

Item 1 Cover Page  
**Firm Brochure**  
(Part 2A of Form ADV)

**GREYLOCK PEAK INVESTMENTS LLC**

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This brochure provides information about the qualifications and business practices of Greylock Peak Investments LLC. If you have any questions about the contents of this brochure, please contact us at: 646-822-1269, or by email at: [admin@greylockpeak.com](mailto:admin@greylockpeak.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. Registration does not imply a certain level of skill or training.

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

## Item 2 Material Changes

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our previous annual updating amendment, we have amended our disclosure brochure to report a change in ownership. Our firm is now owned by Greylock Holdings, LLC. Our brochure was also updated to reflect a regulatory disclosure relating to our affiliated commodity broker-dealers.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 646-822-1269 or by email at: [admin@greylockpeak.com](mailto:admin@greylockpeak.com).

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## Item 4 Advisory Business

### Firm Description

Greylock Peak Investments LLC ("Greylock Peak" or the "Firm") was founded in 2011. Greylock Peak is a privately owned limited liability company headquartered in New York, New York. The Firm is owned by Greylock Holdings, LLC.

### Types of Advisory Services

Websites and other resources refer potential clients to other unaffiliated Registered Investment Advisory ("RIA") firms through our firm. Accordingly, Greylock Peak is a Solicitor for other unaffiliated RIAs, including New Harbor Financial Group ("New Harbor"), an SEC-registered adviser. The unaffiliated RIA firm is responsible for individual client suitability and portfolio management on an initial and ongoing basis. We will not provide any investment advisory services to the client. In no event shall Greylock Peak participate in the management of client accounts or render investment advice to clients on behalf of the third party investment adviser. When soliciting clients for unaffiliated RIA's each client shall be provided with the most recent relevant brochures or equivalent disclosure documents of the unaffiliated RIA's that detail their applicable programs and the compensation to be paid by you and what portion of the same is received by us for our solicitation services and the association between our Firm and the unaffiliated RIA's. Clients who engage the unaffiliated RIA will sign an investment advisory agreement with the unaffiliated RIA.

### Assets under Management

Greylock Peak operates as a Solicitor and does not have investment advisory clients; therefore, there are no assets under management at our Firm.

### Wrap Fee Programs

Greylock Peak does not participate in any wrap fee programs.

## Item 5 Fees and Compensation

### Solicitor Fee

The fees payable to us for these referral services depend upon the fee arrangement between our Firm and the unaffiliated RIA to whom you are referred. We will receive a portion of the unaffiliated RIA's ongoing account management fees as compensation for our solicitation or consulting. Our fee range is 25% to 35% of the fees charged to the referred client by the unaffiliated RIA. The fee shall be paid solely from the unaffiliated RIA and will be paid to us within 30 days of the unaffiliated RIA's receipt of the advisory fee from the client. The fee paid to us will not result in any additional charge to the client of the unaffiliated RIA.

Referred clients have no obligation to pay any compensation directly to Greylock Peak. Greylock Peak seeks payment of its compensation solely from the unaffiliated RIA to whom it recommends clients. Fees are only payable to Greylock Peak upon receipt of funds by the RIA from the prospective client(s).

The duration of payments from the RIA to Greylock Peak shall continue for as long as a given client remains a paying investment management client of the RIA.

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

We act solely as a solicitor for unaffiliated RIAs. We do not accept performance-based fees or participate in side-by-side management.

## **Item 7 Types of Clients**

Our customer base for referrals to other unaffiliated RIA's consists of individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The third party money managers to whom you are referred may impose minimum account sizes for participation in their advisory services. Please refer to the third party money manager's Form ADV Part 2A for information on applicable minimum account sizes, if any.

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

### **Methods of Analysis and Investment Strategies**

We refer clients to unaffiliated RIA's who offer a selection of different investment approaches. This includes trend following, countertrend, technical signal based, fundamental and tactical asset allocation strategies. Information of each unaffiliated RIA's method of analysis and investment strategies are described in each of their ADV Part 2A brochures or other disclosure documents that will be provided upon the referral.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. The advice offered to you is determined by the areas of expertise of the unaffiliated RIA agent providing the service and your stated objective. We advise you to notify your investment manager promptly if there are ever any changes in your financial situation or investment objective or if you wish to impose any reasonable restrictions upon their management services.

We do not represent, warrant, or imply that the services or methods of analysis employed by our unaffiliated RIA's can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. All securities trading, whether in stocks, options, or other investment vehicles, is speculative in nature and involves substantial risk of loss that clients should be prepared to bear. Past performance is not necessarily indicative of future results. You should make every effort to understand the risks involved.

