

Item 1: Cover Page



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Form ADV Part 2A — Firm Brochure

Dated March 12, 2019

This Brochure provides information about the qualifications and business practices of Envisage Financial, LLC (“EF”). If you have any questions about the contents of this Brochure, please contact EF at 720-571-1117. 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.

Envisage Financial, LLC is registered as an Investment Adviser with the State of Colorado. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about EF is available on the SEC’s website at adviserinfo.sec.gov which can be found using the firm’s identification number 292546.

Envisage Financial, LLC is a Registered Investment Adviser in the State of Colorado.

Item 2: Material Changes

The last annual update of this Brochure was filed on April 18, 2018. The following changes have been made to this version of the Disclosure Brochure:

- Item 5: Adviser amended the fee schedule for each of the services disclosed in Item 5.
- Item 12: Adviser added Betterment as a custodian (See Item 12 for additional details on Betterment).
- Item 19: Adviser added an outside business activity.

Future Changes

From time to time, EF may amend this Disclosure Brochure to reflect changes in its business practices, changes in regulations, and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Envisage Financial, LLC.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at adviserinfo.sec.gov by searching for EF's firm name or by its CRD number 292546.

You may also request a copy of this Disclosure Brochure at any time by contacting EF at 720-571-1117.

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Item 4: Advisory Business

Description of Advisory Firm

Envisage Financial, LLC is registered as an Investment Adviser with the State of Colorado. EF became licensed as an Investment Adviser in April 2018. Craig Stavely is the principal owner of EF. Because EF does not manage investments itself and only recommends third-party money managers, it does not report Assets Under Management.

Types of Advisory Services

Ongoing Financial Planning

EF offers Ongoing Financial Planning by helping to address your financial concerns based upon a review and evaluation of the information you provide to EF regarding your current personal and financial situation and anticipated personal and financial needs and objectives.

Ongoing Financial Planning generally covers the following topics:

- Business Planning — EF provides consulting services if you currently operate your own business, are considering starting a business, or are planning for an exit from your current business. EF works with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- Employee Benefits — EF provides review and analysis as to whether you, as an employee, are taking optimum advantage of your employee benefits. If you are a business owner, EF considers and/or recommends the various benefit programs that can be structured to meet both business and personal financial goals.
- Financial Goals — EF helps you identify financial goals and develop a plan to reach them. EF identifies what you plan to accomplish, what resources you need to make it happen, how much time you need to reach your goal, and how much you should budget for your goal.
- Net Worth — EF helps you calculate your net worth by adding up your assets and your liabilities and then subtracting your liabilities from your assets.
- Cash Flow — EF conducts a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. EF recommends what it believes to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts for such reserves, plus strategies to save desired amounts.
- Debt Management — EF provides advice on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications.

- Risk Management — EF conducts a risk management review which includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. EF reviews existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile. EF provides advice on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- Investment Analysis — EF develops an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected custodian.
- Retirement Planning — EF’s retirement planning services include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, EF makes recommendations, including those that may impact the original projections by adjusting certain variables (for example, working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, EF advises on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- Education Planning — EF projects the amount that will be needed to achieve college or other post-secondary education funding goals, and advises on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, EF will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren, if appropriate.
- Income Tax Planning — EF advises ways to minimize current and future income taxes as part of your overall financial planning structure. For example, EF may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency”, with consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation.
- Estate Planning — EF analyzes your exposure to estate taxes and your current estate plan, which includes whether you have a will, powers of attorney, trusts, and other related documents. EF’s advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

EF always recommends that you consult with a qualified tax professional before initiating any tax planning strategy and/or with a qualified attorney when you initiate, update, or complete estate planning activities. EF may provide you with contact information for accountants or attorneys who specialize in these areas if you wish to hire someone for such purposes. EF will participate in meetings or phone calls between you and your accountant or attorney with your approval.

