

Iron Peak Advisors, Inc.

Form ADV Part 2A Brochure

1198 Melody Lane
Suite 104
Roseville, CA 95678

Phone: 916-378-4742
Fax: 916-378-4747

www.ironpeakadvisors.com

May 23, 2014

This disclosure brochure provides clients with information about the qualifications and business practices of Iron Peak Advisors, Inc., an independent investment advisory firm registered with the United States Securities and Exchange Commission ("SEC"). It also describes the services Iron Peak Advisors, Inc. provides as well as background information on those individuals who provide investment advisory services on behalf of Iron Peak Advisors, Inc. Please contact Allen C. Archuleta, Jr., Chief Compliance Officer of Iron Peak Advisors, Inc., at 916-378-4740 if you have any questions about the contents of this disclosure brochure.

The information in this disclosure brochure has not been approved or verified by the SEC or by any state securities authority. Registration with the SEC does not imply that Iron Peak Advisor, Inc. or any individual providing investment advisory services on behalf of Iron Peak Advisors, Inc. possess a certain level of skill or training. Additional information about Iron Peak Advisors, Inc. is available on the Internet at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Iron Peak Advisors, Inc. is 171788.

Item 2 – Material Changes

This item discusses specific material changes to the Iron Peak Advisors, Inc. brochure.

Pursuant to current SEC Rules, Iron Peak Advisors, Inc. will ensure that clients receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of the firm's fiscal year this occurs at the end of the calendar year. Iron Peak Advisors, Inc. may further provide other ongoing disclosure information about material changes as necessary.

Iron Peak Advisors, Inc. will also provide clients with a new brochure as necessary based on changes or new information, at any time, without charge.

This disclosure brochure has been not been materially modified since the most recent filing of Iron Peak Advisors, Inc.'s annual updating amendment (May, 23, 2014)

Item 3 – Table of Contents

Item 4 --- Advisory Business	4
Item 5 --- Fees And Compensation	7
Item 6 --- Performance-Based Fees and Side---By---Side Management	11
Item 7 --- Types of Clients	11
Item 8 --- Methods of Analysis, Investment Strategies and Risk of Loss.....	12
Item 9 --- Disciplinary History	20
Item 10 --- Other Financial Industry Activities and Affiliations	20
Item 11 --- Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	21
Item 12 --- Brokerage Practices.....	22
Item 13 --- Review Of Accounts	25
Item 14 --- Client Referrals And Other Compensation	25
Item 15 --- Custody	26
Item 16 --- Investment Discretion.....	26
Item 17 --- Voting Client Securities	26
Item 18 --- Financial Information	27
Item 19 --- Additional Information.....	27

Item 4 -Advisory Business

A. The Company

Iron Peak Advisors, Inc. is a privately-held Delaware corporation that has been providing investment advisory services through their website since May 23, 2014 and has been registered with the SEC since June 6, 2014. Throughout this disclosure brochure, the company is referred to as "Iron Peak Advisors" or the "firm."

The principal owner of Iron Peak Advisors is Quote My 401k, Inc. Iron Peak Advisors, Inc. is a subsidiary of Quote My 401k, Inc., where Quote My 401k, Inc. is the sole shareholder.

B. Advisory Services

Iron Peak Advisors provides investment advice through applications on their website www.BuildMy401k.com.

Discretionary Investment Management Services

Iron Peak Advisors provides personalized investment management services for no more than 15 households at any given time. Through personal discussions, during which goals and objectives based on a client's particular circumstances are established, Iron Peak Advisors and the client agree on guidelines that quantify the client's risk profile. Thereafter, Iron Peak Advisors creates and manages a customized portfolio based on that profile, allocating the client's assets among various investments while taking into consideration the client's risk tolerance.

Iron Peak Advisors will manage these advisory accounts on a discretionary basis.

Non-Discretionary Investment Management Services

Iron Peak Advisors may also provide non-discretionary investment management services to clients through an application on their website. Such service is done through applications which walk clients through a time horizon and risk tolerance questionnaire, which then assigns a specific asset allocation model, and makes investment recommendation based on the questionnaire and asset allocation model results. Such services are restricted to advice regarding their individual employer sponsored retirement plans. In so doing, Iron Peak Advisors recommends the allocation of client assets among the various mutual fund subdivisions that comprise the retirement plan.

Financial Planning Services

Iron Peak Advisors provides Financial Planning Services at no charge for their discretionary clients. Financial planning is primarily an analytical process designed to organize financial data, identify needs and opportunities and evaluate alternative courses of action; it may include analysis of current net worth, income taxes, cash flow and budgeting, investments and asset allocation, retirement planning, employee benefit plan analysis, estate and gift tax planning, education pre-funding and risk management focusing on life, health and disability coverage.

In general, Iron Peak Advisors gathers required information through personal interviews. Iron Peak Advisors will typically meet with the client to conduct an evaluation of the client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are reviewed, including a questionnaire the client completes that provides

relevant information and authorizations. Iron Peak Advisors conducts a financial analysis and prepares a written plan that describes the client's current situation, identifies needs and opportunities and makes suggestions designed to help the client achieve stated goals.

While financial analyses may include investment advice concerning mutual funds and securities, it may also include investment advice with respect to products that may or may not constitute "securities," such as life insurance and annuities. It also takes into consideration estate tax planning issues that may not constitute "investment" advice.

Iron Peak Advisors may recommend its own services, the services of its own investment adviser representatives in their individual capacities as registered representatives of a Registered Investment Advisor firm, and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if Iron Peak Advisors recommends its own services or that of its own investment adviser representatives. The client is under no obligation to act upon any of the recommendations made by Iron Peak Advisors under a financial planning engagement and/or engage the services of any such recommended professional, including Iron Peak Advisors or any of its related persons. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of Iron Peak Advisors' recommendations.

In performing its services, Iron Peak Advisors shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. If requested by the client, Iron Peak Advisors may suggest the services of other professionals for implementation services, but the client is under no obligation to engage the services of any suggested professional. In addition, each client is advised that it remains their responsibility to promptly notify Iron Peak Advisors if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Iron Peak advisors' previous recommendations and/or services.

Independent Money Manager Program

Iron Peak Advisors may also recommend that certain clients authorize the active discretionary management of a portion of their assets by independent money managers. Client could invest either directly with the independent money manager or through a wrap fee program based upon the stated investment objectives of the client.

