

**FORM ADV**  
**Uniform Application for Investment Adviser Registration**  
**Part II – Page 1**

OMB APPROVAL	
OMB Number:	3235-0049
Expires:	February 28, 2011
Estimated average burden	
Hours per response. . . .	4.07

Name of Investment Adviser: The Elements Financial Group, LLC				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
245 Fischer Ave., Suite A-4	Costa Mesa	CA	92626	(714) 546-2100

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any government authority.**

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**(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)**

**Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.**

Applicant: The Elements Financial Group, LLC	SEC File Number: 801-68318	Date: 05/29/2009
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Definitions for Part II

Related person - Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services - Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

1. **A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:		
<input type="checkbox"/>	(1) Provides investment supervisory services . . . . .	_____ %
<input checked="" type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services . . . . .	100% %
<input type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either service described above . . . . .	_____ %
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription . . . . .	_____ %
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above . . . . .	_____ %
<input type="checkbox"/>	(6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .	_____ %
<input type="checkbox"/>	(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .	_____ %
<input type="checkbox"/>	(8) Provides a timing service . . . . .	_____ %
<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above . . . . .	_____ %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

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B. Does the applicant call any of the services it checked above financial planning or some similar term? . . . . .

	Yes	No
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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C. Applicant offers investment advisory services for: (check all that apply):

<input checked="" type="checkbox"/>	(1) A percentage of assets under management	<input type="checkbox"/>	(4) Subscription fees
<input type="checkbox"/>	(2) Hourly charges	<input type="checkbox"/>	(5) Commissions
<input type="checkbox"/>	(3) Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6) Other

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D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

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2. **Types of Clients** - Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/>	A. Individuals	<input checked="" type="checkbox"/>	E. Trusts, estates, or charitable organizations
<input type="checkbox"/>	B. Banks or thrift institutions	<input checked="" type="checkbox"/>	F. Corporations or business entities other than those listed above
<input type="checkbox"/>	C. Investment companies	<input type="checkbox"/>	G. Other (describe on Schedule F)
<input checked="" type="checkbox"/>	D. Pension and profit sharing plans		

Applicant:

The Elements Financial Group, LLC

SEC File Number:

801-68318

Date:

05/29/2009

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |                                     |   |                          |  |
|-------------------------------------|---|--------------------------|--|
| <input checked="" type="checkbox"/> | A. Equity Securities  | <input type="checkbox"/> | H. United States government securities     |
| <input checked="" type="checkbox"/> | (1) exchange-listed securities                                | <input type="checkbox"/> | I. Options contracts on:                   |
| <input checked="" type="checkbox"/> | (2) securities traded over-the-counter                        | <input type="checkbox"/> | (1) securities                             |
| <input type="checkbox"/>            | (3) foreign issues  | <input type="checkbox"/> | (2) commodities                            |
| <input type="checkbox"/>            | B. Warrants   | <input type="checkbox"/> | J. Futures contracts on:                   |
| <input checked="" type="checkbox"/> | C. Corporate debt securities<br>(other than commercial paper) | <input type="checkbox"/> | (1) tangibles                              |
| <input type="checkbox"/>            | D. Commercial paper   | <input type="checkbox"/> | (2) intangibles                            |
| <input type="checkbox"/>            | E. Certificates of deposit                                    | <input type="checkbox"/> | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> | F. Municipal securities                                       | <input type="checkbox"/> | (1) real estate                            |
| <input type="checkbox"/>            | G. Investment company securities                              | <input type="checkbox"/> | (2) oil and gas interests                  |
| <input type="checkbox"/>            | (1) variable life insurance                                   | <input type="checkbox"/> | (3) other (explain on Schedule F)          |
| <input checked="" type="checkbox"/> | (2) variable annuities  | <input type="checkbox"/> | L. Other (explain on Schedule F)           |
| <input checked="" type="checkbox"/> | (3) mutual fund shares  |                          |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

## A. Applicant's security analysis methods include: (check those that apply)

- |                              |             |   |                               |
|------------------------------|-------------|---|-------------------------------|
| (1) <input type="checkbox"/> | Charting    | (4) <input type="checkbox"/>            | Cyclical                      |
| (2) <input type="checkbox"/> | Fundamental | (5) <input checked="" type="checkbox"/> | Other (explain on Schedule F) |
| (3) <input type="checkbox"/> | Technical   |   |                               |

## B. The main sources of information applicant uses include: (check those that apply)

- |                              |                                       |   |  |
|------------------------------|---------------------------------------|---|--|
| (1) <input type="checkbox"/> | Financial newspapers and magazines    | (5) <input type="checkbox"/>            | Timing services  |
| (2) <input type="checkbox"/> | Inspections of corporate activities   | (6) <input type="checkbox"/>            | Annual reports, prospectuses, filings with the<br>Securities and Exchange Commission |
| (3) <input type="checkbox"/> | Research materials prepared by others | (7) <input type="checkbox"/>            | Company press releases   |
| (4) <input type="checkbox"/> | Corporate rating services             | (8) <input checked="" type="checkbox"/> | Other (explain on Schedule F)  |

## C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |                              |  |   |   |
|------------------------------|--|---|---|
| (1) <input type="checkbox"/> | Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/>            | Margin transactions   |
| (2) <input type="checkbox"/> | Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/>            | Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input type="checkbox"/> | Trading (securities sold within 30 days)                 | (7) <input checked="" type="checkbox"/> | Other (explain on Schedule F)   |
| (4) <input type="checkbox"/> | Short sales  |   |   |

Applicant: The Elements Financial Group, LLC	SEC File Number: 801-68318	Date: 05/29/2009
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**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... Yes  No

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- Each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- Each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| • Name          | • formal education after high school               |
| • Year of birth | • business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
 

<input type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input checked="" type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input type="checkbox"/> (11) real estate broker or dealer
<input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes  No

(If yes, describe on Schedule F the partnerships and what they invest in.)

