EWG Elevate Inc.

dba Protection Point Advisors

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of EWG Elevate Inc. If you have any questions about the contents of this brochure, please contact us at (916) 367-4540 or by email at: rick@eaglewestgroup.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 EWG Elevate Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. EWG Elevate Inc.'s CRD number is: 291805.

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

Version Date: 1/5/2024

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of EWG Elevate Inc. on 03/20/2023 are described below. Material changes relate to EWG Elevate Inc.'s policies, practices or conflicts of interests.

- EWG Elevate Inc. dba Protection Point Advisors has revised Item 4; please review the revised Model Portfolios/Strategies.
- EWG Elevate Inc. dba Protection Point Advisors has added additional disclosures to Item 14: Client Referrals and Other Compensation
- EWG Elevate Inc. dba Protection Point Advisors has added additional disclosures to Item 15: Custody
- EWG Elevate Inc. dba Protection Point Advisors Principal Office and Place of Business has moved to 3200 Douglas Blvd, Ste. 305, Roseville, CA 95661

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

EWG Elevate Inc. (hereinafter "EEI") dba Protection Point Advisors is a Corporation organized in United States. The firm was formed in October 2017, and the principal owner is Richard Lee Watson.

B. Types of Advisory Services

Portfolio Management Services

EEI offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EEI creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

EEI evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. EEI will request 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.

EEI seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of EEI's economic, investment or other financial interests. To meet its fiduciary obligations, EEI attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, EEI'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 EEI's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Model Portfolios/ Strategies

EEI offers the following Model Portfolios/Strategies

APM (Advance and Protect Model): Riskalyze risk: 26 - 32
This momentum model is designed to have no specific asset allocation. In can be any mix of stock, commodities, managed futures, and cash, but limits exposure to anyone asset class to 20%. It looks to limit market downturns to about 5% in a given year (although not guaranteed) and does this by using a three part decision process (statistical momentum, chart review and institutional bias) which evaluates each position within the portfolio each week. Should two of these measures agree, the position might be replaced by another positions or is moved to cash. This is a fairly active model which can be nimble. Because of its responsiveness, it can lag initially in a recovering market and potentially be lead incorrectly in a large volatility oscillating market.

EWG Growth: Riskalyze risk: 40 - 50
This momentum model is based the best index and its relative performance of 10 separate categories. These categories are: Growth, Sectors, Value, World, Markets, Quality, Dividend, Clean Green, Innovation and US Heartland, using primarily Exchange Traded Funds (EFTs). It leans toward a 100% stock exposure in a positive market environment. It has two levels of defense: 1 using a 60% stock/40% bond position if that position scores better per category sort, or a movement towards bonds/gold, or cash, if our proprietary Stormguard indicator triggers .

Stable Growth: Riskalyze risk: 15 - 26
This model was designed to be an alternative to low cash returns with low to moderate volatility. It seeks to earn 2 - 5%/year with limited down years using defensive positions, less trading, and broad diversification. Each quarter, each position is reviewed for momentum and adjusted as necessary. Typical holdings might be real estate, bonds, long/short stock funds – hedge funds, managed futures.

EWG Dividend: Riskalyze risk: 34 - 45
The goal is a consistent 5-6% yield and primarily uses this yield as the model's defense and. The minimum yield for a position is 3%. Uniquely, the model could be made up of any combination of mutual funds, Real estate, ETFs, or individual stocks. This is not a specifically tactical portfolio and generally remains invested, unless suitable replacement positions don't exist.

STAR 25/75: Riskalyze risk: 34 - 45
This model is allocated based on a computer calculated algorithm to rank momentum of stock sectors/style boxes each month or quarter. A diversified portfolio is built from the positions ranked at or better than the average momentum for the last month. In an up market determined by a proprietary algorithm, the maximum allocation to stock funds is 75%. If the algorithm determines that the market has weak momentum, then the maximum allocation to stock is 25% and the excess is allocated to bond or cash funds based on a similar ranking to stocks.

STAR 30/90: Riskalyze risk: 39 - 50
This model is allocated based on a computer calculated algorithm to rank momentum of stock sectors/style boxes each month or quarter. A diversified portfolio is built from the positions ranked at or better than the average momentum for the last month. In an up market determined by a proprietary algorithm, the maximum allocation to stock funds is 90%. If the algorithm determines that the market has weak momentum, then the maximum allocation to stock is 30% and the excess is allocated to bond or cash funds based on a similar ranking to stocks.