The terms and conditions under which the client shall engage the independent money manager is set forth in separate written agreements between (i) the client and Iron Peak Advisors and (ii) the client and the designated independent money manager and/or wrap fee program sponsor. Iron Peak Advisors shall continue to render advisory services to the client relative to the ongoing monitoring and review of account performance.

Factors that Iron Peak Advisors shall consider in recommending an independent money manager include the client's stated investment objective(s) and the management style, performance, reputation, financial strength, reporting and pricing of the independent money manager. In addition to this written disclosure statement, the client shall also receive the written disclosure statement of the designated independent money manager and wrap fee program sponsor (if applicable).

401(k) Retirement Consulting Services

Iron Peak Advisors provides 401(k) Retirement Consulting Services to both the sponsor of non-pooled retirement plans (the "Client") and plan participants (the "Plan Participants").

Services Provided to the Client

Iron Peak Advisors shall provide to the Client the scope of services in connection with the investment and reinvestment of securities, cash and/or other investments held from time to time in the Client's plan account (the "Plan"). Iron Peak Advisors shall be a 3(21) fiduciary of the Plan, as defined under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), with respect to the investment advice Iron Peak Advisors provides to the Plan. Also, for an additional fee Iron Peak Advisors will become a 3(38) fiduciary for any client who request such services.

The scope of services to the Client includes:

- Consultation via phone or video conferencing on the plan anniversary date to discuss the details of the plan, including investment selections, administration and education of the participants;
- Consultation related to the monitoring of service providers, including but not limited to Plan asset custodians and third party plan administrators;
- Under the 3(38) fiduciary option, Iron Peak Advisors will monitor, assess, and remove or implement funds within a clients Plan.

Services Provided to the Plan Participants

To the extent the Client is a plan sponsor of an individual account plan as defined under Section 404(c) of ERISA, Iron Peak Advisors shall provide Plan Participants the services set forth in the scope in connection with the investment and reinvestment of securities, cash and/or other investments held from time to time in the Plan Participants' accounts under the Plan. Iron Peak Advisors shall render investment advice to the Plan Participant through our website BuildMy401k.com. A Plan Participant shall exercise control over the assets in his or her account by providing the record-keeper with investment instructions in the form requested by the plan administrator regarding the investment of the account. Iron Peak Advisors also provides Plan Participants with sufficient information to make informed decisions with regard to investment alternatives available under the Plan in accordance with ERISA regulation Section 2550.404c-1(b)(2)(i)(B)(1) and (2).

The scope of services to Plan Participants includes:

- Provide Plan Participants with an online investor questionnaire that will determine a client time horizon to retirement and their overall risk tolerance.
- Based on the questionnaire results, provide Plan Participants with general asset allocation models based on generally accepted investment theories, which is specific to their time horizon to retirement.
- Provide Plan Participants with investment materials through our website.

C. Client Tailored Services and Client Imposed Restrictions

Iron Peak Advisors offers a limited range of investment advisory services which can be tailored to meet the specific needs of each client. This service has been limited to 15 total households for the firm. In order to provide appropriately individualized services, Iron Peak Advisors will work with the client to obtain information regarding the client's financial circumstances, investment objectives, overall financial condition, income and tax status, personal and business assets, risk profile and other information regarding the client's financial and investment needs.

Iron Peak Advisors will periodically review with clients their financial circumstances, investment objectives and risk profile. In order for Iron Peak Advisors to provide effective advisory services, it is critical that clients provide accurate and complete information to Iron Peak Advisors and inform the firm anytime such information needs to be updated or anytime there is a change in their financial circumstances, investment objectives and/or risk profile.

Generally, clients are permitted to impose reasonable restrictions on investing in certain securities or types of securities in their advisory accounts, provided, however, that some restrictions may not be accommodated when utilizing Exchange Traded Funds, mutual funds or with respect to certain third-party products or services made available through Iron Peak Advisors. In addition, a restriction request may not be honored if it is fundamentally inconsistent with Iron Peak Advisors' investment philosophy, runs counter to the client's stated investment objectives, or would prevent Iron Peak Advisors from properly servicing client accounts.

Whether Independent Money Manager Program clients will be able to place reasonable restrictions on the types of investments which will be made on the client's behalf is at the discretion of the independent money manager.

D. Wrap Fee Programs

Iron Peak Advisors does not provide portfolio management services to a wrap fee program(s). Under a wrap fee program, advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and transaction services (e.g., execution of trades) are provided for one fee. This is different than traditional investment management programs whereby services are provided for a fee, but transaction services are billed separately on a per-transaction basis.

E. Assets Under Management

As of May 23, 2014, the total amount of client assets managed by Iron Peak Advisors is approximately \$149,223. Of this total amount, \$149,223 of client assets are managed on a discretionary basis and \$0 of client assets are managed on a non-discretionary basis. Iron Peak Advisors business model is one where the majority of the fees earned by the firm are solely based on a flat fee for investment advice.

Item 5 - Fees And Compensation

A. Advisory Fees

Investment Management Fees

Investment Management Services Fees

Discretionary

The annual fee for Discretionary Investment Management Services will be charged as a percentage of assets under management according to the following schedule:

Assets Under Management	Maximum Annual Fee (%)
First \$250,000	1.50%
\$250,001 to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
\$2,000,001 to \$3,000,000	0.80%
\$3,000,001 to \$5,000,000	0.70%
Above \$5 million	0.60%

Iron Peak Advisors' annual investment advisory fee is prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. For the first quarter, the annual fee is charged in arrears on the account's first billing cycle. The first quarter's fee is prorated based on the market value at the time cash is deposited or assets are transferred into the account, and the number of days remaining in the quarter. Fees on additional deposits or withdrawals will also be assessed in arrears. Fees are prorated based on the market value at the time the cash is deposited or withdrawn, or assets are transferred into or out of the account, and the number of days remaining in the quarter.

Non-Discretionary

The quarterly fee for Non-Discretionary Investment Management Services through our website will be charged as a flat membership fee, charged on a quarterly basis. This fee will typically range from \$50 to \$100 per quarter for individual clients.

Independent Money Manager Program

Iron Peak Advisors will receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by the designated independent money manager. The fee schedule for this service is the same fee schedule as the one for Investment Management Services (please see above).

