

# Peck Wealth Management, LLC

## Client Brochure

This brochure provides information about the qualifications and business practices of Peck Wealth Management, LLC.

If you have any questions about the contents of this brochure, please contact us at 914-630-2324 or by email at: [pecka@peckwealth.com](mailto:pecka@peckwealth.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Peck Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Peck Wealth Management, LLC's CRD number is: 157407

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Registration does not imply a certain level of skill or training.

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## **Item 2: Material Changes**

This item discusses specific material changes to the Peck Wealth Management, LLC brochure.

Peck Wealth Management, LLC will ensure that clients receive a summary of any material changes to this and subsequent brochures within 120 days of the close of the firm's fiscal year (which occurs at the end of the calendar year). Peck Wealth Management, LLC may further provide other ongoing disclosure information about material changes as necessary.

Peck Wealth Management, LLC will also provide clients with a new brochure upon request, at any time, without charge.

Since the date of its last annual filing (February 5, 2023), Peck Wealth Management, LLC has not made any material changes to this brochure.

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Peck Wealth Management, LLC is a Limited Liability Company organized in the state of New York on April 2011, and the principal owner is Alison A. Peck. We provide investment advisory services which are tailored to each individual client.

### **B. Types of Advisory Services**

Peck Wealth Management, LLC (hereinafter “PWM”) offers the following services to advisory clients. Note: the words, “we”, “our”, “us” refer to PWM and the words “you”, “your” refer to the client or prospective client.

#### ***Portfolio Management Services***

PWM offers ongoing portfolio management services based on the individual goals, time horizon, and risk tolerance of each client. The investment objective of your portfolio will be developed in conjunction with a review of your financial resources and goals, an evaluation of your risk preference, rate of return objectives and liquidity requirements. Your objective will be documented in the Investment Policy Statement as one of four categories: Income, Balanced, Growth, Aggressive Growth.

We develop an investment strategy and asset allocation plan based on your investment objective. Once we construct an investment portfolio for you we will monitor the portfolio on an ongoing basis and rebalance it as required by changes in market conditions and in your financial circumstances. We provide customized account management which can be coordinated across an entire family relationship. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm. This will allow us to manage your account without prior approval for each transaction.

#### **Service Limited to Specific Types of Investments**

PWM limits its portfolio management services to publicly traded securities such as stocks, bonds, exchange traded funds and mutual funds.

### **C. Client Tailored Services and Client Imposed Restrictions**

PWM offers the same suite of services to all of its clients. However, each client has a specific Investment Policy Statement that specifies their risk tolerance. Clients may request that we refrain from investing in particular securities or types of securities. Such restrictions must be provided in writing to our firm.

#### **D. Wrap Fee Programs**

PWM does not participate in any wrap fee programs.

#### **E. Amounts Under Management**

PWM has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary amounts:</b>	<b>Date Calculated:</b>
\$114413643.00	\$0.00	12/31/2023

### **Item 5: Fees and Compensation**

#### **A. Fee Schedule**

##### ***Investment Supervisory Services Fees***

PWM's annual investment management fees are based on the following schedule:

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
Accounts up to \$1,000,000	1.00%
\$1,000,001 - \$5,000,000	0.75%
\$5,000,001- \$10,000,000	0.60%
Accounts above \$10 million	0.50%

The standard fee schedule (shown above) is attached as Exhibit II of the Investment Advisory Contract. Fees calculations are based on the total assets under management including cash balances, for each account. Peck Wealth Management, LLC retains the right to negotiate client account fees based on the complexity of the investment management and advisory services provided. Accounts of the relatives of the Adviser may have deeply discounted fees or no fee. The minimum opening account size is \$500,000.

Clients may terminate their contracts with thirty days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

## **B. Payment of Investment Supervisory Fees**

Advisory fees are billable and payable quarterly in advance based on the value of the client's account at the end of the previous quarter. Each client's value is multiplied by their percentage based fee amount and the result is divided by four to arrive at the quarterly fee. PWM will instruct the qualified custodian holding the client's assets to deduct the fees directly from the client's account and only when the client has provided written authorization permitting the fees to be paid directly from the account. Clients will receive a quarterly fee statement from PWM. The qualified custodian will deliver monthly account statements to the client and PWM has access to the electronic version via the custodian's website. These account statements will show all disbursements from the account. Clients should review all statements for accuracy.

## **C. Clients Are Responsible for Third Party Fees**

Clients are responsible for the payment of all third- party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by PWM. Please see Item 12 of this brochure regarding broker/custodian.