Blend: Riskalyze risk: 32 - 50
Blend/Dual Defense is an investment strategy that adapts to market trends by focusing on areas of the market showing positive momentum each month. It compares different segments of the market and identifies those with the strongest recent performance. If a blended model consisting of 60% stocks and 40% bonds performs better than a chosen position, a blended fund is utilized instead. In times of market uncertainty, the strategy may shift positions to cash as a defensive measure, relying on a proprietary indicator Stormguard. The model can allocate up to 100% in stocks or cash and invests in both mutual funds and exchange-traded funds.

AlphaDPM: Riskalyze risk 29 – 36
This is a monthly reviewed focused momentum model of ETF (exchanged traded funds). The model maintains 4 positions: top monthly momentum in countries, sectors of the S&P, sectors of the I-Shares funds, and a "global mix" basket of funds. The model uses Stormguard to determine if market risk is too high and rotates to defensive positions in an attempt to protect against market loss. Stormguard uses price trend, market sentiment, and position momentum charts to determine if Stormguard should be triggered.

Merlyn's Magic: Riskalyze risk 29 – 45
This model is an aggressive Aritifical intelligence (AI) run model similar to Alpha Droid, but heavily skewed to SSR @ 45%. Other exposures are 25% Global, 15% Style box (large/small and value/growth), and 15% factor based rotation. This model is a computer based model that we just implement. It's a possible successor to Alpha Droid model also using Stormguard to determine if market risk is too high and rotates to defensive positions in an attempt to protect against market loss. Stormguard uses price trend, market sentiment, and position momentum charts to determine if Stormguard should be triggered.

ESG Blend: Riskalyze risk: 30 - 40
ESG Blend/Dual Defense is an investment strategy that adapts to market trends by focusing on areas of the market showing positive momentum each month, however it starts with a filter for specific ESG categories. Those categories are: Clean Green, ESG International, ESG Social, Sustainable Future, Clean Water, Clean Energy, Electric Vehicles. It sorts these different catagories and identifies those with the strongest recent performance. If a blended model consisting of 60% stocks and 40% bonds performs better than a chosen position, a blended fund is utilized instead. In times of market uncertainty, the strategy may shift positions to cash as a defensive measure, relying on a proprietary

indicator. The model can allocate up to 100% in stocks or cash and invests in both mutual funds and exchange-traded funds.

SSR (Single Sector Rotation): Riskalyze risk: 54-70
This model is an aggressive Artificial intelligence (AI) run model similar to Alpha Droid, but focuses on one position at a time, not 4. This is a monthly reviewed focused momentum model of ETF (exchanged traded funds). The model maintains 1 position: top monthly momentum in countries, sectors of the S&P, sectors of the I-Shares funds, an aggressive mix of ETFs and a "global mix" basket of funds. The model uses Stormguard to determine if market risk is too high and rotates to defensive positions in an attempt to protect against market loss. Stormguard uses price trend, market sentiment, and position momentum charts to determine if Stormguard should be triggered.

Core/Satellite: Riskalyze risk: 19 – 55
This a series of models combining 2/3 of a static core stock position to 1/3 sector monthly rotation and movement to cash. The sector rotation portion also uses Stormguard to determine if market risk is too high and rotates to defensive positions in an attempt to protect against market loss. It is available ranging from a pure stock exposure to 25%, 50% and 75% Hiker bond.

Canvas Custom Indexing:
This model offers sophisticated Environmental, Social and Governance (ESG) investment options, as well as custom indexing solutions. Our personalized approach allows clients to choose their preferred level of ESG exposure. Customizable options include specific stock restrictions and value-based investing, which help align clients' portfolios with their personal beliefs or tax transition or harvesting needs.

PPA models: Pre-blended models:
- PPA Conservative (Riskalyze risk: 25 – 35)
  - 25% APM, 25% Dividend, 50%Core bond
- PPA Income (Riskalyze risk: 30 - 40)
  - 50% APM, 50% Dividend
- PPA Moderate (Riskalyze risk: 34 - 44)
  - 40%Blend, 40%CorSat, 20% Core bond
- PPA Growth (Riskalyze risk: 40 - 50)
  - 33%EWG Grth, 33%Merlyn, 34% Core Equity
- PPA Aggressive Growth (Riskalyze risk: 55 – 70)
  - 30% US AlphaDPM, 20% Core Equity, 10% Satellite, and 40% from an Innovation category.

