



## **Firm Brochure**

### **Part 2A of Form ADV**

#### **ELDERADO FINANCIAL, INC.**

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Montrose, CO 81401**

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877-422-4770 (Toll Free)

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This brochure provides information about the qualifications and business practices of ElderAdo Financial, Inc. (hereinafter "EFI" or "Advisor"). 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. If you have any questions about the contents of this brochure, please contact Jaimee Carnes, our Chief Compliance Officer, at the above telephone or email addresses.

Additional information about ElderAdo Financial, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by entering a unique identifying number, known as a IAPD/CRD number into the search field. The IAPD/CRD number for ElderAdo Financial, Inc. is 112908. You can also search by Registration with the SEC and other state securities authorities. A registration or license does not imply a certain level of skill or training.

This brochure was last updated December 31, 2020.

## Item 2 - Material Changes

### Annual Update

This Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure. We will offer or deliver information about our qualifications and business practices to clients on at least an annual basis, without charge. Under SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide other ongoing disclosure information about material changes as necessary.

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### Material Changes since Last Update

- EFI has had no material changes since the last update on December 31, 2019.
- Our Assets Under Management have been updated. Please refer to *Item 4 – Advisory Business* for more information.

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### Full Brochure Available

If you would like to receive a copy of our Brochure, free of charge, or have questions about the contents, please contact EFI at Local: 970-249-9900 or Toll Free: 877-422-4770 or by email: [info@ElderadoFinancial.com](mailto:info@ElderadoFinancial.com). Our Brochure is also available on our web sites free of charge: [www.ElderadoFinancial.com](http://www.ElderadoFinancial.com) and [www.PrestigeAdvisors.com](http://www.PrestigeAdvisors.com).

Additional information about EFI is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with EFI who are registered, or are required to be registered, as investment advisor representatives of EFI.

## Item 3 – Table of Contents

|   |    |
|---|----|
| Item 4 – Advisory Business .....  | 1  |
| Item 5 – Fees and Compensation .....                                      | 2  |
| Item 6 – Performance-Based Fees and Side-By-Side Management .....         | 4  |
| Item 7 – Types of Clients .....   | 4  |
| Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss..... | 4  |
| Item 9 – Disciplinary Information .....                                   | 6  |
| Item 10 – Other Financial Industry Activities and Affiliations .....      | 6  |
| Item 11 – Code of Ethics .....  | 7  |
| Item 12 – Brokerage Practices .....                                       | 7  |
| Item 13 – Review of Accounts.....   | 8  |
| Item 14 – Client Referrals and Other Compensation.....                    | 9  |
| Item 15 – Custody.....  | 10 |
| Item 17 – Voting Client Securities.....                                   | 11 |
| Item 18 – Financial Information .....                                     | 11 |
| Item 19 – Requirements for State-Registered Advisors.....                 | 11 |

## Item 4 – Advisory Business

### Firm Description

Elderado Financial Inc. (hereafter referred to as EFI) was founded June 20, 1998. EFI is an investment and asset management advisory firm registered with the State of Colorado Division of Securities.

EFI generally provides financial planning and investment management services to individuals, high net worth individuals, charitable organizations, foundations, endowments, and trusts on a personalized and confidential basis. EFI provides advice to our clients by gathering the relevant client information and consulting with the client. Financial planning and asset management services to the client may include: determination of financial objectives, identification of financial challenges, cash flow management, insurance review, investment management, education funding, retirement planning and other areas of importance to the client. Investment advice and asset management for our clients is provided in respect to the client's overall risk tolerance and goals.

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### Principal Owners

Jim Elder is the principal owner.

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### Types of Advisory Services

EFI provides both financial planning and investment management services as described in the Firm Description. Each of EFI programs is described in greater detail in Item 5 ("Fees and Compensation") of this Firm Brochure.

Dependent on the advisory relationship (Agreement) selected by the client, EFI may have discretion over the type of securities bought and sold as well as dollar amounts without first obtaining client's permission for each transaction. Client agrees to this upon their choice of program and their signature on the Agreement.