Applicant: The Elements Financial Group, LLC	SEC File Number: 801-68318	Date: 05/29/2009
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**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

**10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? . . . . .

Yes  No

(If yes, describe on Schedule F.)

**11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and Triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

See Schedule F.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

See Schedule F.

Applicant: The Elements Financial Group, LLC	SEC File Number: 801-68318	Date: 05/29/2009
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**12. Investment or Brokerage Discretion.**

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- |   |   |  |
|---|---|--|
| (1) securities to be bought or sold? .....                | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| (2) amount of the securities to be bought or sold ? ..... | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| (3) broker or dealer to be used ? .....                   | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| (4) commission rates paid? .....                          | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? ..... Yes  No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, Describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant’s accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... Yes  No
- B. Directly or indirectly compensates any person for client referrals? ..... Yes  No

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
  - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? ..... Yes  No

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
Item 1.D.	<p><b>ADVISORY SERVICES AND FEES</b></p> <p>The Elements Financial Group, LLC (“Elements”) offers an asset allocation platform (the “Platform”) to affiliated and non-affiliated registered investment advisors (“Advisors”) and offers investment advisory services through its Platform to potential clients referred by solicitors generally affiliated with broker-dealers (see Item 13.B. below for additional disclosure on referral arrangements).</p> <p><b>Platform Services for Advisors</b></p> <p>Elements provides Advisors with a turnkey asset management platform, in accordance with a written agreement executed between Elements and the Advisor, which generally includes (i) investment manager screening; (ii) access to multiple institutional assets allocation strategists (“Strategists”); (iii) model asset accumulation portfolios and model retirement portfolios designed to cover a number of standard risk/return assumptions; (iv) access to software including tools for setup of client accounts, client proposals, investment policy statements, client agreements and the ability to view and manage client data; (v) research, timely information and recommendations regarding the qualifications, investment philosophies, policies and performance of the Strategists available in the Platform; (vi) preparation and distribution of periodic performance measurement reporting with respect to Advisor’s clients’ assets invested through the Platform; (vii) assistance in marketing the Platform to Advisor’s clients; and (viii) operational and administrative services in connection with the Platform including account set-up and maintenance.</p> <p>For each client account opened through the Platform with an Advisor, Elements provides certain services to the client, which generally include: (i) exercising discretion with respect to whether, how and when to implement transactions in a client’s account based on the model(s) selected by Advisor and client; and (ii) arranging for the execution of trades in clients’ accounts (with the exception of accounts invested in Bond Model Portfolios, as described further below). Advisors are responsible for, among other things: (i) ensuring client suitability and determining client investment objectives and goals, both initially and ongoing; and (ii) for selecting and changing the model portfolio(s) in clients’ account that are made available through the Platform in accordance with such objectives and goals. The complete services provided by the Advisor will be fully outlined in the investment management agreement executed between the Advisor and the client and in the Advisor’s Form ADV Part II.</p> <p>Elements has entered into written agreements with Strategists, pursuant to which each Strategist has agreed to, among other things, develop various model portfolios for inclusion in Element’s Platform. The model portfolios currently offered on the Platform are as follows: “Mutual Fund Model Portfolios” comprised primarily of various mutual funds, “ETF Model Portfolios” comprised primarily of various exchange traded funds (ETFs); “UMA Model Portfolios” comprised of individual equity and fixed income securities, mutual funds and ETFs, and the “Bond Model Portfolios” comprised of individual bonds and bond mutual funds. Strategists generally will not have any discretionary authority or control with respect to client assets, will not be responsible for ensuring client suitability and will not vote proxies on any securities held in client accounts. However, the Strategist for the Bond Model Portfolios will also provide services as the “Bond Manager”, which will include: (i) exercising discretion with respect to whether, how and when to implement transactions in a client’s Bond Model Portfolio account; and (ii) arranging for the execution of trades in these clients’ accounts. The UMA Model Portfolios consist of the following five different investment styles: (i) Growth; (ii) Balanced Growth; (iii) Balanced; (iv) Balanced Income; and (v) Income. Elements also has entered into written agreements with certain investment advisers (“Asset Managers”) that will be responsible for developing and maintaining certain portions (“Sleeves”) of each investment style in the UMA Model Portfolios.</p> <p>While a Strategist’s and Asset Manager’s goal is to create model portfolios and Sleeves that will enable</p>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
Item 1.D (cont.)	<p>Platform clients' assets to grow over time, it is important that Platform clients understand that investments in individual securities, bonds, mutual funds and ETFs carry a degree of risk, including loss of initial investment and there is no assurance that these types of investments will provide positive returns over any period of time.</p> <p><b>Investment Advisory Services</b></p> <p>For clients referred to Elements by a solicitor, the client will enter into an investment management agreement directly with Elements, as the Advisor. For these clients, Elements will, in addition to providing the services as the Platform provider that are described above, provide investment advisory services, which include, but are not limited to: (i) determining suitability of the Platform and the model portfolio selected by the client; (ii) exercising discretion with respect to whether, how and when to implement transactions in a client's account based on the model(s) selected by the client; and (iii) arranging for the execution of trades in clients' accounts (with the exception of accounts invested in Bond Model Portfolios, as described further above). The complete services provided by Elements as the Advisor will be fully outlined in the agreement executed between Elements and the client</p> <p>Depending on the type of arrangement made between Elements and the solicitor, the solicitor may assist the client in completing Platform account applications and other applicable forms and submit them to Elements. The solicitor may also obtain information from the client regarding the client's investment objectives and financial situation and may assist the client in determining a suitable model portfolio(s) based on such objectives and financial information. The client is ultimately responsible for making the final selection of the model portfolio(s). The client is further responsible for promptly notifying Elements in writing of any change in the client's investment objectives, financial situation, and/or the selection of model portfolio(s).</p> <p><b>Platform Fee</b></p> <p>Elements charges an annual Platform fee of 50 basis points (0.50%), which is based on a percentage of assets under management in each client account. The Platform fee is currently non-negotiable and Elements reserves the right to change its Platform fees at anytime without notice. Each calendar quarter Elements shall compute the Platform fee and send an invoice directly to the custodian for payment directly from the assets in the client's account. During the initial quarter in which a client account has been opened, the Platform fee shall first be charged in arrears based on the quarter-end account value pro-rated for the amount of days the account was opened during the quarter. Thereafter, the quarterly Platform fee shall be charged in advance based on the quarter-end account value as of the end of the prior quarter. Note that each new client account will be charged twice at the end of the first quarter it has been open, once for the pro-rated arrears amount and once for the advance amount of the subsequent quarter.</p> <p><b>Advisor, Asset Manager, Bond Manager and Strategist Fees</b></p> <p>As part of the services provided under the Platform, Elements will also calculate the Advisor's fee, outlined in the agreement executed between the client and the Advisor, at the same time and in the same manner as the Platform fee and will send an invoice to the client's custodian for payment from the client's account to be sent either directly to the Advisor or to Elements for payment to the Advisor, depending on the arrangement between the Advisor and Elements.</p> <p>Clients that have UMA Model Portfolio accounts will be charged an annual fee to cover the costs of the services provided by the Asset Manager. This fee will range from approximately 10 basis points to 27 basis points (0.10% to 0.27%) depending on which investment styles the account assets are invested in. This fee will be added to the Platform fee and will be calculated by Elements at the same time and in the</p>

