

Elite Life Management LLC

Form ADV Part 2A – Disclosure Brochure

Effective: November 20, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Elite Life Management LLC (“Elite” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (833) 3BE-ELITE.

Elite is a registered investment advisor located in the State of Florida. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Elite to assist you in determining whether to retain the Advisor.

Additional information about Elite and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 310917.

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Phone: (814) 836-5776

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Elite. For convenience, we have combined these documents into a single disclosure document.

Elite believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Elite encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- No material changes.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 310917. You may also request a copy of this Disclosure Brochure at any time by contacting us at (859) 421-0128.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Services	4
A. Firm Information.....	4
B. Advisory Services Offered.....	4
C. Client Account Management.....	5
D. Wrap Fee Programs	5
E. Assets Under Management.....	5
Item 5 – Fees and Compensation	5
A. Fees for Advisory Services	5
B. Fee Billing	6
C. Other Fees and Expenses	6
D. Advance Payment of Fees and Termination	6
E. Compensation for Sales of Securities	6
Item 6 – Performance-Based Fees and Side-By-Side Management	7
Item 7 – Types of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	7
A. Methods of Analysis.....	7
B. Risk of Loss	7
Item 9 – Disciplinary Information	9
Item 10 – Other Financial Industry Activities and Affiliations	9
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10
A. Code of Ethics.....	10
B. Personal Trading with Material Interest.....	10
C. Personal Trading in Same Securities as Clients	10
D. Personal Trading at Same Time as Client	10
Item 12 – Brokerage Practices	11
A. Recommendation of Custodian[s]	11
B. Aggregating and Allocating Trades	11
Item 13 – Review of Accounts	12
A. Frequency of Reviews.....	12
B. Causes for Reviews	12
C. Review Reports	12
Item 14 – Client Referrals and Other Compensation	12
A. Compensation Received by Elite	12
B. Client Referrals from Solicitors.....	13
Item 15 – Custody	13
Item 16 – Investment Discretion	13
Item 17 – Voting Client Securities	13
Item 18 – Financial Information	13
Form ADV 2B - Brochure Supplement	14
Privacy Policy	24

Item 4 – Advisory Services

A. Firm Information

Elite Life Management LLC (“Elite” or the “Advisor”) is a Securities and Exchange Commission (“SEC”) registered investment advisor with its retail office located in the State of Florida and its principal office located in the Commonwealth of Pennsylvania. Elite is organized as a Limited Liability Company (“LLC”) under the laws of Florida. Elite was founded in October 2020 and became a registered investment advisor in November 2020. Elite is owned and operated by HBK Sorce Financial LLC (an Ohio operating company which owns interests in several financial services companies). 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, trusts, estates, entities and other registered investment advisors (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate and disclose potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Elite provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Elite works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Elite will then construct an investment portfolio, consisting primarily of exchange-traded funds (“ETFs”), mutual funds, individual stocks, and/or individual bonds to pursue the Client’s investment goals. The Advisor may also utilize other types of investments where appropriate to meet the needs of certain Clients, including, but not limited to, limited partnerships and private placements. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Elite’s investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Elite will construct, implement and monitor the portfolio to meet the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Elite evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Elite may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Elite may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Elite may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Elite accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

C. Client Account Management

Prior to engaging Elite to provide investment advisory services, each Client enters into a written agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Elite, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Elite will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Elite will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Elite will provide investment management and ongoing oversight of the Client's investment portfolio.
- Financial Planning – Elite will provide financial planning analysis, advice and plans to the extent appropriate and agreed upon to assist clients in meeting their long-term financial goals.

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

As of August 31, 2024 Elite has \$126,470,367 in assets under management on a discretionary basis and \$1,401,978 on a non-discretionary basis. 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 engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor which will identify the fee.

