



Western Peak Investment Advisors, LLC

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This Brochure provides information about the qualifications and business practices of Western Peak Investment Advisors, LLC. If you have any questions about the contents of this Brochure, please contact Andrew Geller at (512) 551-9258 and/or ageller@westernpeakia.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. Western Peak Investments is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Item 2 – Material Changes

This item is used to discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. Western Peak Investment Advisors will also reference the date of its last annual update of the Brochure.

The Firm will ensure that clients receive a summary of any materials changes to this and subsequent Brochures within 120 days of its business' fiscal year-end. Further, Western Peak will provide clients with a new Brochure, as necessary, based on changes or new information, at any time, without charge.

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Additional information about Western Peak and its supervised persons is also available via the SEC's Web site at www.adviserinfo.sec.gov.

This is the Firm's initial annual update. The Firm has experienced no material changes since the last update of its Brochure on August 8, 2011.

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* The SEC requires all investment advisers to organize their disclosure documents according to specific categories listed above, some of which may not pertain to Western Peak's business. When a required category is not relevant to our business, we list the category and state that it does not apply.

Item 4 – Advisory Business

Western Peak was formed as a Texas LLC on April 6, 2011 and is solely owned by Andrew Geller. The Firm offers investment advisory services including, but not limited to, listed equities, options, fixed income (both taxable and tax-exempt), structured notes, derivatives, foreign exchange, mutual, closed-end, and exchange-traded funds, and separately-managed accounts. The Firm also provides advisory services for private transactions such as promissory notes, real-estate partnerships, and equity ownership in private companies.

These services will generally begin with an initial consultation with the client, including their current investments, income, and expenses, the risk that the client is willing to accept, and the return the client is looking for from a portfolio. Western Peak also considers the client's financial knowledge and liquidity needs. Based upon the information, the Firm will design and present an allocation strategy to meet each client's unique situation, along with several options for implementation. Clients may impose written restrictions on any type of investment for any reason. Western Peak does not participate in wrap fee programs. As of December 31, 2011, the Firm manages no client assets on a discretionary basis and has \$49,400,000 client assets it manages on a non-discretionary basis.

Item 5 – Fees and Compensation

Western Peak is compensated on a flat fee that is negotiated between the Firm and the client based on the services provided as well as the amount of the assets in the accounts on which the Firm is advising. Clients will be billed 25% of their annual fee on a quarterly basis, at the beginning of each calendar quarter. If the client begins the relationship during a quarter, their initial billing will be for the portion of the quarter remaining. They will then be billed again at the beginning of the next full quarter. Clients will pay all account fees, custodian fees, and mutual, closed-end, and exchange-traded fund expenses. Clients will incur brokerage and other transaction costs associated with any direct transaction. Also, clients participating in separately-managed account programs may be charged various program fees in addition to fees charged by Western Peak. If a client cancels the advisory contract in writing, the proportional amount of the fee will be refunded based on the number of days left in the quarter. No outside compensation will be paid from the sale of securities or other investment products.

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

Western Peak does not charge any performance-based fees or fees that are based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Clients

Western Peak provides investment advice to high net-worth individuals and families, and trusts set up by those individuals and families. The minimum investable assets for a client are \$5,000,000.

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

The investment strategies implemented for clients will be personalized based on each client's risk and return profile, in addition to their income situation, liquidity needs, and market knowledge and understanding. After an allocation model is established, analysis of historical returns, when compared with benchmark indices, will be used to determine the effectiveness of an investment. For private investments owned by or presented by the clients, analysis will be customized to that particular investment. Investing in securities involves a significant risk of loss that clients should be prepared to bear.

All investments carry some amount of risk. Western Peak's investment strategies may be subject to the following principal investment risks:

Credit Risks – The risk that the portfolio could lose money if the issuer or guarantor of a fixed-income security, or the counter-party to a derivative contract, is unable or unwilling to meet its financial obligations.

Counter-Party Risks – A portfolio may incur a loss if the other party to an investment contract, such as a derivative, fails to fulfill its contractual obligation.

Currency Risks – The risk that foreign currencies will decline in value relative to the US dollar and affect a portfolio's investments in foreign (non-US) currencies or in securities that trade in, and receive revenues in, or in derivatives that provide exposure to, foreign (non-US) currencies.

Debt Securities Risks – The issuer of a debt security may fail to pay interest or principal when due, and changes in market interest rates may reduce the value of debt securities or reduce the portfolio's returns.

Derivatives Risks – The use of derivatives such as futures, options and swap agreements can lead to losses, including those magnified by leverage, particularly when derivatives are used to enhance return rather than offset risk.

Emerging-Markets Risk – Foreign investment risks are typically greater for securities in emerging markets, which can be more vulnerable to recessions, currency volatility, inflation and market failure.

Equity Risks – The risk that the value of equity securities, such as common stocks and preferred stocks, may decline due to general market conditions which are not specifically related to a particular company or to factors affecting a particular industry or industries. Equity securities generally have greater price volatility than fixed income securities.

ETF Risks – A portfolio will be exposed indirectly to all of the risks of securities held by an ETF.

Foreign Investment Risk – Foreign investments face the potential of heightened illiquidity, greater price volatility and adverse effects of political, regulatory, tax, currency, economic or other macroeconomic developments.

High-Yield Securities Risk – High-yield securities have a much greater risk of default or of not returning principal and tend to be more volatile than higher-rated securities of similar maturity.

Interest-Rate Risk – The risk that fixed income securities will decline in value because of an increase in interest rates.

Issuer Risk – The value of a security may decline because of adverse events or circumstances that directly relate to conditions at the issuer or any entity providing it credit or liquidity support.

