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ADV Part 2A – Firm Brochure  
April 1, 2024

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This brochure provides information about the qualifications and business practices of Meadow Creek Wealth Advisors, LLC ("Meadow Creek"). If you have any questions about the contents of this brochure, please contact us at (470) 359-9270. 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 Meadow Creek also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration does not imply a certain level of skill or training.

## **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 the annual provision of 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 21, 2024. Of course, the complete Brochure is available to clients at any time upon request.

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#### **Item 4 – Advisory Business**

Meadow Creek Wealth Advisors, LLC ("Meadow Creek") was established and applied for registration as an Investment Adviser in 2018. Through independently owned LLCs, Meadow Creek is principally owned by Willem Hattink, Kenneth K. Budd and Kristin Ribic. Willem Hattink is its Managing Member and Chief Compliance Officer.

As of December 31, 2023, Meadow Creek managed \$285,695,546 on a discretionary basis and \$284,137,248 on a non-discretionary basis.

#### **SERVICES PROVIDED**

Meadow Creek provides advisory services, giving continuous advice based on the Client's individual needs. At the outset of each client relationship, before developing an investment strategy, Meadow Creek makes a detailed assessment of the Client's current financial circumstances. Meadow Creek spends time with the Client, discussing the Client's investment experience, available resources, income needs, and tolerance for investment risk, and broadly identifying the Client's objectives and goals. This background information assists Meadow Creek in developing a recommended investment plan that is designed to fit the Client's specific needs.

Based on the information initially gathered from the Client, Meadow Creek generally develops for each client:

- a Financial Review, which provides a current financial snapshot for the Client, together with financial analysis and projections (the "Financial Review"). These may include short-term (5 years or less), intermediate-term (5 - 10 years), and/or long term (10 years or more) projections; and
- a Portfolio Strategy or an Investment Policy Statement that sets forth a recommended portfolio allocation for the Client, together with appropriate risk/return expectations (the "Investment Plan").

The Financial Review represents limited financial planning, and normally addresses areas such as general cash flow planning, retirement planning and insurance analysis. The goal of this service is to assess the financial circumstances of the client to more effectively develop the client's Investment Plan. It represents a reflection of the client's current financial picture and a look at the future goals and expectations of the client. The Investment Plan outlines the types of investments Meadow Creek believes appropriate for the client in an effort to meet those goals and expectations.

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

As described above, at the beginning of a client relationship, Meadow Creek meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Meadow Creek based on updates to the client's financial or other circumstances.

Once an Investment Plan is prepared on behalf of a new client, the Investment Plan will be implemented, monitored and updated from time to time as determined to be necessary or advisable based on Meadow Creek's experience, changes in market conditions, changes in the client's financial position and/or other circumstances. Modifications to the initial Investment Plan, while a topic for ongoing communications with the client, will not necessarily be reflected in a written document.

To implement the client's Investment Plan, Meadow Creek will manage the client's investment portfolio on

a discretionary or a non-discretionary basis. As a discretionary investment adviser, Meadow Creek will have the authority to supervise and direct the portfolio without prior consultation with the client. Under a non-discretionary arrangement, clients must be contacted prior to the execution of any trade in the account(s) under management. This can result in a delay in executing recommended trades, which could adversely affect the performance of the portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, the client retains the responsibility for the final decision on all actions taken with respect to the portfolio.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account or that should not be sold if held in the account. If a client's instructions are unreasonable or Meadow Creek believes that the instructions are inappropriate for the client, Meadow Creek will work with the client to determine an appropriate alternative course of action. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund. 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 Meadow Creek.

### ***Separate Account Managers***

When appropriate and in accordance with the Investment Plan for a client, Meadow Creek may select one or more Separate Account Managers, each a "Manager". Having access to various Managers offers a wide variety of manager styles and offers clients the opportunity to utilize more than one Manager if necessary to meet the needs and investment objectives of the client. Meadow Creek will select the Manager(s) it deems most appropriate for the client. Factors that Meadow Creek considers in selecting Managers generally include matching the client's stated investment objective(s), Manager's management style, performance, risk level, reputation, financial strength, reporting, pricing, and research. Meadow Creek will monitor the overall financial situation of the client, and monitor the investment approach and performance of the Manager(s), and assist the client in understanding the investments of the portfolio.