A. Fees for Advisory Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are billed at an annual rate of up to 1.50% and are based on the market value of assets under management at the end of the prior calendar quarter. Fees are based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The Fee for the initial quarter shall be calculated on a pro rata basis commencing on the date of account opening and shall be based on the market value of the assets under management on the first month-end following the date this agreement is signed and assets have been posted to the account(s). The fee for accounts which are a fixed dollar amount shall be prorated so that one fourth of the fee is paid quarterly in advance. Fees may be negotiable at the sole discretion of the Advisor. Certain Clients may be offered a fixed fee not to exceed the annual rate above. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Elite will be independently valued by the Custodian. Elite will conduct periodic reviews of the Custodian's valuations. In the rare circumstance where the custodian cannot obtain a value, Elite will look to other third-party sources for valuation such as the issuer of a private placement or use the purchase value or other historical value obtained. If no other valuations are available, the Advisor will determine fair value based on appropriate factors, including its knowledge of the security and current market conditions, which valuation will be reviewed and approved by the Chief Compliance Officer.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

B. Fee Billing

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. 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 respective quarter-end date. 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 calendar quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by Elite to be paid directly from their account[s] held by the Custodian as part of the investment advisory 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 custody and securities execution fees charged by the Custodian. The fees charged by Elite are separate and distinct from these custody 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 ETFs 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 may be able to invest in 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. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Elite may be compensated for its investment advisory services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor 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 prior consent, which can include notice and a reasonable opportunity to determine whether to continue their relationship with the transferee.

E. Compensation for Sales of Securities

Elite does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Elite's representatives may also be licensed as an independent insurance professional. As such, they may earn commission-based compensation for selling insurance products. Commissions for insurance products are separate and in addition to Elite's advisory fees. This practice presents a conflict of interest as there is an incentive to recommend insurance products that generate a commission. However, you are under no obligation, contractually or otherwise, to purchase insurance products through an Elite representative.

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

Elite does not charge performance-based fees for its investment advisory services. The fees charged by Elite are as described in Item 5 – Fees and Compensation above – and are not based upon the capital appreciation of the funds or securities held by any Client. Elite does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients. See Item 10 – Other Financial Industry Activities and Affiliates for conflicts of interest due to fees earned by affiliate entities.

Item 7 – Types of Clients

Elite offers investment advisory services to individuals, high net worth individuals, trusts, estates, entities, institutional clients, charitable organizations, retirement plans and other registered investment advisors. Elite generally does not impose a minimum relationship size.

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

A. Methods of Analysis

Elite primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Elite are 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. Elite may retain third parties, including affiliates, to provide the research and due diligence.

As noted above, Elite generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Elite will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Elite may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss, including loss of principal. Elite will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help 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 these methods of 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.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Following are some of the risks associated with the Advisor's strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (including 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 which are more fully described in their offering documents. Client should only have a portion of their assets in these investments and should read any related offering materials carefully.

Model Portfolios

The Firm may allocate investment management assets of its client accounts, on a discretionary basis, among one or more of its Model Portfolio programs (which range from conservative through moderate and aggressive) as described in the Investment Management Agreement and/or a client suitability profile. HBKS's proprietary programs have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, with a non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is specifically applicable to HBKS's management of client assets:

1. Initial Interview – at the opening of the account, HBKS, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives;
2. Individual Treatment – the client's account is managed on the basis of the client's financial situation and investment objectives;
3. Annual Notice – at least annually the Firm will seek to contact and meet with the client to determine whether the client's financial situation or investment objectives have changed, or if then client wants to impose and/or modify any reasonable restrictions on the management of his/her/its account;
4. Annual Contact – at least annually, the Firm shall contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of his/her/its account.
5. Consultation Available – the Firm shall be reasonably available to consult with the client relative to the status of the client's account;
6. Quarterly Statement – the client shall be provided with a report at least quarterly for the account for the preceding period;
7. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct the Firm not to purchase certain mutual funds;
8. No Pooling – the client's beneficial interest in a security does not represent an undivided interest in all the

securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the client's account;