**Schedule F of Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
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Item 1.D. (cont.)

same manner as the Platform fee.

Clients that have Bond Model Portfolio accounts will be charged an annual fee to cover the costs of the services provided by the Bond Manager. This fee will be 10 basis points (0.10%) and will be calculated by Elements at the same time and in the same manner as the Platform fee.

Elements will be responsible for and will pay all Strategist fees from the Platform fee paid by the client.

**Investment Advisory Fees**

For accounts referred by a solicitor in which Elements perform services as the Advisor and the Platform provider, Elements will charge the following annual maximum fees:

Portfolio Style	Up to \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	\$1,000,001 - \$2,000,000	\$2,000,001 and above
Mutual Fund and ETF	2.1%	1.85%	1.6%	1.35%	1.1%
Bond and UMA Profile 1	2.2%	1.95%	1.7%	1.45%	1.2%
UMA Profile 2	2.22%	1.97%	1.72%	1.47%	1.22%
UMA Profile 3	2.28%	2.03%	1.78%	1.53%	1.28%
UMA Profile 4	2.32%	2.07%	1.82%	1.57%	1.32%
UMA Profile 5	2.37%	2.12%	1.87%	1.62%	1.37%

These fees are inclusive of the 50 basis points (0.50%) charged by Elements for their services as Platform provider, fees for the solicitor, fees for administrative services of the solicitor's broker dealer (if applicable) and in the case of UMA and/or Bond accounts, fees for the Asset Manager and/or Bond Manager. The investment advisory fee range listed above is dependent on which investment style the account assets are invested in.

Elements will charge these fees at the same time and in the same manner as the Platform fee, described above.

**Additional Fee Information**

All fees stated above reflect Element's maximum fees and Elements reserves the right to charge fees that are lower depending on the assets in the account and the services that will be provided to a client. In addition, Elements may change the fees it charges, but will provide each client with thirty (30) days written notice prior to the change taking effect.