Investment Advisory Services (Third-Party Money Manager)

EF offers Investment Advisory Services by recommending you to a third-party money manager, which will typically delegate the following services to EF:

- assisting you in completing profile and/or other applicable forms;
- determining suitability and/or investment strategy and selected portfolio for you;
- meeting at least annually with you to review any changes in your financial situation; and
- acting as liaison between the third-party money manager and you.

Retirement Plan Services (Third-Party Service Provider)

EF offers Retirement Plan Services by recommending you to a third-party service provider, which will typically delegate the following services to EF:

- assisting you in completing profile and/or other applicable forms;
- determining suitability and/or investment strategy and selected portfolio for you;
- meeting at least annually with you to review any changes in your financial situation; and
- acting as liaison between the third-party service provider and you.

Client Tailored Services and Client Imposed Restrictions

EF offers the same suite of services to everyone. However, specific offerings and its implementation are dependent upon your individual situation (income, tax levels, and risk tolerance levels) which will be reviewed in order to construct a specific offering that matches your restrictions, needs, and targets.

Wrap Fee Programs

EF does not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note you have the right to terminate an advisory services contract without penalty or fee within five (5) business days after entering into it. How EF is paid depends on the type of advisory service it is performing. Please review the fees and compensation information below.

Ongoing Financial Planning

Ongoing Financial Planning consists of an annual fee based upon your complexity and needs. The annual rate is between \$395 and \$19,995. An equal portion of EF's annual fee is paid in arrears every month by way of electronic funds transfer. The annual fee is not based upon, or in any way related to, your funds or assets. The annual fee may be negotiable in certain cases. EF or you may terminate this service at any time by providing advance written notice to the other party. Upon termination any earned but unpaid fee will be due up to the date of termination. If you participate in Ongoing Financial Planning, EF will waive its annual fee for Investment Advisory Services. If an employer participates in Ongoing Financial Planning, EF will waive its annual fee for Retirement Plan Services.

Investment Advisory Services (Third-Party Money Manager)

Investment Advisory Services consist of an annual fee based upon the market value of your account. The annual rate is 1.00%. An equal portion of EF's annual fee is charged directly to your account by the custodian and remitted to EF on an ongoing basis. The frequency (monthly, quarterly, etc.) and timing (in advance vs in arrears) of EF's fee will align with the frequency and timing utilized by your third-party money manager, which will be outlined in your contract between you and EF. The annual fee may be negotiable in certain cases. EF or you may terminate this service at any time by providing advance written notice to the other party. Upon termination any earned but unpaid fee will be due up to the date of termination, and any unearned fee will be refunded. If you participate in Ongoing Financial Planning, EF will waive its annual fee for Investment Advisory Services.

EF's annual fee is separate from the fees and expenses charged by your account's underlying holdings (for example, mutual funds, ETFs, common stocks, etc.). EF's annual fee does not include fees or commissions associated with executing transactions for your account including redemption fees or asset- or transaction-based trading fees. EF's annual fee does not include the third-party money manager's fee or fees and expenses charged by any third party such as a custodian, trustee, third party administrator, recordkeeper, etc.

Retirement Plan Services (Third-Party Service Provider)

Retirement Plan Services consist of an annual fee based upon the market value of your plan. The annual rate is 1.00%. An equal portion of EF's annual fee is charged directly to your plan by the custodian and remitted to EF on an ongoing basis. The frequency (monthly, quarterly, etc.) and timing (in advance vs in arrears) of EF's fee will align with the frequency and timing utilized by your third-party service provider, which will be outlined in your contract between you and EF. The annual fee may be negotiable in certain cases. EF or you may terminate this service at any time by providing advance written notice to the other party. Upon termination any earned but unpaid fee will be due up to the date of termination, and any unearned fee will be refunded. For employers who participate in Ongoing Financial Planning, EF will waive its annual fee for Retirement Plan Services.

EF's annual fee is separate from the fees and expenses charged by your plan's underlying holdings (for example, mutual funds, ETFs, etc.). EF's annual fee does not include fees or commissions associated with executing transactions for your plan including redemption fees or asset- or transaction-based trading fees. EF's annual fee does not include the third-party service provider's fee or fees and expenses charged by any third party such as a custodian, trustee, third party administrator, recordkeeper, etc.