The investment management fees charged by the designated independent money manager, together with the fees charged by the wrap fee program sponsor (if applicable) and corresponding designated custodian of the client's assets, **may be exclusive of, and in addition to**, Placer Summit's investment advisory fee. As discussed below, the client may incur additional fees than those charged by Placer Summit, the designated independent money manager(s), wrap fee program sponsor (if applicable), and corresponding custodian.

401(k) Retirement Plan Fees

Iron Peak Advisors provides 401(k) Services via our parent website QuoteMy401k.com. 401(k) plans are charged a flat quarterly fee by Iron Peak Advisors for consultation. Education for participants will be provided by *Iron Peak Advisors' education website, BuildMy401k.com, and fees will be charged to the Plan Sponsor/Participant based on the number of total participants in the plan on a quarterly basis.* 401(k) Retirement Plan fees are set according to the following schedule:

401(k) Plan Consulting

Plan Assets	Maximum Annual Fee (\$)
\$0 - \$1,000,000	\$2,500
\$1,000,001 to \$2,000,000	\$4,500
\$2,000,001 to \$3,000,000	\$6,000
\$3,000,001 to \$5,000,000	\$8,750
\$5,000,001 to \$10,000,000	\$15,000
\$10,000,001 to \$25,000,000	\$26,000
\$25,000,001 to \$50,000,000	\$37,500
\$50,000,001 +	\$42,500

401(k) Participant Education Portal

Participants	Maximum Per Participant Fee (\$)
1 – 50	\$20.00
51 – 150	\$19.00
151 – 250	\$18.00
251 – 500	\$16.00
501 – 1,000	\$14.50
1,001 – 2,500	\$12.00
2,500 – 5,000	\$11.00
5,000 +	\$10.00

Iron Peak Advisors' annual fee will be paid (or deducted) in accordance with the fee payment policies of the plan's custodian and/or third-party administrator, which may vary from client to client.

B. Payment Method

There are two options a client may select to pay Iron Peak Advisors' advisory services fees:

Direct Debiting (Discretionary)

Each quarter, Iron Peak Advisors will notify the client's qualified custodian of the amount of the fee due and payable to Iron Peak Advisors pursuant to the firm's fee schedule and advisory agreement. The qualified custodian will not validate or check Iron Peak Advisors' fees, its corresponding calculation or the assets on which the fee is based unless the client has retained their services to do so. With the client's pre-approval, the qualified custodian will "deduct" the fee from the client's account or, if the client has more than one account, from the account the client has designated to pay Iron Peak Advisors' advisory fees.

Each month, the client will receive a statement directly from the qualified custodian showing all transactions, positions and credits/debits into or from the client's account. Statements sent after quarter end will also reflect the advisory fee paid by the client to Iron Peak Advisors.

Direct Debiting (Non-Discretionary)

Each quarter, Iron Peak Advisors will charge the client's the amount of the fee due and payable to Iron Peak Advisors pursuant to the firm's fee schedule as outlined on the fee section of our website. With the client's pre-approval, the credit card on file for the client will be charged the quarterly fee due as outlined in their membership agreement, outlined in the Terms of Use on our website.

Billing (Discretionary)

Iron Peak Advisors will issue the client an invoice for the firm's services and the client will pay Iron Peak Advisors by check or wire transfer within 30 days' of the date of the invoice, or as negotiated and documented in the client's advisory agreement.

C. Additional Fees and Expenses

Mutual Fund Fees

All fees paid to Iron Peak Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of Iron Peak Advisors. In that case, the client would not receive the services provided by Iron Peak Advisors which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. To the extent that client assets are invested in money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus. Accordingly, the client should review both the fees charged by the funds and the fees charged by Iron Peak Advisors to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Trading and Other Costs

All fees paid to Iron Peak Advisors for investment advisory services are separate and distinct from transaction fees charged by broker dealers associated with the purchase and sale of equity securities and options. Such fees may include odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In addition, fees do not include the services of any co-fiduciaries, accountants, broker dealers or attorneys. Please see the section entitled "Brokerage Practices" of this disclosure brochure for additional information on brokerage and other transaction costs.

Money Managers Fees and Expenses

All fees paid to Iron Peak Advisors for its investment advisory services are separate and distinct from the fees and expenses charged by independent money managers to their clients.

Each independent money manager used involves different custodial, administrative, and fee arrangements, and may require certain minimum initial account investments. These fees and expenses are described in each independent money manager's firm brochure. These fees will generally include a management fee and possible other fees. The actual management fees may be higher or lower for specific independent money manager employing similar strategies.

In certain circumstances a client could invest with an independent money manager directly, without the services of Iron Peak Advisors. In that case, the client would not receive the services provided by Iron Peak Advisors which are designed, among other things, to assist the client in determining which independent money managers are most appropriate to the client's financial condition and objectives.

D. Termination and Refunds

A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of any account, any earned, unpaid fees will be due and payable and any prepaid fees will be refunded by the custodian.

E. Important Additional Information

Fees Negotiable

Iron Peak Advisors retains the right to modify fees, including minimum account size, in its sole and absolute discretion, on a client-by-client basis based on the size, complexity and nature of the advisory services provided.

Fee Offset

If a financial planning services client engages Iron Peak Advisors for additional investment advisory services, Iron Peak Advisors may offset all or a portion of its fees for those services based upon the amount paid for the financial planning services.

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

Iron Peak Advisors does not accept performance-based fees or engage in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Iron Peak Advisors' fees are calculated as described above in Item 5 - Fees and Compensation - and are not charged on the basis of a share of the capital gains upon, or capital appreciation of, the funds in a client's account.

Item 7 -Types of Clients

Iron Peak Advisors provides investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other types of business entities.

Engaging the Services of Iron Peak Advisors

All clients wishing to engage Iron Peak Advisors for investment advisory services must first complete the applicable investment advisory agreement as well as any other document or questionnaire provided by Iron Peak Advisors. The investment advisory agreement describes the services and responsibilities of Iron Peak Advisors to the client. It also outlines Iron Peak Advisors' fee in detail. In addition, clients must complete certain custodial documentation. Upon completion of all these documents, Iron Peak Advisors will be considered engaged by the client. Clients are responsible for ensuring that Iron Peak Advisors is informed in a timely manner of changes in their investment objectives and risk tolerance.

Neither Iron Peak Advisors nor the client may assign the investment advisory agreement without the consent of the other party. Transactions that do not result in a change of actual control or management of Iron Peak Advisors are not to be considered an assignment.

