

**Brochure**

**Form ADV Part 2A**

**Item 1 - Cover Page**

**Peachtree Investment Partners, LLC <sup>TM</sup>**

**CRD# 142839**

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**June 13, 2019**

This Brochure provides information about the qualifications and business practices of Peachtree Investment Partners, LLC<sup>TM</sup>. If you have any questions about the contents of this Brochure, please contact us at (404) 478-3333 or [garry@peachtreeinvestment.com](mailto:garry@peachtreeinvestment.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Peachtree Investment Partners, LLC<sup>TM</sup> is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Peachtree Investment Partners, LLC<sup>TM</sup> also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

**Item 2 - Material Changes**

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 8, 2019. Of course the complete Brochure is available to clients at any time upon request.

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#### ***Item 4 - Advisory Business***

##### General Information

Peachtree Investment Partners, LLC™ ("Peachtree") was formed in 2006 and provides portfolio management services to its clients.

Garrard K. Schaefer is the sole principal owner of Peachtree. Please see ***Brochure Supplement***, Exhibit A, for more information on Mr. Schaefer.

As of December 31, 2018, Peachtree managed \$124,085,127 on a discretionary basis, and no assets on a non-discretionary basis. Peachtree does not participate in or offer any wrap programs.

#### **SERVICES OFFERED**

##### Portfolio Management

Peachtree provides portfolio management services to its clients. Peachtree does not offer asset allocation, risk assessment or financial planning services. A Principal of Peachtree is available to meet with clients or prospective clients to discuss and describe the firm's management style. Specifically, Peachtree focuses on value investing and primarily seeks to invest in stocks that have demonstrated an attractive return on capital with a history of generating free cash flow and stable dividends.

Once a client or prospective client and Peachtree agree that this investment style is suitable or remains suitable for the client's financial situation, the proportion of their assets to be managed in this manner is determined by the client. In general, all portfolios will be managed in a similar manner regardless of a client's individual investment objectives.

A client's investment profile may be updated from time to time when requested by the client, or when determined to be necessary or advisable by Peachtree based on updates to the client's financial or other circumstances.

Notwithstanding the foregoing, clients may impose certain written restrictions on Peachtree in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Peachtree.

With respect to any account for which Peachtree meets the definition of a fiduciary under Department of Labor rules, Peachtree acknowledges that both Peachtree and its Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between Peachtree and Client.

## ***Item 5 - Fees and Compensation***

### **General Fee Information**

Fees paid to Peachtree are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to Peachtree are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Peachtree and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

### **Portfolio Management Fees**

The annual fee, based on a percentage of assets under management, is 1.00%.

The minimum portfolio value is generally set at \$250,000. The minimum annual fee for any account is \$2,500. Peachtree may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Peachtree deems it appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in arrears. If management begins after the start of a quarter, fees will be prorated accordingly. Fees will also be prorated for deposits to and withdrawals from the account during the billing period. With client authorization and unless other arrangements are made, fees are normally debited directly from client account(s).

Either Peachtree or the client may terminate their Investment Advisory Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Peachtree from the client will be invoiced or deducted from the client's account prior to termination.

## ***Item 6 - Performance-Based Fees and Side-By-Side Management***

Peachtree does not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Peachtree has no performance-based fee accounts, it has no side-by-side management.

## ***Item 7 - Types of Clients***

Peachtree serves individuals, trusts, and estates. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$250,000, and the annual minimum fee charged is \$2,500. Under certain circumstances and in its sole discretion, Peachtree may negotiate such minimums.

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

### **Methods of Analysis**

Peachtree primarily invests in common stocks and may utilize ETFs, primarily for the small-cap or mid-cap portion of client accounts.

Peachtree focuses on fundamental analysis, which involves a review of the business and financial information about an issuer. Without limitation, the following factors generally will be considered:

- Financial strength ratios;
- Price-to-earnings ratios;
- Dividend yields; and
- Growth rate-to-price earnings ratios

Peachtree utilizes the third party research of major Wall Street firms such as Bank of America/Merrill Lynch, JP Morgan, Goldman Sachs and others. Value Line Investment Publications is another valuable resource.

In evaluating stocks, Peachtree looks for three main characteristics in a stock. One, the stock should provide a good return on invested capital. Two, free cash flow is important. And finally three, Peachtree looks for stocks that pay a dividend.

ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

#### Investment Strategies

Peachtree is generally a long term investor, meaning that 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. As previously noted, Peachtree primarily invests in common stocks and may utilize ETFs, primarily for the small-cap or mid-cap portion of client accounts.

#### Risk of Loss

All investment portfolios are subject to risks that clients should be prepared to bear. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*General Investing Risks.* Peachtree's investment strategies are generally not intended to be a complete investment program. All investments carry a certain amount of risk and there is no guarantee that a client portfolio will be able to achieve its investment objective. **Clients generally should have a long-term investment perspective and be able to tolerate potentially sharp declines in value.**

*Equity Market Risks.* Peachtree will primarily invest client assets directly into equity investments, generally stocks, or into pooled investment funds that invest in the stock market. Investments in equity markets are subject to many risks, including the risk of general market fluctuations and company-specific changes in profitability. Also, small and micro-cap company securities tend to be more sensitive to changing economic conditions and tend to be more volatile and less liquid than equity securities of larger companies. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear

markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Management Risks.* While Peachtree manages client investment portfolios based on Peachtree's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Peachtree allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that Peachtree's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, Peachtree may invest client portfolios in ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Fixed Income Risks.* Peachtree may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* Peachtree may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

#### ***Item 9 - Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Peachtree or the integrity of Peachtree's management. Peachtree has no disciplinary events to report.

#### ***Item 10 - Other Financial Industry Activities and Affiliations***

Neither Peachtree nor its Management Person has any other financial industry activities or affiliations to report.

## ***Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

### **Code of Ethics and Personal Trading**

Peachtree has adopted a Code of Ethics (“the Code”), the full text of which is available to you upon request. Peachtree’s Code has several goals. First, the Code is designed to assist Peachtree in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Peachtree owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with Peachtree (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Peachtree’s associated persons. Under the Code’s Professional Standards, Peachtree expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Peachtree associated persons are not to take inappropriate advantage of their positions in relation to Peachtree clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, Peachtree’s associated persons may invest in the same securities recommended to clients. Under its Code, Peachtree has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code’s personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading. These policies are designed to discourage and prohibit personal trading that would disadvantage clients.

### **Participation or Interest in Client Transactions**

As outlined above, Peachtree has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, Peachtree’s goal is to place client interests first.

Consistent with the foregoing, Peachtree maintains policies regarding participation in initial public offerings (“IPOs”) and private placements to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person’s shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Peachtree’s written policy.

## ***Item 12 - Brokerage Practices***

### **Best Execution and Benefits of Brokerage Selection**

When given discretion to select the brokerage firm that will execute orders in client accounts, Peachtree seeks “best execution” for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Peachtree may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of Peachtree’s clients.

Therefore, research services received may not be used for the account for which the particular transaction was effected.

Peachtree recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of clients' assets. Peachtree will also effect trades for client accounts at Schwab, or may in some instances, consistent with Peachtree's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although Peachtree may recommend that clients establish accounts at Schwab, it is ultimately the client's decision to custody assets with Schwab. Peachtree is independently owned and operated and is not affiliated with Schwab.

Schwab Advisor Services provides Peachtree with access to its institutional trading, custody, reporting and related services, which are typically not available to Schwab retail investors. Schwab also makes available various support services. Some of those services help Peachtree manage or administer our clients' accounts while others help Peachtree manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform offered by Schwab. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Peachtree client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Advisor Services also makes available to Peachtree other products and services that benefit Peachtree but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Peachtree accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Peachtree in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of Peachtree's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help Peachtree manage and further develop its business enterprise. These services may include: (i) technology, compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Peachtree. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Peachtree. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of Peachtree personnel. In evaluating whether to recommend that clients custody their assets at Schwab, Peachtree may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.



### Directed Brokerage

Clients may direct Peachtree to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that Peachtree has with Schwab is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Peachtree to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Peachtree that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

### Aggregated Trade Policy

Peachtree typically directs trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, Peachtree may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, Peachtree will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Peachtree or its officers, directors, or employees will be excluded first.

### ***Item 13 - Review of Accounts***

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Peachtree. These factors generally include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Garry Schaefer, Peachtree's Managing Partner, reviews all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, Peachtree provides

at least an annual report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client.