**Other Fees and Charges**

Clients should understand that the Platform fees described above do not include Advisor fees (if applicable), Element's below minimum account size surcharge (if applicable) as described in Item 10 below, and custodian fees. Clients should further understand that any brokerage commissions, transaction charges, stock transfer fees, and other similar charges that are incurred in connection with transactions for a client's account will be paid out of the assets in the account and are in addition to the fees paid to Elements. In addition, for mutual fund shares purchased in a client's account, the client may be subject to deferred sales charges and 12b-1 fees and other mutual fund annual expenses, which are fully described in each fund's prospectus and statement of additional information. The fees and costs of any index or exchange traded funds or mutual funds in which a client's account may invest will not be deducted from the Platform fees that a client pays to Elements. Each of these mutual fund and/or

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
Item 1.D. (cont.)	<p>exchange traded funds fees and expenses are outlined in the relevant fund’s prospectus and statement of additional information.</p> <p><b>Termination of Agreements</b></p> <p><u>Agreement between Advisor and Elements</u></p> <p>Generally, this agreement may be terminated by either party by delivering written notice of termination at least sixty (60) days in advance of the effective termination date. In addition, either party may terminate the agreement if the other party is in material violation of any SEC, FINRA, banking or other such regulation or materially breaches the agreement and fails to remedy such violation or breach within ten (10) days of written notice from the party that intends to terminate the agreement. Upon termination, Elements will not liquidate the client’s assets unless it receives written instruction to do so from the Advisor.</p> <p><u>Elements Investment Management Agreement</u></p> <p>Within five (5) business days after the date of execution of this agreement, a client will have the right to terminate the agreement without penalty or liability for payment of fees. (Provided however, any investment action taken by Elements regarding the client’s account prior to the effective date of such termination shall be at client’s risk.) After the expiration of that period, either party may terminate the Agreement at any time without cause by giving written notice of such termination to the other party. Upon termination, all unearned pre-paid fees paid to Elements will be promptly refunded to the client. Upon termination, Elements will not liquidate the client’s assets unless it receives written instruction to do so from the client. Clients should understand that in the event a client terminates this agreement and requests that their account(s) be fully liquidated, it may take Elements a number of days or more to sell all the securities in the account(s) due to market conditions at the time.</p> <p>In the event of a client’s death or disability, Elements will continue to manage the account until such time as it is notified of client’s death or disability and given alternative instructions by an authorized party.</p> <p><b>Proxy Voting Policy</b></p> <p>Element’s policy is to not vote proxies on behalf of Platform clients and therefore, shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a Platform client’s account. The obligation to vote client proxies shall, at all times, rest with the client. Elements shall not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client or the client’s Advisor.</p> <p>Proxies issued on securities held by a registered investment company (i.e. mutual fund) are generally voted by the investment adviser that manages the assets of the mutual fund.</p> <p><b>Class Action Filings</b></p> <p>A securities “class action” lawsuit is a civil suit brought by one or more individuals (“Plaintiffs”) on behalf of themselves and others who have the same grievance against the issuer of a certain security. When a class action is filed, a written notice of filing and/or settlement is prepared (the “Notice”), which outlines the reasons for the lawsuit, the parameters for qualification as a member of the class and certain legal rights that need to be considered before becoming a member of the class (i.e. participating in the settlement). In addition, the Notice will contain instructions issued by the court o broker/dealers</p>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
Item of Form (identify)	Answer
Item 1.D. (cont.)	<p>and/or other nominees (e.g. custodians) who receive the Notice and who hold the security on behalf of the owner/beneficiary, to either (1) provide the Claims Administrator (usually the attorney for the Plaintiffs) with the name and address of each such owner/beneficiary so the Claims Administrator can send the Notice directly to such owner/beneficiary, or (2) request additional copies of the Notice and send the Notice directly to the owner/beneficiary.</p> <p>In some cases, in addition to the owner/beneficiary, Elements may also receive notification of a class action. Since, as described above, the broker/dealer, nominee or Claims Administrator is responsible for sending the Notice to the owner/beneficiary of the security, and Elements does not hold securities on behalf of Platform clients, Elements does not send any additional notification to Platform clients. Because each class action involves certain legal rights that must be considered by the owner/beneficiary of the security before becoming a member of the class, Elements cannot instruct, or give advice to Platform clients on whether or not to participate as a member of the class and will not automatically file claims on the Platform client's behalf. However, if a Platform client notifies Elements that they wish to participate in a class action, Elements will provide the client with any transaction information pertaining to the Platform client's account with Elements that may be needed in order for the client to file a proof of claim in a class action.</p>
Item 4.A. B. & C.	<p><b>METHODS OF ANALYSIS, SOURCES OF INFORMATION AND INVESTMENT STRATEGIES</b></p> <p>Elements has entered into a written agreement with Wilshire Associates, Inc. ("Wilshire"), whereby Wilshire conducts searches of mutual fund managers and provides Elements with a list of select mutual funds covering all major asset classes ("Wilshire List") for Elements to provide to the Strategists. Wilshire also monitors the mutual fund managers that are on the Wilshire List and provide Elements with periodic evaluations and recommendations for changes as appropriate. In most cases, Strategists have the choice of selecting mutual funds from the Wilshire List or performing their own research and selecting other mutual funds for inclusion in their Mutual Fund Models, or a combination of both. Under the Wilshire agreement, Wilshire also provides services as a Strategist for the Elements Platform. The written agreement between Elements and Wilshire can be terminated upon thirty (30) days prior written notice from either party.</p> <p>As mentioned in section 1.D above, Elements has entered into written agreements with Strategists, pursuant to which each Strategist has agreed to, among other things, develop various model portfolios for inclusion in Element's Platform. Elements pays Strategists a tiered fee based on Platform client assets invested in a Strategist's model(s), the more assets invested the lower the fee charged to Elements.</p>
Item 5.	<p><b>EDUCATION AND BUSINESS STANDARDS</b></p> <p>Elements generally requires the following standards of education and/or business experience for certain officers and employees:</p> <ol style="list-style-type: none"> <li>1. A four-year college degree or commensurate education</li> <li>2. A FINRA Series 65 financial advisor license as required by any state in which the individual is to be licensed as an investment adviser representative.</li> <li>3. A minimum three (3) years previous experience in the securities industry</li> <li>4. Regular attendance at scheduled training meetings</li> </ol>
Item 6.	<p><b>EDUCATION AND BUSINESS BACKGROUND</b></p> <p><b>Nicholas Scalzo</b> (Year of Birth - 1969)</p>