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### Tailored Relationships

Both financial planning and asset management services are customized to the needs of the individual client. At no time is the client under any obligation to implement (with EFI or with any other firm) any or all of the suggestions as outlined in the financial plan. Implementation is solely at the client's discretion. ***It is the responsibility of the client to notify EFI of any changes to their financial situation or objectives that may impact the focus of the financial plan or their current investments with EFI.***

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### Non-Participation in Wrap Fee Programs

EFI maintains a policy and practice of not using any wrap fee programs. Wrap-fee program definition: A program that bundles or wraps investment advice, custody and execution services under one contract for a single fee.

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## Amount of Assets under Management

Current as of December 31, 2020, EFI manages a total of 706 accounts. The amount of assets under management is approximately \$114,897,221. EFI manages all accounts on a discretionary basis with zero assets managed on a non-discretionary basis.

## Item 5 – Fees and Compensation

### Asset Management and Financial Planning Services

Elderado Financial, Inc. offers advisory services in the areas of personal and business planning and asset management as indicated in the 3 service options listed below. The specific manner in which fees are charged by EFI is established in a client's written Agreement with EFI and the service option selected.

- 1) Asset Management Program Agreement: EFI provides investment advisory services and offers financial planning to individuals and company qualified plans payable in arrears each month as a percentage of assets under management. See Asset Management Program Fees below for the fee schedule and further detail. EFI will provide asset management on a discretionary basis, further described in Item 16: Investment Discretion.
- 2) Financial Planning Retainer Agreement: For planning services on a limited scope of work, clients are billed a retainer, calculated on an annual basis. These services are based on a negotiated rate and are billed quarterly. Services provided may include retirement planning, investment portfolio assessment and risk tolerance assessment, and other general and specialized financial planning topics based on the needs and concerns of the client. EFI advisors can provide investment advice on a discretionary or non-discretionary basis.
- 3) Financial Planning Agreement: EFI provides comprehensive financial planning services, specific financial planning, or hourly financial consultations. The fee is due upon completion of the agreement. The adviser will collect the pertinent data, conduct personal interviews with the client, and present to the client. Other general and specialized financial planning topics may be included based on the needs and concerns of the client. The fees charged by the adviser are solely for the preparation of the comprehensive financial plan, specific financial plan, or financial consultation, and do not include any commissions that might be generated upon implementation of any securities or insurance recommendations. EFI advisors can provide investment advice on a discretionary or non-discretionary basis.

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### Asset Management Program Fees

Clients who enter into an agreement with EFI for the Asset Management Program will be provided both asset management and financial planning services. Clients who opt for this program will authorize the deduction of fees directly from their managed accounts, payable in arrears, based upon the asset value on the last day of the previous month as 1/12<sup>th</sup> of client's annual fees. These fees will be debited from client's accounts between the 1<sup>st</sup> and 15<sup>th</sup> of the month following the end of the previous calendar month by the Custodian where the account is held, then forwarded to EFI.

#### Asset Management Program Fee Schedule\*:

|           |    |                |       |
|-----------|----|----------------|-------|
| \$0       | to | \$149,999..... | 1.50% |
| \$150,000 | to | \$499,999..... | 1.00% |
| \$500,000 | to | \$999,999..... | .85%  |

|                                 |      |
|---------------------------------|------|
| \$1,000,000 to \$1,999,999..... | .75% |
| \$2,000,000 and above.....      | .70% |

\*Fees may be negotiated per advisor discretion

Clients may incur and are responsible for certain fees, charges and commissions imposed by third-parties for executing transactions and other custodial services for client accounts. Such fees, charges and commissions are separate and distinct from EFI’s fee. These fees and expenses will generally be used to pay management fees for the securities, other fund expenses and account administration (e.g., custody, brokerage and account reporting). Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in the fund’s prospectus. More details are provided concerning our Custodian in Item 12–Brokerage Practices.

