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**Part 2A of Form ADV:
Firm Brochure**

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Chief Compliance Officer**

This brochure provides information about the qualifications and business practices of Elite TAMP LLC., Elite Portfolios. If you have any questions about the contents of this brochure, please contact us by telephone at (402) 670-7704 or email at jsmith@lawvisory.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 Elite Portfolios is available on the SEC's website at www.adviserinfo.sec.gov.

Please note that the use of the term "registered investment adviser" and description of Elite Portfolios' and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2. Material Changes

- Amendment

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Item 4. Advisory Business

Elite TAMP, LLC ("Elite") is a new investment management firm, registered as an investment adviser with the SEC. Elite offers investment models and portfolio services directly to other independent investment advisory firms (the "Advisers"), which ultimately benefits the Advisers' clients.

Jeffrey Smith serves as Elite's Chief Compliance Officer.

The decision as to what investment strategy(ies) client assets are invested in is based on suitability information gathered and reviewed by the independent RIA, who is a client of our Firm. In these situations, the RIA's client remains a client only of that RIA.

ELITE will create different strategies or model portfolios available to these RIAs and will not offer direct investment advice to the independent RIA's clients.

We also maintain strategy models for Turnkey Asset Management Platforms ("TAMPs") with a comprehensive and ready-to-use solution for RIAs to manage their clients' investment portfolios in the event the RIAs elect this option for their own clients.

Item 5. Fees and Compensation

ELITE as a firm will not serve retail or private clients and so the fees charged would be for services provided to RIAs.

With respect to any portfolio services we offer, we do not charge any overlay fee (except when it involves private alternatives, as discussed further below). Instead, compensation will come in the form of a revenue share arrangement with (a) third-party managers and (b) funds or exchange-traded funds (ETFs).

For fees charged by independent third-party money managers, this will be detailed and disclosed in the appropriate agreement such as a TAMP agreement. Fees charged by funds or ETFs will be detailed and disclosed through their prospectus.

As mentioned above, we do not generally charge any overlay fee when we provide portfolio management services except when it involves private alternatives and investments managed by independent RIAs, for which ELITE may act as a subadvisor. In these cases, we may share in the fees charged by that RIA to their clients as compensation for our sub-advisory services. Additionally, we may charge a portfolio construction fee that will be

determined on a case-by-case basis and detailed within a separate agreement with the RIA client.

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

We do not charge performance fees, though we may receive a percentage of performance fees earned by our clients, which are independent RIAs.

Item 7. Types of Clients and Account Requirements

We only provide services to other registered investment advisers and investment advisory firms.

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

Our strategies may consist of a unique blend of managers and related strategies designed to meet the different needs or requests of our clients, who are independent registered investment advisers. These strategies may include alternative strategies, credit strategies, income-focused strategies, or others requested or preferred by our clients. Our strategies and analyses may also include proprietary strategies or models designed specifically for the needs of our clients.

As with any investment, there is always a risk of loss and in some strategies there is a risk of a total loss of an investment. Although our strategies seek to minimize risk exposure, there are certain risks that cannot be avoided.

Item 9. Disciplinary Information

ELITE has no legal or disciplinary action that must be disclosed in response to this Item.

Item 10. Other Financial Industry Activities and Affiliations

Affiliates

ELITE, ThePartners Wealth Management, LLC and Adaptive Investments, LLC have common control persons and ownership structure.

ThePartners Wealth Management, LLC (ThePARTNERS), is an affiliate registered investment advisor that provides investment advisory solutions for its clients either on a tailored, customized basis, via the use of Models, or via engagement of outside investment management firms. IARs may have an ownership interest in both ThePARTNERS and ELITE, and to the extent that they do have ownership have an economic incentive to recommend the use of ThePARTNERS to open an account and ELITE to provide Models. Clients should also be aware that certain conflicts of interest may exist should any IARs of ELITE or ThePARTNERS (regardless of ownership) recommend that all or a portion of a Client's account be allocated to Models provided by ELITE. A conflict of interest exists as those allocations will result in revenue being generated indirectly to individuals and entities that also have an interest in ThePARTNERS. No Client or IAR is under any obligation to utilize the services of ThePARTNERS.

Adaptive Investments, LLC (Adaptive), is an affiliated registered investment advisor. Adaptive manages mutual funds and ETFs, and provides Models and other services that may be used by IARs to develop portfolios. Clients should also be aware that certain conflicts of interest may exist should any IARs of ELITE or Adaptive (regardless of ownership) recommend that all or a portion of a Client's account be allocated to Models provided by ELITE. A conflict of interest exists as those allocations will result in revenue being generated indirectly to individuals and entities that also have an interest in Adaptive. No Client or IAR is under any obligation to utilize the services of Adaptive [or invest in any Adaptive-managed ETF].