**Schedule F of  
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**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
Item of Form (identify)	Answer
Item 6. (cont.)	<p>Attended California State University Fullerton from 1987-1992 Chartered Life Underwriter designation from the American College for Financial Planning, 2006 The Elements Financial Group, LLC – Managing member, December 2006 to present Claremont Financial Group, Inc Co-owner, January 2005 to present Pacific Financial Associates., Registered Principal, October 2005 to present Associated Securities Corp., Registered Rep, July 2002 to October 2005</p> <p><b>Gaetan Scalzo</b> (Year of Birth - 1966) Attended Orange Coast Community College from 1985-1988 Certified Financial Planner, certification May, 2006 The Elements Financial Group, LLC – Managing Member, December 2006 to present Claremont Financial Group, Inc Co-owner, January 2005 to present Pacific Financial Associates, Registered Rep., November 2005-present Associated Securities Corp., Registered Representative, August 2002 to November 2005</p>
Item 8.C.	<p><b>OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS</b></p> <p>The principal owners of Elements are also the principal owners of another registered investment advisory firm, Claremont Financial Group, Inc. (“Claremont”). Claremont provides retail clients services which include asset allocation strategies, investment and asset management strategies, and financial planning services for a fee. Further information may be obtained from Claremont’s Form ADV Part 1 &amp; II. In addition, both Nicholas Salzo and Gaetan Scalzo are registered representatives of Pacific Financial Associates, a FINRA registered broker-dealer.</p> <p>Claremont has entered into a written agreement with Elements in order to provide its clients the Platform.</p>
Item 9.E.	<p><b>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</b></p> <p><b>Code of Ethics</b></p> <p>Elements has adopted a Code of Ethics (the “Code”) for all Supervised Persons of the firm (as such term is defined in the Code). The Code sets forth the standards of business conduct the firm expects from each Supervised Person. It requires Supervised Persons to report and Elements to monitor certain business and personal trading activity and conduct to avoid potential or real conflicts of interest. The Code requires compliance with fiduciary duties, applicable securities laws, confidentiality, personal trading restrictions and placing client’s interests first. A current copy of the Code will be provided to clients and prospective clients upon request.</p> <p><b>Participation in client transactions</b></p> <p>Elements and certain Supervised Persons associated with Elements (collectively defined as “Access Persons”) may buy or sell securities that it also buys and sells for Platform clients, so long as the Access Persons adhere to the written policies and procedures that are outlined in Element’s Code. These policies and procedures are summarized below :</p> <p>Access Persons are required to obtain written approval prior to effecting, for himself or herself, for his or her immediate family (i.e. spouse, minor children, and adults living in the same household as the Access Person), for trust accounts for which the Access Person serves as a trustee or in an account which the Access Person has a beneficial interest, transactions in certain securities (which are outlined in the Code). This does not apply where Access Persons have personal accounts that are managed by Elements through the Platform. Those accounts will be considered by Elements to be client accounts and generally treated the same as other clients’ accounts, with the following exceptions:</p>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer						
Item 9.E. (cont.)	<p>Elements utilize a third-party service provider to place trades for execution. In an effort to avoid any potential or actual conflicts of interest with its other clients, Elements will not send any model trade instructions to its third-party service provider for any Access Person managed account, until toward the end of the trading day.</p> <p>Under the Code, Access Persons are required to hold certain securities for a defined period of time from the date of acquisition and also submit certain quarterly and annual reports regarding transactions and securities holdings in their personal non managed accounts.</p> <p>Under certain limited circumstances, exceptions may be made to the policies and procedures in the Code. Elements will maintain records of these trades, including the reasons for any exceptions.</p> <p>All Elements Supervised Persons are prohibited from acting upon any material, non-public information, as defined under federal securities laws and Element's Insider Trading Policy.</p>						
Item 10.	<p><b>CONDITIONS FOR MANAGING ACCOUNTS</b></p> <p>The minimum account sizes for clients investing in Model Portfolios offered on the Platform are:</p> <table border="1" style="width: 100%;"> <tr> <td>Mutual Fund and ETF Model Portfolios</td> <td>\$ 50,000</td> </tr> <tr> <td>UMA Model Portfolio</td> <td>\$500,000</td> </tr> <tr> <td>Bond Model Portfolio</td> <td>\$250,000</td> </tr> </table> <p>Accounts below this minimum may be negotiable and accepted on an individual basis at Element's discretion. Exceptions to these minimums are also made for Associated Persons of Elements and their friends and family. In the event that the balance of an account is below \$50,000 due to withdrawals or inadequate capitalization by the Client, Elements reserves the right to either: remove any account from any management strategy at any time the balance of the account is below \$50,000; or add a quarterly surcharge of \$25 to the Platform Fees payable to Elements pursuant to Item 1.D. above on each occasion the balance of the account is below such applicable minimum on a date in respect of which the Elements Fees are calculable.</p> <p>In addition to the Mutual Fund Portfolio minimum account size noted above, DFA Mutual Fund Portfolios are also subject to a minimum additional contribution amount of \$20,000.</p> <p>There may be times when certain restrictions are placed by the Platform client, which prevents Elements from accepting or continuing to manage the account. Elements reserves the right to not accept and/or terminate a Platform client's account if it feels that the client imposed restrictions would limit or prevent it from meeting and/or maintaining its investment strategy.</p> <p>For clients referred by a solicitor, Elements reserves the right to not accept and/or terminate the account, if Elements believes at any time, based on information provided by the client that the model portfolio selected by the client is not suitable and the client's decision is to not change the selection.</p> <p>Prior to opening an account on the Platform, a client should carefully consider: 1) committing to management only those assets that the client believes will not be needed for current purposes and that can be invested on a long-term basis, usually a minimum of five to seven years, 2) that volatility from investing in the stock market can occur, and 3) that over time the client's assets may fluctuate and at anytime be worth more or less than the amount invested.</p>	Mutual Fund and ETF Model Portfolios	\$ 50,000	UMA Model Portfolio	\$500,000	Bond Model Portfolio	\$250,000
Mutual Fund and ETF Model Portfolios	\$ 50,000						
UMA Model Portfolio	\$500,000						
Bond Model Portfolio	\$250,000						

