

Item 1: Cover Page

Form ADV Brochure

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This brochure provides information about the qualifications and business practices of Elder Tree Wealth Management, Inc. If you have any questions about the contents of this brochure, please contact us at +1 (844) 333-3101 and/or concierge@aeldra.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.

Additional information about Elder Tree Wealth Management, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. Elder Tree's CRD number is 313471.

Registration with the SEC does not imply a certain level of skill or training.

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Item 4: Advisory Business

Elder Tree Wealth Management, Inc. ("Elder Tree," "we," "our," or "us") provides an online-only advisory platform so investors can buy and sell individual stocks and ETFs. We opened our doors in 2021. Our principal owner is Sukeert Shanker, who is also our Chief Compliance Officer. We do not monitor your account or individual investments, except as noted below under Item 13.

We do not currently charge an advisory fee on cash held in your accounts. We do not make available or offer any advice with respect to proprietary products. We do not presently tailor our advice to your individual needs. We do not participate in wrap-fee programs.

As of 09/06/2021, we have no assets under management (AUM).

We do not provide comprehensive financial planning services and the investment advisory services provided through Elder Tree are not a complete investment program. We are not aware of your aggregate investable and invested assets. We encourage you to consider additional asset classes, strategies and investments to supplement your overall investment plan if appropriate for your investment goals. You may find it beneficial to incorporate other platforms or investments into your investment program.

Item 5: Fees and Compensation

We are compensated by our clients for providing access to the US securities market, an amount based on assets under management. Clients will pay an annual Access Fee of 0.50% of their invested assets, assessed monthly. We calculate this by multiplying the daily value of the assets in the client's account(s), excluding cash, for each calendar day in the month by the applicable daily fee rate (i.e., the annual rate of 0.50% divided by the number of days in that year) and then adding together the fee for each calendar day in the month. This Access Fee is not negotiable, although it may vary over time. Such Access Fees are deducted from client assets on a monthly basis.

When investing in Exchange-Traded Funds (also known as ETFs), clients also pay the operating expense ratios of these ETFs held in their portfolios, but this expense is not deducted by Elder Tree. For more details on ETF fees, clients should refer to disclosures provided by the manager of the ETF. Clients do not pay trading charges or commissions, but as with all trading, they will pay the bid/ask spread prevailing in the market on trades.

Because we are compensated based on the amount of assets in your account, we are incentivized to increase your assets. You should be aware that the more assets you hold in your account, the higher your Access Fee will be. You pay this Access Fee even if you do not buy or sell any securities and whether you make or lose money on your investments. If you hold no

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assets in your account, you pay no Access Fee. Fees and costs will reduce any amount of money you make on your investments over time.

To determine whether an investment advisory account is appropriate for you, you should carefully analyze the projected costs of the investment advisory account, such as expected size, volume and frequency of transactions, the volume and frequency of transactions, projected holding period, the securities available and the advisory services provided. Although we believe our fees are competitive, lower fees for comparable services may be available from other investment advisers or broker dealers.

As an internet-only adviser, we do not currently employ or compensate any financial professionals. We receive no compensation from third parties for recommending or selling certain investments, nor do we receive compensation from investments that are issued, sponsored or managed by Elder Tree Wealth Management, Inc.

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

We do not earn performance-based fees on our client accounts.

Item 7: Types of Clients

We provide services to individual investors. We do not have any account minimums for retail investors.

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

We offer only self-directed, nondiscretionary trading to individuals, so we do not provide particular investment strategies or methods of analysis.

It is important that you remember that any investing carries risks. On average, the more profitable an investment is likely to be, the higher risk of loss; otherwise, everyone would invest in it and the expected return would decrease. You as the investor should be prepared to bear losses in the short, medium, or long term. Investing in a portfolio that corresponds to your risk tolerance may lead to better performance in the long run—if your portfolio is riskier than your personal risk tolerance can handle, you may overreact to losses and have poor performance in the long run.

You may choose to invest in individual securities or in ETFs. Security prices can be volatile and investing in securities involves risk of loss. The value of stocks fluctuates in response to issuing company, market, political and economic developments. Prices may fluctuate, possibly significantly, in a short period of time. New issues may experience increased volatility due to

supplier, key employee, financing or other factors. Your account will be subject to general movements in the stock market and the value fluctuations of each particular security.

ETFs are subject to market risk, including the possible loss of principal. The value of an ETF portfolio will fluctuate with the value of the underlying securities. ETFs trade like a stock and may trade for less than their net asset value if there is low market demand for the ETF. Investors should consider an ETF's investment objective, risks, charges, and expenses carefully before investing. This information can be found in the ETF's prospectus, which should be read carefully before investing.