A copy of Iron Peak Advisors' privacy policy notice and this written disclosure statement are provided to each client prior to or contemporaneously with the execution of the investment advisory agreement. Any client who has not received a copy of Iron Peak Advisors' written

disclosure statement at least forty eight (48) hours prior to executing the investment advisory agreement shall have five (5) business days subsequent to executing the agreement to terminate Iron Peak Advisors' services without penalty.

Additions and Withdrawals to Client's Account

The client may make additions to and withdrawals from the account at any time, subject to Iron Peak Advisors' right to terminate an account. Clients may withdraw account assets on notice to Iron Peak Advisors, subject to the usual and customary securities settlement procedures. However, Iron Peak Advisors designs its portfolios as long-term investments and assets withdrawals may impair the achievement of a client's investment objectives.

Additions may be in cash or securities provided that Iron Peak Advisors reserves the right to liquidate any transferred securities, or decline to accept particular securities into a client's account. Iron Peak Advisors may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Conditions for Managing Accounts

Investment Management Services

As a condition for starting and maintaining a relationship, Iron Peak Advisors shall generally impose a minimum portfolio size of \$25,000. Iron Peak Advisors, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and *pro bono* activities. Iron Peak Advisors shall only accept clients with less than the minimum portfolio size if, in the sole opinion of Iron Peak Advisors, the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance. Iron Peak Advisors may aggregate the portfolios of family members to meet the minimum portfolio size.

Independent Money Manager Program

Independent money manager(s) may impose more restrictive account requirements and varying billing practices than Iron Peak Advisors. In such instances, Iron Peak Advisors may alter its corresponding account requirements and/or billing practices to accommodate those of the independent money manager(s) or wrap fee program sponsor. In addition, independent money managers that are commodity trading advisers will have certain client net worth and income requirements.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Iron Peak Advisors' security analysis methods include fundamental analysis, technical analysis, cyclical analysis and charting.

Fundamental Analysis

Fundamental analysis is a method of evaluating securities by attempting to measure the intrinsic value of a stock. Fundamental analysts study the overall economy and industry

conditions, the financial condition of a company, details regarding the company's product line, and the experience and expertise of the company's management. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Technical Analysis

Technical analysis involves the examination of past market data rather than specific company data in determining which securities to buy/sell. Technical analysis may involve the use of various quantitative-based calculations, variation metrics and charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of a company. These trends may include put/call ratios, pricing trends, moving averages, volume, and changes in volume, among many others. These trends, both short and long-term, are used for determining specific trade entry and exit points and broad economic analysis.

Cyclical Analysis

Cyclical analysis is similar to technical analysis in that it involves the assessment of market conditions at a macro (e.g., the entire market/economy) or micro (e.g., company specific) level, rather than the overall fundamental analysis of the health of a particular company. Cyclical analysis involves the historical patterns and trends of securities, markets or economies as a whole in an effort to determine future behaviors, the estimation of price movement and an evaluation of a transaction before entry into the market in terms of risk and profit potential.

Charting

Charting involves the use of patterns in performance charts which might identify favorable conditions for buying and/or selling a security. Charts of market and security activity are reviewed in an attempt to identify when the market is moving up or down and to predict how long the trend will last and when that trend may reverse.

Investment Strategies

Iron Peak Advisors will use all or some of the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizons, among other considerations:

Long-Term Purchases

Securities are purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short-Term Purchases

Securities are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Types of Investments

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to domestic or foreign equity securities, corporate debt securities, certificates of deposit, municipal and United States government securities, mutual funds, and exchange traded funds (ETFs). In addition, Iron Peak Advisors may recommend the use of other independent money

managers, which, in turn, may involve the use of real estate investment trusts (REITS), limited partnerships, and futures.

Sources of Information

In conducting security analysis, Iron Peak Advisors may utilize the following sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the U.S. Securities and Exchange Commission and company press releases.

Investing Involves Risk

Investing in securities involves risk of loss that each client should be prepared to bear. The value of a client's investment may be affected by one or more of the following risks, any of which could cause a client's portfolio return, the price of the portfolio's shares or the portfolio's yield to fluctuate:

- *Market Risk.* The value of portfolio assets will fluctuate as the stock or bond market fluctuates. The value of investments may decline, sometimes rapidly and unpredictably, simply because of economic changes or other events that affect large portions of the market.
- *Management Risk.* A client's portfolio is subject to management risk because it is actively managed by Iron Peak Advisors' investment professionals. Iron Peak Advisors will apply its investment techniques and risk analysis in making investment decisions for a client's portfolio, but there is no guarantee that these techniques and Iron Peak Advisors' judgment will produce the intended results.
- *Interest Rate Risk.* Changes in interest rates will affect the value of a portfolio's investments in fixed-income securities. When interest rates rise, the value of investments in fixed-income securities tend to fall and this decrease in value may not be offset by higher income from new investments. Interest rate risk is generally greater for fixed-income securities with longer maturities or durations.
- *Credit Risk.* An issuer or guarantor of a fixed-income security, or the counterparty to a derivatives or other contract, may be unable or unwilling to make timely payments of interest or principal, or to otherwise honor its obligations. The issuer or guarantor may default causing a loss of the full principal amount of a security. The degree of risk for a particular security may be reflected in its credit rating. There is the possibility that the credit rating of a fixed-income security may be downgraded after purchase, which may adversely affect the value of the security. Investments in fixed-income securities with lower ratings tend to have a higher probability that an issuer will default or fail to meet its payment obligations.
- *Allocation Risk.* The allocation of investments among different asset classes may have a significant effect on portfolio value when one of these asset classes is performing more poorly than the others. As investments will be periodically reallocated, there will be transaction costs which may be, over time, significant. In addition, there is a risk that certain asset allocation decisions may not achieve the desired results and, as a result, a client's portfolio may incur significant losses.
- *Foreign (Non-U.S.) Risk.* A portfolio's investments in securities of non-U.S. issuers may involve more risk than those of U.S. issuers. These securities may fluctuate more widely in price and may be less liquid due to adverse market, economic, political, regulatory or other factors.
- *Emerging Markets Risk.* Securities of companies in emerging markets may be more volatile than those of companies in developed markets. By definition, markets, economies and government institutions are generally less developed in emerging market countries. Investment in securities of companies in emerging markets may

entail special risks relating to the potential for social instability and the risks of expropriation, nationalization or confiscation. Investors may also face the imposition of restrictions on foreign investment or the repatriation of capital and a lack of hedging instruments.