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
Item of Form (identify)	Answer
Item 11.A. & B.	<p><b>REVIEW OF ACCOUNTS</b></p> <p>Elements principals continually monitor Platform Strategists and Asset Managers and will make changes (hire or fire) to Strategists and Asset Managers as deemed appropriate. Elements will also implement any rebalancing to the model portfolios as instructed by the Strategists and/or Asset Managers. Each Platform client’s Advisor is responsible for monitoring Platform client suitability and investment objectives and communicating any model portfolio and/or Strategist changes to Elements, as such Advisor deems appropriate.</p> <p>Clients are provided with monthly custodial reports from an independent third-party custodian, which include a listing of all investments in the Platform client’s account, the current valuation of each security and the account overall, and a listing of all transactions occurring during the month, including any deduction of management and Platform fees.</p> <p>Elements will make available to Platform clients and their Advisors for online viewing, additional monthly investment activity and performance, allocation of assets, appraisal, and fee reports.</p>
Item 12	<p><b>INVESTMENT OR BROKERAGE DISCRETION</b></p> <p>In accordance with the written agreement between Elements and the Advisors (or in the case of a solicited client, the written agreement between Elements and the client), Elements has the discretionary power to appoint third party managers (e.g. Asset Manager or Bond Manager) and to buy, sell, invest, reinvest, convey, exchange, convert, transfer, redeem, liquidate or otherwise dispose of securities in Platform client accounts (with the exception of accounts invested in Bond Model Portfolios) without notice to, or approval from client, which are consistent with the model portfolio(s) selected by Platform client. Elements will also perform any rebalancing of the Platform client accounts in accordance with changes communicated by the Strategists and/or Asset Managers. Elements also has the authority to hire and fire Strategists and Asset Managers in the Platform. Elements will use its best efforts to provide Advisors with reasonable advanced notice of any termination and the opportunity to select an alternative Strategist.</p> <p>Elements will provide recommendations to Advisors regarding third-party custodian/brokers for the custody of the Platform client’s cash and/or securities (“Custodial Brokers”). Factors considered by Elements in the recommendation of a Custodial Broker are dependent upon, but not limited to, the reasonableness of their commissions, product availability, research and other services available to both the client and Elements (Please refer to item 13A below for additional information). Elements will attempt to obtain any and all services available from the Custodial Broker it deals with, including use of portfolio management software to enable the download of client account information and transactions. Before selecting a Custodial Broker, clients should thoroughly consider the differences between having their assets custodied at a broker/dealer vs. at a bank or trust company. Some of these differences include, but are not limited to, custodian costs, trading issues, security of assets, client reporting and technology.</p> <p>Currently, Elements recommends either Schwab Institutional (“Schwab”) or Pershing Advisor Solutions (“Pershing”) as the Custodial Broker for Platform clients’ accounts, as selected by the Advisor or broker-dealer. Clients should understand that each Custodial Broker charges fees that are separate from and in addition to the Platform and advisory fees. The following are the currently negotiated Custodial Broker fees:</p>

**Schedule F of Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant: The Elements Financial Group, LLC	SEC File Number: 801-68318	Date: 05/29/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
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Item 12 (cont.)

**Schwab**  
Mutual Fund Programs (other than DFA)  
 Mutual Fund Model Portfolios will generally not be charged any administration fee or transaction fees except in the case of certain "transaction fee funds".

ETF, DFA Mutual Fund, and UMA Programs  
 The custodian will charge each account a monthly fee in arrears based on the average account balance over the previous month as follows:

Tier	Account Value	Client Fees Per Annum	Client Fees Per Month
First	First \$250,000	0.25%	0.0208%
Second	Next \$750,000	0.10%	0.0083%
Third	Next \$1,000,000	0.08%	0.0067%
Fourth	Over \$2,000,000	0.07%	0.0058%

Note that clients of certain Advisors may be subject to a different fee structure depending on the pricing arrangements which they may have previously negotiated with the Schwab.

