# Eliason Wealth Management LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Eliason Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (720) 588-9717 or by email at: info@eliasonwealthmanagement.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 Eliason Wealth Management LLC is also available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. Eliason Wealth Management LLC's CRD number is: 318316.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 03/11/2024

Item 2: Material Changes  The last annual updating amendment of Eliason Wealth Management LLC was on 03/16/2023. Material changes relate to Eliason Wealth Management LLC's policies, practices, or conflicts of interests only.						
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# **Item 4: Advisory Business**

Eliason Wealth Management LLC (hereinafter "EWM") is a Limited Liability Company organized in the State of Colorado. The firm became registered as an investment adviser in February 2022. The principal owner, Managing Member and Chief Compliance Officer is Emmanuel Eliason.

#### Portfolio Management Services

EWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EWM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Determine investment strategy
- Asset allocation
- Assessment of risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

EWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. EWM requires discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

EWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of EWM's economic, investment or other financial interests. To meet its fiduciary obligations, EWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, EWM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is EWM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

#### Pension Consulting Services

EWM offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) on a non-discretionary basis. Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options

- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

#### Financial Planning

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

EWM may use the following information and/or documents to create a financial plan for clients: personal and family demographic information, list of income and expenditures, investment account statements, retirement account statements, benefit statements, insurance policies, and will and estates. Clients will receive a comprehensive financial plan customized to the client's specific situation. The financial plan may include but are not limited to reports covering: cashflow statements, balance sheet, investment reports, retirement planning reports, estate planning, and risk management.

#### Subscription Services

EWM provides a newsletter. There is no additional fee for the newsletter. It will offer recommendations on purchasing and selling general securities, sectors, asset classes, or other specific groupings of securities at a stated time. The newsletter is available to clients, prospects, and any other individuals who may be interest.

#### Services Limited to Specific Types of Investments

EWM generally limits its investment advice to mutual funds, fixed income securities, exchange traded real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, and non-U.S. securities. EWM may use other securities as well to help diversify a portfolio when applicable.

EWM offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs, which restrictions will be documented in the Investment Policy Statement. However, if the restrictions prevent

EWM from properly servicing the client account, or if the restrictions would require EWM to deviate from its standard suite of services, EWM reserves the right to end the relationship.

EWM has the following assets under management:

<b>Discretionary Amounts:</b>	Non-discretionary Amounts:	Date Calculated:	
\$ 181,888.00	\$ 19,843.00	December 2023	

# Item 5: Fees and Compensation

#### Portfolio Management Fees

<b>Total Assets Under Management</b>	Annual Fees	
\$0 - \$1,000,000	1.00%	
\$1,000,000 - \$5,000,000	0.80%	
\$5,000,000 - \$10,000,000	0.60%	
\$10,000,000 - AND UP	0.40%	

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based.

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears. Please see Item 15 for additional information regarding direct fee deduction.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without fee or penalty within five business days of signing the Investment Management Contract. Thereafter, clients may terminate the Investment Management Contract immediately upon written notice.

For contracts terminated mid-quarter, clients will be responsible for paying the prorated advisory fee (earned but unpaid), which will be equal to the daily rate\* times the number of days in the quarter up to and including the effective date of termination. (\*The daily rate is calculated by dividing the annual asset-based fee by 365.)

#### Pension Consulting Services Fees

#### Asset-Based Fees for Pension Consulting

<b>Total Assets Under Management</b>	Annual Fee	
\$0 - AND UP	1.00%	

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based. Fees are paid in arrears.

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement.

For contracts terminated mid-quarter, clients will be responsible for paying the prorated advisory fee (earned but unpaid), which will be equal to the daily rate\* times the number of days in the quarter up to and including the effective date of termination. (\*The daily rate is calculated by dividing the annual asset-based fee by 365.)

#### **Fixed Fees for Pension Consulting**

The rate for creating client pension consulting plans is between \$2,000 and \$10,000. The final fee schedule will be memorialized in the client's advisory agreement. This service may be canceled immediately upon written notice.