9. Separate Account - a separate account is maintained for the client with the Custodian; and
10. Ownership – each client retains indicia of ownership of the account (e.g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Elite or its owner/any of its Supervised Persons. Elite values 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 available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 310917.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, Advisor representatives may also be licensed insurance professionals. Implementations of insurance recommendations are separate and apart from their role with Elite. As insurance professionals, they may receive customary commissions and other related revenues from the various insurance companies whose products are sold. They are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any insurance related recommendations made by Advisor representatives. Advisor is also affiliated with HBK Sorce Insurance LLC, and insurance agency owned by HBK Sorce Financial LLC which is also an owner of Advisor. This creates a conflict of interest in that clients may be encouraged to purchase insurance products through HBK Sorce Insurance LLC based on compensation to be received rather than the client's best interests. Clients are under no obligation to purchase insurance products through HBK Sorce Insurance LLC.

Investment Advisor Affiliations

Advisor is affiliated with HBK Sorce Advisory LLC d.b.a. HBKS® Wealth Advisors (HBKS) (an SEC registered investment advisor). HBK Sorce Financial LLC is an owner of both the Advisor and HBKS. Advisor retains HBKS to provide sub-advisory and consulting services in connection with the operation of Advisor's business and management of client portfolios, including the use of model portfolios developed and managed by HBKS. The use of HBKS for sub-advisory and consulting services presents a conflict of interest, as HBKS receives compensation from Advisor for those services. Conflicts of interest also exist in that clients may also be encouraged to use other advisory services of HBKS due to the ability to generate further compensation for HBKS.

Advisor is affiliated with Park Shore Partners LLC (PSP) (an SEC registered investment advisor). HBK Sorce Financial LLC is an owner of both Advisor and PSP. PSP serves as General Partner and/ or Investment Manager of the Park Shore Opportunity Fund Ltd., and its feeder funds, including the Park Shore Opportunity US Fund LP, the Park Shore Opportunity Offshore Fund Ltd. and Park Shore Opportunity US QP Fund LP (together, the "Affiliated Funds"). The Affiliated funds offer and issue securities through private placements. PSP also acts as sub-advisor for the Park Shore Multi Asset Strategy Fund LLC (the "MAS Fund"), which is owned by First Trust Capital Management L.P., and which offers securities through private placements. Advisor representatives, on a non-discretionary basis, may recommend that qualified clients consider allocating a portion of their investment assets to the Affiliated Funds or MAS Fund. The terms and conditions for participation in the Affiliated Funds and MAS fund, including management and incentive fees, conflicts of interest, and risk factors, are set forth in the their offering documents. Adviser clients are under absolutely no obligation to consider or make an investment in any private investment fund(s), including the Affiliated Funds or MAS Fund.

Broker Dealer Affiliations

Advisor is affiliated with HBK Sorce Brokerage LLC (a limited use broker dealer registered with the State of Ohio) as it and Advisor are under common ownership by HBK Sorce Financial LLC. The recommendation by Advisor that a client engage the services of HBK Sorce Brokerage LLC, in its capacity as a limited use/broker dealer, presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend commission products based on commissions to be received by HBK Sorce Brokerage LLC, rather than on a particular client's need. No client is under any obligation to purchase any commission products from HBK Sorce Brokerage LLC or any of its registered representatives.

CPA Affiliations

Advisor is affiliated with the accounting firm of Hill, Barth & King LLC d.b.a. HBK CPAs & Consultants (HBKCPA) as HBKCPA is an indirect owner of HBK Sorce Financial LLC, which is an owner of Advisor. The recommendation by Advisor that a client engage the services of HBKCPA in its capacity as a CPA firm or as a consultant, presents a conflict of interest. No client is under any obligation to engage HBKCPA, in its capacity as a CPA firm or as consultants.

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

A. Code of Ethics

Elite has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Elite (our "Supervised Persons"). The Code 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 covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (859) 421-0128.