The Manager(s) will generally be granted discretionary trading authority to provide investment supervisory services for the portfolio. Meadow Creek retains the authority to terminate the Manager's relationship or to add new Managers without specific client consent. Fees paid to such Manager(s) are separate from and in addition to the fee assessed by Meadow Creek .

Additionally, certain Managers may require a different billing schedule or impose more restrictive account requirements than Meadow Creek. In such instances, Meadow Creek may be required to alter its corresponding account requirements and/or billing practices to accommodate those of the Manager(s).

### ***Financial Planning***

Limited Financial Planning is generally included with Portfolio Management services. In rare circumstances, Meadow Creek may assess a separate fee for more extensive Financial Planning – please see ***Section 5 – Fees and Compensation*** for additional information regarding billing arrangements. Clients will receive a written financial plan, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. In general, the plan will address any or all of the following, as applicable:

- Personal: Family records, budgeting, personal liability, estate information, and financial goals
- Tax and Cash Flow: Income tax spending analysis and planning for past and future years
- Death and Disability: Cash needs at death, income needs of surviving dependents, estate planning
- Retirement: Strategies and investment plans to help a client achieve their retirement goals
- Investments: Analysis of investment alternatives and their effect on a client's portfolio

Information on clients will be gathered by in-depth personal interviews and review of personal financial information. Gathering data concerning current financial status, future requirements, risk appetite, and goals is essential. Based upon this thorough review, a written plan is prepared for the client providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. It is recommended that the client review this plan with tax accountants, attorneys, and other professional service providers as appropriate.

Meadow Creek may work with other professionals such as attorneys, Certified Public Accountants, trust officers, mortgage analysts, etc., to offer financial and estate planning advice. The financial management process begins with an in-depth evaluation of the client's current financial goals and objectives. Once we have established the overall objectives, Meadow Creek will focus on the client's specific goals.

### ***General Consulting***

In addition to the foregoing services, Meadow Creek may provide general consulting services to clients. These services are generally provided on a project basis and usually include, without limitation: cash flow planning for certain events such as education expenses or retirement; estate planning analysis; income tax planning analysis; review of a client's insurance portfolio; captive insurance arrangements; risk management; third-party coordination of attorneys and CPAs; as well as other matters specific to the client as and when requested by the client and agreed to by Meadow Creek. The scope and fees for consulting services will be negotiated with each client at the time of engagement for the applicable project.

### ***Retirement Plan Advisory Services***

Establishing a sound fiduciary governance process is vital to good decision-making and to ensure that prudent procedural steps are followed in making investment decisions. Meadow Creek will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 ("ERISA") sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. Meadow Creek acts as a fiduciary under ERISA Section 3(21). As such, Meadow Creek works with clients to recommend the investment choices for a plan among which the plan participants may select.

Meadow Creek does not have discretion over plan investments, and Retirement Plan clients will retain control of the plan's investments and will approve the fund lineup. Meadow Creek does not offer investment management services, as defined under ERISA section 3(38).

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of

1974 ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours. Additional disclosure may be found elsewhere in this brochure or the written agreement between Meadow Creek and the Client.

#### Fiduciary Consulting Services

- *Investment Selection Services*

Meadow Creek will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).

- *Non-Discretionary Investment Advice*

Meadow Creek provides Plan Fiduciaries and Plan Participants general, non-discretionary investment advice regarding asset classes and investments.

- *Investment Monitoring*

Meadow Creek will assist in monitoring the plan's investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and Meadow Creek will make recommendations to maintain or remove and replace investment options. The details of this aspect of service will be enumerated in the engagement agreement between the parties.

#### ***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 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, you should consider the availability, costs and benefits of:

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.