Fixed pension consulting fees are paid via check. These fees are paid 25% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account. Clients will be responsible for paying the earned but unpaid advisory fee based upon the prorated amount of work completed.

Clients may terminate the agreement without penalty for a full refund of EWM's fees within five business days of signing the Pension Consulting Agreement. Thereafter, clients may terminate the Pension Consulting Agreement immediately upon written notice.

#### Financial Planning Fees

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$3,000 and \$6,000.

Financial planning fees are paid via check, cash and wire.

Fixed financial planning fees are paid 25% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Clients may terminate the agreement without penalty, for full refund of EWM's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account. Clients will be responsible for paying the earned but unpaid advisory fee based upon the prorated amount of work completed.

#### Subscription Fees

EWM offers a monthly subscription newsletter, "Eliason Wealth Magazine." There is no fee for the newsletter. This newsletter will be provided via postal mail or electronic mail and may be cancelled immediately upon written notice.

#### Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by EWM. Please see Item 12 of this brochure regarding broker-dealer/custodian.

#### **Outside Business Activity**

Emmanuel Kaku Eliason in his outside business activities (see Item 10 below) is licensed to accept compensation for the sale of insurance products to EWM clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the purchase of insurance products for which the supervised persons receives compensation, EWM will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase EWM-recommended products and, if purchasing, have the right to purchase those products through other insurance agents that are not affiliated with EWM.

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

EWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client and therefore, does not engage in side-by-side management.

# **Item 7: Types of Clients**

EWM generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans

There is no account minimum for any of EWM's services.

# Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

#### Methods of Analysis

EWM makes use of primarily academic-based investment strategies that focus on employing multiple asset classes. The approach is founded on broadly recognized economic theory that is supported by empirical research. The backbone of EWM's strategies is the assumption that markets are highly efficient most of the time and that security prices quickly capture new information in the market. As a result, EWM's investment strategies emphasize the use of mutual funds and low-cost exchange traded funds. However, whenever appropriate, given a client's unique risk profile and financial objectives, EWM may recommend higher cost actively managed mutual funds as well as equities, fixed income, and options.

#### **Investment Strategies**

EWM adapts an investment philosophy grounded on evidenced-based research. To this extent, EWM develops model portfolios that considers client's risk tolerance, investment objectives and time horizons amongst others for long term investment strategy. As a general philosophy, EWM adapts a passive investment strategy.

EWM does not engage in timing the market. EWM believes that markets are generally highly efficient therefore, chasing returns through consistent active trading, stock picking and market timing will not be able to outperform the markets in the long term. Instead, EWM undertakes fundamental analysis and leans on academic research that supports

modern portfolio theory. EWM generally draws on institutional funds that captures the benefits of index funds while limiting the drawbacks.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

EWM uses long term trading, margin transactions and options trading (including covered options or spreading strategies). EWM adapts a passive investment strategy

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

#### Material Risks Involved- Methods of Analysis

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

#### **Investment Strategies**

EWM's use of margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies. EWM adapts a passive investment strategy

**Passive investing** is an investment strategy to maximize returns by minimizing buying and selling. Index investing in one common passive investing strategy whereby investors purchase a representative benchmark index and hold it over a long-time horizon. Passive investing broadly refers to a buy-and-hold portfolio strategy for long-term investment horizons, with minimal trading in the market. Passive investing is subject to total market risk. Index funds track the entire market, so when the overall stock market or bond prices fall, so do index funds.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired. Clients can lose more than the amount that they invest in margin securities and margin interest reduces returns when margin is utilized to purchase securities.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. Options transactions are short term by nature and can result in higher level of commissions.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

EWM's use of margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and

credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Commodities and precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes) and an ETF purchased at a premium may ultimately be sold at a discount. An ETF purchased at a premium may be sold at a discount. The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its

prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Exchange Traded Real estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

# **Item 9: Disciplinary Information**

There are no criminal, civil, administrative, or self-regulator organization proceedings to report.