B. Personal Trading with Material Interest

Elite allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Elite does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. 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 conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. 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 by conducting a coordinated review of personal accounts and the accounts of the Clients. 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. **At no time will Elite, or any Supervised Person of Elite, transact in any security to the detriment of any Client or in a manner designed to provide the Supervised Person a trading advantage.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Elite does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Elite to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Elite does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

While Elite does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Elite. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. 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, and its reputation and/or the location of the Custodian's offices. Elite will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Elite maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. Elite does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from Schwab. Please see Item 14 below.

2. Brokerage Referrals - Elite does not receive any compensation from any third party in connection with the recommendation for establishing an 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]). 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 Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Elite will execute its transactions through the Custodian as authorized by the Client. Elite may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Elite if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage account statements no less than quarterly from the Custodian. These account statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client account statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Elite

Elite is a fee-only advisory firm, that is compensated solely by its Clients and not from any investment product. Elite does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Elite may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Elite may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

Elite has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Elite. As a registered investment advisor participating on the Schwab Advisor Services platform, Elite receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. 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.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and support to Elite that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Elite believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Promoters

Elite does not engage paid promoters for endorsements or Client referrals.

Item 15 – Custody

Elite does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. 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 that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Elite to ensure accuracy, as the Custodian does not perform this review. 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 proxies, however, the Client retains the sole responsibility for proxy decisions and voting. Elite may retain third party advisors, including affiliates, to manage a portion of Client assets where the third party will vote certain corporate actions on behalf of the Client. The Client will be notified if this type of arrangement arises.

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, have 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 advance fees of \$500 or more for services to be performed six months or more in the future.

Form ADV Part 2B – Brochure Supplement

for

**Jeremy T. Shelby
Senior Financial Advisor, Principal
Effective: November 20, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeremy T. Shelby (CRD# 6823184) in addition to the information contained in the Elite Life Management LLC (“Elite” or the “Advisor”, CRD# 310917) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Elite Disclosure Brochure or this Brochure Supplement, please contact us at (859) 421-0128.

Additional information about Mr. Shelby is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6823184.

Item 2 – Educational Background and Business Experience

Jeremy T. Shelby, born in 1987, is dedicated to advising Clients of Elite as its Managing Director. Mr. Shelby earned a Bachelors in Sports Management from Grambling State University in 2011. Mr. Shelby also earned an Associates of Science from Columbia State Community College in 2007. Additional information regarding Mr. Shelby's employment history is included below.

Employment History:

Principal, HBK Sorce Holdings LLC	04/2024 to Present
Managing Director, Elite Life Management LLC	09/2020 to Present
Managing Director, Motion Group Sports	02/2020 to 09/2020
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith Incorporated	06/2017 to 01/2020
Program Director, Boys & Girls Clubs of Sarasota County	10/2016 to 06/2017
Director, Boys & Girls Clubs of Manatee County	10/2014 to 10/2016
Paraeducator, Fayette County Public Schools	08/2012 to 10/2014
Professional Baseball Player, Baltimore Orioles	06/2010 to 03/2011

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Shelby. Mr. Shelby has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Shelby.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Shelby.***

However, we do encourage you to independently view the background of Mr. Shelby on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6823184.

Item 4 – Other Business Activities

Insurance Agency Affiliations

As noted in Item 5, Shelby is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Shelby's role with Elite. As an insurance professional, Mr. Shelby may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Shelby is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Shelby.

Principal HBK Sorce Holdings LLC

Mr. Shelby is an owner in HBK Sorce Holdings LLC, a holding company which wholly owns HBK Sorce Financial LLC and HBKS Investments LLC. In turn, these two entities own several registered investment advisors (including Elite), an insurance agency and a broker dealer. As a principal owner, Mr. Shelby receives indirect compensation from the operation of these other entities and, therefore, has a conflict of interests in recommending that products or services be sold or provided through these other entities. Clients are under no obligation to implement any recommendations made by Mr. Shelby, or use any services offered through any of these other entities if recommended by Mr. Shelby.