## Item 5 – Fees and Compensation

### ***Portfolio Management Fees***

Our annual fee for portfolio management services varies depending on the market value of your assets under management, the type and complexity of the asset management services provided, as well as the level of administration requested either directly or assumed by the client. Assets in each of the client's account(s) are included in the fee assessment unless specifically identified for exclusion in writing. The specific manner in which fees are charged by the Firm is established in a client's written agreement and, in some instances, may be negotiated.

<b>Portfolio Management Fees</b>	
<b>Account Value</b>	<b>Annual Fee</b>
Up to \$999,999	2.00%
\$1,000,000 – 2,999,999	1.00%
\$3,000,000 – 4,999,999	0.80%
\$5,000,000 – 9,999,999	0.70%
\$10,000,000 – 19,999,999	0.50%
\$20,000,000 +	0.40%

For new clients of Meadow Creek, typically accounts come in over a period of approximately one month. The initial fee is typically assessed at the end of the first full month, or once the accounts are fully transferred (less trailing cash balances) to Meadow Creek's management.

Thereafter, the fee will be assessed monthly in advance, and calculated based on the fair market value of the assets in the account as of the last trading day of the prior calendar month. The monthly fee is calculated by multiplying the annual rate by the account value at the prior month-end, and then dividing by 365 (366 in Leap Years) and multiplying by the number of days in the month. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was managed during the calendar month, and any unearned fees will be rebated to the client.

Advisory fees will be debited directly from the client's account as specified in the advisory agreement. The amount of the fee will be shown on the statement received by the Custodian. Meadow Creek urges clients to carefully review such statements for accuracy and contact us at the main number with any questions or concerns. Alternatively, upon request, Meadow Creek will bill a client directly for advisory services. Advisory fees are due upon receipt of the invoice.

### ***Separate Account Managers***

For accounts managed by a (third-party) Manager, the billing arrangements of each Manager may differ in terms of timing or other factors. For example, many Managers assess fees on a quarterly basis instead of monthly. Each Manager's Form ADV will describe the specific billing arrangements. In such cases Meadow Creek may also receive its fees under this different arrangement.

### ***Financial Planning***

Meadow Creek may charge a fixed agreed upon rate or an hourly rate for any agreed-upon financial planning work. This rate will vary depending on the requested task; however, the client will be provided with an estimate in advance.

Financial planning fees will be charged on an agreed-upon fixed fee, ranging from \$2,500 to \$10,000, or an hourly basis, ranging from \$350 to \$650 per hour, depending on the nature and complexity of each client's



circumstances. An estimate for the total hours will be determined at the start of the advisory relationship. 50% of the estimated fee will be due upon signing the Financial Planning agreement, with the balance (based on actual hours) due upon presentation of the plan to the client. Typically, the financial plan will be presented to the client within 90 days of the contract date, if all of the relevant information needed to prepare the financial plan has been promptly provided by the client.

Fees for Financial Planning Services are billed separately to the client for remittance. Fees are due upon receipt of the invoice. The client may terminate the arrangement at any time, in writing, and will be refunded a portion of the fee based upon a pro-rated calculation related to the time and expense expended by the firm.

### ***General Consulting Fees***

When Meadow Creek provides general consulting services to clients, these services are generally separate from Meadow Creek's Managed Account Program services. General consulting will be provided on an hourly or fixed fee basis as negotiated and agreed upon with the client prior to work starting.

General consulting fees will be charged on an agreed-upon fixed fee or on an hourly basis, ranging from \$350 to \$650 per hour, depending on the nature and complexity of the specified project.

### ***Retirement Plan Advisory Fees***

Fees for Retirement Plan Advisory Services are negotiated prior to the signing of the Agreement. In general, fees charged for investment advisory services are payable monthly in advance and are based upon the market value of the Plan assets on the last business day of the calendar month. Fees may be billed directly to the Client or a third-party administrator ("TPA") or custodian at the Client's instruction. The initial fee will be prorated according to the number of days remaining in the calendar month. Upon termination of an account, any prepaid fees will be prorated according to the days the account was opened during the calendar month, and any unearned fees will be rebated to the client.