**Pershing Advisor Solutions**

Mutual Fund Programs  
 The custodian will charge an annual account administration fee of \$50 to be collected in arrears in quarterly installments (\$12.50 per quarter).

DFA Mutual Fund Programs  
 The custodian will charge a \$25 ticket charge for each mutual fund transaction.

ETF Programs  
 The custodian will charge each account a monthly fee in advance based on the average account balance over the previous three month ends as follows:

Tier	Account Value	Client Fees Per Annum	Client Fees Per Month
First	First \$250,000	0.25%	0.0208%
Second	Next \$250,000	0.12%	0.0100%
Third	Next \$250,000	0.10%	0.0083%
Fourth	Next \$250,000	0.08%	0.0067%
Fifth	Next \$1,000,000	0.06%	0.0050%
Sixth	Over \$2,000,000	0.05%	0.0042%

UMA Programs  
 The custodian will charge each account a monthly fee in advance based on the average account balance over the previous three month ends as follows:

Tier	Account Value	Client Fees Per Annum	Client Fees Per Month
First	First \$500,000	0.15%	0.0375%
Second	Next \$250,000	0.12%	0.0100%
Third	Next \$250,000	0.10%	0.0083%
Fourth	Next \$500,000	0.08%	0.0067%
Fifth	Next \$500,000	0.06%	0.0050%
Sixth	Over \$2,000,000	0.05%	0.0042%

