

Elm3 Financial Group, LLC is a registered investment adviser with the Securities and Exchange Commission and provides investment advisory accounts and services, rather than brokerage accounts and services. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What Investment Services and Advice Can You Provide Me?

We provide investment advisory, portfolio management, and financial planning to retail investors. Our clients typically include individuals, high net-worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations.

Portfolio management services are performed on a continuing basis and include the appropriate allocation of portfolio assets with proper diversification to help meet your stated investment objectives. Portfolio management is performed on a discretionary basis which means you grant us full authority to buy, sell, or otherwise effect investment transactions involving the assets in your name. If we provide discretionary investment management, accounts are monitored throughout each month. You may impose reasonable restrictions on our discretionary authority, which must be provided to us in writing and accepted by us. We do not impose any condition, such as a minimum account size, in connection with providing advisory services.

Our investment management services begin with initial discovery consisting of discussions, questionnaires, and requests for records to understand and document your investment objectives and risk tolerance. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice. Once we construct an investment portfolio for you, we will monitor your portfolio on an ongoing basis, but no less than quarterly, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

We also provide comprehensive and targeted financial planning services to assist clients in reaching their financial and retirement goals. Reviews for financial planning relationships vary depending on the scope of the relationship and are determined contractually. <u>Please see Item #4 of our Form ADV Part 2A for more information.</u>

Conversation Starters

You are encouraged to ask questions including the following to help you better understand our services:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What Fees Will I Pay?

For portfolio management services, you will pay an ongoing fee based upon a percentage of the market value of the assets being managed. Our investment management fees are payable quarterly, in arrears using the gross value of the investment portfolio as of the last business day of the prior quarter. Our investment management fee is tiered and ranges between 0.50% - 1.25% of invested assets. Please see Item #5 of our Form ADV Part 2A for more information.

In addition to the investment management fees paid to our firm, you are also responsible for all transaction, brokerage, and custodian fees incurred as part of our account management. Financial planning services are billed on a flat-fee or hourly basis. Fees will be quoted in advance and range from \$600 to \$5,000 depending on the scope and complexity of work. Quotes are calculated at a rate not to exceed \$325 per hour. <u>Please see Item #5 of our Form ADV Part 2A for more information.</u>

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Our receipt of fees for managing client accounts results in several conflicts of interest. For example, with asset-based fees, the more assets there are in a client's advisory account, the more a client will pay in asset-based fees, and we therefore have an incentive to encourage clients to increase the assets in their accounts. <u>Please see Item #5 of our Form</u> ADV Part 2A for detailed descriptions of conflicts of interest and how we address them.

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Conversation Starters

Ask your financial professional: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What Are Your Legal Obligations to Me When Acting as My Investment Adviser? How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Certain persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons can earn separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Insurance commissions are separate and in addition to our advisory fees. This presents a conflict of interest because persons providing investment advice on behalf of our firm who are also insurance agents have a financial incentive to recommend insurance products.

We may recommend that you roll the assets of an existing retirement plan into an IRA that we will manage on your behalf, on which we would charge an asset-based fee. This creates a conflict of interest because we have an incentive to recommend a rollover to you based on compensation rather than based solely on your needs. We manage this conflict by ensuring that the recommendation is in your best interest. You are under no obligation to complete the rollover, nor are you obligated to have the assets managed by us.

Please see Item #5 and #10 of our Form ADV Part 2A for more information.

Conversation Starters

How might your conflicts of interest affect me, and how will you address them?

How Do Your Financial Professionals Make Money?

Portfolio Managers receive a fixed base salary and may earn a discretionary bonus based on the financial performance of *Elm3 Financial Group LLC*. Financial professionals may also receive a commission for insurance product sold.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

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As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information:

Conversation Starters

You are encouraged to ask questions including the following to help you better understand our services:

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

Your Elm3 financial advisor will be your primary point of contact. However, administrative requests may be handled by an administrative assistant or client service professional. In the event you have issues that need to be addressed, you may contact Stacey Nickens at (678) 297-9500 or by email to <u>stacey.nickens@elm3financial.com</u>, or Margaret Nickens at <u>Margaret.nickens@elm3financial.com</u>.

M Nickens (Nov 4, 2022 15:44 MDT)