### ***Other Charges***

Meadow Creek's advisory fees and transaction charges do not cover charges imposed by third parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund or third-party investment manager charges asset management fees, which are in addition to the advisory fees charged by our firm. The fees charged by such funds or managers are disclosed in each fund's prospectus or Manager's ADV Part 2A. Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory agreement. The Management Fee also does not cover fees and charges in connection with: debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law.

### ***Account Termination***

Client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be deemed to be accepted the day that it is received by the contra party. Upon written receipt of notice to terminate its client agreement and unless specific transfer instructions are received, Meadow Creek and its agent will cease advisory services. Should the client provide specific instructions to liquidate, Meadow Creek will proceed with liquidation of the client's account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, the client should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may

result in tax consequences that should be discussed with the client's tax advisor. Factors that could affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be made as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. Meadow Creek and its agent are not responsible for market fluctuations of the client's account from the time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

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

Meadow Creek does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

#### **Item 7 – Types of Clients**

Meadow Creek provides portfolio management services to high net worth individuals, charitable institutions, foundations, endowments, estates, and trusts. In general, we require a minimum of \$1,000,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size.

Certain Separate Account Managers may require a higher minimum as disclosed in the individual Manager's Firm Brochure. Under certain circumstances, the minimum may be waived, including related accounts that are combined to meet the minimum.

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

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds, and fixed income securities.

Investment recommendations are based on an analysis of the client's individual needs and are drawn from research and analysis. Security analysis methods includes the following:

- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- Technical analysis and charting: We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at any time, and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase, or maturity phase. Generally projected revenues, growth potential, and business risk may fluctuate based on the company's cycle stage.

Information for this analysis is drawn from financial websites and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases, and corporate rating services.

It is important to note that investing in securities involves a risk that clients must be prepared to bear.

Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- **Interest Rate Risk:** Fluctuations in interest rates cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund can drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not. For Corporate Cash Management clients, liquidity risk includes operational liquidity risk based on short-term needs arising from day-to-day operations.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations could result in bankruptcy and/or a declining market value.

#### **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 Meadow Creek or the integrity of Meadow Creek's management. Meadow Creek has no information applicable to this Item.

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

Meadow Creek is separately registered as an insurance agency and individual Investment Adviser Representatives are licensed as insurance agents. As insurance agents, they may offer Life, Health, Long Term Care and other insurance products. Fees and commissions charged in connection with insurance products are separate and distinct from advisory fees paid.

This poses a conflict of interest to the extent that there is a financial incentive to recommend insurance products that result in commissions, trails or other payments. Meadow Creek is dedicated to acting in clients' best interests based on fiduciary principles. Clients are under no obligation to purchase any recommended brokerage products or insurance products; it is solely at the discretion of the client and insurance products can be purchased through another insurance agency.

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

Meadow Creek has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Meadow Creek must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of Meadow Creek may buy or sell securities that are recommended to clients. Meadow Creek's employees and persons associated with Meadow Creek are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Meadow Creek and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Meadow Creek's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Meadow Creek will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of Meadow Creek's clients. In addition, the Code requires pre-approval of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between Meadow Creek and its clients.

Advisors may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a conflict of interest in that Meadow Creek or its Representatives are in a position to benefit from the sale or purchase of those securities. Meadow Creek's Code of Ethics includes a policy to monitor the personal trading activities and securities holdings of each of the Firm's Representatives or other Access Persons. The Code of Ethics'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 prevent personal trading that would disadvantage clients.

Meadow Creek's clients or clients may request a copy of the firm's Code of Ethics by contacting the Compliance Department at our main number.

### **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, Meadow Creek 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, Meadow Creek 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 Meadow Creek's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Meadow Creek recommends the custodial services of Raymond James and Associates, Inc. ("Raymond James"), a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of

clients' assets. As the custodian holding the client's account, Raymond James does not generally charge separately for custody services. It is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed. Raymond James is also compensated by earning interest on the uninvested cash in your account. When selecting a custodian to recommend, a number of factors were considered, including their financial strength, reputation, execution capabilities, pricing, responsiveness, fees, research, and other services.