Selection of Other Advisers

EEI may direct clients to third-party investment advisers. Before selecting other advisers for clients, EEI will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where EEI is recommending the adviser to clients.

Private Placement Offerings

We may also recommend to appropriate advisory clients:

- Investments in private placement offerings and/or limited investment partnerships (i.e., hedge funds and venture capital funds)

Investments in these types of private investment vehicles:

- Are not registered with or regulated by the SEC.
- Are available only to clients that are deemed to be an "accredited investor" in accordance with the requirements set forth in applicable laws, rules and regulations.
- Typically require investors to lock-up their assets for a period of time.
- Can have limited or no liquidity.
- Involve different risks than investing in registered funds and other publicly offered and traded securities.
- Are only recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.
- Additional information about the fees related to such investments is included in the private offering documents provided to prospective investors.
- We rely on the evaluation and performance data provided directly from the private investment vehicles. Private investment vehicles are often delayed in providing us with this information, which will delay us in reporting this information to clients.

Investments in the PPA Co-Living Fund I, LLC is now closed and no new subscribers are being accepted.

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. Advice, recommendations and the plan may be delivered verbally if requested by the client.

401-k services

EEI provides non-discretionary 3(21) services to 401-k plans. Services may include but are not limited to; Assisting in the education and enrollment of plan participants, periodic fee and service reviews of plan service providers, provide periodic electronic market updates and newsletters for plan participants, plan design and monitoring of industry vendors and trends.

Services Not Limited to Specific Types of Investments

EEI does not limit its investment advice. Generally EEI invests in mutual funds, fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and options. EEI may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

EEI will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by EEI on behalf of the client. EEI may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent EEI from properly servicing the client account, or if the restrictions would require EEI to deviate from its standard suite of services, EEI reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. EEI does not participate in any wrap fee programs.

E. Assets Under Management

EEI has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$ 441,354,739	$ 23,417,989	December 2022

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
$0 - $250,000	1.75%
$250,001 - $500,000	1.60%

Total Assets Under Management	Annual Fees
$500,001 - $1,000,000	1.50%
$1,000,001 - $1,500,000	1.45%
$1,500,001 - $2,500,000	1.40%
$2,500,001 - $3,500,000	1.35%
$3,500,001 - $5,000,000	1.30%
$5,000,001 – $10,000,000	1.25%

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

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 penalty for a full refund of EEI's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Selection of Other Advisers Fees

EEI may direct clients to third-party investment advisers. EEI will be compensated via a fee share from the advisers to which it directs those clients. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

EEI may specifically direct clients to Brinker Capital. The annual fee schedule is as follows:

Total Assets	EEI's Fee	Brinker's Fee	Total Fee
All Assets	Up to 0.95%	Up to 0.95%	Up to 1.90%

EEI may specifically direct clients to SEI. The annual fee schedule is as follows:

Total Assets	EEI's Fee	SEI's Fee	Total Fee
All Assets	Up to 0.62%	Up to 0.63%	Up to 1.25%

Private Fund Fees

The Fund will pay to the Manager an annual management fee equal to 1.5% of the Fund's aggregate Capital Commitments of the Members ("Management Fee"). The Management Fee will accrue as of the Initial Closing based on total Capital Commitments of the

Members regardless of when Members are admitted to the Fund. Management Fees will generally be paid on a quarterly basis in advance.

Please see Item 10 -Other Financial Industry Activities and Affiliations for additional information regarding the Private Funds

Financial Planning Fees

Hourly Fees

The typical negotiated hourly planning fee is $250, but we reserve the right to waive any/all hourly planning fees in-part, or entirely.

Fixed Fees

The fixed rate for creating client financial plans is between $1500 and $4000. The fees are negotiable.

Clients may terminate the agreement without penalty, for full refund of EEI's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly or quarterly basis. Fees are paid in advance. Fees are based on the valuation of the last business day of the prior month end.

Payment of Selection of Other Advisers Fees

Fees are paid monthly or quarterly in arrears.

Fees for selection of Brinker Capital as third-party adviser are withdrawn by Brinker Capital directly from client accounts. EEI then receives its portion of the fees from Brinker Capital; EEI does not directly deduct the advisory fees.

Fees for selection of SEI as third-party adviser are withdrawn by SEI directly from client accounts. EEI then receives its portion of the fees from SEI; EEI does not directly deduct the advisory fees.

Payment of Financial Planning Fees

Financial planning fees are paid via check.

Hourly financial planning fees are paid in arrears upon completion.

