

Crestwyn Consulting Group - Form ADV Part 2A

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Form ADV Part 2A

Firm Brochure – September 2025

5900 Balcones St. STE 19828

Austin, TX 78731

Phone: (512) 631-5975

Email: hello@crestwyn.com

Website: www.crestwyn.com

- This brochure provides information about the qualifications and business practices of Crestwyn Consulting Group, LLC (“Crestwyn” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at hello@crestwyn.com or (512) 631-5975. 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. Registration with the Texas State Securities Board does not imply a certain level of skill or training.

Additional information about Crestwyn Consulting Group, LLC is available on the SEC’s website at www.adviserinfo.sec.gov.

Material Changes

This section will be updated annually and whenever material changes occur. Material changes will be highlighted and communicated promptly to clients.

Item 3 – Table of Contents

1. Cover Page – p.1
 2. Material Changes – p.2
 3. Table of Contents – p.2
 4. Advisory Business – p.3
 5. Fees and Compensation – p.3
 6. Performance-Based Fees and Side-by-Side Management – p.4
 7. Types of Clients – p.5
 8. Methods of Analysis, Investment Strategies, and Risk of Loss – p.5
 9. Disciplinary Information – p.5
 10. Other Financial Industry Activities and Affiliations – p.5
 11. Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading – p.6
 12. Brokerage Practices – p.6
 13. Review of Accounts – p.6
 14. Client Referrals and Other Compensation – p.6
 15. Custody – p.6
 16. Investment Discretion – p.7
 17. Voting Client Securities – p.7
 18. Financial Information – p.7
 19. Form ADV Acknowledgment & Dispute Resolution – p.7
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4 – Advisory Business

Firm Information and Ownership

Crestwyn Consulting Group, LLC was formed in July 2025 in Texas. The Firm is solely owned by Elizzia Pace, who serves as Chief Executive Officer and Chief Compliance Officer.

Advisory Services

Crestwyn provides both traditional and digital asset investment advisory services. Our services include:

- **Portfolio Management:** Discretionary and non-discretionary management of client accounts.
- **Financial Planning:** Retirement, estate, tax, and digital asset integration planning.
- **Selection of Other Advisers:** Referral or selection of third-party managers where appropriate. Clients will pay both Crestwyn's fees and the fees of such third-party managers.
- **Educational Services:** Seminars, workshops, and periodic publications on investment topics.

Tailored Services

We tailor advisory services to each client by considering risk tolerance, liquidity needs, time horizon, digital asset exposure, and investment objectives. Clients may request reasonable investment restrictions in writing (e.g., excluding specific securities or asset classes).

Wrap Fee Programs

Crestwyn does not sponsor or participate in wrap fee programs.

Assets Under Management

As of August 31, 2025, Crestwyn managed \$0 in client assets on either a discretionary or non-discretionary basis.

5 – Fees and Compensation

Portfolio Management Fees

Crestwyn charges an annual asset-based fee of up to 1.75% of assets under management, subject to a minimum annual fee of \$4,375. For accounts below \$145,833, the effective rate may exceed 3%. Clients are advised that this fee is above industry

norms and that similar services may be available at lower cost. Accounts of \$5,000,000 or more may be subject to negotiated rates, not to exceed 1.25% annually.

Hourly Consulting Fees

Hourly consulting is billed at \$350 per hour. Fees are billed monthly in advance based on estimated hours. Unused fees are either applied to future services or refunded.

Project-Based Fees

Project fees range from \$2,000 to \$25,000, depending on scope and complexity.

Enterprise Arrangements

Custom pricing is available for business and institutional clients and will be documented in the client agreement.

Third-Party Adviser Fees

If Crestwyn recommends a third-party adviser, that adviser's fees are separate from and in addition to Crestwyn's fees.

Other Fees and Expenses

Clients may incur custodial fees, brokerage commissions, transaction charges, exchange fees, and product expenses (such as mutual fund or ETF expenses). Crestwyn does not receive any portion of these fees.

Payment of Fees

Asset-based fees are deducted from client accounts or billed directly. Hourly and project-based fees are payable by check or electronic transfer. Crestwyn does not accept prepayment of more than \$500 per client, six months or more in advance.