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
Item 13.A.	<p><b>Directed Brokerage</b></p> <p>In circumstances where Elements is required to execute transactions through a specific broker (aka “Directed Brokerage”), the client should understand that: (1) Elements will not be able to negotiate specific brokerage commission rates on client’s behalf, or seek better execution services or prices from other broker-dealers and, as a result, the client may pay higher commissions and/or receive less favorable net prices on transactions for their account than might otherwise be the case, (2) transactions for that account generally will be effected independently unless it is decided to purchase or sell the same security for several clients at approximately the same time (block trade), in which case such client’s transaction may be included with that of other clients for execution as a block by the same broker. However, if transactions are not able to be traded as a block trade, Directed Brokerage transactions may have to be entered after orders for other clients, with the result that market movements may work against the Directed Brokerage client, and (3) conflicts may arise between the Directed Brokerage client’s interest in receiving best execution with respect to transactions effected for his/her account and Element’s interest in receiving possible future client referrals from the broker.</p> <p>Therefore, prior to directing Elements to use a specific broker-dealer or custodian, a client should consider whether, under that restriction, execution, clearance and settlement capabilities, commission expenses and whatever amount is allocated to custodian fees, if applicable, would be comparable to those otherwise obtainable. Clients should understand that he/she might not obtain commissions rates or transaction charges as low as it might otherwise obtain if Elements had discretion to select other broker-dealers or custodians.</p> <p>All directed brokerage arrangements must be provided to Elements in writing by the client or Advisor. A client or Advisor must also notify Elements in writing if the client decides to terminate the directed brokerage arrangement.</p>
Item 13.B.	<p><b>Trade Aggregation and Allocation</b></p> <p>Element’s policy permits the aggregation of orders for Platform clients in the same securities for the purpose of obtaining best execution, negotiating more favorable commission rates, or allocating equitably among Element’s clients the differences in prices and commission or other transaction costs that might not have been obtained had such orders been placed independently.</p> <p>Under this procedure, Elements will observe the following:</p> <ul style="list-style-type: none"> <li>• Transactions will not be aggregated unless such aggregations are consistent with Element’s duty to seek best execution for its clients.</li> <li>• No client account will be favored over any other client account.</li> <li>• Each account that participates in an aggregated transaction shall participate at the average of the executed share price for that transaction.</li> </ul> <p>Aggregated transactions will be allocated among accounts in writing prior to the time such aggregated transaction is transmitted to a broker for execution (Pre Allocation Statement).</p> <p>If the aggregated transaction is filled in its entirety, it will be allocated among the accounts listed on the Pre Allocation Statement. If an aggregated transaction is only partially filled, it will generally be allocated on a <i>pro rata</i> basis. However, the transaction may be allocated on a basis different from that specified in the Pre Allocation Statement in both cases (filled entirely or partially filled) so long as all client accounts participating in the aggregated transaction receive fair and equitable treatment and the reasons for the different allocation is explained in writing and received prior approval by the firm’s Chief Compliance Officer or designee.</p>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
Item of Form (identify)	Answer
Item 13.B. (cont.)	<p><b>Soft Dollar Considerations</b></p> <p>Except for the indirect benefits that Elements may receive from Custodial Brokers, which may be deemed to fall outside the safe harbor of Section 28(e) of the Exchange Act (“Section 28(e)”), Element’s general policy is to comply with the provisions of Section 28(e) when entering into soft dollar arrangements. Section 28(e) generally allows investment advisers to use client commissions to pay for certain brokerage and research services under certain circumstances without breaching their fiduciary duties to clients. Elements currently has no Section 28(e) soft dollar arrangements in place. However, Custodial Broker’s (e.g. Schwab or Pershing) support of independent investment advisers could be considered similar to other research-for-commission programs. As such, Element’s use of Custodial Brokers in this capacity and the indirect benefits it receives is described below.</p>
Misc.	<p><b>ADDITIONAL COMPENSATION</b></p> <p>Some Custodial Brokers, including Schwab and Pershing, may provide Elements with access to their institutional trading and custody services, which are typically not available to retail investors. These services are generally available to independent investment advisers on an unsolicited basis, at no charge to them so long the adviser maintains a minimum amount of its clients’ assets in accounts with the Custodial Broker. Some of the services provided by Custodial Brokers also include brokerage, custody, research, and access to certain mutual funds and other investments that may not otherwise be available to non-institutional investors or would require a significantly higher minimum initial investment. In some cases, the Custodial Broker does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for security trades that are executed through the Custodial Broker. The Custodial Broker may also make available to Elements other products and services that benefit Elements but may not benefit Platform clients’ accounts. Some of these other products and services may assist Elements in managing and administering Platform clients’ accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitation of trade execution (and allocation of aggregated trade orders for multiple client accounts), providing research pricing information and other market data and assisting with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of Platform client accounts, including accounts not maintained at the Custodial Broker providing the services. The Custodial Broker may also make available to Elements other services intended to help Elements manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the Custodial Broker may make available, arrange and/or pay for these types of services rendered to Elements by other independent third parties. While as a fiduciary, Elements endeavors to act in Platform clients’ best interests, Element’s recommendation that Platform clients maintain their assets in accounts at a certain Custodial Broker may be based in part on the benefit to Elements of the availability of some of the foregoing products and services.</p> <p>In addition, due to the fact that Elements does not directly pay for these services, including any research received, it may be construed as receipt of an economic benefit by Elements and therefore, a conflict of interest between Elements and the Platform client.</p> <p><b>CLIENT REFERRALS</b></p> <p>Elements enters into contractual agreements (“solicitation agreements”) with individuals and organizations, some of whom may be affiliated with Elements (“affiliated solicitors”), including Elements employees, and others of whom may be unaffiliated (“unaffiliated solicitors”), such as certain broker-dealers and their representatives that solicit potential clients for Elements. All such solicitation</p>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
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Item of Form (identify)	Answer
	<p>agreements are made in writing and comply with the requirements of Rule 206(4)-3 under the Investment Advisers Act that are applicable to each arrangement, including required representations that must be made by the solicitor. While the specific terms of each solicitation agreement may differ, generally, an unaffiliated solicitor's compensation is based upon Element's engagement of new clients referred by the unaffiliated solicitor and the retention of those clients. In addition, Elements may pay the broker-dealer compensation for administrative and other services that it performs on behalf of Elements. The terms of each arrangement will be outlined in the written agreements between the solicitor and Elements and, if applicable between the broker-dealer and Elements. In addition, the solicitor is required to provide the solicited potential client with a copy of Element's ADV Part II (or other disclosure document that contains equivalent information), along with a document disclosing that the solicitor is receiving payment for soliciting the client, the amount of the payment(s), the amount of compensation paid to the broker-dealer, if applicable, whether or not the client is paying higher fees to Elements due to the solicitation and whether or not the solicitor is affiliated with Elements. The solicitor is required to obtain the client's signature acknowledging receipt of Element's ADV Part II and the required disclosures about the arrangement.</p> <p style="text-align: center;"><b>(continued on next page)</b></p>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
The Elements Financial Group, LLC	801-68318	05/29/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: The Elements Financial Group, LLC	IRS Empl. Ident. No.: 20-8200125
Item of Form (identify)	Answer
	<p style="text-align: center;"><b>THE ELEMENTS FINANCIAL GROUP, LLC Privacy Notice</b></p> <p>Your relationship with us is based on trust and confidence and we value our relationships with our clients. In order to fulfill our responsibilities to you, we require that you provide us with current and accurate financial and personal information. We will protect the information you have provided in a manner that is safe, secure and professional. We are very committed to protecting your privacy and to safeguarding that information.</p> <p style="text-align: center;"><b>Type of Information We Require</b></p> <p>We may require and obtain the following kinds of confidential personal information about you:</p> <ul style="list-style-type: none"> <li>• Information on applications or other forms, such as your name, address, assets, phone number, social security number, occupation, assets, income and other financial and family information;</li> <li>• Information about your transactions with us, our affiliates or with brokerages, banks and custodians with whom you hold investment or cash accounts. This information includes account numbers, holdings, balances, transaction history and other financial and investment activities.</li> </ul> <p style="text-align: center;"><b>Sharing Nonpublic Personal and Financial Information</b></p> <p>The Elements Financial Group, LLC (“Elements”) is committed to the protection and privacy of its customer’s and consumer’s personal and financial information. Elements will not share such information with any non-affiliated third party except:</p> <ul style="list-style-type: none"> <li>• When necessary to complete a transaction in the account, such as with the clearing firm or account custodians;</li> <li>• When required to maintain or service the account;</li> <li>• To resolve customer disputes;</li> <li>• When requested by a fiduciary or beneficiary on the account;</li> <li>• When required by our attorneys or accountants;</li> <li>• When required by a regulatory agency, or for other reasons required or permitted by law;</li> <li>• In connection with a sale or merger of Element’s business;</li> <li>• In any circumstance that has the customer’s instruction or consent.</li> </ul> <p style="text-align: center;"><b>Protection of Personal Information</b></p> <p>We restrict access to your personal and account information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your personal information.</p>