Other Types of Fees and Expenses

EF's annual fees are exclusive of brokerage and trading commissions, transaction fees, and other related costs and expenses which may be incurred by you. You may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to EF's annual fees, and EF shall not receive any portion of these commissions, fees, and costs.

EF does not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

EF does not offer performance-based fees and therefore does not engage in side-by-side management.

Item 7: Types of Clients

EF generally provides services to small businesses, individuals, high net-worth individuals, and trusts.

EF does not have a minimum account size requirement.

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

EF recommends you to a third-party money manager (the "outside manager"). EF's analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that outside manager has demonstrated an ability to invest over a period of time and in different economic conditions. EF monitors the outside manager's underlying holdings, strategies, concentrations, and leverage as part of its overall periodic risk assessment. Additionally, as part of EF's due-diligence process, it surveys the outside manager's compliance and business enterprise risks.

A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as EF does not control the underlying investments in an outside manager's portfolio, there is also a risk that an outside manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for you. Moreover, as EF does not control the outside manager's daily business and compliance operations, it may be unaware of the lack of internal controls necessary to prevent business, regulatory, or reputational deficiencies.

Material Risks Involved

All investing strategies that EF offers involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Materials risks associated with EF's investment strategies include:

- **Market Risk** — Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operations success of the issuer's operations or its financial condition.
- **Strategy Risk** — Investment strategies and/or investment techniques may not work as intended.
- **Small and Medium Cap Company Risk** — Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face greater risk of business failure, which could increase the volatility of your portfolio.
- **Turnover Risk** — At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover could result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.
- **Limited Markets Risk** — Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions you may be unable to sell or liquidate investments at prices you consider reasonable or favorable, or find buyers at any price.
- **Concentration Risk** — Certain investment strategies focus on particular asset-classes, industries, sectors, or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.
- **Interest Rate Risk** — Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.
- **Legal or Legislative Risk** — Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.
- **Inflation Risk** — Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investment remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common Stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds ("ETFs") may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. EF has no control over the risks taken by the underlying funds in which you invest.

Investment Companies Risk. When you invest in open end mutual funds or ETFs, you indirectly bear its proportionate share of any fees and expenses payable directly by those funds. Therefore, you will incur higher expenses, many of which may be duplicative. In addition, your overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

EF and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

EF and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

EF and its management have not been involved in legal or disciplinary events that are material to your evaluation of EF or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No EF employee is registered, or have an application pending to register, as a broker-dealer, or a registered representative of a broker-dealer.

No EF employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

EF does not have any related parties. As a result, EF does not have a relationship with any related parties.

EF only receives compensation directly from you. EF does not receive compensation for any outside source. EF does not have any conflicts of interest with any outside party.

Craig Stavelly is a licensed insurance agent in Colorado. However, he is not affiliated with any insurance company and he will not sell insurance products to you.

Recommendations or Selections of Other Investment Advisors

As referenced in Item 4 of this Brochure, EF recommends you to a third-party money manager (the “outside manager”) to manage your account. In the event that EF recommends an outside manager, please note that it does not share in their advisory fee. EF’s annual fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any outside manager EF recommends. Additionally, EF will only recommend an outside manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, EF and its associates have a duty of utmost good faith to act solely in your best interests. You entrust EF with your funds and personal information, which in turn places a high standard on its conduct and integrity. EF's fiduciary duty is a core aspect of its Code of Ethics and represents the expected basis of all of its dealings. EF also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to you. A summary of the Code of Ethics' Principles is outlined below.

- Integrity — Associated persons shall offer and provide professional services with integrity.
- Objectivity — Associated persons shall be objective in providing professional services to you.
- Competence — Associated persons shall provide services to you competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness — Associated persons shall perform professional services in a manner that is fair and reasonable to you and shall disclose conflicts of interest in providing such services.
- Confidentiality — Associated persons shall not disclose your confidential information without your specific consent unless in response to proper legal process, or as required by law.
- Professionalism— Associated persons' conduct in all matters shall reflect credit of the profession.
- Diligence — Associated persons shall act diligently in providing professional services.