- *Currency Risk.* Fluctuations in currency exchange rates may negatively affect the value of a portfolio's investments or reduce its returns.
- *Derivatives Risk.* Certain strategies involve the use of derivatives to create market exposure. Derivatives may be illiquid, difficult to price and leveraged so that small changes may produce disproportionate losses for a client's portfolio and may be subject to counterparty risk to a greater degree than more traditional investments. Because of their complex nature, some derivatives may not perform as intended. As a result, a portfolio may not realize the anticipated benefits from a derivative it holds or it may realize losses. Derivative transactions may create investment leverage, which may increase a portfolio's volatility and may require the portfolio to liquidate portfolio securities when it may not be advantageous to do so.
- *Capitalization Risk.* Investments in small- and mid-capitalization companies may be more volatile than investments in large-capitalization companies. Investments in small-capitalization companies may have additional risks because these companies have limited product lines, markets or financial resources.
- *Liquidity Risk.* Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing Iron Peak Advisors from selling out of such illiquid securities at an advantageous price. Derivatives and securities involving substantial market and credit risk also tend to involve greater liquidity risk.
- *Issuer Specific Risk.* The value of an equity security or debt obligation may decline in response to developments affecting the specific issuer of the security or obligation, even if the overall industry or economy is unaffected. These developments may comprise a variety of factors, including, but not limited to, management issues or other corporate disruption, political factors adversely affecting governmental issuers, a decline in revenues or profitability, an increase in costs, or an adverse effect on the issuer's competitive position.
- *Concentrated Portfolios Risk.* Certain investment strategies focus on particular asset classes, countries, regions, industries, sectors or types of investments. Concentrated portfolios are an aggressive and highly volatile approach to trading and investing. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding is likely to have a larger impact on portfolio performance than a more broadly diversified portfolio.
- *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.

B. Risks Associated with Investment Strategies and Methods of Analysis

Risks Associated with Investment Strategies

Long-Term Purchases

Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or your particular investments will decrease in value even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost (e.g., "locking-up" assets that may be better utilized in the short-term in other investments).

Short-Term Purchases

Using a short-term purchase strategy generally assumes that the performance of the financial markets can be accurately predicted over the short-term. The risk associated with a short-term purchase strategy is that there are many factors that may affect market performance in the short-term including interest rate fluctuations, cyclical earnings, etc. Such factors may have a smaller impact over the longer-term. In addition, short-term trading may incur a disproportionately higher amount of transaction costs compared to long-term trading.

Risk Associated with Methods of Analysis

The analysis of securities requires subjective assessments and decision-making by experienced investment professionals, however, there is always the risk of an error in judgment.

Iron Peak Advisors' securities analysis methods rely on the assumption that the companies whose securities the firm purchases and sells, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While Iron Peak Advisors is alert to indications that data may be incorrect, there is always the risk that the firm's analysis may be compromised by inaccurate or misleading information.

Fundamental Analysis

Fundamental analysis, when used in isolation, has a number of risks:

- Information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.
- The data used may be out of date.
- It ignores the influence of random events such as oil spills, product defects being exposed, acts of God, and so on.
- It assumes that there is no monopolistic power over markets.
- The market may fail to reach expectations of perceived value.

Technical Analysis

The primary risk in using technical analysis is that spotting historical trends may not help predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Iron Peak Advisors will be able to accurately predict such a reoccurrence.

Cyclical Analysis

The primary risk in using cyclical analysis is that economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore, there is an attendant difficulty in predicting economic trends. Consequently, the changing value of securities would be affected by these changing trends.

Charting

The primary risk in using charting analysis is that it may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about a security and yet, day-to-day changes in the market prices of securities may follow

random patterns and may not be predictable with any reliable degree of accuracy.

C. Risks Associated with Specific Securities Utilized

Common Stocks

The major risks associated with investing in common stocks relate to the issuer's capitalization, quality of the issuer's management, quality and cost of the issuer's services, the issuer's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk and the issuer's ability to create shareholder value (e.g., increase the value of the company's stock price).

Preferred Stocks

Preferred stock dividends are generally fixed in advance. Unlike requirements to pay interest on certain types of debt securities, the company that issues preferred stock may not be required to pay a dividend and may stop paying the dividend at any time. Preferred stock may also be subject to mandatory redemption provisions and an issuer may repurchase these securities at prices that are below the price at which they were purchased by the investor. Under these circumstances, a client account holding such preferred securities could lose money.

Fixed-Income Securities

Different forms of fixed-income instruments, such as bonds, money market funds, and certificates of deposit may be affected by various forms of risk, including:

- *Interest Rate Risk.* The risk that the value of the fixed-income holding will decrease because of an increase in interest rates.
- *Liquidity Risk.* The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed-income securities are generally liquid (e.g., corporate bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also the risk of not being able to purchase a particular issue at the desired price.
- *Credit Risk.* The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments.
- *Reinvestment Risk.* With declining interest rates, investors may have to reinvest income or principal at a lower rate.
- *Duration Risk.* Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Municipal Bonds

In addition to the risks set forth under "Fixed-Income Securities" above, municipal bonds are susceptible to events in the municipality that issued the bond or the security posted for the bond. These events may include economic or political policy changes, changes in law, tax base erosion, state constitutional limits on tax increases, budget deficits or other financial difficulties and changes in the credit rating assigned to municipal issues.

Exchange Traded Funds

ETFs are subject to risks similar to those of stocks. Investment returns will fluctuate and are subject to market volatility, so that when shares are sold they may be worth more or less than their original cost. ETF shares are bought and sold at market price (not Net Asset Value) and are not individually redeemed from the fund. There is also the risk that a manager may deviate from the stated investment mandate or strategy of the ETF which could make the holdings less suitable for a client's portfolio. ETFs may also carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. In addition, while many ETFs are known for their potential tax efficiency and higher "qualified dividend income" (QDI) percentages, there are assets classes within these ETFs or holding periods that may not benefit. Shorter holding periods, as well as commodities and currencies that may be part of an ETF's portfolio, may be considered "non-qualified" under certain tax code provisions.

Equity Funds

The major risks associated with investing in equity mutual funds is similar to the risks associated with investing directly in equity securities, including market risk, which is the risk that investment returns will fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. Other risks include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification and the type and amount of sector diversification within specific industries. In addition, there is the risk that a manager may deviate from the stated investment mandate or strategy of the mutual fund which could make the holdings less suitable for a client's portfolio. Also, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold their shares in the fund. Mutual funds may also carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees.

