual fund shares, United States government securities, option contracts on securities and interests in partnerships investing in real estate.

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter for Clients whose accounts are held at E*TRADE Clients with accounts at Interactive Brokers are charged management fees on a daily basis. Elite offers services on a fee-only basis. The typical management fee structure is 1.00% of the Client's assets under management for any managed portfolio including the strategies as defined above in Item 4.B: Advisory Services Offered. However, the following investment strategy has a different management fee structure, as follows:

The investment advisory fee in the first quarter of service is prorated from the inception date of the

account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Elite. All securities held in account[s] managed by Elite will be independently valued by the Custodian. Elite will not have the authority or responsibility to value portfolio securities.

White-Labeling Fees

Elite's fee schedule for white labeled services where independent third party investment managers utilize intermediaries responsible for trading and allocations:

- Up to \$100M = 0.30% - 0.35% annually
- Next \$50M = 0.25% - 0.30% annually
- Anything over \$150M = 0.20% - 0.25% annually

Elite's fee schedule for white labeled services where independent third party investment managers utilize Elite's investment platform/infrastructure (through Interactive Brokers or E*TRADE), where Elite is responsible for trading and allocations:

- Up to \$100M = 0.60% annually
- Next \$50M = 0.55% annually
- Anything over \$150M = 0.50% annually

Fees are negotiable at Elite's sole discretion.

In addition to our fees, Clients are responsible for fees and expenses paid to Custodians and broker-dealers. These fees are disclosed in the disclosure document or agreements in account opening documents.

B. Fee Billing

Investment Management Fees

Billing periods may vary depending on the broker-dealer/custodian selected by the Client. All Clients will have their investment advisory fees deducted from the Client's account[s] at the Custodian. **For Clients billed on a quarterly basis**, the Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of each quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Elite at the end of the prior quarter. **For Clients billed on a daily basis**, the amount due is calculated by applying the daily rate (annual rate divided by 365) to the total assets under management with Elite at the end of the day.

Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Elite to be paid directly from their accounts held by the Custodian as part of the agreement and separate account forms provided by the Custodian.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Elite, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The investment advisory

fee charged by Elite is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Elite for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in most of these products directly, without the services of Elite, but would not receive the services provided by Elite which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Elite to fully understand the total fees to be paid.

Lattice Capital Management – Private Funds

As appropriate for the investment objectives of the Client, Elite may recommend to accredited investors who are also Qualified Clients, shares of, or partnership interests in, funds offered by Lattice Capital Management LLC and where Lattice is also the General Partner of those funds. Lattice Capital Management LLC is affiliated with Elite by ownership and operations. These funds typically charge an annual management fee of 1%, a special profit allocation fee of 10%, a performance fee of 7% in addition to other administrative fees. Fees can include accounting, compliance and research fees. A performance fee is paid to the fund's Portfolio Manager, Kevin Lennil. Investors in the Lattice Funds should review the Funds' Private Placement Memorandums and other governing documents for a more complete discussion of the fees and expenses associated with an investment in the Funds.

Please refer to the Lattice Capital Management LLC ADV Part 2A – Disclosure Brochure and the respective funds documentation for a complete disclosure of strategies, fees, risks and other pertinent information.

Recommendations to engage Lattice Capital Management LLC creates a conflict of interest due to the common ownership of Elite and Lattice. This conflict is mitigated where any assets invested through Lattice will not be charged additional management fees by Elite. For assets referred to Lattice, management and performance fees will be collected by Lattice Capital Management LLC. Clients are not obligated to implement recommendations made by Elite to engage Lattice Capital Management LLC.

D. Advance Payment of Fees and Termination

Investment Management and White Labeling Services

Elite is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement with Elite, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, Elite will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's written approval.

E. Compensation for Sales of Securities

Elite does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Item 6 - Performance Fees

Investment advisory fees for services provided by Elite are typically not based on a share of the capital gains or capital appreciation of managed securities. However, Elite may employ certain types of investments that do charge a performance fee.

Lattice does earn performance fees as disclosed in Item 5 of this Disclosure Brochure. Certain Supervised Persons of Elite may also be Supervised Persons of Lattice and receive compensation based on performance fees charged by Lattice. This creates a conflict of interest for Clients of Elite who invest a portion of their assets with Lattice. Clients of Elite are not obligated to accept recommendations regarding the placement of assets with Lattice. For any investments that charge performance fees, refer to their offering or other documentation for an explanation and amounts of the performance fees.