EF periodically reviews and amends its Code of Ethics to ensure that it remains current, and it requires all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. EF will provide a copy of its Code of Ethics to you upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither EF, its associates, or any related person is authorized to recommend to you, or effect a transaction for you, involving any security in which it or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

EF does not recommend securities to you or invest in any securities that would create a conflict of interest with you.

Trading Securities At/Around the Same Time as Client's Securities

Because EF and its "related persons" do not recommend or trade securities for your related securities, it does not trade in securities at or around the same time as you.

Item 12: Brokerage Practices

Factors Used to Select Custodians

Envisage Financial, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to you based on your need for such services. EF recommends custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

EF currently receives soft dollar benefits by nature of its relationship with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC and MTG, LLC dba Betterment Securities ("Betterment Securities").

2. Brokerage for Client Referrals

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

3. Clients Directing Which Custodian to Use

EF does recommend a specific custodian for you to use, however, you may custody your assets at a custodian of your choice. You may also direct EF to use a specific broker-dealer to execute transactions. By allowing you to choose a specific custodian, EF may be unable to achieve most favorable execution of your transaction and this may cost you money over using a lower-cost custodian.

The Custodians EF Uses — TD Ameritrade

EF participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to EF services which include custody of securities, trade execution, clearing and settlement of transactions. EF receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

The Custodians EF Uses — Betterment

EF does not maintain custody of your assets it manages, although it may be deemed to have custody of your assets if you give it the authority to withdraw advisory fees from your account (see Item 15: Custody, below). Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. EF may recommend you use MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker-dealer, member SIPC, as the qualified custodian. EF is independently owned and operated and is not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when EF and/or you instruct them to. While EF may recommend you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an agreement directly with them. EF does not open the account for you, although it may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then EF cannot manage your account on Betterment Institutional (defined below).

Your Brokerage and Custody Costs

For your accounts that Betterment Securities maintains, it generally does not charge you separately for custody services but is compensated as part of the Betterment Institutional (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. EF has determined that having Betterment Securities execute trades is consistent with its duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “Factors Used to Select Custodians”).

Services Available to EF via Betterment Institutional

Betterment Securities serves as broker-dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms like EF (“Betterment Institutional”). Betterment Institutional also makes available various support services which may not be available to Betterment’s retail customers. Some of those services help EF manage or administer its clients’ accounts, while others help EF manage and grow its business. Betterment Institutional’s support services are generally available on an unsolicited basis (EF doesn’t have to request them) and at no charge to EF. Following is a more detailed description of Betterment Institutional’s support services:

1. **Services That Benefit You** — Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of your assets through Betterment Securities. Betterment Securities’ services described in this paragraph generally benefit you and your account.
2. **Services That May Not Directly Benefit You** — Betterment Institutional also makes available to EF other products and services that benefit it, but may not directly benefit you or your account. These products and services assist EF in managing and administering your accounts, such as software and technology that may:
 - a. Assist with back-office functions, recordkeeping, and client reporting of your accounts.
 - b. Provide access to your account data (such as duplicate trade confirmations and account statements).

- c. Provide pricing and other market data.
 - d. Assist with back-office functions, recordkeeping, and client reporting.
3. Services That Generally Benefit Only EF — By using Betterment Institutional, EF will be offered other services intended to help it manage and further develop its business enterprise. These services include:
- a. Educational conferences and events.
 - b. Consulting on technology, compliance, legal, and business needs.
 - c. Publications and conferences on practice management and business succession.