Issuer Non-Diversification Risk – The risks of focusing investments in a small number of issuers, industries, or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.

Leverage Risk – The risk that certain portfolio transactions may give rise to leverage, causing the portfolio to be more volatile than if it had not been leveraged.

Liquidity Risk – A security may not be able to be sold at the time desired or without adversely affecting the price.

Market Risk – The market price of securities held by a portfolio may rapidly or unpredictably decline due to factors affecting securities markets generally or particular industries.

Mortgage- and Asset-Backed Securities Risk – These securities may decline in value when defaults on the underlying mortgage or assets occur and may exhibit additional volatility in periods of changing interest rates. When interest rates decline, the prepayment of mortgages or assets underlying such securities may require the reinvestment of money at lower prevailing interest rates, resulting in reduced returns.

Regulatory Risk – The risk that changes in government regulations may adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

Short Sale Risk – The risk of entering into short sales includes the potential loss of more money than the actual cost of the investment, and the risk that the third party to the short sale may fail to honor its contract terms, causing a loss to a portfolio.

Private Securities Risk – Private securities contain the risks of their respective public securities, but these risks can be magnified due to their illiquidity and lack of public knowledge on the business. These securities are inherently more risky.

Real Estate Risk – The real estate market has experienced some large swings recently. Due to changes in interest rates, the lending market, economic policy, and supply and demand, in addition to illiquidity, real estate investments can carry a great deal of risk.

Western Peak will predominantly recommend ETFs for both strategic and tactical allocations. The risks associated with an ETF depend on the type of assets it invests in, as the portfolio is exposed indirectly to all of the risks of the securities within the ETF.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be used by a client in the evaluation of Western Peak or the integrity of Western Peak's management. Mr. Geller was named in a customer complaint alleging unsuitability of an investment. Mr. Geller's prior firm settled the complaint for \$60,000 without consulting Mr. Geller, who contributed nothing to the settlement.

Item 10 – Other Financial Industry Activities and Affiliations

Western Peak is not affiliated with any other Investment Adviser or broker/dealer. The Firm does not have any relationships or arrangements that are material to its advisory business.

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

Western Peak has adopted a Code of Ethics for all Supervised Persons of the Firm describing its high standard of business conduct and its fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on, and the reporting of, gifts and gratuities and personal securities trading procedures, among other things. All Supervised Persons at Western Peak must sign an acknowledgement, acceptance, and understanding of the terms of the Code of Ethics, annually.

On occasion, Western Peak may own securities products that it also recommends to clients, which may present a potential conflict of interest. However, as a preventative measure, all client transactions will be conducted and implemented before any such transaction relating to any personal accounts of Western Peak or any affiliated person of Western Peak. In addition to this measure, all of the principals of Western Peak will act in accordance with applicable securities laws and conduct their business to ensure overall compliance with *Insider Trading Rules and The Securities Fraud Enforcement Act of 1988*. Any trading by Western Peak personnel is controlled by Western Peak's Code of Ethics. A copy of such Code will be available upon request.

Item 12 – Brokerage Practices

Client brokerage commissions are used, in addition to execution, to obtain research publications, both proprietary and third-party, that would otherwise not be available or would be available at a very high cost. At times, the benefit of certain firms' research for clients can outweigh the additional cost of execution at that firm, thereby making the net benefit to the client more valuable than the additional execution expense. Western Peak may cause its clients to pay a commission higher than those charged by other broker/dealers in return for certain benefits to the Firm, such as research capabilities. Soft-dollar benefits of quality research, both proprietary and third-party, will benefit all clients. Western Peak acquired no products and/or services with client brokerage commissions during the last fiscal year. The Firm intends to use the research and modeling capabilities of the broker/dealers through whom the Firm executes transactions and has accounts with, which are for the benefit of the clients both directly and indirectly. Over the last fiscal year, as the client's accounts were maintained at the broker/dealers they chose, all executions were done through that broker/dealer. Western Peak does not accept client referrals

from any broker/dealer that the Firm works with. Western Peak is not an affiliate of a broker/dealer, and there is no economic relationship between the Firm and any broker/dealer. Western Peak does not require clients to direct the Firm to execute through a specified broker/dealer. Clients may direct brokerage. As there are currently no assets with which Western Peak has discretion, all orders must be placed by the client with their broker/dealer.

If possible, transactions for client accounts are pooled to obtain the best execution and commission. However, as the timing and firm through which the transactions are executed varies due to client availability and interest in executing, this is not always possible.

Item 13 – Review of Accounts

All account reviews are conducted by Andrew Geller who is primarily responsible for each account.

Item 14 – Client Referrals and Other Compensation

Western Peak does not receive any economic benefits from any persons or entities who are not clients. Western Peak does not directly or indirectly compensate any person or entity for client referrals.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker/dealer, bank or other qualified custodian that holds and maintains clients' investment assets. Western Peak urges you to carefully review such statements and compare such official custodial records to the account statements that the Firm may provide to you. The statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients having questions regarding statements should contact Western Peak or the custodian directly.

Item 16 – Investment Discretion

Western Peak usually receives discretionary authority in writing from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Western Peak observes the investment policies, limitations and restrictions of clients for which it advises. For registered investment companies, Western Peak's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Western Peak in writing.

Item 17 – Voting Client Securities

It is the general policy of Western Peak to not take any action or render any advice in reference to the voting of proxies for those securities held in all client accounts.

Item 18 – Financial Information

Western Peak is well capitalized and has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Item 19 - Requirements for State-Registered Advisers

Neither Summa nor any of its supervised persons have any relationships or arrangements with the issuer of any securities.