Item 7 - Types of Clients

Elite provides investment advisory services to individuals, high net-worth individuals and other financial services firms or advisors. The relative percentage of each type of Client is available on Elite's Form ADV Part 1. These percentages will change over time. Elite generally does not impose a minimum account size for establishing a relationship, but may impose a minimum account size for participation in certain investment strategies managed by Elite. Each strategy has defined its minimums within its related documentation and are negotiable at the discretion of the Advisor.

Item 8 - Methods of Analysis, Sources of Information, Investment Strategies Risk of Loss

A. Methods of Analysis

Elite primarily employs fundamental, technical, cyclical, charting analysis methods in developing and selecting investment strategies for its Clients. Research and analysis from Elite is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to

strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Elite will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Elite is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

Investment strategies used to implement investment advice include:

- Long-term purchases (securities held at least a year)
- Short-term purchases (securities sold within a year)
- Trading (securities sold within 30 days)
- Short sales
- Margin transactions
- Option writing, including covered options, uncovered options or spreading strategies

B. Risk of Loss

Note: All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk.

Although Elite advises assets in a manner consistent with risk tolerances, there can be no guarantee that our efforts will be successful. The investor should be prepared to bear the risk of loss.

Market Risks

Competition. The securities industry and the varied strategies and techniques to be engaged in by the Adviser are extremely competitive and each involves a degree of risk. The Adviser will compete with firms, including many of the larger securities and investment banking firms, which have substantially greater financial resources and research staffs.

Market Volatility. The profitability of the Adviser substantially depends upon it correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Adviser cannot guarantee that it will be successful in accurately predicting price and

interest rate movements.

Adviser's Investment Activities. The Adviser's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the Adviser. Such factors include a wide range of economic, political, competitive, technological and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability of the Adviser to realize profits.

Material Non-Public Information. By reason of their responsibilities in connection with other activities of the Adviser and/or its affiliates, certain principals or employees of the Adviser and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Accuracy of Public Information. The Adviser selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Adviser by the issuers or through sources other than the issuers. Although the Adviser evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Adviser is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Investments in Undervalued Securities. The Adviser intends to invest in undervalued securities. The identification of investment opportunities in undervalued securities is a difficult task, and there are no assurances that such opportunities will be successfully recognized or acquired. While investments in undervalued securities offer the opportunities for above-average capital appreciation, these investments involve a high degree of financial risk and can result in substantial losses. Returns generated from the Adviser's investments may not adequately compensate for the business and financial risks assumed.

Investment Risks

Portfolios may invest substantially all of their available capital principally in securities, engage in short sales of securities and trade in options (including covered and uncovered puts and calls and over-the-counter options) and other derivative instruments, private securities and money market instruments. Markets for such instruments fluctuate and the market value of any particular investment may vary substantially. In addition, such securities may be issued by unseasoned companies and may be highly speculative. The Fund's portfolio may not generate any income or appreciate in value.

Portfolio Turnover. The investment strategy of the Portfolios may require active trading of the portfolio, and as a result, turnover and brokerage commission expenses may significantly exceed those of other investment entities of comparable size.

Small Cap Companies. The portfolios may invest a portion of its assets in the stocks of companies with small market capitalizations. While Elite believes these investments often provide significant potential for appreciation, those stocks involve higher risks in some respects than do investments in stocks of larger companies. For example, prices of such stocks are often more volatile than prices of large-capitalization stocks. In addition, due to thin trading in some such stocks, an investment in these stocks may be more illiquid than that of larger capitalization stocks.

Lack of Diversification. The portfolios may not be widely diversified among sectors, industries, geographic areas or types of securities. Further, the portfolios may not necessarily be diversified among a wide range of issuers. Accordingly, the portfolios may be subject to more rapid change in value than would be the case if the Investment Vehicles were required to maintain a wide diversification among companies or industry groups.

Short-Sales. Elite may sell securities short. Short sales can, in certain circumstances, substantially increase the impact of adverse price movements on the portfolios. A short sale involves the risk of a theoretically unlimited increase in the market price of the particular investment sold short, which could result in an inability to cover the short position and a theoretically unlimited loss. There can be no assurance that securities necessary to cover a short position will be available for purchase.