Raymond James makes products and services available to Meadow Creek that benefit Meadow Creek but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of Meadow Creek accounts. Some of these products and services provided includes software and other technology that provides access to client account data (such as trade confirmations and account statements); provides research, pricing and other market data; facilitates payment of fees from clients' accounts; and assists with back-office functions, recordkeeping and client reporting. In evaluating whether to recommend that clients custody their assets at Raymond James, Meadow Creek takes 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 Raymond James, which creates a potential conflict of interest.

#### Aggregated Trade Policy

Meadow Creek may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This method permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. It allows Meadow Creek to execute trades in a timely, equitable manner, and may reduce overall costs to clients.

Meadow Creek will only aggregate transactions when it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients, and is consistent with the terms of Meadow Creek's Investment Advisory Agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all Meadow Creek's transactions in a given security on a given business day. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

Meadow Creek will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Employees that participate in the block trade will also receive their pro rata share. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of Meadow Creek. Meadow Creek's books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and Meadow Creek will receive no additional compensation or remuneration of any kind as a result of the

proposed aggregation.

For Managers that Meadow Creek recommends, we do not direct brokerage in these accounts. Brokerage practices of Managers are disclosed separately in their respective Brochures.

#### **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 Meadow Creek. 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. Meadow Creek's Investment Advisory Representatives review the accounts they each manage.

For those clients to whom Meadow Creek provides separate financial planning and/or consulting services, reviews are conducted on an as needed or agreed upon basis. Such reviews are conducted by one of Meadow Creek's investment adviser representatives or principals.

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, Meadow Creek 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.

The client agrees to inform the firm in writing of any material changes to the information included in the questionnaire or any other change in the client's financial circumstances that might affect the manner in which client's assets should be invested. Clients may contact the firm during normal business hours to consult with the firm concerning the management of the client's account(s).

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

As noted above, Meadow Creek receives an economic benefit from Raymond James in the form of support products and services it makes available to Meadow Creek and other independent investment advisors whose clients maintain accounts at Raymond James. 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 Raymond James' products and services to Meadow Creek is based solely on our participation in the programs and not on the provision of any particular investment advice. Neither Raymond James nor any other party is paid to refer clients to Meadow Creek.

#### **Item 15 – Custody**

Raymond James is the custodian of nearly all client accounts at Meadow Creek. 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 urged to review this information carefully, and to notify Meadow Creek of any questions or concerns. Clients are also asked to promptly notify Meadow Creek if the custodian fails to provide statements on each account held.

From time to time and in accordance with Meadow Creek's agreement with clients, Meadow Creek 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, pending trades or other similar issues.

#### **Item 16 – Investment Discretion**

As described in **Item 4 - Advisory Business**, Meadow Creek will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, a Limited Power of Attorney (“LPOA”) is executed by the client, giving Meadow Creek 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. Meadow Creek 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 Meadow Creek and the requirements of the client’s custodian.

For *non-discretionary* accounts, the client also generally executes an LPOA, which allows Meadow Creek to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the investment advisory agreement between Meadow Creek and the client, Meadow Creek does not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. As with discretionary accounts, clients may limit the terms of the LPOA, subject to Meadow Creek’s agreement with the client and the requirements of the client’s custodian.

As disclosed earlier, Meadow Creek may utilize third party investment managers to manage part or all of a client’s investment portfolio, has the authority to evaluate managers on an ongoing basis, and can switch money managers or reallocate assets among managers as it deems necessary or advisable without consulting the client.

#### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, Meadow Creek does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients should contact their financial advisor if they have any questions and/or to obtain this information. Clients will receive their proxies directly from the custodian or transfer agent.

#### **Item 18 – Financial Information**

Registered Investment Advisers are required to provide clients with certain financial information or disclosures about Meadow Creek’s financial condition. Meadow Creek has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy proceeding. Thus, no disclosure is required for this Item.