Item 5 – Additional Compensation

Mr. Shelby has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Shelby is supervised by Michael Wassmann, the Chief Compliance Officer who can be reached at (814) 836-5776.

Elite has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Elite. Further, Elite is subject to regulatory oversight by various agencies. These agencies require registration by Elite and its Supervised Persons. As a registered entity, Elite is

subject to examinations by regulators, which may be announced or unannounced. Elite is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor

Form ADV Part 2B – Brochure Supplement

for

**Stephanie J. Terbrock
Advisor Associate**

Effective: November 20, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Stephanie J. Terbrock (CRD# 6989890) in addition to the information contained in the Elite Life Management LLC (“Elite” or the “Advisor”, CRD# 310917) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Elite Disclosure Brochure or this Brochure Supplement, please contact us at (833) 323-3548.

Additional information about Ms. Terbrock is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 6989890.

Item 2 – Educational Background and Business Experience

Stephanie J. Terbrock, born in 1994, is dedicated to advising Clients of Elite as an Advisor Associate. Ms. Terbrock earned a Bachelors in Economics with a Minor in Mathematics from the University of Mississippi in 2018. Additional information regarding Ms. Terbrock’s employment history is included below.

Employment History:

Advisor Associate, Elite Life Management LLC	02/2021 to Present
Registered Client Associate, Merrill Lynch, Pierce, Fenner and Smith Incorporated	02/2020 to 02/2021
Trading Services Representative, Wells Fargo Clearing Services, LLC	07/2018 to 02/2020
Bartender, Jinsei Sushi	08/2016 to 06/2018

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Terbrock. Ms. Terbrock has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Terbrock.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Terbrock.***

However, we do encourage you to independently view the background of Ms. Terbrock on the Investment AdviserPublic Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 6989890.

Item 4 – Other Business Activities

Ms. Terbrock is dedicated to the investment advisory activities of Elite’s Clients. Ms. Terbrock does not have any other business activities.

Item 5 – Additional Compensation

Ms. Terbrock is dedicated to the investment advisory activities of Elite’s Clients. Ms. Terbrock does not receive any additional forms of compensation.

Item 6 – Supervision

Ms. Terbrock serves as an Advisor Associate of Elite and is supervised by Jeremy Shelby, the Managing Director, and Michael Wassmann the Chief Compliance Officer. Mr. Shelby can be reached at (833) 323-3548, and Michael Wassmann can be reached at (814) 836-5776.

Elite has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Elite. Further, Elite is subject to regulatory oversight by various agencies. These agencies require registration by Elite and its Supervised Persons. As a registered entity, Elite is subject to examinations by regulators, which may be announced or unannounced. Elite is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Ryan A. Williams, ChFC®
Senior Financial Advisor**

Effective: November 20, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ryan A. Williams, ChFC® (CRD# 6655190) in addition to the information contained in the Elite Life Management LLC (“Elite” or the “Advisor”, CRD# 310917) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Elite Disclosure Brochure or this Brochure Supplement, please contact us at (833) 323-3548.

Additional information about Mr. Williams is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6655190.

Item 2 – Educational Background and Business Experience

Ryan A. Williams, born in 1984, is dedicated to advising Clients of Elite as a Senior Financial Advisor. Mr. Williams earned a Bachelors in Business Management from University of Tampa in 2008. Mr. Williams also earned an Associates of Finance from Manatee Community College in 2006. Additional information regarding Mr. Williams' employment history is included below.