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## Termination of Agreement

For the Asset Management Program Agreement, Financial Planning Agreement, or the Financial Planning Retainer Agreement, the client or EFI may cancel the Agreement at any time with written notice.

Termination of the Asset Management Program Agreement: Clients are billed after services are rendered so refunds of prepaid services are not applicable. The client will be responsible for any fees or charges incurred by client from third parties as a result of maintaining managed accounts or for any securities transactions executed. Managed accounts terminated during a calendar month may be charged a prorated fee.

Termination of the Financial Planning Retainer Agreement: If the client or EFI cancels the Agreement after EFI has begun the services requested, the client will be charged for the services completed, then refunded a pro-rata portion of the amount already paid.

Termination of the Financial Planning Agreement: The advisor or client may terminate the agreement within three (3) days of the date of acceptance without penalty to the client. Afterwards, the client will incur a pro rata charge for bona fide advisory services actually rendered prior to the termination. After the five-day period, either party may terminate the agreement by providing written notice to the other party. Upon termination, any prepaid fees will be pro-rated to the date of termination and any *unearned* portion will be refunded.

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## Conflicts of Interest

EFI provides financial planning and advisory services to multiple clients resulting in our client relationships being non-exclusive. We strive to avoid circumstances where one client’s interest may conflict with another client.

EFI and our advisors are not dually registered or affiliated with a broker/dealer and do not accept or receive compensation on the sale of securities products, mutual funds, or annuities. Item 12 describes the factors that EFI considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

With approval from the client, EFI advisors may work with other professionals such as attorneys, accountants and insurance agents who EFI feels will be suitable for the unique needs of the client. In the event a conflict of interest occurs while EFI is working with another professional concerning the client, the issue will be disclosed to the client and action taken as needed to resolve the conflict. EFI maintains the policy that no referral commissions are paid to other professionals when clients are referred to their services.

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

This section is not applicable as EFI does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

EFI generally provides financial planning and investment management services to individuals, high net worth individuals, charitable organizations, foundations, endowments and trusts. Clients vary in scope and length of service.

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### **Account Minimums**

For clients who have signed the Asset Management Program Agreement, the minimum household account size will generally be \$25,000. This may vary and will be negotiable at the sole discretion of EFI. Accounts of less than \$25,000 may be set up when the client and the EFI advisor anticipate the client will add additional funds to the accounts bringing the total to \$25,000 within a reasonable time.

For clients who have signed the Financial Planning Retainer Agreement or Financial Planning Agreement, there will be no minimum account size requirement as client's assets will not be actively managed.

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

### **Methods of Analysis**

EFI primarily uses analysis tools such as Morningstar Office® mutual fund information and tools, Morningstar Office® stock, bond and ETF information, TD Ameritrade's advisor services, and various financial websites. EFI may also use methods to analyze securities that include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports and prospectuses.

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### **Investment Strategies**

In order for EFI to conduct financial planning and investment management, the client will be required to furnish certain records and documents to the EFI advisor for review. These documents may include tax returns, current financial specifics including W2s or 1099s, information on current retirement plans and insurance provided by employer, mortgage information, insurance policies, statements reflecting current investments in client's retirement and non-retirement accounts, copies of wills or trusts, and other documents that may be deemed pertinent at the Advisor's request.

Upon receipt of these documents, EFI will review the client's current financial situation and make recommendations based on client's current situation, expectations, investment objectives and investment time horizon. The client's risk tolerance (or ability to live comfortably with risk in association with investments)

will also be taken into account. A plan will then be presented to client along with an outline of suggestions to improve the client's current financial situation as well as suggested steps to help client reach their investment goals.

The financial plan chosen by the client may be "comprehensive" or "modular" in structure. A comprehensive plan will focus on all areas listed that are pertinent to the client. A modular plan will focus on areas of particular interest such as retirement or philanthropic planning. Other areas of concern to the client may be reviewed by the EFI advisor or outsourced to other experts for their review (only with prior approval of the client). The financial plan may include specific financial and investment strategies as well as specific recommendations.