## Item 9 Disciplinary Information

Greylock Peak is required to disclose whether its firm or management persons have been involved in any legal events, criminal or civil action, an administrative proceeding before the SEC or any other regulatory agency, or a self-regulatory organization proceeding or disciplinary events that are material to a referral's or a prospective referral's evaluation of our advisory business or the integrity of our management. Although neither the firm nor its management persons have disciplinary events to disclose, its affiliated commodity broker-dealers, Gold Bullion International, LLC ("GBI") and GoldSilver LLC ("GoldSilver") have entered into consent orders with the Minnesota Department of Commerce which alleged that the firms conducted bullion product transactions with Minnesota consumers in amounts substantially exceeding statutory thresholds without having first registered with the Minnesota Department of Commerce. Both firms paid a fine and are now fully registered. GBI and GoldSilver also entered into an Assurance of Discontinuance with the Attorney General of the State of New York relating to their late filing of renewals of their commodity broker-dealer registrations. Both firms paid a fine and are fully registered with the State of New York.

## Item 10 Other Financial Industry Activities and Affiliations

### Financial Industry Activities

Greylock Peak is indirectly owned, through Greylock Holdings, LLC, by GBI, a precious metals commodity broker-dealer. Clients of Greylock Peak may engage GBI separately for access to its precious metals platform either directly or through their investment advisor. Greylock Peak is also affiliated with GoldSilver, also a precious metals commodity broker-dealer. A conflict of interest exists in that Greylock Peak has an incentive to recommend investment advisers who use GBI's and/or GoldSilver's precious metals platform for their clients. Compensation received by GBI and GoldSilver is separate and in addition to solicitor fees received by Greylock Peak.

### Third Party Relationships

We currently have a third party advisory relationship with New Harbor. We may develop other solicitor arrangements with other unaffiliated RIA's at our discretion. Upon being referred to a third-party adviser, you will receive a Solicitor's Disclosure Statement. The Solicitor's Disclosure Statement provides, among other things, disclosure regarding the affiliation, if any, between our firm and the third-party adviser: the terms of the solicitation agreement between our firm and the third-party adviser, including the amount of compensation to be paid to our Firm for the solicitation; and the additional cost to you if any, as a result of the solicitation agreement.

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

### Code of Ethics

The employees of Greylock Peak have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. Our firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### Participation or Interest in Client Transactions

Greylock Peak and its employees do not and will not buy or sell securities held by clients.

## **Item 12 Brokerage Practices**

Greylock Peak does not recommend a particular broker-dealer to any client or prospect.

## **Item 13 Review of Accounts**

We do not review client accounts nor do we provide reports directly to clients. Clients receive performance reports of third party adviser and typical statements on their accounts from the unaffiliated RIA.

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

### **Client Referrals**

Greylock Peak does not pay third parties for client referrals.

### **Other Compensation**

Greylock Peak receives no compensation other than what is already disclosed in this Brochure.

## **Item 15 Custody**

Greylock Peak does not maintain custody of any funds or securities for any clients we refer to other unaffiliated RIA's. All assets are held at the designated qualified custodians with each unaffiliated RIA, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

## **Item 16 Investment Discretion**

We do not manage client accounts. We will refer you to an unaffiliated RIA whose investment style is believed to be consistent with your financial needs, investment goals, tolerance for risk and stated investment objectives to manage your portfolio. The unaffiliated RIA is granted authority by you to manage and invest your assets.

## **Item 17 Voting Client Securities**

Without exception, we will not vote proxies on behalf of your advisory accounts. Please reference the Part 2A Disclosure Brochure, Item 17 "Voting Client Securities" of the referred advisory firm for details on whether they vote proxies on your behalf along with their proxy voting policies and procedures or if you will receive proxies directly from your advisory firm, the custodian, or the transfer agent and whether you can contact your adviser about a particular solicitation.

## **Item 18 Financial Information**

### **Financial Condition**

Greylock Peak does not have any financial impairment that will preclude the firm from meeting contractual commitments.

A balance sheet is not required to be provided because Greylock Peak does not serve as a custodian for client funds or securities, and does not charge more than \$1,200 in fees per client, six months or more in advance, nor have we filed a bankruptcy petition at any time in the past ten years.

## Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

## Item 20 Additional Information

### Privacy Notice

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, if you choose to discuss the services available through our unaffiliated investment adviser(s), we will share some information with the unaffiliated investment adviser(s), and our other service providers, such as accountants, consultants, and/or attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to further a relationship with the unaffiliated investment adviser at your request, or required by law.