**PRIVACY NOTICE  
(Information Security Program) of  
Meadow Creek Wealth Advisors, LLC**

*This is for your information only. No action is required on your part.*

At Meadow Creek Wealth Advisors, LLC, protecting your privacy is very important to us. We want you to understand what information we collect and how we use it. We collect and use “nonpublic private information” in order to provide our clients with a broad range of financial services as effectively and conveniently as possible. We treat nonpublic personal information in accordance with our privacy policy.

“Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing a financial service or product to you.

**What Information Do We Collect?**

In order to fulfill our obligations to you, we need certain information. Generally, this includes your name, address, social security number, date of birth, account numbers, and information about your income. We may also have access to other sensitive information, such as credit scores, income tax information and so forth.

**Where Do We Get This Information?**

We may collect nonpublic personal information about you from a variety of sources, such as:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others, such as the custodian(s) of your account(s); and
- Information we receive from non-affiliated third parties, including consumer reporting agencies.

**What Information Do We Disclose and To Whom Do We Disclose It?**

We do not disclose any nonpublic information about you without your express consent, except as permitted by law and as needed to provide the services you have requested. This applies to current as well as former clients. We restrict access to your nonpublic personal information to those who need to know that information in order to provide products or services to you.

Our “affiliates” are companies with which we share common ownership. We do not currently have any affiliated companies.

**Our Security Procedures**

We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information. This includes measures to protect your information in the course of its disposal.



# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 – Cover Page**

Kenneth Kaul Budd  
Meadow Creek Wealth Advisors LLC  
4200 Northside Parkway  
Building 14, Suit 250  
Atlanta, GA 30327  
(470) 359-9270  
April 1, 2024

This brochure supplement provides information about Kenneth Budd that supplements the Meadow Creek brochure. You should have received a copy of that brochure. Please contact Willem Hattink if you did not receive Meadow Creek’s brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Budd is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Kenneth Kaul Budd, b. September 20, 1961

Educational Background

University of Alabama – Bachelor of Arts

Business Experience

<b>Firm</b>	<b>Position</b>	<b>Dates</b>
Meadow Creek Wealth Advisors LLC	Investment Adviser Representative	8/2018 – Present
Merrill Lynch	Senior Vice President/Financial Advisor	1/1984 – 8/2018

**Item 3 - Disciplinary Information**

Investment Advisor Representatives are required to disclose all material facts regarding any legal and disciplinary events would be material to clients’ and prospective clients’ evaluation of the representative. Mr. Budd has no information applicable to this Item.

**Item 4 - Other Business Activities**

Advisors are required to disclose other investment related businesses or activities outside of their role of Investment Adviser Representative. Mr. Budd has no other business activities to disclose.

**Item 5 - Additional Compensation**

Mr. Budd does not receive compensation for advisory services other than fees paid by the client.

### Item 6 - Supervision

Mr. Budd is an Investment Advisory Representative and a Principal of Meadow Creek and, along with the other Principals, serves on the investment committee.

Overall investment decisions are made as a team by the investment committee, and portfolio activity based on these decisions will be carried out by each Investment Advisory Representative, as assisted by other staff members of the firm.

Willem Hattink, Chief Compliance Officer, is responsible for compliance oversight of Meadow Creek. He also participates as a team member in the investment and trading processes, and may be contacted at (470) 359-9270.

## Brochure Supplement

### Form ADV Part 2B

#### Item 1 - Cover Page

Willem Hattink  
Meadow Creek Wealth Advisors LLC  
4200 Northside Parkway  
Building 14, Suit 250  
Atlanta, GA 30327  
(678) 394-1000  
April 1, 2024

This brochure supplement provides information about Willem Hattink that supplements the Meadow Creek brochure. You should have received a copy of that brochure. Please contact Mr. Hattink if you did not receive Meadow Creek's brochure or if you have any questions about the contents of this supplement.