In all matters, EFI's planning services are analytical and advisory only, and do not include legal or other professional services. Upon request and with client's permission, the EFI Advisor will work with client's legal, accounting, insurance or other professional advisors to ensure the coordination of all aspects of the financial planning process.

The Advisor provides planning services based on the information that the client provides. In order for the Advisor to provide suitable advice for the client's situation, it is the responsibility of the client to notify EFI of any changes to their financial situation or objectives that may impact the focus of the financial plan or their current investments with EFI. EFI and its Advisors will not be held responsible for a lack of planning if the client does not share information that is pertinent to their financial circumstances.

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## **Risk of Loss**

**Interest Rate Risk:** The balanced and income focused mutual funds and bonds recommended by EFI carry interest rate risk. Stocks purchased by EFI individually, or in equity focused or balanced mutual funds may also be affected by this type of risk as the cost of capital increases.

**Market Risk:** The stocks, bonds, mutual funds and ETF investments purchased within client accounts by EFI are publicly traded and may increase or decrease in value based on variance in world markets.

**Inflation Risk:** All investments of EFI clients are denominated in U.S. Dollars and are subject to Inflation risk. Fixed income assets such as bonds and fixed income funds tend to be more susceptible to this type of risk but in times of high inflation and poor market performance, equity-based assets are not insulated from the risk of inflation.

**Currency Risk:** EFI recommends international investments in stocks and bonds that are both hedged and unhedged against currency risk. Risk of loss is assumed as currencies fluctuate.

**Reinvestment Risk:** EFI invests in assets that pay interest and dividends and in bonds that can reach maturity or be called early resulting in a cash position. There is a risk that EFI clients may obtain these cash holdings at a date that is less favorable than the initial investment date.

**Business Risk:** EFI clients assume this business risk when equity or debt of these businesses is purchased in client accounts through individual holdings or through funds.

**Liquidity risk:** EFI generally avoids investments with high liquidity risk over long periods of time. EFI focuses on publicly traded investments that allow trading on a daily basis. In rare cases, based on a client's needs, an asset may be held that has a higher degree of liquidity risk such as an individual bond or ownership in an individual equity or REIT that is not publicly traded.



**Financial Risk:** The stocks and bonds owned individually or within mutual funds and exchange traded funds within the accounts of EFI clients are subject to this risk. A company or government has the ability to change its financial situation while owned within a client's account leading to financial risk.

**Small Company Risk:** EFI purchases investments in debt and equity of small companies on an individual basis and through managed funds. Investors in these assets assume small company risk.

**Government Risk:** Securities may be impacted by prospective changes in legislation and policies within different government entities. Corruption in governments can also negatively affect investments. Increasing tax rates, fiscal policy and other factors across governments poses risk to an investor. EFI invests within the United States and abroad. Seeking return within stocks, bonds, real estate investments, and funds under the authority of these governments assumes government risk within client accounts.

## **Item 9 – Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of EFI or the integrity of the firm's management.

EFI and its' employees have NOT been involved in any legal or disciplinary events concerning past or present investment clients.

## **Item 10 – Other Financial Industry Activities and Affiliations**

### **Financial Industry Activities**

EFI is not registered and does not have an application pending as a broker-dealer, municipal securities dealer or government securities dealer, future commissions merchant, commodity pool operator, a commodity trading advisor or an associated person of the foregoing entities.

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### **Affiliations**

EFI has no affiliations that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading advisor or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships. EFI also does not have any affiliation with product sales firms.

EFI, in its fiduciary duty to its clients, will always act in the best interests of its clients. Although EFI Advisors may recommend or select other financial professionals for our clients, EFI does not receive any direct or indirect compensation. Clients are not obligated to implement any recommendation provided by the Advisor.