Options and Other Derivative Instruments. Elite may invest, from time to time, in options and other derivative instruments, including, but not limited to, the buying and selling of puts and calls on some of the securities held by Elite. The prices of many derivative instruments, including many options and swaps, are highly volatile. The values of options and swap agreements depend primarily upon the price of the securities, indexes, commodities, currencies or other instruments underlying them. Price movements of options contracts and payments pursuant to swap agreements are also influenced by, among other things, interest rates, changing supply and demand relationships, and trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Options on highly volatile securities, currencies or other assets may be more expensive than options on other investments.

ETF Risk. The risk that the value of an ETF in which a Strategy invests will be more volatile than the underlying portfolio of securities the ETF is designed to track, or that the costs to the fund of owning shares of the ETF will exceed those the fund would incur by investing in such securities directly.

Leveraged and Inverse ETF Risk. For some of its Strategies, Elite may invest in “leveraged” or “inverse” ETFs. Leveraged ETFs use borrowed capital to increase their buying power and magnify their investment returns. Although the use of leverage may increase returns in times when investment performance is positive, leverage can also magnify losses in times when investment performance is negative. Inverse ETFs use a variety of investment techniques (such as short sales, buying put options) to gain short exposure to the securities markets by moving in the opposite direction to the index or other benchmark the inverse ETF is based on. Inverse ETFs may also be leveraged. The use of these leveraged and inverse ETFs in some of Elite’s Strategies may increase the volatility of these Strategies and the risk that a client may suffer a significant loss. There is also a risk that inverse and leveraged ETFs may not achieve their stated objectives on any given trading day.

Sector Concentration Risk. The risk that events negatively affecting an industry or market sector in which the Strategy invests will cause the overall value of the Strategy to decline. To the extent that some of the Strategies invest significant portions of their portfolio in ETFs representing particular markets or sectors (such as Energy, Healthcare, Real Estate, etc.) or in an ETF representing U.S. Treasuries, the Strategy is more vulnerable to conditions that negatively affect such sectors as compared to an investment strategy that is not significantly invested in such sectors.

Hedging Transactions. Investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, other derivatives, and other investment techniques are commonly utilized by investment funds to hedge against fluctuations in the relative values of its portfolio positions as a result of changes in currency exchange rates, interest rates and/or the equity markets or sectors thereof. Any hedging against a decline in the value of portfolio positions does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but

establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. The Adviser is not obligated to establish hedges for portfolio positions and may not do so.

Leverage. The Portfolio will use leverage by engaging in short sales, entering into swaps and other derivatives contracts and other leveraging strategies. Such leverage increases the risk of loss and volatility. In addition, the use of leverage requires the pledging of assets as collateral. Margin calls or changes in margin requirements can cause the Portfolio to be required to pledge additional collateral or liquidate the Portfolio holdings, which could require the portfolio to close positions at substantial losses that would not otherwise be realized.

Market or Interest Rate Risk. The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the Adviser holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Adviser's performance; however, if the Adviser has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the Adviser.

Fixed Income Call Option Risk. Many bonds, including agency, corporate and municipal bonds, and all mortgage-backed securities, contain a provision that allows the issuer to "call" all or part of the issue before the bond's maturity date. The issuer usually retains this right to refinance the bond in the future if market interest rates decline below the coupon rate. There are three disadvantages to the call provision. First, the cash flow pattern of a callable bond is not known with certainty. Second, because the issuer will call the bonds when interest rates have dropped, the Adviser is exposed to reinvestment rate risk – the Adviser will have to reinvest the proceeds received when the bond is called at lower interest rates. Finally, the capital appreciation potential of a bond will be reduced because the price of a callable bond may not rise much above the price at which the issuer may call the bond.

Inflation Risk. Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Adviser purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the Adviser is exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security.

Investments in Non-U.S. Investments. From time to time, the Adviser may invest and trade a portion of its assets in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- Enforcing legal rights in some foreign countries is difficult, costly and slow, and there are sometimes special problems enforcing claims against foreign governments.
- Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Adviser may directly hold foreign currencies and purchase and sell

foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the Adviser's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the Adviser's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the Adviser's foreign currency holdings. If the Adviser enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the Adviser enters forward contracts for the purpose of increasing return, it may sustain losses.