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

ELITE or its related persons do not buy or sell securities for any client account. Moreover, ELITE's portfolio services do not involve direct investment advice or recommendations to private client accounts since our only clients are other registered investment advisers.

ELITE and persons associated with the Firm can invest for their own accounts, or to have a financial investment in the same securities or other investments that we recommend or acquire for our independent adviser Clients and may engage in transactions that are the same as or different than transactions recommended to or made for the investment advisers. This creates a conflict of interest. We recognize the fiduciary responsibility to act in all our Client's best interest and have established policies to mitigate conflicts of interest.

We have developed and implemented a Code of Ethics that sets forth standards of conduct expected of our advisory personnel to mitigate this conflict of interest. The Code of Ethics

addresses, among other things, personal trading, gifts, and the prohibitions against the use of inside information.

The Code of Ethics is designed to protect our clients to detect and deter misconduct, educate personnel regarding the Firm's expectations and laws governing their conduct, remind personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of ELITE, safeguard against the violation of the securities laws, and establish procedures for personnel to follow so that we may determine whether their personnel are complying with the Firm's ethical principles.

We have established the following restrictions in order to ensure our Firm's fiduciary responsibilities:

- No supervised employee of ELITE shall prefer his or her own interest to that of the independent investment adviser client.
- We maintain a list of all securities holdings of anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer/individual of ELITE.

We emphasize the unrestricted right of the client to decline implementation of any advice rendered.

In accordance with Securities and Exchange Commission rules governing investment advisers, ELITE requires prompt reports of all securities transactions by Access Persons identified in the Code of Ethics as "Reportable Securities" transactions. ELITE further requires that all brokerage account relationships of such individuals be disclosed, that ELITE receive duplicate confirmations of transactions and custodial account statements, and annual certifications of compliance with the Code of Ethics from all Access Persons.

The responsibilities of the Chief Compliance Officer of ELITE include overseeing the regular monitoring and verification of compliance of covered persons with the requirements of the Code of Ethics, and reporting material violations to ELITE senior management. Covered transactions of the Chief Compliance Officer are reviewed by another officer (or designee) of ELITE. In addition to reporting and recordkeeping requirements, the Code of Ethics imposes various substantive and procedural restrictions on Reportable Securities transactions.

Item 12. Brokerage Practices

Our firm does not utilize securities brokerage services. The choice of which custodian to utilize is determined by the Client in consultation with the Adviser.

Clients may pay administrative, brokerage, custody, or clearing fees for services provided by their custodian. ELITE receives no part or benefit of these fees. ELITE does not charge a due diligence fee or impose any fee sharing or mark-ups.

Item 13. Review of Accounts

Our Firm monitors our portfolios and strategies on a regular basis for consistency with investment asset allocation, risk tolerance, and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in geopolitical and macroeconomic specific events.

Advisers are responsible for reviewing their client accounts and are required to contact Clients on an annual basis to determine if there have been any changes to the Client's financial situation and stated investment objectives or if the Client wishes to impose any reasonable investment restrictions on the management of the assets in the account.

Item 14. Client Referrals and Other Compensation

We do not make referrals or recommendations to other firms for compensation. ELITE enters into relationships with independent RIAs who may utilize a third-party asset manager or utilize a strategy that combines the strategies of multiple third-party asset managers together for management of their client assets. In such circumstances, there may be agreements for our firm to receive a portion of the fees received by the third party asset manager or from the independent RIAs from their clients for the utilization of such strategies or managers.

Item 15. Custody

We do not have custody of client funds or securities.

ELITE does not have physical custody of Client assets. If provided with the authority through its billing services for certain accounts, ELITE directs the custodian to debit advisory,

manager, platform and other fees from client accounts; however, ELITE does not have authority to possess or take actual custody of Clients' funds or securities.

Item 16. Investment Discretion

We will not exercise investment discretion or discretionary authority with respect to our Clients. The decision as to what investment strategy the assets of the Clients are invested in is based on suitability information gathered and reviewed by the Adviser, the client of ELITE.

Item 17. Voting Client Securities

We do not and will not accept proxy voting authority for any securities. Our clients may contact our CCO at 248-376-1480 or jsmith@lawvisory.com to request any additional information on our proxy voting policies.

Item 18. Financial Information

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time.