## **Item 11 – Code of Ethics**

EFI has adopted a Code of Ethics in compliance with SEC Rule 204A-1 and similar statutes or rules. We will provide a copy of our Code of Ethics to any client or prospective client upon request. Our Code of Ethics describes our high standard of business conduct and our fiduciary duty to our clients. The employees at EFI are committed to act in the best interests of the client and with integrity and complete objectivity with respect to our advisory services and recommendations made to the client.

The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at EFI must acknowledge the terms of the Code of Ethics annually, or as amended.

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### **Participation or Interest in Client Transactions and Personal Trading**

EFI and its related persons maintain a policy to not recommend to clients or buy or sell securities for client accounts for which EFI or its related persons has a material financial interest.

At times, EFI's employees may buy or sell the same securities or select different securities for their personal accounts as those recommended to clients. To avoid a potential conflict of interest, EFI maintains a strict policy that employees of EFI must work to avoid all activities, investment decisions and relationships that are contrary to the best interests of clients. EFI complies fully with The Insider Trading and Securities Fraud Enforcement Act of 1988 and requires employees to document and receive approval from our Chief Compliance Officer for all personal securities transactions. Our Code of Ethics states that the officers, directors, and employees of EFI (related persons) have a fiduciary duty to place the interests of the clients ahead of their own interests and that they must avoid activities, interests and relationships that may interfere with making decisions in the best interests of clients.

## **Item 12 – Brokerage Practices**

### **Recommendation of Custodian(s)**

EFI does not hold custody of client assets and has discretion to determine the broker/custodian through which securities are to be bought and sold. EFI currently uses TD Ameritrade Institutional to custody client assets. EFI selects the specific Custodian by evaluating the quality and cost of services including the Custodian's reliability, integrity, on-going service and financial responsibility. EFI reviews regularly the quality and cost of Custodian services and evaluates the Custodian's commitment to achieving best execution for our client's trades. Advisor routinely recommending and/or requiring that clients use a specified broker-dealer may result in Advisor being unable to achieve the most favorable execution of client transactions, and that practice may cost clients more money.

Clients who are in the Asset Management Program will authorize EFI to direct trades to this Custodian as agreed in the Asset Management Program Client Agreement. The Custodian for client's accounts delivers statements to clients at least once monthly listing all transactions and fees charged directly to the client's account. These fees should be reviewed by the client, as it is not the Custodian's duty to do so. EFI may review performance reports with the clients during a telephone or face-to-face meeting if the client has questions.

Clients who are receiving financial planning services and who are not in the Asset Management Program at EFI are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by EFI.

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## **Research and Other Soft Dollar Benefits**

Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. EFI participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. EFI receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14 below.)

EFI does not receive fees or commissions from any of the Custodian advisor programs.

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## **Order Aggregation**

Clients who are in the Asset Management Program will authorize orders to be executed by our Custodian, and may be aggregated to achieve best execution. As most trades are mutual funds or exchange-traded funds, trade aggregation does not provide any client benefit.

## **Item 13 – Review of Accounts**

### **Periodic Reviews**

For clients enrolled in the Asset Management Program, Quarterly Portfolio Reviews are completed by advisors of EFI to monitor the values in any asset class and whether they have drifted beyond their target minimums or maximums. EFI advisors consider the client's current investment holdings and analyze the probability that the performance of each security will contribute to the investment objectives of the client. Various factors are considered on whether or not asset classes need to be rebalanced such as protecting against short-term capital gains, deferring long-term capital gains realization, minimization of transaction costs, or the advisor's judgment that an asset class may be undervalued or overvalued relative to historic norms. The EFI advisor will notify clients in the event that rebalancing actions are recommended. EFI also completes a daily reconciliation of accounts from data received from the Custodian.

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### **Review Triggers**

Reviews may be scheduled when there are changes in tax laws or changes in a client's situation and investment goals. Additional portfolio reviews and financial plan reviews are undertaken upon request by the client, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. EFI may also recommend investment changes as a result of consultation with a CPA or attorney.