## **D. Payment of Fees**

PWM collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be deposited back into client's account within fourteen days.

## **E. Outside Compensation for the Sale of Securities to Clients**

Neither PWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

## **F. IRA Rollover Considerations**

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leaving the funds in your employer's (former employer's) plan.

2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
  - a) Employer retirement plans generally have a more limited investment menu than IRAs.
  - b) Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
  - a) If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
  - b) You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you.

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

PWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

PWM generally provides management supervisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Charitable organizations, Foundations

### **Minimum Account Size**

There is an account minimum, \$500,000 which may be waived by the investment advisor, based on the needs of the client and related accounts.

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

### **Methods of Analysis**

PWM's methods of analysis may include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

**Charting analysis** involves the use of patterns in performance charts. PWM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.



**Cyclical analysis** involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

PWM uses long term and short-term trading strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### **Methods of Analysis**

**Charting analysis** strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy include: 1) the markets do not always repeat cyclical patterns and  
2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

### **Investment Strategies**

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk and clients should be aware that there can be a material risk of loss using any of those strategies.

## **C. Risks of Specific Securities Utilized**

PWM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither PWM nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither PWM nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither PWM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

PWM does not utilize nor select other advisors or third party managers. All assets are managed by PWM management.

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

### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available on request by any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

PWM does not recommend that clients buy or sell any security in which a related person to PWM has a material financial interest.

### **C. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of PWM may buy or sell the same securities for themselves at or around the same time as clients. A conflict of interests exists in such cases because PWM has the ability to trade ahead of the client and potentially receive more favorable prices than the client receives. To mitigate this conflict of interest, it is our policy that representatives of PWM shall not have priority over the client's account in the purchase or sale of client securities.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

While the client can choose their Custodian, PWM recommends that an account be established with a brokerage firm with which PWM has an existing relationship. Such relationships may include benefits provided to PWM included but not limited to market information and administrative services that help PWM manage the client's account. Custodians are also suggested based on their relatively low transaction fees and access to mutual funds and ETFs. PWM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodians. Custodians may provide PWM with free research and products for recommending clients to use their custodial services. This provides PWM an incentive to choose custodians that do provide free research and products over custodians that do not. PWM receives a benefit because it does not have to pay for or produce the research services or products.

#### ***1. Research and Other Soft-Dollar Benefits***

PWM receives research, products, or services from its broker-dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that PWM must meet in order to receive free research from the custodian or broker/ dealer. There is no incentive for PWM to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. The first consideration when recommending broker/dealers to clients is best execution.

#### ***2. Brokerage for Client Referrals***

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

#### ***3. Clients Directing Broker/Dealer/Custodian to Use***

PWM allows clients to direct brokerage. PWM may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost client's money because without the ability to direct brokerage PWM may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

PWM maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing PWM the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed on a periodic basis by Alison Peck, Principal. Alison Peck is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at PWM are assigned to this reviewer.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly from the custodian, a written report that details the clients account.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

PWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to PWM clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

PWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

PWM, with Client's written authority, has limited custody of client's assets through direct fee deduction of PWM's Fees only. Constructive custody of all client's assets and holdings is maintained primarily at the Custodian. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. PWM does not provide account statements to clients in addition to those provided by the custodian.

In the case of one account, PWM is deemed to have custody of the Client's assets given that Alison Peck, President and Chief Compliance Officer, serves as a co-trustee. This is a special circumstance and the account is audited by an independent CPA firm each year.

## **Item 16: Investment Discretion**

For those clients' accounts where PWM provides ongoing supervision, the client has given PWM written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides PWM discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian. Discretionary authority is executed by agreement through the custodian account application and the investment advisory contract.

## **Item 17: Voting Client Securities (Proxy Voting)**

PWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

PWM does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither PWM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

PWM has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Additional Information**

- A.** PWM currently has only one management person/executive officer; Alison A. Peck. Alison A. Peck's education and business background can be found on the Supplemental ADV Part 2B form.
- B.** Other Businesses in Which This Advisory Firm or its Personnel are Engaged

Alison A. Peck's does not engage in other business activities.

**C. How Performance Based Fees are Calculated and Degree of Risk to Clients**

PWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Material Disciplinary Disclosures**

No management person at PWM has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

**E. PWM has instituted policies and procedures to ensure that client information is private and secure. For the full text of PWM's Privacy Policy, please contact Alison Peck at 914 630-2324 or [pecka@peckwealth.com](mailto:pecka@peckwealth.com) .**