EF's Interest in Betterment Securities' Services

The availability of these services from Betterment Institutional benefits EF because it does not have to produce or purchase them. In addition, EF doesn't have to pay for Betterment Securities' services. These services may be contingent upon EF committing a certain amount of business to Betterment Securities in assets in custody. EF may have an incentive to recommend that you maintain your accounts with Betterment Securities, based on its interest in receiving Betterment Institutional and Betterment Securities' services that benefit its business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. EF believes, however, that its selection of Betterment Securities as custodian and broker is in your best interest. EF's selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment Institutional and Betterment Securities' services that benefit only EF.

Aggregating (Block) Trading for Multiple Client Accounts

Third-party money managers used by EF may block your trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Accounts with Investment Advisory Services will be reviewed regularly on a quarterly basis by Craig Stavelly, Owner and CCO. Accounts are reviewed with regards to your investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of your imposed restrictions, excessive drawdown, volatility in performance, or buy and sell decisions from EF or per your needs. You will be invited, at least annually, to meet with Craig Stavelly to review your accounts and to go over your financial situation and discuss any changes that may impact your financial plans or investment accounts.

You should receive trade confirmations from the custodian for each transaction in your account as well as monthly or quarterly statements and annual tax reporting statements from your custodian showing all activity in the account, such as receipt of dividends and interest.

EF will not provide written reports to you for Investment Advisory Services. You may receive periodic reports directly from the outside manager.

Item 14: Client Referrals and Other Compensation

EF does not receive any economic benefit, directly or indirectly, from any third party for advice rendered to you. Nor does EF, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

As discussed under Item 12 above, EF participates in TD Ameritrade's institutional customer program and it may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between EF's participation in the program and the investment advice it gives to you, although it may receive 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 your duplicate statements and confirmations; research related products and tools; consulting services; access to a trading desk serving EF's participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to your account); the ability to have EF's fee deducted directly from your account; access to an electronic communications network for your 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 EF by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by EF's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit EF but may not benefit your account. These products or services may assist EF in managing and administering your account, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help EF manage and further develop its business enterprise. The benefits received by EF or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of EF's fiduciary duties to you, it puts your interests first at all times. You should be aware, however, that the receipt of economic benefits by EF or its related persons in and of itself creates a potential conflict of interest and may indirectly influence its choice of TD Ameritrade for custody and brokerage services. EF believes that the use of TD Ameritrade is in your best interest based on the fees that are charged, the services that are available, as well as the quality of their support and reputation.

EF receives a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to it and other independent advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit EF, and the related conflicts of interest are described above (see Item 12: Brokerage Practices). The availability to EF of Betterment Institutional and Betterment Securities' products and services is not based on EF giving particular investment advice, such as buying particular securities for you.

Item 15: Custody

EF does not accept custody of your funds except in the instance of withdrawing its fee.

For accounts in which EF directly debits its advisory fee:

- i. EF will send a copy of its invoice to the custodian at the same time that it sends you a copy.
- ii. The custodian will send at least quarterly statements to you showing all disbursements for the account, including the amount of the advisory fee.
- iii. You will provide written authorization to EF, permitting it to be paid directly from your account held by the custodian.

Item 16: Investment Discretion

Depending on the third-party money manager EF recommends to you, you may be able to impose reasonable restrictions on its ability to invest in certain securities, types of securities, and/or industry sectors.

Item 17: Voting Client Securities

EF does not vote client proxies. Therefore, you maintains exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to your investment assets. You shall instruct your qualified custodian to forward to you copies of all proxies and shareholder communications relating to your investment assets. If you would like EF's opinion on a particular proxy vote, you may contact EF at the phone number listed on the cover of this Brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event EF was to receive any written or electronic proxy materials, EF would forward them directly to you by mail, unless you have authorized EF to contact you by electronic mail, in which case, EF would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about its financial condition. EF has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to you, and it has not been the subject of a bankruptcy proceeding.