## **Review Reports**

EFI clients receive periodic communications and quarterly reports. The reports include a portfolio performance summary. EFI communications may be delivered electronically either through a secure web portal or by regular mail. Clients also receive monthly statements from the Custodian either electronically through a secure web portal or by regular mail.

## **Item 14 – Client Referrals and Other Compensation**

### **Incoming Referrals**

EFI typically receives referrals from current clients, accountants, attorneys and other similar sources. EFI does NOT compensate referring clients or professionals.

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### **Referrals Out**

EFI does not receive referral fees or any other form of compensation from other professionals when clients and non-clients are referred by EFI.

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### **Other Compensation**

As disclosed under Item 12 above, EFI participates in TD Ameritrade's institutional customer program and EFI may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between EFI's participation in the program and the investment advice it gives to its clients, although EFI receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving EFI participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to EFI by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by EFI's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit EFI but may not benefit its client accounts. These products or services may assist EFI in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help EFI manage and further develop its business enterprise. The benefits received by EFI or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, EFI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by EFI or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the EFI's choice of TD Ameritrade for custody and brokerage services.

EFI may receive coaching services referrals from TD Ameritrade through its participation in TD Ameritrade Institutional Coaching Program. In addition to meeting the minimum eligibility criteria for participation in the TD Ameritrade Institutional Coaching Program, EFI may have been selected to participate in the TD

Ameritrade Institutional Coaching Program based on the amount and potential profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with EFI and there is no employee or agency relationship between them. TD Ameritrade has established the TD Ameritrade Institutional Coaching Program as a means of assisting independent unaffiliated advisors to grow and maintain their respective investment advisor business. TD Ameritrade does not supervise EFI and has no responsibility for EFI's management of client portfolios or EFI's other advice or services. EFI's participation in the TD Ameritrade Institutional Coaching Program raises potential conflicts of interest. EFI will encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to participate in the TD Ameritrade Institutional Coaching Program, EFI may have an incentive to recommend to clients that the assets under management by EFI be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade.

EFI's participation in the TD Ameritrade Institutional Coaching Program does not diminish its duty to seek best execution of trades for client accounts. EFI receives no fees or commissions from any of the Custodian advisor programs.

## **Item 15 – Custody**

Under government regulations, EFI is deemed to have custody of your assets when, for example, you authorize us to instruct the qualified Custodian to deduct our advisory fees directly from your account(s). The qualified Custodian maintains actual custody of your assets. EFI requires that all clients within a managed account program place their assets with our qualified Custodian, TD Ameritrade, and that clients provide written authorization for EFI to deduct asset management fees from the client's account(s). The payment of management fees in this manner is generally more efficient and convenient for both the client and EFI.

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## **Account Statements**

Clients participating in the Asset Management Program will receive account statements at least quarterly from the qualified custodian that holds and maintains client's investment assets. We urge you to carefully review and compare such official custodial statements with the periodic performance reports that we provide to you. Our reports are generally sent to clients quarterly and may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

EFI receives discretionary authority from clients who participate in the Asset Management Program. Discretionary authority will be granted by the signature of client on the Asset Management Program Client Agreement at the beginning of an advisory relationship. This enables EFI to select the identity and select amount of securities to be bought or sold, then proceed in a timely manner with changes to the account(s). The limited power of attorney agreed upon by the client is limited to the purchase and sale of securities, including the trading of options, if applicable, and the authorization for management fees to be paid to EFI from Account.

In all cases, discretion is exercised in a manner consistent with the stated investment objectives, guidelines, or limitations previously provided by the client and agreed to by EFI. It is the client's responsibility to advise EFI of any changes in the client's investment goals. All clients are encouraged to review their objectives and account performance with EFI each year, either in person, phone conference, or by email.

