



ITEM 1: INTRODUCTION

Eliot Rose Wealth Management, LLC (“Eliot Rose”, “we”, “our”, or “us”) is registered with the Securities and Exchange Commission as an investment adviser. Our services and compensation structure differ from a registered broker-dealer, and it is important for you to understand the differences between those structures. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing. The italicized sentences appearing in text boxes below are intended to be “conversation starters” for you to have with us, as required by the instructions to Form CRS.

ITEM 2: RELATIONSHIPS AND SERVICES – WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Eliot Rose may be engaged to provide discretionary investment advisory services to individuals (our “retail investors” or “clients”) on a fee-only basis.

Discretionary Services: Eliot Rose offers to its clients financial planning and, to the extent specifically requested by a client, investment management. Each new client engagement with Eliot Rose will begin as a Financial Planning engagement. During the Financial Planning process, Eliot Rose may recommend its investment management services on a fee-only basis. We do not limit the scope of the universe of securities that we use in managing client accounts, and may use individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds (“ETFs”), on a discretionary basis in accordance with the client’s designated investment objective(s).

As part of its investment advisory services, Eliot Rose will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors. Clients who engage Eliot Rose on a discretionary basis may, at any time, impose restrictions, *in writing*, on Eliot Rose’s discretionary authority (i.e. limit the types/ amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe Eliot Rose’s use of margin, etc.).

Planning and Consulting: In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of Eliot Rose), we may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

Eliot Rose generally requires a minimum fee of \$4,000 and a \$500,000 minimum asset level for Investment Advisory Services. Eliot Rose, in its sole discretion, may reduce or waive its minimum asset requirement or minimum annual fee based upon certain criteria. For more detailed information about our advisory business and the types of clients we generally service, please see Items 4 and 7, respectively in our [Form ADV Part 2A](#).



CONVERSATION STARTERS:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications?
What do these qualifications mean?

ITEM 3: FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT – WHAT FEES WILL I PAY?

Eliot Rose’s planning and consulting fees are negotiable, but generally require an annual minimum fee of \$4,000, which may increase from there, on a fixed fee basis, up to \$8,000.

To the extent specifically requested by a client, Eliot Rose may be engaged to provide discretionary investment advisory services in addition to Financial Planning and Consulting services on a fee-only basis. Eliot Rose’s annual investment advisory fee, which includes Financial Planning and Consulting, shall be based upon a percentage (%) of the market value and type of assets placed under Eliot Rose’s management and will vary generally between negotiable and 1.25%. We will deduct fees and/or bill clients quarterly in arrears for Investment Advisory Services, based upon the market value of the assets on the last business day of the previous quarter. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of Eliot Rose), Eliot Rose may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client. As a result of these factors, similarly situated clients could pay different fees, the services to be provided by Eliot Rose to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above. Because our fee is based on the amount of your assets under our management, the more assets you entrust

us to manage, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you entrust to us.

Custodial Fees: Your account will be held with a qualified custodian. You will also be responsible for the fees and expenses charged by qualified custodians and imposed by broker dealers. Those fees and expenses include, but are not limited to, transaction charges, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. If your assets are invested mutual funds, ETFs, or other registered and unregistered investment companies, you will bear your pro rata share of the investment management fees and other fees of the funds, which are in addition to the fees you pay us. These fees and expenses are described in each fund's prospectus or other offering documents. Clients should note that similar advisory services may (or may not) be available from other investment advisors for similar or lower fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [Form ADV Part 2A](#).



CONVERSATION STARTERS:

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

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

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

- We and/or our representatives buy or sell securities that are also recommended to clients. This practice may create a situation where we and/or our representatives are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. For more detailed information about our *conflicts* of interest, please review Item 4, 5, 11, 12, and 17 of our [Form ADV Part 2A](#).



CONVERSATION STARTERS:

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

How do your financial professionals make money?

Our financial professionals are generally compensated on a salary basis and are eligible to receive discretionary bonuses. We do not receive, directly or indirectly, any other compensation. You should discuss your financial professional's compensation directly with your financial professional.

ITEM 4: DISCIPLINARY HISTORY

Do you or your financial professionals have legal or disciplinary history? No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional: "As a financial professional, do you have any disciplinary history? If so, for what type of conduct?"

ITEM 5: ADDITIONAL INFORMATION

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Jason Eliot Siperstein, at any time to request a current copy of our [ADV Part 2A](#) or our relationship summary. Our Chief Compliance Officer may be reached by phone at (401) 588-5122.



CONVERSATION STARTERS:

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



ELIOT ROSE WEALTH MANAGEMENT

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