# Item 10: Other Financial Industry Activities and Affiliations

Neither EWM nor its representatives are registered as, or have pending applications to become, a broker/dealer, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

Emmanuel Kaku Eliason is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. EWM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to act on an insurance recommendation made by the firm and if the client acts on the recommendation, they have the right to do so through the professional of their choosing.

EWM does not utilize nor select third-party investment advisers.

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

EWM has a written Code of Ethics that covers the following areas:

- Prohibited Purchases and Sales
- Compliance Procedures
- Insider Trading
- Personal Securities Transactions
- Exempted Transactions
- Prohibited Activities
- Conflicts of Interest
- Gifts and Entertainment
- Confidentiality
- Service on a Board of Directors
- Compliance with Laws and Regulations
- Procedures and Reporting
- Certification of Compliance
- Reporting Violations
- Compliance Officer Duties
- Training and Education
- Recordkeeping
- Annual Review
- Sanctions

EWM will mitigate conflicts of interest by (i) disclosing to the client any conflict of interest and (ii) always acting in the best interest of the client consistent with its fiduciary duty. ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE THIS CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK US AT ANY TIME.

EWM does not recommend that clients buy or sell any security in which EWM or a related person has a material financial interest.

From time to time, representatives of EWM may buy or sell securities for themselves at or around the same time they recommend those securities to clients. This may provide an opportunity for representatives of EWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. EWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that front runs or operates to the client's disadvantage when similar securities are being bought or sold.

# **Item 12: Brokerage Practices**

EWM will require clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc. based on EWM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and EWM may also consider the market expertise and research access provided by the Schwab, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in EWM's research efforts.

While EWM has no formal soft dollars program in which soft dollars are used to pay for third party services, EWM may receive research, products, or other services from Schwab in connection with client securities transactions ("soft dollar benefits"). EWM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and EWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. EWM benefits by not having to produce or pay for the research, products or services, and EWM will have an incentive to recommend a custodian based on receiving research or services. This constitutes a conflict of interest because it gives EWM an incentive for clients to use Schwab. Clients should be aware that EWM's acceptance of soft dollar benefits may result in higher commissions charged to the client. EWM believes its requirement to use Schwab is in the clients best interest based on the services that Schwab provides and the fees that Schwab charges.

EWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

EWM does not trade away from Schwab and EWM does not permit the client to direct EWM to do so.

If EWM buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, EWM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. EWM would determine the appropriate number of shares consistent with its duty to seek best execution.

#### **Item 13: Review of Accounts**

All client accounts for EWM's portfolio management services provided on an ongoing basis are reviewed at least quarterly by Emmanuel Eliason, Managing Member and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at EWM are assigned to this reviewer. EWM is required to review all accounts with the client on an annual basis.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client of EWM's advisory services provided on an ongoing basis will receive a quarterly statement detailing the client's account, including assets held, asset value, and calculation of fees, which will come from the custodian.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Emmanuel Eliason, Managing Member and Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

With respect to financial plans, EWM's services will generally conclude upon delivery of the financial plan.

Each financial planning client will receive the written financial plan upon completion.

# Item 14: Client Referrals and Other Compensation

Other than the soft dollar benefits disclosed in Item 12 above, EWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to EWM's clients.

With respect to Schwab, EWM receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For EWM client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to EWM other products and services that benefit EWM but may not benefit its clients' accounts. These benefits may include national, regional or EWM specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of EWM by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist EWM in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of EWM's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of EWM's accounts. Schwab Advisor Services also makes available to EWM other services intended to help EWM manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to EWM by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to EWM. EWM is independently owned and operated and not affiliated with Schwab.

EWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

# **Item 15: Custody**

EWM does not have physical custody of client funds or securities. However, when advisory fees are deducted directly from client accounts at client's custodian, EWM will be deemed to have limited custody of a client's assets. For fees deducted directly from client accounts, in states that require it, EWM will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Utilize a custodian that sends at least quarterly statements reflecting all additions and deductions, including the amount of advisory fees.
- (C) Send the qualified custodian written notice of the amount of the fee to be deducted and send the client a written invoice upon or prior to fee deduction itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

Clients will receive all account statements from the custodian and billing invoices from EWM that are required in each jurisdiction. They should carefully review those statements for accuracy and compare them to the invoices received from EWM. Client should notify EWM promptly of any inaccuracies.

