#### **ITEM 1: INTRODUCTION**

ELE Wealth Solutions, Inc. ("EWS") is registered with the Securities and Exchange Commission ("SEC") as a securities broker-dealer and is a member of the Financial Industry Regulatory Authority ("FINRA"). ELE Advisory Services, Inc. ("EAS") is registered with the SEC as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Please visit <a href="www.investor.gov/CRS">www.investor.gov/CRS</a> for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

# ITEM 2: RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me? EWS offers brokerage services to retail investors while EAS offers investment advisory services to retail investors.

# **Brokerage Services**

Our brokerage services offered through EWS, include the buying and selling of securities and investment products. These include mutual funds, variable annuities, and insurance products. If you open a brokerage account, you will typically pay us a transaction-based fee, generally referred to as a commission, every time you buy or sell an investment. The firm does have one product, a Nationwide Monument variable annuity, which compensates the firm through a fee based on the percentage of the account value. There is no minimum amount required to open an investment account, but we may recommend some investments which require a minimum investment. When we provide brokerage services, we may recommend investments, or you may select them, but the ultimate decision regarding an investment strategy or the purchase or sale of an investment will be yours. Although we do not provide ongoing monitoring of your account, we will review your account before every recommendation to ensure we act in your best interest. Product sponsors provide you with account statements on a quarterly or monthly basis.

### **Advisory Services**

EAS primarily offers the following investment advisory services to retail clients: portfolio management (we review your portfolio, investment strategy, and investments); financial planning (we assess your financial situation and provide advice to meet your goals); solicitor/selection of other advisers (we may select a third party adviser for you to use). As part of our standard services, we typically monitor client accounts on a quarterly basis. Our firm offers both discretionary advisory services (where our firm makes the decision regarding the purchase or sale of investments) as well as non-discretionary services (where the retail investor makes the ultimate decision). We do not limit the types of investments that we recommend. Our firm does not have a minimum account size. Please also see our Form ADV Part 2A ("Brochure"), specifically Items 4 & 7.

<u>Questions to ask us</u>: Given my financial situation, should I choose a brokerage service? Should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

### ITEM 3: FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay? Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay.

#### **Brokerage Services Fees**

When you transact in a brokerage account, you will typically pay a transaction-based fee. This fee is based on the specific transaction, not the value of your account. With certain investments such as variable insurance products this fee is called a commission. With mutual funds this fee is usually referred to as a "load" and reduces the value of your investment. Certain investments, such as mutual funds, also impose additional fees that will reduce the value of your investment over time, and in the case of 12b-1 fees and trails, result in additional compensation to our firm and financial professionals. Also, with certain investments you may have to pay fees, such as surrender charges, when you sell the investment. In a brokerage account, more transactions result in higher costs. Therefore, we have an incentive to encourage you to engage in transactions. You may also pay other fees for things like account maintenance, wire transfers, and service fees. Notwithstanding the above disclosed transaction-based fees, the firm does have one product, a Nationwide Monument variable annuity, which compensates the firm through a fee based on the percentage of the account value.

<u>Revenue Sharing:</u> Revenue sharing occurs for certain investments where a manager or sponsor of those investments shares with us revenue it earns on those investments.

#### **Advisory Services Fees**

Our fees vary depending on the services you receive. Additionally, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. For hourly fee arrangements, each additional hour (or portion therefore) we spend working for you would increase the advisory fee. Our fixed fee arrangements are based on the amount of work we expect to perform for you, so material changes in that amount of work will affect the advisory fee we quote you. Portfolio management fees are paid quarterly in advance or arrears. Financial planning fees are typically charged a retainer of no more than \$500 in advance and the remainder in arrears; while ongoing financial consulting services fees are charged in arrears. A one-time fee of \$500 to open an account may be charged at the time of execution of the Investment Advisory Services Contract. This fee is negotiable. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our Brochure.

<u>Third Party Costs:</u> Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. You will also pay fees to a custodian that will hold your assets. Additionally, you will typically pay transaction fees when we buy and sell an investment for your account. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please also see our <u>Brochure</u> for additional details.

<u>Conflicts of Interest</u>: When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We address these conflicts by disclosing them in this document, as well as through routine monitoring of transactions, and a strict prohibition on recommendations that are not in your best interest. It is important to note that while we will take reasonable

care in developing and making recommendations to you, securities involve risk, and you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please consult any available prospectus for any security we recommend for a discussion of risks associated with the product. We can provide those documents to you or help you to find them.

You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money? Our financial professionals can offer various types of brokerage and advisory services, and can earn more or less if a certain type of service is recommended. They are also compensated in a variety of ways, and the compensation can be based on factors such as: the amount of client assets they manage; the time and complexity required to meet a client's needs; product sales commissions; or revenue we earn from the financial professional's advisory services or recommendations.

Commission-based financial professionals are compensated solely through commissions. In contrast, fee-based financial professionals charge an asset based or flat fee directly to their clients for their services. This fee can be structured in multiple ways, such as an hourly rate, a flat monthly or annual fee, or a percentage of assets under management. Financial professionals that offer both brokerage and advisory services can be compensated as commission-based or fee-based depending on the type of product or service offered.

Primarily, we and our financial professionals' benefit from the brokerage services and advisory services we provide to you because of the commissions and advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Our financial professionals also have the ability to receive commissions from clients. Moreover, we receive compensation from third parties for recommending certain investments and thus have an incentive to recommend those investments over other choices. Please also see Item 10 of our <u>Brochure</u> for additional details.

#### **ITEM 4: DISCIPLINARY HISTORY**

Do you or your financial professionals have legal or disciplinary history?

Yes, you can visit *www.investor.gov* for a free, simple search tool to research us and our financial professionals.

<u>Questions to ask us</u>: As a financial professional, do you have any disciplinary history? For what type of conduct?

# **ITEM 5: ADDITIONAL INFORMATION**

For additional information on our brokerage services offered through EWS, please visit, <a href="www.investor.gov">www.investor.gov</a>, BrokerCheck (<a href="brokercheck.finra.org">brokercheck.finra.org</a>) our website (<a href="www.elewealth.com">www.elewealth.com</a>) and your account agreement. For additional information on advisory services, see our <a href="mailto:Brochure">Brochure</a> available at <a href="https://adviserinfo.sec.gov/firm/summary/148228">https://adviserinfo.sec.gov/firm/summary/148228</a> and any individual brochure supplement your financial representative provides. If you have any questions, need additional up-to-date information, or want another copy of this Client Relationship Summary, then please contact us at 248-356-6555.

<u>Questions to ask us:</u> Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?