Diversification does not ensure a profit and may not protect against loss in declining markets. Investors should refer to the individual ETF prospectus for a more detailed discussion of the specific risks and considerations for an individual ETF.

ETFs may have underlying investment strategy risks similar to investing in commodities, bonds, real estate, international markets or currencies, emerging growth companies, or specific sectors. As a result, each ETF will have specific risks depending on its investments:

- When investing in bonds, it is important to note that as interest rates rise, bond prices will fall.
- Due to their narrow focus, sector-based investments typically exhibit greater volatility than the broad market.
- There are special considerations associated with international investing, including the risk of currency fluctuations and political and economic events. Investing in emerging markets may involve greater risk and volatility than investing in more developed countries.
- When investing in real estate companies, property values can fall due to environmental, economic, or other reasons, and changes in interest rates can negatively impact the performance.
- The risk of loss in trading commodities and futures can be substantial. The high degree of leverage that is often obtainable in commodity trading can work against you as well as for you. You should therefore carefully consider whether such trading in ETFs is suitable for you in light of your financial condition.

Item 9: Disciplinary Information

We are required to disclose any material disciplinary history for the company or for any management personnel, such as violations of financial laws, felonies, or consent orders from regulators. At present, there is no such history to disclose.

Visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research Elder Tree's disciplinary record. Elder Tree's CRD number is 313471.

Item 10: Other Financial Industry Activities and Affiliations

Neither we nor any of our management persons are, or plan to be, registered as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading advisor. Nor are we or any of our management persons an associated person with any of these entities, nor do we have material relationships with such entities, or other individuals such as financial planners, lawyers, real estate brokers, or similar that would create a conflict of interest.

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

Pursuant to SEC Rule 204A-1, we have adopted a Code of Ethics that includes but is not limited to Prohibited Activities, Conflicts of Interest, Confidentiality, Compliance with laws and Regulations, Reporting Violations, Training and Education, and Recordkeeping.

The full Code of Ethics will be provided to any client or prospective client upon request.

As we do not make investment recommendations to clients, we experience no conflicts of interest between our recommendations and our own personal trading.

Item 12: Brokerage Practices

Our broker-dealer is DriveWealth, LLC, an SEC registered broker-dealer and FINRA member ("Broker" or "Custodian"). In order to transact through the Elder Tree platform, you must open a brokerage account with the Broker who maintains custody of your assets. The Broker also provides execution, clearing, and settlement services for your account. All account opening functionalities, including identity verification and approval, are handled digitally by Broker. Only individuals will be permitted to establish accounts with the Broker, which shall be in the individuals' own name. Clients will be required to complete all applicable Broker forms and agreements, including a limited power of attorney, if required, which authorizes the Broker to deduct our fees from your accounts pursuant to your agreements with us. The Broker reserves the right to reject any account application for any reason whatsoever.

In seeking best execution, the determinative factor is not just cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Broker's services. The appointment of a registered broker-dealer as the sole Broker for your accounts may result in less favorable executions than may be available through the use of a different broker-dealer.

We do not receive soft-dollar compensation from the Broker.

The Broker aggregates orders involving multiple client accounts trading in the same securities. Each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order.

Item 13: Review of Accounts

As we do not employ financial professionals, such professionals do not periodically review your accounts. We do provide periodic statements that review the performance of your accounts.

We also conduct various checks of client accounts for anti-fraud or cybersecurity and to comply with applicable laws and regulations, for example checking for inactive accounts or unusual withdrawals.

We provide monthly account statements to you that indicate your account holdings, transactions, and investment performance. These statements are provided electronically as PDFs and can also be viewed while you are logged into your account.

Item 14: Client Referrals and Other Compensation

We receive no compensation from an outside party for providing advisory services to our clients. Our sole source of income is Access Fees from our clients.

We do not compensate other people for client referrals. If we start doing so, for example through a customer-referral bonus program for existing clients, we will disclose that fact accordingly.

Item 15: Custody

We do not have custody of client accounts; your accounts are held by our broker-dealer DriveWealth. If you receive account statements from DriveWealth, we urge you to compare those statements with statements from us to check for discrepancies.

Item 16: Investment Discretion

Self-directed brokerage accounts are non-discretionary, meaning that only you decide how to trade. We do not presently offer discretionary accounts.

Item 17: Voting Client Securities

We do not have authority to vote securities owned by our clients.

Item 18: Financial Information

As we do not require prepayment of fees, we are not obligated to disclose our financial statements. We have no financial conditions that are reasonably likely to prevent us from meeting our obligations to our clients.