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

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

Willem-Jau O. Hattink, b. October 4, 1958

##### Educational Background

Higher Economic School, Rotterdam, Netherlands – BS, Business Administration  
George Washington University, Washington, DC – MBA, Finance

##### Business Experience

<b>Firm</b>	<b>Position</b>	<b>Dates</b>
Meadow Creek Wealth Advisors LLC	President/CCO	6/2018 – Present
SunTrust Bank	Executive Vice President	7/1983 – 4/2018
SunTrust Investment Services, Inc.	CEO/President	6/2004 – 4/2018
SunTrust Advisory Services, Inc.	Advisor	8/2016 – 4/2018

#### Item 3 - Disciplinary Information

Investment Advisor Representatives are required to disclose all material facts regarding any legal and disciplinary events would be material to clients' and prospective clients' evaluation of the representative. Mr. Hattink has no information applicable to this Item.

#### Item 4 - Other Business Activities

Advisors are required to disclose other investment related businesses or activities outside of their role of

Investment Adviser Representative. Mr. Hattink has no other business activities to disclose.

#### **Item 5 - Additional Compensation**

Mr. Hattink does not receive compensation for advisory services other than fees paid by the client.

#### **Item 6 - Supervision**

Mr. Hattink is a Principal of Meadow Creek and, along with the other Principals, serves on the investment committee.

Overall investment decisions are made as a team by the investment committee, and portfolio activity based on these decisions will be carried out by each Investment Advisory Representative, as assisted by other staff members of the firm.

As Chief Compliance Officer, Mr. Hattink is responsible for compliance oversight of Meadow Creek. He also participates as a team member in the investment and trading processes, and may be contacted at (470) 359-9270.

# April 1, Brochure Supplement

## Form ADV Part 2B

### Item 1 – Cover Page

Kristin H. Ribic, CFA®  
Meadow Creek Wealth Advisors LLC  
4200 Northside Parkway  
Building 14, Suit 250  
Atlanta, GA 30327  
(470) 359-9270  
April 1, 2024

This brochure supplement provides information about Kristin Ribic that supplements the Meadow Creek brochure. You should have received a copy of that brochure. Please contact Willem Hattink if you did not receive Meadow Creek's brochure or if you have any questions about the contents of this supplement.

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

### Item 2 - Educational Background and Business Experience

Kristin H. Ribic, b. April 19, 1967

#### Educational Background

University of Illinois – BBA, Accountancy

New York University, Leonard N. Stern School of Business – MBA, Finance and International Business

Chartered Financial Analyst® (CFA®)

The Chartered Financial Analyst® (CFA®) designation is issued by the CFA Institute after candidates pass three course exams involving 250 hours of self-study time for each of the three levels. In order to qualify to sit for the exams, candidates must have an undergraduate degree or four years of qualified professional experience or a combination of work and college experience that totals at least four years. Candidates are also required to sign a Professional Conduct Statement and a Candidate Responsibility Statement.

#### Business Experience

<b>Firm</b>	<b>Position</b>	<b>Dates</b>
Meadow Creek Wealth Advisors LLC	Investment Adviser Representative	8/2018 – Present
Wells Fargo Private Bank	Senior Investment Strategist	5/2013 – 8/2018

### **Item 3 - Disciplinary Information**

Investment Advisor Representatives are required to disclose all material facts regarding any legal and disciplinary events would be material to clients' and prospective clients' evaluation of the representative. Ms. Ribic has no information applicable to this Item.

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

Advisors are required to disclose other investment related businesses or activities outside of their role of Investment Adviser Representative. Ms. Ribic has no other business activities to disclose.

### **Item 5 - Additional Compensation**

Ms. Ribic does not receive compensation for advisory services other than fees paid by the client.

### **Item 6 - Supervision**

Ms. Ribic is an Investment Advisory Representative and a Principal of Meadow Creek and, along with the other Principals, serves on the investment committee.

Overall investment decisions are made as a team by the investment committee, and portfolio activity based on these decisions will be carried out by each Investment Advisory Representative, as assisted by other staff members of the firm.

Willem Hattink, Chief Compliance Officer, is responsible for compliance oversight of Meadow Creek. He also participates as a team member in the investment and trading processes, and may be contacted at (470) 359-9270.