Fixed-Income Funds

In addition to the risks associated with investing in equity mutual funds, fixed-income mutual funds also the same risks as set forth under "Fixed-Income Securities" listed above.

Indexed Funds

Indexed Funds have the potential to be affected by "tracking error risk" which means a deviation from a stated benchmark index. Since the core of a portfolio may attempt to closely replicate a benchmark, the source of the tracking error (deviation) may come from a "sample index" that may not closely align the benchmark. In addition, while many index mutual funds are known for their potential tax efficiency and higher "qualified dividend income" (QDI) percentages, there are assets classes within these funds or holding periods that may not benefit. Shorter holding periods, as well as commodities and currencies that may be part of a fund's portfolio, may be considered "non-qualified" under certain tax code provisions.

Options

There are numerous risks associated with transactions in options on securities or securities indexes. A decision as to whether, when and how to use options involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. In the case of index options, the client

incurs basis risk between the performance of the underlying portfolio and the performance of the underlying index. For example, the underlying portfolio may decline in value while the underlying index may increase in value, resulting in a loss on the call option while the underlying portfolio declines as well.

Real Estate Related Securities

Investing in real estate related securities includes, among others, the following risks: possible declines in the value of real estate; risks related to general and local economic conditions, including increases in the rate of inflation, possible lack of availability of mortgage funds, overbuilding, extending vacancies of properties, increases in competition, property taxes and operating expenses, changes in zoning laws, costs resulting from cleanup of, and liability to third-parties for damages resulting from, environmental problems, casualty and condemnation losses, uninsured damages from floods, earthquakes or other natural disasters, limitations on and variations in rents and changes in interest rates. Investing in Real Estate Investment Trusts (“REITs”) involves certain unique risks in addition to those risks associated with investing in real estate in general. REITs are dependent upon the skills of management, are not diversified and are subject to cash flow dependency, default by borrowers and self-liquidation.

Alternative Investments

The performance of alternative investments (e.g., commodities, futures, hedge funds; funds of hedge funds, private equity or other types of limited partnerships) can be volatile. Alternative investments generally involve various risk factors and liquidity constraints, a complete discussion of which is set forth in the offering documents of each specific alternative investment. Due to the speculative nature of alternative investments a client must satisfy certain income or net worth standards prior to investing.

Independent Money Managers

As further discussed in the section “Advisory Business” of this disclosure brochure, Iron Peak Advisors may recommend that clients authorize the active discretionary management of a portion of their assets by certain independent money managers, based upon the stated investment objectives of the client. Iron Peak Advisors shall continue to render services to the client relative to the discretionary and/or non-discretionary selection of the independent money managers as well as the monitoring and review of account performance and client investment objectives. When selecting an independent money manager for a client, Iron Peak Advisors will review:

- Information about the independent money managers (such as its disclosure statement); and/or
- Material supplied by the independent money managers or independent third parties for a description of the independent money manager’s investment strategies, past performance and risk results.

Note that there may be other circumstances not described here that could adversely affect a client’s investment and prevent their portfolio from reaching its objective.

D. Cash Management

Cash is invested in an insured money market fund. Depending on balances, rates and market conditions, Iron Peak Advisors may utilize a higher yielding money market fund.

Item 9 –Disciplinary History

Iron Peak Advisors is required to disclose any legal or disciplinary events that are material to a client's or a prospective client's evaluation of the firm's advisory business or the integrity of Iron Peak Advisors' management. Neither Iron Peak Advisors nor any of its supervised persons have ever been disciplined by a regulatory agency.

Item 10 –Other Financial Industry Activities and Affiliations

A. Registered Representatives

Insurance Agents

Certain investment adviser representatives associated with Iron Peak Advisors, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully disclosed commission basis, the purchase of certain insurance products. While Iron Peak Advisors does not sell such insurance products to its investment advisory clients, Iron Peak Advisors does permit these investment adviser representatives, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that Iron Peak Advisors recommends the purchase of insurance products where individuals associated with Iron Peak Advisors receive insurance commissions or other additional compensation.

B. Futures and Commodity Registration

Iron Peak Advisors is not registered, nor does it have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor. No management person is registered, nor does any management person have an application pending to register, as an associated person of a futures commission merchant, commodity pool operator or a commodity trading advisor.

C. Financial Industry Affiliations

Iron Peak Advisors does not have any financial industry affiliations to disclose.

D. Selection of Other Advisers

As described in the "Independent Money Manager Program" section of this disclosure brochure, Iron Peak Advisors will occasionally recommend that a client use another registered investment adviser for services or investment strategies not offered by Placer Summit. If a client decides to engage the services of the other registered investment adviser, Iron Peak Advisors will receive an ongoing referral fee (commonly known as a solicitor's fee) directly from that other investment adviser. While Iron Peak Advisors will only recommend other registered investment advisers that will best serve the interests of Iron Peak Advisors' clients, the payment of a referral fee to Iron Peak Advisors causes a conflict of interest between Iron Peak Advisors and the client. The theory is that Iron Peak Advisors' recommendation to use the other investment adviser is tainted by Iron Peak Advisors' receipt of the referral fee; hence the conflict between the client's interests and Iron Peak Advisors' interests.

While Iron Peak Advisors cannot eliminate this conflict of interest, it can alert clients to its existence. Iron Peak Advisors does this by providing the client with a "Solicitor's Disclosure Document" that explains the financial relationship between Iron Peak Advisors and the other investment adviser. The Solicitor's Disclosure Document details the amount of the referral fee paid to Iron Peak Advisors.

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

Code of Ethics

Iron Peak Advisors has adopted a Code of Ethics to prevent violations of federal securities laws; including the unlawful use of what is commonly called “inside information”. The Code of Ethics is predicated on the principle that Iron Peak Advisors and its employees owe a fiduciary duty to its clients. Accordingly, Iron Peak Advisors expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws. Iron Peak Advisors and its employees are required to adhere to the Code of Ethics. At all times, Iron Peak Advisors and its employees must (i) place client interests ahead of Iron Peak Advisors’; (ii) engage in personal investing that is in full compliance with Iron Peak Advisors’ Code of Ethics; and (iii) avoid taking advantage of their position. In addition, the Code of Ethics requires that certain individuals report their personal securities holdings and transactions and obtain pre- approval of certain investments such as initial public offerings and limited offerings. Clients and prospective clients may request a copy of Iron Peak Advisors’ Code of Ethics by contacting Allen Archuleta, Jr., Chief Executive Officer of Iron Peak Advisors’, at 916-378-4740.