- Non-U.S. securities, commodities and other markets may be less liquid, more volatile and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

Lack of Liquidity. The Portfolio may invest in thinly traded and relatively illiquid securities or those securities may not be traded at the time the Portfolio invest or may cease to be traded after the Portfolio invests. The Portfolio also may acquire significant positions in some securities. In such cases and in the event of extreme market activity, the Portfolio may not be able to liquidate its investments promptly if necessary. In addition, the Portfolios sales of thinly traded securities could depress the market value of those securities and thereby reduce the Portfolios profitability or increase its losses. Such circumstances or events could affect the Portfolios gain or loss materially and adversely.

Alternative Investments (Limited Partnerships). The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Risk of Default or Bankruptcy of Third Parties. The Adviser may engage in transactions in securities, commodities, other financial instruments and other assets that involve counterparties. Under certain conditions, the Adviser could suffer losses if a counterparty to a transaction were to default or if the market for certain securities, commodities, other financial instruments and/or other assets were to become illiquid.

Regulatory Risks

Strategy Restrictions. Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Adviser may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel and accountants to determine what restrictions may apply and whether an investment in the Adviser is appropriate.

Trading Limitations. For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the Adviser to loss. Also, such a suspension could render it impossible for the Adviser to liquidate positions and thereby expose the Adviser to potential losses.

Conflicts of Interest: In the administration of Client accounts, portfolios and financial reporting, the Adviser

faces inherent conflicts of interest which are described in this brochure. Generally, the Adviser mitigates these conflicts through its Code of Ethics which provides that the Client's interest is always held above that of the Firm and its associated persons.

Supervision of Trading Operations. The Adviser, with assistance from its brokerage and clearing firms, intends to supervise and monitor trading activity in the portfolio accounts to ensure compliance with firm and Client objectives. Despite the Adviser's efforts, however, there is a risk that unauthorized or otherwise inappropriate trading activity may occur in portfolio accounts.

Depending on the nature of the investment management service selected by a Client and the securities used to implement the investment strategy, Clients will be exposed to risks that are specific to the securities in their particular investment portfolio.

Reliance on Management and Key Personnel. Investors have no right or power to take part in the management of Elite. Accordingly, no investor should invest with Elite unless such investor is willing to entrust all aspects of management to Elite. The investment performance of Elites portfolios depends largely on the skill of key personnel of Elite, including, in particular, its sub advisors. If key personnel were to leave Elite, it might not be able to find equally desirable replacements and the performance of the Elite portfolios could, as a result, be adversely affected.

Security Specific Risks

Liquidity. Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation. The Portfolios may invest in thinly traded and relatively illiquid securities or those securities may not be traded at the time the Portfolios invest or may cease to be traded after the Portfolios invest. The Portfolios also may acquire significant positions in some securities. In such cases and in the event of extreme market activity, the Portfolios may not be able to liquidate its investments promptly if necessary. In addition, the Portfolios sales of thinly traded securities could depress the market value of those securities and thereby reduce the Portfolios profitability or increase its losses. Such circumstances or events could affect the Portfolios gain or loss materially and adversely.

Currency. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Lack of Registration Interests in private funds (including the Lattice Funds) have neither been registered under the Securities Act nor under the securities or "blue sky" laws of any state and, therefore, are subject to transfer restrictions.

Withdrawal of Capital. The ability to withdraw funds from private funds (including the Lattice Funds) is usually restricted in accordance with the withdrawal provisions contained in the relevant fund's offering memorandum, limited partnership agreements and other governing documents. In addition, substantial withdrawals by investors within a short period of time could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, possibly reducing the value of the fund's assets and/or disrupting the fund's investment strategy.

Item 9 - Disciplinary Information

There are no legal, regulatory or disciplinary events involving Elite or any of its employees. Elite and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD# 132122. You may also research the background of Fariba Ronnasi by searching for her individual CRD # 4135998.

Item 10 - Other Financial Industry Activities and Affiliations

Elite is not registered and does not have an application pending as a securities broker-dealer, futures commission merchant, or commodity pool operator.