## **Item 17 – Voting Client Securities**

EFI will accept authority to vote proxies related to securities held by any client in a manner solely in the best interest of the client. If a client elects to receive this complimentary service, the client will be required to sign an authorization form. When voting on proxies, EFI will consider only those factors that relate to the client's investment, including how its vote will economically impact and affect the value of the client's investment. By maintaining this fiduciary practice of always doing what's in the client's best interest, EFI strives to avoid potential conflicts of interest. Proxy votes generally will be cast in favor of proposals that maintain or strengthen the shared interests of shareholders and management, increase shareholder value, maintain or increase shareholder influence over the issuer's board of directors and management, and maintain or increase the rights of shareholders; proxy votes generally will be cast against proposals having the opposite effect. In voting on each and every issue, EFI shall vote in a prudent and diligent fashion and only after a careful evaluation of the issue presented on the ballot. If a client requests to direct EFI's vote on a particular solicitation in a timely manner and before the vote is cast, EFI will vote according to client's wishes.

Clients may obtain information on how EFI voted any proxies on behalf of their account(s) as well as a copy of our proxy voting policies and procedures by request to EFI at any time.

## **Item 18 – Financial Information**

EFI does not have any adverse financial circumstances that would reasonably impair EFI from meeting contractual commitments to clients. EFI and its advisory persons have not been subject to either bankruptcy or financial compromise.

A balance sheet is not required to be provided because EFI does not operate as a qualified custodian for client funds or securities and EFI does not require any fees to be pre-paid.

## **Item 19 – Requirements for State-Registered Advisors**

The Brochure Supplement (Part 2B of Form ADV) contains additional information required by State-Registered Advisors. Please refer to the Brochure Supplements (Part 2B of Form ADV) on the following pages for this information on each EFI advisor.



**Brochure Supplement  
Part 2B of Form ADV**

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**JIM ELDER**

**CRD#: 2417388**

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**ELDERADO FINANCIAL, INC.**

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This brochure supplement provides information about JIM ELDER that supplements the ElderAdo Financial, Inc. brochure. You should have received a copy of that brochure. Please contact ElderAdo Financial if you did not receive ElderAdo Financials' brochure or if you have any questions about the contents of this supplement. Additional information about Jim Elder is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **JIM ELDER - Education and Business Standards**

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**Year of Birth:** 1959

### **Educational Background:**

- College for Financial Planning, Denver, CO (1994-1996)
- Colorado State University, Ft. Collins, CO (1978-1981)

### **Business Experience:**

- ElderAdo Financial, Inc. – President (2018 – Present)
- ElderAdo Financial, Inc. - Vice President (2015 - 2018)
- ElderAdo Financial, Inc. - President (2011 - 2015)
- ElderAdo Financial, Inc. - Chief Financial Officer (1998 – 2011)
- Excellence in Finances - Chief Financial Officer (1993 – 1998)

### **Other Business Activities:**

- Member of Rotary International. Time commitment: 1-hour weekly.
- ElderAdo Properties, LLC (Real Estate Property Investment). Time commitment: 5 hours weekly.
- ElderAdo Acres, LLC (Farm). Time commitment: 20 hours weekly.
- ElderAdo Vacations, LLC. Time commitment: 5 hours weekly.
- ELCO Enterprises, LLC (Real Estate Property Investment). Time commitment: 1-hour weekly.

**Disciplinary Information:** No disciplinary action has occurred.

**Additional Compensation:** Jim Elder does not receive any economic benefit from third parties for providing advisory services.

**Supervision:** Jim Elder discusses investment decisions with the EFI Investment Committee.





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**JANET ELDER**

**CRD#: 4429456**

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**Year of Birth:** 1963

**Educational Background:**

- Phillips University, Enid, OK (1985)
- Arapahoe Community College, Littleton, CO (1988)

**Business Experience:**

- ElderAdo Financial, Inc. – Chief Investment Officer (2019 – Present)
- ElderAdo Financial, Inc. – Chief Investment Officer (1998 – 2017)
- Excellence in Finances – Chief Investment Officer (1997-1998)

**Other Business Activities:** Janet Elder was a member of Altrusa International

**Disciplinary Information:** No disciplinary action

**Additional Compensation:** Janet Elder does not receive any economic benefit from third parties for providing advisory services.