Participation or Interest in Client Transactions

Individuals associated with Iron Peak Advisors may not effect securities transactions for compensation.

Clients are free, however, to implement Iron Peak Advisors’ recommendations though any broker-dealer that they choose. The receipt of commissions for recommended products could represent an incentive for these individuals to recommend products that pay a commission over other products, therefore creating a conflict of interest.

Individuals associated with Iron Peak Advisors may buy, sell, or hold in their personal accounts the same securities that they recommend to clients.

As this represents a conflict of interest, Iron Peak Advisors has enacted certain policies and procedures to ensure that its client’s interests always come first. For example, unless specifically permitted in Iron Peak Advisors’ Code of Ethics, no individual associated with Iron Peak Advisors may make any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of Placer Summit’s clients. This restriction extends to their immediate family (e.g., spouse, minor children, and adults living in the same household) as well.

In addition, when Iron Peak Advisors is purchasing or considering for purchase any security on behalf of a client, no individual associated with Iron Peak Advisors may make a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when Iron Peak Advisors is selling or considering the sale of any security on behalf of a client, no individual associated with Iron Peak Advisors may make a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Item 12 -Brokerage Practices

A. Broker Selection

Iron Peak Advisors generally has the authority to determine the broker dealer to be used and the commission rates paid. Iron Peak Advisors will generally recommend that clients utilize the brokerage and clearing services of TD Ameritrade, Inc. ("TDA") for investment management accounts.

Iron Peak Advisors participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Iron Peak Advisors receives some benefits from TD Ameritrade through its participation in the Program.

Best Execution

Best execution has been defined by the SEC as the "execution of securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances." The best execution responsibility applies to the circumstances of each particular transaction and an investment adviser must consider the full range and quality of a broker-dealer's services, including, among other things, execution capability, commission rates, the value of any research, financial responsibility and responsiveness.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Iron Peak Advisors will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

If the client requests Iron Peak Advisors to arrange for the execution of securities brokerage transactions for the client's account; Iron Peak Advisors shall direct such transactions through broker-dealers that Iron Peak Advisors reasonably believes will provide best execution. Iron Peak Advisors shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

Broker Analysis

Iron Peak Advisors evaluates a wide range of criteria in seeking the most favorable price and market for the execution of transactions. These include the broker-dealer's trading costs, efficiency of execution and error resolution, financial strength and stability, capability, positioning and distribution capabilities, information in regard to the availability of securities, trading patterns, statistical or factual information, opinion pertaining to trading and prior performance in serving Iron Peak Advisors.

Also in consideration is such broker-dealers' provision or payment of the costs of research and other investment management-related services (the provisional payment of such costs by brokers are referred to as payment made by "soft dollars", as further discussed in the "Research/Soft Dollars Benefits" section immediately below). Accordingly, if Iron Peak Advisors determines in good faith that the amount of trading costs charged by a broker-dealer is reasonable in relation to the value of the brokerage and research or investment management-

related services provided by such broker, the client may pay trading costs to such broker in an amount greater than the amount another broker might charge.

Iron Peak Advisors portfolio managers are responsible for continuously monitoring and evaluation the performance and execution capabilities of brokers that transact orders for our client accounts to ensure consistent quality executions. In addition, Iron Peak Advisors periodically reviews its transaction costs in light of current market circumstances and other relevant information.

TD Ameritrade

Iron Peak Advisors participates in TD Ameritrade's institutional customer program and Iron Peak Advisors' may recommend TD Ameritrade to clients for custody and brokerage services.

There is no direct link between Iron Peak Advisors' participation in the program and the investment advice it gives to its clients, although Iron Peak Advisors receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors, including the following products and services (provided without cost or at a discount):

- Receipt of duplicate client statements and confirmations;
- Research related products and tools;
- Consulting services; access to a trading desk serving adviser participants;
- Access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- The ability to have advisory fees deducted directly from client accounts;
- Access to an electronic communications network for client order entry and account information;
- Access to mutual funds with no transaction fees and to certain institutional money managers; and
- Discounts on compliance, marketing, research, technology, and practice management products or services provided to Iron Peak Advisors by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by Iron Peak Advisors' related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Iron Peak Advisors but may not benefit its client accounts. These products or services may assist Iron Peak Advisors in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Iron Peak Advisors manage and further develop its business enterprise.

The benefits received by Iron Peak Advisors or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Iron Peak Advisors endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Iron Peak Advisors or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Iron Peak Advisors' choice of TD Ameritrade for custody and brokerage services.

Directed Brokerage

Certain clients may direct Iron Peak Advisors to use particular brokers for executing transactions in their accounts. With regard to client directed brokerage, Iron Peak Advisors is

required to disclose that Iron Peak Advisors may be unable to negotiate commissions, block or batch orders or otherwise achieve the benefits described above, including best execution. Directed brokerage commission rates may be higher than the rates Iron Peak Advisors might pay for transactions in non-directed accounts. Therefore, directing brokerage may cost clients more money.

Iron Peak Advisors reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than TD Ameritrade, if Iron Peak Advisors believes that the broker dealer would adversely affect its fiduciary duty to the client and/or ability to effectively service the client portfolio.

As a general rule, Iron Peak Advisors encourages each client to compare the possible costs or disadvantages of directed brokerage against the value of custodial or other services provided by the broker to the client in exchange for the directed brokerage designation.

B. Trade Aggregation/Allocation

Investment Management

Transactions for each client generally will be made independently, unless Iron Peak Advisors decides to purchase or sell the same securities for several clients at approximately the same time. Iron Peak Advisors may (but is not obligated to) combine or “batch” such orders to:

- Obtain best execution;
- Negotiate more favorable commission rates; or
- Allocate equitably among Iron Peak Advisors’ clients, differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently.

Under this procedure, transactions will generally be averaged as to price and allocated among Iron Peak Advisors’ clients pro rata. When aggregating lien trade orders, Iron Peak Advisors will not receive any additional compensation or remuneration as a result of the aggregation. In the event that Iron Peak Advisors determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include:

- When only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates;
- Allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;
- If an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed);
- With respect to sale allocations, allocations may be given to accounts low in cash;
- In cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, Iron Peak Advisors may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or
- In cases where a small proportion of an order is executed in all accounts, shares may

be allocated to one or more accounts on a random basis.