Lattice Capital Management, LLC

Fariba Ronnasi, President and Chief Compliance Officer (“CCO”) of Elite, is also Director of Investor Relations and CCO of Lattice Capital Management, LLC (“Lattice”) an affiliated, SEC-registered investment advisor. Lattice and Elite share office space and certain employees subject to Elite’s compliance program (“Supervised Persons”), which may at times create conflicts of interest and limit investment activities. Mr. Ali R.M. Dadgar, who is the spouse of Ms. Ronnasi, is the Managing Member at Lattice Capital Management LLC. Clients of Elite may receive recommendations to allocate a portion of their assets to the funds managed by Lattice. This may cause a conflict of interest in recommending Lattice as the Lattice Funds charge their own management and performance-based fees. Clients of Elite are under no obligation to implement the recommendations made by Elite and Elite does not charge management fees on any investment in a Lattice Fund.

These and other persons associated with the General Partner of the Lattice Funds (the “General Partner”) and Elite have fiduciary duties both to the Funds managed by Lattice (the “Partnership”) and to the Clients of Elite. Their multiple roles may create conflicts of interest in selecting, negotiating and managing investments for the Lattice Funds and Elite’s Clients. These persons may give different or conflicting advice to the Lattice Funds and the Clients of Elite, depending on each Client’s investment considerations. They may be subject to compliance policies and trading restrictions imposed by Elite that may have the effect of restricting their investment activities and the investment activities of the Lattice Funds. The General Partner or Elite may not be able to buy or sell certain securities at certain times, or take other action that might benefit the Lattice Funds, because of confidential information they acquire or other trading limitations or compliance obligations they incur in connection with their other activities and those of their Affiliates. The General Partner and Elite may have conflicts of interest over the amount of time they devote to the Lattice Funds and the amount of time they and their Affiliates and principals devote to Elite’s clients. This conflict may be mitigated as the Supervised Persons of Lattice and Elite share the same office location. The General Partner, by means of a third party administrator, determines the value of the Lattice Funds’ securities and may have an incentive to overvalue those securities to receive greater management fees and special profit allocations than it otherwise would be entitled. To address this conflict of interest, the Lattice hires an outside accounting firm to perform an audit of the financial records of the Lattice Funds’ securities. The audited financial statements of that audit are then distributed to both General and limited partners of the Lattice Funds.

Item 11 - Code of Ethics, Participation/Interest in Client Transactions,

Personal Trading

A. Code of Ethics

Elite has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Elite's compliance program (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Elite and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Elite's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (425) 828-4300 or by email at Fariba.Ronnasi@elitewm.com.

B. Personal Trading with Material Interest

Elite does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Elite allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Elite may have a conflict of interest if trading in the same securities as Clients. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Elite requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Elite allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. Additionally, all Supervised Persons must pre-clear their personal trades with the CCO. At no time will Elite, or any Supervised Person of Elite, transact in any security to the detriment of any Client.

Item 12 - Brokerage Practices

A. Recommendation of Custodian[s]

Elite does not have discretionary authority to select the broker-dealer/custodian (the “Custodian”) for custody and execution services. The Client will engage the Custodian to safeguard Client assets and authorize Elite to direct trades to the Custodian as agreed in the investment advisory agreement. There are no restrictions placed upon Elite that limit which security may be purchased or sold on behalf of the Client or the amount of any security purchased, sold or held in a Client’s account unless specifically identified in writing in the Client’s statement of investment policy or Client service agreement.

Neither Elite nor any of its representatives will have the authority to withdraw funds or to take custody of Client funds or securities, except for the authorized deduction of Elite’s investment advisory fees.

Elite may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, access to Client records, trading support technology, and/or the reputation of the Custodian. Elite does not receive research services, other products, or compensation as a result of recommending a particular broker-dealer/custodian that may result in the Client paying higher commissions than those obtainable through other providers.

Elite will generally recommend that Clients establish their account[s] at Interactive Brokers LLC (“Interactive Brokers”) or E*Trade (“Etrade”) unaffiliated SEC-registered broker-dealers, custodians and FINRA members (collectively the “Institutional Platforms”). Interactive Brokers and Etrade will serve as the “qualified custodian” for Clients. Through its relationships with the Institutional Platforms, Elite receives certain economic benefits (Please see Item 14 below).