Fixed fees may be billed in advance and on a monthly, quarterly, semi-annual or annual basis.

Payment of 401-k fees

Management fees are billed in arrears and may be paid by the plan or the plan sponsor. Fees range between 20 bp and 1% and are negotiable.

C. 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 EEI. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

EEI collects fees in advance. 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.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation for the Sale of Securities or Investment Products to Clients

Neither EEI nor its supervised persons accept any compensation for the sale of securities, including asset-based sales charges or service fees from the sale of mutual funds. EEI supervised persons do accept compensation for the sale of Investments products such as insurance

1. *This is a Conflict of Interest*

This presents a conflict of interest and gives the supervised person and EEI an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which EEI or the supervised person receives compensation, EEI will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. *Clients Have the Option to Purchase Recommended Products From Other Agents*

Clients always have the option to purchase EEI recommended products through other agents that are not affiliated with EEI.

3. *Commissions are not the Primary Source of Income for this Registered Investment Adviser*

Commissions are not EEI's primary source of compensation.

4. *Advisory Fees in Addition to Commissions or Markups*

Advisory fees that are charged to clients are not reduced to offset the commissions on investment products recommended to clients.

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

EEI 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.

Item 7: Types of Clients

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Insurance Companies

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

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

EEI's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. EEI uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

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.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

EEI uses long term trading and short term trading.

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

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

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.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

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.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

C. Risks of Specific Securities Utilized

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. 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.

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. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. 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 writing also involves 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.

Puts (or "put options") are options to sell assets at an agreed price on or before a particular date, permitting the investor to hedge an investment already in the portfolio or speculate in an investment the investors does not own (i.e., a naked put). The seller's potential loss on a naked put is substantial. If the stock falls all the way to zero (bankruptcy), the loss is equal to the strike price (at which the stock must be purchased in order to cover the option) minus the premium received.

Pooled Investment Vehicles: Only eligible clients can invest in alternative investments in pooled investment vehicles such as private equity or hedge funds. These types of investments generally have a higher level of risk due to their concentrated nature, lack of liquidity, and other reasons. Before investing in a pooled investment vehicle for a client, EEI will require the client to provide representations establishing that the client is an "accredited investor". EEI will rely on the accuracy of a client's representations in making corresponding representations about the client. The client is responsible for promptly informing EEI should its representations become inaccurate.

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

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither EEI nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

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

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

All investment advisers of EEI are also licensed insurance agents. From time to time, they will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. EEI always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of EEI in their capacity as a licensed insurance agent.

Patrick Salimi is the President of Retireminting, Inc., a marketing, consulting, and systems creation company for legal and investment firms.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

EEI may direct clients to third-party investment advisers. EEI will be compensated via a fee share from the advisers to which it directs those clients. This creates a conflict of interest in that EEI has an incentive to direct clients to the third-party investment advisers that provide EEI with a larger fee split. EEI will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. EEI will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where EEI is recommending the adviser to clients.

PPA Co-Living Fund I, LLC, a Delaware limited liability company (the “Fund”), has been formed by The PPA Invest Team, LLC, a Delaware limited liability company (the “Manager”) for the purpose of acquiring residential co-living properties.

The Fund will be managed by PPA Invest Team, LLC, a Delaware limited liability company is its manager (the “Manager”).

PPA Co-Living Fund I, LLC, is under common ownership with EEI.

The PPA Invest Team, LLC, is under common ownership with EEI.

EEI employees may also be members of the Private Funds.

Because investment in these types of entities can involve certain additional degrees of risk, they will only be recommended when consistent with the client’s stated investment objectives, tolerance for risk, liquidity, and suitability.

Related persons of EEI may spend as much as 25% of their time on these related Activities.

No client is obligated to invest in the Private Funds, or any other Private Funds sponsored or owned by an employee of EEI.

The information contained in this Brochure does not constitute an offer to sell or the solicitation of an offer to invest in the Private Fund. Such an offer can be made only by means of the respective Private Fund’s offering documents and only in those jurisdictions where permitted by law. Such offering documents contain information specific to the respective Private Funds, risks, fees and expenses, and among other things.

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

A. Code of Ethics

EEI has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. EEI's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

When suitable, EEI will recommend that clients buy or sell a security in which a related person to EEI or EEI has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of EEI may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of EEI 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 may create a conflict of interest. EEI will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of EEI may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of EEI to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, EEI will never engage in trading that operates to the client's disadvantage if representatives of EEI buy or sell securities at or around the same time as clients.