#### ***Item 14 - Client Referrals and Other Compensation***

As noted above, Peachtree receives an economic benefit from Schwab in the form of support products and services it makes available to Peachtree and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***(Item 12 - Brokerage Practices)***. The availability of Schwab's products and services to Peachtree is based solely on our participation in the program, and not on the provision of any particular investment advice. Neither Schwab nor any other party is paid to refer clients to Peachtree.

#### ***Item 15 - Custody***

Schwab is the custodian of nearly all client accounts at Peachtree. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Peachtree of any questions or concerns. Clients are also asked to promptly notify Peachtree if the custodian fails to provide statements on each account held.

From time to time and in accordance with Peachtree's agreement with clients, Peachtree will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting and pending trades.

#### ***Item 16 - Investment Discretion***

As described above under ***Item 4 - Advisory Business***, Peachtree manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, Peachtree will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Peachtree the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client, and the withdrawal of advisory fees directly from the account. Peachtree then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Peachtree and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between Peachtree and the client.

#### ***Item 17 - Voting Client Securities***

Where Peachtree has authority to vote proxies, Peachtree will seek to vote proxies in the best interest of the client(s) holding the applicable securities. In voting proxies, Peachtree considers factors that Peachtree believes relate to the client's investment(s) and factors, if any, that are set forth in written instructions from the client.

In a limited number of cases, Peachtree has agreed to vote proxies for certain legacy clients. With respect to securities selected on behalf of the client in these situations, Peachtree will vote proxies

where required. Where Peachtree has authority to vote proxies, Peachtree will seek to vote proxies in the best interest of the client(s) holding the applicable securities. In voting proxies, Peachtree considers factors that Peachtree believes relate to the client's investment(s) and factors, if any, that are set forth in written instructions from the client.

In general, Peachtree believes that voting proxies in accordance with the following guidelines, with respect to such routine items, is in the best interests of our clients. Accordingly, Peachtree generally votes **for**:

- The election of directors (where no corporate governance issues are implicated);
- Proposals that strengthen the shared interests of shareholders and management;
- The selection of independent auditors based on management or director recommendation, unless a conflict of interest is perceived;
- Proposals that Peachtree believes may lead to an increase in shareholder value;
- Management recommendations adding or amending indemnification provisions in charter or by-laws; and
- Proposals that maintain or increase the rights of shareholders.

Peachtree will generally vote **against** any proposals that Peachtree believes will have a negative impact on shareholder value or rights. If Peachtree perceives a conflict of interest, Peachtree's policy is to notify affected clients so that they may choose the course of action they deem most appropriate.

A copy of our complete policy, as well as records of proxies voted, is available to clients upon request. As required under the Advisers Act, such records are maintained for a period of five (5) years.

### ***Item 18 - Financial Information***

Peachtree does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Garrard Kelly Schaefer**

**CRD# 1396569**

**of**

**Peachtree Investment Partners, LLC**

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June 13, 2019

This brochure Supplement provides information about Garry Schaefer, and supplements the Peachtree Investment Partners, LLC ("Peachtree") brochure. You should have received a copy of that brochure. Please contact us at (404) 478-3333 if you did not receive Peachtree's brochure, or if you have any questions about the contents of this Supplement.

Additional information about Garry is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Garrard Kelly ("Garry") Schaefer (year of birth 1954) has been the Managing Partner and Chief Compliance Officer of Peachtree since founding the firm in December of 2006. Prior to that, Garry was Vice President at Wealth Strategy Group, The Northern Trust Company, Inc. from May of 2004 until December of 2006. Prior to that, he was Managing Director at Legg Mason from May of 2003 until May of 2004. Garry was Executive Director of CIBC World Markets from June of 2002 until May of 2003 and Senior Vice President of Prudential Securities from May of 1986 until October of 2001.

Garry earned his Bachelor of Science in Business Administration from the University of Denver in 1976. He is currently on the Board of Trustees for Pace Academy in Atlanta, Georgia and is also a member of the Investment Committee.

Garry is the father of 3 daughters and enjoys running, playing tennis and paddle tennis.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Garry has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Garry is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Garry has no other income or compensation to disclose.

***Item 6 - Supervision***

As the sole owner of Peachtree Investment Partners, LLC, Garry supervises all duties and activities of the firm, and is responsible for all advice provided to clients. His contact information is on the cover page of this disclosure document.