1. *Soft Dollars* - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Elite does not participate in soft dollar programs sponsored or offered by any broker-dealer. While Elite does not have any soft dollar arrangements, the Advisor does receive certain economic benefits in connecting with its relationships with the Institutional Platforms. Please see Item 14.**

2. *Brokerage Referrals* - Elite does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. *Directed Brokerage* - All Clients are serviced on a “directed brokerage basis”, where Elite will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). By trading through Clients’ custodians, Elite will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian. Clients may be subject to higher costs due to directed brokerage.

B. Aggregating and Allocating Trades

Elite may purchase and/or sell the same security for accounts placed in Elite’s various strategies. When possible, Elite may also aggregate the same transaction in the same securities for many Clients for whom Elite has discretion to direct brokerage. Clients with trades not participating in an aggregate transaction may incur higher costs for trades executed and Elite will endeavor to use block trading when appropriate. Clients in aggregated transactions each receive the same price per unit, although they may pay differing

brokerage commissions depending upon the nature of their directed brokerage arrangement, if any. Elite may aggregate the same transactions in a similar security in separate blocks for each strategy. Elite will execute the trade blocks in a way that does not consistently advantage or disadvantage any particular Client account(s).

If more than one price is paid for securities in an aggregated transaction, each Client in the aggregated transaction will receive the average price paid for the block of securities in the same aggregated transaction for the day. If Elite is unable to fill an aggregated transaction completely, but receives a partial fill of the aggregated transaction, Elite will allocate the filled portion of the transaction to Clients based on the initial pre-allocation or other written statement. This will be done in a way that does not consistently advantage or disadvantage any particular Client account(s).

Item 13 - Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are reviewed on a regular basis. Formal reviews of Client accounts are performed at least annually to compare the Client's account performance to their stated goals.

B. Causes for Reviews

Elite will attempt to contact the Client at least quarterly, and will make written inquiry regarding changes in the Client's financial situation and needs or investment objectives. In addition, Elite will attempt to meet with the Client at least annually to review any changes in the Client's financial situation, needs or investment objectives, as well as the performance of the programs managed by the third party investment adviser(s).

C. Review Reports

The Client will receive statements regarding their account, its holdings, transactions and fees at least quarterly. Account custodians or money managers may prepare and distribute the statements from the custodian of the particular Client account.

Elite does not manage, oversee or report upon a Client's investment in Direct Participation Programs or any investment not specifically listed on the monthly statement from the account custodian unless specifically agreed to in writing by the Client and Elite.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Elite

Participation in Institutional Advisor Platform

Elite has established relationships with the Institutional Platforms to assist the Advisor in managing Client

account[s]. Access to the Institutional Platforms are provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at the Institutional Platforms. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from the Institutional Platforms: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Covestor

Elite also receives compensation from Covestor Limited ("Covestor"), a registered investment advisor located in Boston, Massachusetts. Elite provides information to Covestor regarding a specific managed account, which Covestor then makes available to Covestor's clients for investment purposes. Covestor collects advisory fees from its clients and shares a portion of those fees with Elite pursuant to their agreement. Elite does not provide advice to Covestor or Covestor's clients. Clients of Elite are not obligated to create an account with Covestor.

B. Client Referrals from Solicitors

Elite may, from time to time, enter into written agreements with certain individuals and entities who will act as solicitors of accounts for Elite. Each solicitor must enter into a written agreement with Elite and will receive a portion of the total fee paid to Elite for managing the account. The Client is not charged any additional amount in advisory fees as a result of these arrangements. An additional disclosure statement, listing compensation to be paid to solicitors, is provided to the Client prior to or at the signing of Elite's investment advisory agreement. Kevin Lennil, an employee of Elite, is also a solicitor for Elite Wealth Management.

Item 15 - Custody

Elite does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a qualified custodian. Clients are required to engage the Custodian to retain their funds and securities and direct Elite to utilize the Custodian for the Client's security transactions. Elite encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

Item 16 - Investment Discretion

Elite generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Elite. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Elite will be in accordance with each Client's investment objectives and goals.