Refunds

Advisory agreements may be terminated at any time upon written notice. Prepaid fees will be refunded on a pro rata basis.

6 – Performance-Based Fees and Side-by-Side Management

Crestwyn does not charge performance-based fees.

7 – Types of Clients

Crestwyn provides services to high-net-worth individuals, families, small businesses, family offices, and institutional clients. The general minimum account size is \$250,000, although the Firm may accept smaller accounts at its discretion.

8 – Methods of Analysis, Investment Strategies, and Risk of Loss

Methods of Analysis and Strategies

Crestwyn utilizes fundamental and quantitative analysis to evaluate investments, and applies portfolio diversification and risk-mitigation techniques such as rebalancing and liquidity management.

For digital assets, Crestwyn limits recommendations to assets vetted through Onramp-approved platforms that undergo due diligence for regulatory, operational, and security standards. For digital assets not vetted by Onramp, Crestwyn performs an internal review under the Howey Test before making recommendations. Alternative investments may include private funds or structured products, which carry additional risks including illiquidity and valuation uncertainty.

Risk of Loss

Investing in securities involves the risk of loss, and clients should be prepared to bear such risk.

9 – Disciplinary Information

Crestwyn and its management personnel have no disciplinary history to disclose.

10 – Other Financial Industry Activities and Affiliations

Crestwyn is not a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading adviser, and has no material financial industry affiliations.

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

Crestwyn maintains a Code of Ethics that governs employee conduct and addresses conflicts of interest. The Firm and its personnel may buy or sell securities recommended to clients. Employee trades are monitored to ensure they do not disadvantage clients. A copy of the Code of Ethics is available upon request.

12 – Brokerage Practices

Crestwyn recommends custodians and broker-dealers based on cost, execution quality, and platform capabilities. The Firm may receive non-cash benefits such as research or technology support from custodians, which do not increase client costs. Crestwyn does not currently aggregate client trades.

13 – Review of Accounts

The Chief Compliance Officer reviews client accounts at least annually. Reviews may also occur due to deposits, withdrawals, market events, or at client request. Clients receive written reports summarizing holdings and performance.

14 – Client Referrals and Other Compensation

Crestwyn may compensate solicitors in accordance with applicable rules. The Firm may also receive non-cash benefits from custodians or vendors, which are disclosed.

15 – Custody

Crestwyn Consulting Group does not maintain custody of client funds or securities. Client assets are held with qualified custodians, which may include SEC-registered broker-dealers, banks, or state-chartered trust companies that meet the definition of a qualified custodian. Clients receive account statements directly from the custodian at least quarterly. Clients are strongly encouraged to review those custodial statements

carefully and to compare them with any reports or invoices received from Crestwyn Consulting Group.

Crestwyn is deemed to have limited custody solely by virtue of the authority to deduct advisory fees directly from client accounts, where authorized by the client in writing. This form of custody is limited in nature and subject to regulatory safeguards. Crestwyn does not have access to client funds or securities beyond this authority.

Crestwyn does not accept standing letters of authorization (SLOAs), does not serve as trustee, and does not otherwise take custody of client assets.

16 – Investment Discretion

Crestwyn may accept discretionary authority through a written agreement, limited to selecting securities and executing trades. Crestwyn does not have authority to withdraw funds, except for advisory fee deductions as authorized in writing. Clients may impose reasonable restrictions in writing.

17 – Voting Client Securities

Crestwyn does not vote client securities or proxies. Clients are responsible for voting their proxies and will receive related materials directly from their custodian or the issuer. Upon request, Crestwyn may provide general guidance on proxy matters.

18 – Financial Information

Crestwyn does not require or solicit prepayment of more than \$500 per client, six months or more in advance. The Firm has no financial condition that would impair its ability to meet contractual obligations. Crestwyn and its management have not been the subject of bankruptcy proceedings.

19 – Form ADV Acknowledgment & Dispute Resolution

Information regarding Crestwyn's executive officer and management persons, including outside business activities and compensation, is provided in the Form ADV Part 2B Brochure Supplement.

Clients acknowledge receipt of this brochure prior to engaging Crestwyn's services. Any disputes arising under the advisory agreement will first be addressed through good-faith negotiation, and if unresolved, may be submitted to binding arbitration in accordance with applicable law.