The Fund will be managed by PPA Invest Team, LLC, a Delaware limited liability company, as its manager (the "Manager").

PPA Co-Living Fund I, LLC, has designated PPA Invest Team, LLC as having primary responsibility for investment management and administrative matters pertaining to the Private Fund, such as accounting, tax, and periodic reporting. PPA Invest Team, LLC and its employees will devote to the Private Funds as much time as it deems necessary and appropriate to manage the Private Funds' business. PPA Invest Team, LLC is not restricted from forming additional investment vehicles, entering into other investment advisory relationships, or engaging in other business activities, even though such activities may be in competition with the Private Funds and/or may involve substantial time and resources of PPA Invest Team, LLC.

Potentially, such activities can be viewed as creating a conflict of interest in that the time and effort of our investment personnel and employees will not be devoted exclusively to the business of our advisory accounts but also, can be allocated between the businesses of the Private Funds.

The Private Funds are not required to register as an investment company under the Investment Company Act of 1940 in reliance upon an exemption available to funds whose securities are not publicly offered.

PPA Invest Team, LLC manages the Private Fund on a discretionary basis in accordance with the terms and conditions of the Private Fund's offering and organizational documents.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on EEI'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 EEI may also consider the market expertise and research access provided by the broker-dealer/custodian, 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 EEI's research efforts. EEI will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

EEI recommends Fidelity Brokerage Services LLC and Schwab Institutional, a division of Charles Schwab & Co., Inc.

1. *Research and Other Soft-Dollar Benefits*

While EEI has no formal soft dollars program in which soft dollars are used to pay for third party services, EEI may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). EEI 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 EEI does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. EEI benefits by not having to produce or pay for the research, products or services, and EEI will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that EEI's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

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

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

EEI requires clients to use either Schwab Institutional, a division of Charles Schwab & Co., Inc. of Fidelity Brokerage Services, LLC. Not all advisers require their clients to use certain custodians.

B. Aggregating (Block) Trading for Multiple Client Accounts

If EEI 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, EEI 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. EEI would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for EEI's advisory services provided on an ongoing basis are reviewed at least Quarterly by Richard Watson, Director of Compliance, assigned compliance staff or the assigned Investment Adviser Representative, with regard to clients' respective investment policies and risk tolerance levels. EEI has an investment committee that reviews all offered investment models to clients.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Richard Watson, Director of Compliance, assigned compliance staff, or Investment Adviser Representative. 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.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

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).

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client of EEI's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. EEI will also provide at least quarterly a separate written statement to the client.

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

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

EEI receives compensation from third-party advisers to which it directs clients.

With respect to Schwab, EEI 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 EEI 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 EEI other products and services that benefit EEI but may not benefit its clients' accounts. These benefits may include national, regional or EEI specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of EEI 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 EEI 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 EEI'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 EEI's accounts. Schwab Advisor Services also makes available to EEI other services intended to help EEI 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 EEI 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 EEI. EEI is independently owned and operated and not affiliated with Schwab.

EEI has negotiated reduced client trade fees, reduced alternative holdings fees and absorption of client account transfer/termination fees.

B. Compensation for Client Referrals

EEI currently engages the services of promoters through the National Referral Network and pays compensation to them if they refer clients to us. Prior to paying such referral fees, we will ensure compliance with all local and federal securities regulations prior to paying such compensation.

EEI does compensate in-house promoters who are registered with EEI for client referrals. The promoters will receive a portion of the advisory fees generated for clients they refer. This amount is generally from 15% to 20% of the advisory fees as long as the client remains with EEI and the promoter maintains an active promoter arrangement with EEI. This fee is negotiable on a client-by-client basis.

This may represent a conflict of interest since the promoters receive a fee for referring clients to EEI. This conflict is mitigated by the firm reviewing all referrals to make sure the referral is in the best interests of the client.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, EEI will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

EEI is under common control with the PPA Invest Team, LLC, which acts as the manager for the pooled investment vehicle, PPA Co-Living Fund I. As such, the PPA Invest Team, LLC is considered a related person and, therefore, has custody of client assets through their role as manager of the Fund.

Item 16: Investment Discretion

EEI provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, EEI 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, EEI'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 EEI.

Item 17: Voting Client Securities (Proxy Voting)

EEI 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 the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

EEI neither requires nor solicits prepayment of more than $1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

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

C. Bankruptcy Petitions in Previous Ten Years

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