Item 17 - Voting Client Securities

Elite does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to the background and intent of proxies received, however, the Client retains the sole responsibility for proxy decisions and voting

Item 18 - Financial Information

Neither Elite, nor its management, have any adverse financial situations that would reasonably impair the ability of Elite to meet all obligations to its Clients. Neither Elite, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Elite is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

FORM ADV PART2B

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This ADV 2B ("Brochure Supplement") provides information about *Fariba Ronnasi* that supplements the *Elite Wealth Management* Disclosure Brochure. You should have received a copy of that brochure. Please contact *Fariba Ronnasi, Chief Compliance Officer* if you did not receive the *Elite Wealth Management* brochure or if you have any questions about the contents of this supplement. Additional information about *Fariba Ronnasi* is available on the SEC's website at www.adviserinfo.sec.gov.

Effective Date: February 2019

Fariba Ronnasi

Date of Birth: 4/23/1968

Educational Background:

- *Bachelor of Arts in Finance, Seattle University*
- *Masters of Finance, Seattle University*

Business Experience:

- *President, Elite Wealth Management, LLC (2004 - present)*
- *Chief Investment Officer, Lattice Capital Management (2006 - present);*
- *Vice President & Managing Director, Columbia Financial Center (2001-2004)*

Disciplinary Information:

Ms. Ronnasi has no legal or disciplinary events to disclose.

Other Business Activities:

Lattice Capital Management

Fariba Ronnasi, is also the Chief Investment Officer of Lattice Capital Management, LLC ("Lattice") an affiliated SEC- registered investment advisor. Lattice and Elite share office space and certain employees subject to Elite's compliance program ("Supervised Persons"), which may at times create conflicts of interest and limit investment activities.

Additional Compensation:

As Chief Investment Officer of Lattice, Mrs. Ronnasi apportions her time between the related firms as necessary, and being related firms provides for economies of scale and efficient resource management, Ms. Ronnasi's business activities at Lattice Capital Management represent a substantial amount (greater than 10%) of her time and compensation.

Supervision:

As Elite's founder, President and CCO, Ms. Ronnasi maintains the ultimate responsibility for the company's operations and supervisory structure. The firm maintains appropriate policies, procedures and operational controls.

Fariba Ronnasi's contact information:

PHONE: (425) 828-4300

EMAIL: fariba.ronnasi@elitewm.com

FORM ADV PART 2B

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This ADV 2B ("Brochure Supplement") provides information about Kevin Lennil that supplements the *Elite Wealth Management* Disclosure Brochure. You should have received a copy of that brochure. Please contact *Fariba Ronnasi, Chief Compliance Officer* if you did not receive the *Elite Wealth Management* brochure or if you have any questions about the contents of this supplement. Additional information about *Kevin Lennil* is available on the SEC's website at www.adviserinfo.sec.gov.

Effective Date: February 2019

Kevin Lennil

Date of Birth: 11/12/1985

Educational Background:

- *University of Washington, (2004 - 2008)*

Business Experience:

- *Portfolio Manager, Elite Wealth Management, LLC (2014 -present)*
- *Portfolio Manager, Lattice Capital Management (2013 – present)*
- *Managing Partner, Exagroup LLC (2009 – 2013)*
- *Owner, Lennil Enterprise (2007-2008)*

Disciplinary Information:

Mr. Lennil has no legal or disciplinary events to disclose.

Other Business Activities:

Mr. Lennil is also Portfolio Manager of Lattice Capital Management, LLC (“Lattice”) an affiliated SEC registered investment advisor. Lattice and Elite share office space and certain employees subject to Elite’s compliance program (“Supervised Persons”) which may at times create conflicts of interest and limit investment activities.

Additional Compensation:

As Portfolio Manager of Lattice, Mr. Lennil apportions his time between the related firms as necessary, and being related firms provides for economies of scale and efficient resource management, Mr. Lennil’s business activities represent a substantial amount (greater than 10%) of his time and compensation. Mr. Lennil receives compensation as a solicitor for Elite.

Supervision:

Mr. Lennil is supervised by Fariba Ronnasi, CCO of Elite. Ms. Ronnasi maintains the ultimate responsibility for the company’s operations and supervisory structure. Elite maintains appropriate policies, procedures and operational controls.

Kevin Lennil’s contact information:

PHONE: (425) 828-4300

EMAIL: Kevin.lennil@elitewm.com

Privacy Policy

November 14, 2016

Our Commitment to You

Elite Wealth Management, Inc. (“Elite” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Elite (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Elite does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards

as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Elite does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Elite or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Elite does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (425) 828-4300.