EF does not have custody of your funds or securities or requires or solicits prepayments of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

Craig Stavelly

Born — 1981

Educational Background

2003 — MBA, Colorado State University-Pueblo

2003 — BSBA, Colorado State University-Pueblo

Business Experience

03/2018 - Present — Envisage Financial, LLC, Owner and CCO

10/2016 - 03/2018 — Prudential Financial - Rocky Mountain Financial Group, Financial Planner

09/2014 - 10/2016 — MassMutual Colorado, Financial Planner

10/2012 - 09/2014 — Northwestern Mutual - Greenwood Village, Associate Financial Representative

Professional Designations, Licensing, & Exams

CFP® Certification — CERTIFIED FINANCIAL PLANNER™ Certification

RICP® — Retirement Income Certified Professional®

ChFC® — Chartered Financial Consultant®

CLU® — Chartered Life Underwriter®

ChSNC® — Chartered Special Needs Consultant®

CAP® — Chartered Advisor in Philanthropy®

CASL® — Chartered Advisor in Senior Living®

REBC® — Registered Employee Benefits Consultant®

RHU® — Registered Health Underwriter®

Outside Business Activities

Craig Stavelly provides financial planning services to Registered Investment Advisers as an independent contractor. This activity typically accounts for up to 10% of his time. This activity involves financial plan creation and does not include meeting with clients of other firms.

Performance Based Fees

EF is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Envisage Financial, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Envisage Financial, LLC, nor Craig Stavely, have any relationship or arrangement with issuers of securities.

Additional Compensation

Craig Stavely does not receive any economic benefit from any person, company, or organization in exchange for providing you advisory services through EF.

Supervision

Craig Stavely, as Owner and Chief Compliance Officer of EF, will adhere to the policies and procedures of EF. He may be contacted at the phone number listed on the cover of this brochure supplement.

Requirements for State Registered Advisers

Craig Stavely has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Item 1: Cover Page



Envisage Financial, LLC

5540 Iran St
Denver CO 80249
720-571-1117

Form ADV Part 2B — Brochure Supplement

Dated March 12, 2019

For

Craig Stavely — Individual CRD# 5718550
Owner and Chief Compliance Officer

This brochure supplement provides information about Craig Stavely that supplements the Envisage Financial, LLC (“EF”) brochure. A copy of that brochure precedes this supplement. Please contact Craig Stavely if the EF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Craig Stavely is available on the SEC’s website at adviserinfo.sec.gov which can be found using the identification number 5718550.

Envisage Financial, LLC is a Registered Investment Adviser in the State of Colorado.

Item 2: Educational Background and Business Experience

Craig Stavelly

Born — 1981

Educational Background

2003 — MBA, Colorado State University-Pueblo

2003 — BSBA, Colorado State University-Pueblo

Business Experience

03/2018 - Present — Envisage Financial, LLC, Owner and CCO

10/2016 - 03/2018 — Prudential Financial - Rocky Mountain Financial Group, Financial Planner

09/2014 - 10/2016 — MassMutual Colorado, Financial Planner

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Professional Designations, Licensing, & Exams

CFP® Certification — CERTIFIED FINANCIAL PLANNER™ Certification

RICP® — Retirement Income Certified Professional®

ChFC® — Chartered Financial Consultant®

CLU® — Chartered Life Underwriter®

ChSNC® — Chartered Special Needs Consultant®

CAP® — Chartered Advisor in Philanthropy®

CASL® — Chartered Advisor in Senior Living®

REBC® — Registered Employee Benefits Consultant®

RHU® — Registered Health Underwriter®

Item 3: Disciplinary Information

No management person at Envisage Financial, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Craig Stavelly provides financial planning services to Registered Investment Advisers as an independent contractor. This activity typically accounts for up to 10% of his time. This activity involves financial plan creation and does not include meeting with clients of other firms.

Item 5: Additional Compensation

Craig Stavelly does not receive any economic benefit from any person, company, or organization in exchange for providing you advisory services through EF.

Item 6: Supervision

Craig Stavelly, as Owner and Chief Compliance Officer of EF, will adhere to the policies and procedures of EF. He may be contacted at the phone number listed on the cover of this brochure supplement.

Item 7: Requirements for State Registered Advisers

Craig Stavelly has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.