Employment History:

Senior Financial Advisor, Elite Life Management LLC	02/2021 to Present
Financial Advisor, Merrill Lynch, Pierce, Fenner and Smith Incorporated	05/2016 to 02/2021
Bartender, Tide Tables Restaurant	10/2015 to 03/2016
Agriculture Consultant, Agritech	09/2013 to 08/2015
Professional Athlete, Baldam Boars Baseball	01/2011 to 08/2013

Chartered Financial Consultant™ (“ChFC®”)

The Chartered Financial Consultant™ (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals, and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course-specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines, namely, estate planning, retirement planning, or non-qualified deferred compensation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Williams. Mr. Williams has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Williams.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Williams.***

However, we do encourage you to independently view the background of Mr. Williams on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6655190.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Williams is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Williams's role with Elite. As an insurance professional, Mr. Williams will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Williams is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in

recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Williams or the Advisor. Mr. Williams spends approximately 10% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Williams has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Williams serves as a Senior Financial Advisor of Elite and is supervised by Jeremy Shelby and Michael Wassmann the Chief Compliance Officer. Mr. Shelby can be reached at (833) 323-3548 and Mr. Wassmann can be reached at (814) 836-5776.

Elite has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Elite. Further, Elite is subject to regulatory oversight by various agencies. These agencies require registration by Elite and its Supervised Persons. As a registered entity, Elite is subject to examinations by regulators, which may be announced or unannounced. Elite is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Maike S. Foster
Advisor Associate**

Effective: October 16, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Maike S. Foster (CRD# 5420205) in addition to the information contained in the Elite Life Management LLC (“Elite” or the “Advisor”, CRD# 310917) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Elite Disclosure Brochure or this Brochure Supplement, please contact us at (833) 323-0324.

Additional information about Ms. Foster is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 6989890.

Item 2 – Educational Background and Business Experience

Maike S. Foster, born in 1981, is dedicated to advising Clients of Elite as an Advisor Associate. Ms. Foster earned an Associate of Arts degree in Secondary Education in 2001. Additional information regarding Ms. Foster's employment history is included below.

Employment History:

Advisor Associate, Elite Life Management LLC	07/2024 to Present
Senior Registered Associate, Morgan Stanley	04/2021 to 07/2024
Senior Registered Client Service Associate, Merrill Lynch, Pierce, Fenner & Smith Incorporate	07/2013 to 04/2021

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Foster. Ms. Foster has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Foster.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Foster.***

However, we do encourage you to independently view the background of Ms. Foster on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5420205.

Item 4 – Other Business Activities

Ms. Foster is dedicated to the investment advisory activities of Elite's Clients. Ms. Foster does not have any other business activities.

Item 5 – Additional Compensation

Ms. Foster is dedicated to the investment advisory activities of Elite's Clients. Ms. Foster does not receive any additional forms of compensation.

Item 6 – Supervision

Ms. Foster serves as an Advisor Associate of Elite and is supervised by Jeremy Shelby and Michael Wassmann the Chief Compliance Officer. Mr. Shelby can be reached at (833) 323-0324, and Michael Wassmann can be reached at (814) 836-5776.

Elite has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Elite. Further, Elite is subject to regulatory oversight by various agencies. These agencies require registration by Elite and its Supervised Persons. As a registered entity, Elite is subject to examinations by regulators, which may be announced or unannounced. Elite is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: November 15, 2022

Our Commitment to You

Elite Life Management LLC (“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?

Driver's license number	Date of birth
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?
<p>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.</p>	Yes	No
<p>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.</p>	No	Not Shared
<p>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].</p>	Yes	Yes
<p>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.</p>	No	Not Shared

We may also share your personal information with Elite affiliates to offer you or provide you with further products or services. Our affiliates include the following:

- | | |
|------------------------------|---|
| HBKS® Wealth Advisors | HBK CPAs and Consultants |
| HBK Sorce Insurance LLC | Hill, Barth & King Financial Holdings LLC |
| HBK Sorce Brokerage LLC | HBK Professional LLC |
| Park Shore Partners LLC | HBK Retirement LLC |
| HBK Healthcare Solutions LLC | HBK Valuation Group LLC |
| HBK Sorce Holdings LLC | HBK Energy LLC |
| HBKS Investments LLC | Vertilocity |

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 (859) 421-0128.