**Supervision:** Janet Elder discusses investment decisions with the EFI Investment Committee.



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**ADAM MILLER**

**CRD#: 5317765**

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## **ADAM MILLER - Education and Business Standards**

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**Year of Birth:** 1983

### **Educational Background:**

- College for Financial Planning, Greenwood Village, CO, Certified Financial Planner® (2010 - Present)
- Indiana Wesleyan University, Marion, IN, MBA/Personal Financial Planning (2016)
- The American College, Bryn Mawr, PA, Chartered Advisor in Philanthropy® (2010)
- Colorado Mesa University, Grand Junction, CO, BBA (2005)

### **Business Experience:**

- ElderAdo Financial, Inc. – Financial Planner/Investment Advisor (2007-Present)
- ElderAdo Financial, Inc. – President (2015-2018)
- ElderAdo Financial, Inc. – Vice President (2011-2015)

### **Other Business Activities:**

- National Christian Foundation, Colorado - Advisory Board. Time commitment: 1-hour weekly.
- Advisors in Philanthropy - Board of Directors. Time commitment: 1-hour weekly.
- Generous Giving - Volunteer Facilitator. Time commitment: 8 hrs a quarter.

**Disciplinary Information:** No disciplinary action has occurred.

**Additional Compensation:** Adam Miller does not receive any economic benefit from third parties for providing advisory services.

**Supervision:** Adam Miller discusses investment decisions with the EFI Investment Committee.



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Part 2B of Form ADV**

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**DANIEL CARNES**

**CRD#: 6921500**

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## **DANIEL CARNES - Education and Business Standards**

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**Year of Birth:** 1992

### **Educational Background:**

- Southern New Hampshire University, Manchester, NH, BS-Computer Information Technology (2019)
- Glendale Community College, Glendale, AZ, Associate's in Business (2014)
- Conservatory of Recording Arts & Sciences, Tempe, AZ, Audio Engineering Certificate (2011)

### **Business Experience:**

- ElderAdo Financial, Inc. – Financial Planner/Investment Advisor/Treasurer (2019-Present)
- Charles Schwab Inc. – Advanced Brokerage Professional (2018-2019)
- U-HAUL International – IT Corporate Help Desk (2016-2018)

### **Other Business Activities:**

- Member of Rotary International. Time commitment: 1-hour weekly.

**Disciplinary Information:** No disciplinary action has occurred.

**Additional Compensation:** Daniel Carnes does not receive any economic benefit from third parties for providing advisory services.

**Supervision:** Daniel Carnes discusses investment decisions with the EFI Investment Committee.



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**JAIMEE CARNES**

**CRD#: 6205351**

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## **JAIMEE CARNES - Education and Business Standards**

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**Year of Birth:** 1991

### **Educational Background:**

- CFP Board, Certified Financial Planner® (2016 - Present)
- Northern Arizona University, Flagstaff, AZ, BSBA (2013)

### **Business Experience:**

- ElderAdo Financial, Inc. – Financial Planner/Investment Advisor/Vice President (2020-Present)
- Vanguard Marketing Corp. – Personal Investor Supervisor (2018-2019)
- Vanguard Marketing Corp. – Information Center Specialist (2017)
- Vanguard Marketing Corp. – Contractor Supervisor and Trainer (2016)
- Vanguard Marketing Corp. – High Net Worth Operations and Employee Training (2013-2015)

### **Other Business Activities:**

- Black Canyon Rotary Club Secretary. Time commitment: 1-hour weekly.
- Greater Montrose Chamber of Commerce Secretary. Time commitment: 1-hour weekly

**Disciplinary Information:** No disciplinary action has occurred.

**Additional Compensation:** Jaimee Carnes does not receive any economic benefit from third parties for providing advisory services.

**Supervision:** Jaimee Carnes discusses investment decisions with the EFI Investment Committee.