#### **Item 16: Investment Discretion**

EWM provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Because investment discretion has been granted, EWM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, EWM's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to EWM.

# **Item 17: Voting Client Securities (Proxy Voting)**

EWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to EWM or the issuer of the security.

#### **Item 18: Financial Information**

EWM neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Neither EWM nor its management has any financial condition that is likely to reasonably impair EWM's ability to meet contractual commitments to clients.

EWM has not been the subject of a bankruptcy petition in the last ten years.

#### **Item 19: Requirements For State Registered Advisers**

EWM currently has one management person: Emmanuel Kaku Eliason. Education, business background, and other business activities can be found on his. Form ADV Part 2B brochure supplement.

Emmanuel Kaku Eliason is licensed as an insurance agent and more information regarding this license and the conflicts of interests can be found in Item 10 above.

EWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

No management person at EWM or EWM has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

Neither EWM, nor its management persons, has any relationship or arrangement with issuers of securities.

This brochure supplement provides information about Emmanuel Eliason that supplements the Eliason Wealth Management LLC brochure. You should have received a copy of that brochure. Please contact Emmanuel Eliason if you did not receive Eliason Wealth Management LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Emmanuel Eliason is also available on the SEC's website at www.adviserinfo.sec.gov.

# Eliason Wealth Management LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

# **Emmanuel Eliason**

Personal CRD Number: 7485743 Investment Adviser Representative

> Eliason Wealth Management LLC 9200 E Mineral Ave Ste 100 Centennial, CO 80112 (720) 588-9717 eeliason@eliasonwealthmanagement.com

> > UPDATED: 03/16/2023

# Item 2: Educational Background and Business Experience

Name: Emmanuel Eliason Born: 1973

#### **Educational Background and Professional Designations:**

#### **Education:**

Master of Science Organization Leadership: Leadership and Management, Regis University - 2012

Bachelor of Science Computer Information Systems; Minor: Business Management, Columbia College - 2008

#### **Designations:**

#### CFP® - Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial
  planning subject areas that CFP Board's studies have determined as necessary for the competent
  and professional delivery of financial planning services, and attain a Bachelor's Degree from a
  regionally accredited United States college or university (or its equivalent from a foreign
  university). CFP Board's financial planning subject areas include insurance planning and risk
  management, employee benefits planning, investment planning, income tax planning, retirement
  planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination
  includes case studies and client scenarios designed to test one's ability to correctly diagnose
  financial planning issues and apply one's knowledge of financial planning to real world
  circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- i. Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- ii. Ethics Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

#### **Business Background:**

12/2021 - Present Managing Member and Chief Compliance Officer

Eliason Wealth Management LLC

07/2007 - Present Self-Employed

08/2001 - 07/2015 Business Development Specialist

Wavetech Geophysical, Inc

# **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

Emmanuel Kaku Eliason is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Eliason Wealth Management LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to act on an insurance recommendation made by the firm and if the client acts on the recommendation, they have the right to do so through the professional of their choosing.

#### **Item 5: Additional Compensation**

Emmanuel Eliason does not receive any economic benefit from any person, company, or organization, other than Eliason Wealth Management LLC in exchange for providing clients advisory services through Eliason Wealth Management LLC other than as disclosed in Item 4 immediately above.

# **Item 6: Supervision**

As the Chief Compliance Officer of Eliason Wealth Management LLC, Emmanuel Eliason supervises all activities of the firm. Emmanuel Eliason's contact information is on the cover page of this disclosure document. Emmanuel Eliason adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

# **Item 7: Requirements For State Registered Advisers**

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

Emmanuel Eliason has no civil, administrative, or self-regulatory organization proceedings or arbitrations to report. Emmanuel Eliason has not been the subject of a bankruptcy petition.