401(k) Retirement Planning

Iron Peak Advisors' 401(k) retirement planning practice, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price.

C. Trade Errors

Trade errors made by Iron Peak Advisors or the custodian are promptly reported to the custodian and will be rectified with no adverse financial effect on the client. In the event of an error by the client, Iron Peak Advisors will do its best to mitigate the impact of the error on the clients account.

Item 13 -Review Of Accounts

Reviews

For those clients to whom Iron Peak Advisors provides investment management services, Iron Peak Advisors monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. 401(k) Retirement Consulting Services accounts will be reviewed as contracted for at the inception of the advisory relationship. For those clients to whom Iron Peak Advisors provides financial planning services, reviews are conducted on an "as needed" basis. Such reviews are conducted by one of Placer Summit's investment adviser representatives.

All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Iron Peak Advisors and to keep Iron Peak Advisors informed of any changes thereto. Iron Peak Advisors shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Reports

Clients are provided with transaction confirmation notices and summary account statements at least quarterly directly from the custodian for the client's accounts. Those clients to whom Iron Peak Advisors provides financial planning services will receive reports from Iron Peak Advisors summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by Iron Peak Advisors. For 401(k) Retirement Consulting accounts, Iron Peak Advisors will provide reports as contracted for at the inception of the advisory relationship.

Item 14 -Client Referrals And Other Compensation

A. Economic Benefits

Iron Peak Advisors does not receive any economic benefits (e.g., sales incentives, prizes) from non-clients for providing investment advice.

B. Client Referrals

From time to time, Iron Peak Advisors may retain solicitors to refer clients to Iron Peak Advisors. If a client is introduced to Iron Peak Advisors by either an unaffiliated or an affiliated solicitor, Iron Peak Advisors may pay that solicitor a referral fee in accordance with all requirements of the Investment Advisers Act and any corresponding state securities

law requirements. Any such referral fee shall be paid solely from Iron Peak Advisors' investment management fee, and shall not result in any additional charge to the client. If the client is introduced to Iron Peak Advisors by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of their solicitor relationship, and shall provide each prospective client with a copy of this written disclosure statement together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between Iron Peak Advisors and the solicitor, including the compensation to be received by the solicitor from Iron Peak Advisors. Any affiliated solicitor of Iron Peak Advisors shall disclose the nature of their relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of this written disclosure statement.

Item 15 -Custody

Discretionary Investment Management Services

Custody of client assets will be maintained with the independent custodian selected by the client. Iron Peak Advisors will not have physical custody of any assets in the client's account except as permitted for payment of advisory fees. Clients will be solely responsible for paying all fees or charges of the custodian. Clients will authorize Iron Peak Advisors to give the custodian instructions for the purchase, sale, conversion, redemption, exchange or retention of any security, cash or cash equivalent or other investment for the client's account.

Clients will receive directly from the custodian at least quarterly a statement showing all transactions occurring in the client's account during the period covered by the account statement, and the funds, securities and other property in the client's account at the end of the period. Clients are urged to carefully review the account statement sent by the broker-dealer/custodian and to compare the account statement provided by the broker-dealer/custodian with any statements provided by Iron Peak Advisors.

Non-Discretionary Investment Management Services

Client assets will be maintained at the custodian designated by the sponsor of the client's retirement plan.

Item 16 -Investment Discretion

For those client accounts over which Iron Peak Advisors has discretion, Iron Peak Advisors requests that it be provided with written authority (e.g., limited power of attorney contained in Iron Peak Advisors Investment Management Agreement) to determine the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. All such amendments shall be submitted in writing.

Iron Peak Advisors generally has discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are effected: (1) which securities are bought and sold for the account and (2) the total amount of securities to be bought and sold. Iron Peak Advisors authority in making investment related decisions may be limited by account guidelines, investment objectives and trading restrictions, as agreed between Iron Peak Advisors and the client.

Item 17 -Voting Client Securities

Proxy Voting

Iron Peak Advisors does not vote proxies on behalf of its clients. Therefore, the client that
 Iron Peak Advisors, Inc.
 Effective Date: May 23, 2014

maintains exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceeding or other type events pertaining to the client's investment assets. Iron Peak Advisors and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Clients can contact Allen C. Archuleta, Jr., Chief Compliance Officer of Iron Peak Advisors, at 916-378-4740 if they have questions regarding a particular solicitation.

Class Action Settlements

Although Iron Peak Advisors may have discretion over client accounts, it will not be responsible for handling client claims in class action lawsuits or similar settlements involving securities owned by the client. Clients will receive the paperwork for such claims directly from their account custodians. Each client should verify with their custodian or other account administrator whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly.

Item 18 -Financial Information

A. Prepayment of Fees

Because Iron Peak Advisors does not require or accept prepayment of more than \$1,200 in fees six months or more in advance, Iron Peak Advisors is not required to include a balance sheet with this disclosure brochure.

B. Financial Condition

Iron Peak Advisors does not have any adverse financial conditions to disclose.

C. Bankruptcy

Iron Peak Advisors has never been the subject of a bankruptcy petition.

Item 19 -Additional Information

Privacy Notice

Iron Peak Advisors views protecting its clients' private information as a top priority and has instituted policies and procedures to ensure that client information is private and secure. Iron Peak Advisors does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties, except as permitted or required by law. In the course of servicing a client's account, Iron Peak Advisors may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers, etc. Iron Peak Advisors restricts internal access to nonpublic personal information about the client to those persons who need access to that information in order to provide services to the client and to perform administrative functions for Iron Peak Advisor. As emphasized above, it has always been and will always be Iron Peak Advisors' policy never to sell information about current or former clients or their accounts to anyone. It is also Placer Summit's policy not to share information unless required to process a transaction, at the request of a client, or as required by law. For the full text of Placer Summit's Privacy Policy, please contact Allen C. Archuleta, Jr., Chief Compliance Officer of Iron Peak Advisors, at 916-378-4740.

Requests for Additional Information

Clients may contact Allen Archuleta, Jr., Chief Compliance Officer of Iron Peak Advisors, at 916-378-4740 to request additional information or submit a complaint. Written requests and complaints should be sent to Iron Peak Advisors, Inc., 1198 Melody Lane, Suite 104, Roseville, CA 95678.