

SILVERPEAK WEALTH ADVISORS, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of SilverPeak Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 720-465-5055 or by email at: kirsten@silverpeakwealth.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 SilverPeak Wealth Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. SilverPeak Wealth Advisors, LLC's CRD number is: 170732.

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Registration as an investment adviser does not imply a certain level of skill or training.

08/25/2021

Item 2: Material Changes

The purpose of this page is to inform you of any material changes since the previous version of this brochure. Material changes relate to SilverPeak Wealth Advisors, LLC policies, practices, or conflicts of interests only.

On 03/18/2021, SilverPeak Wealth Advisors, LLC submitted its annual updating amendment for fiscal year 2020. Since our last annual updating amendment filing, we have updated Item 8 with important information about risks associated with investments in non-traded REITs, options, and interval funds.

If you would like to receive a complete copy of our current brochure free of charge at any time, please contact us at (720) 465-5055 or kirsten@silverpeakwealth.com.

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Item 4: Advisory Business

SilverPeak Wealth Advisors, LLC (hereinafter "SilverPeak") is a Limited Liability Company organized in the State of Colorado.

The firm was formed in February 2014 and attained registration as an investment adviser in June 2014. The owners and co-presidents are Henry M. Nicholson, III and Margaret Elizabeth Jacques.

We are committed to helping clients build, manage, and preserve their wealth and to provide assistance to help clients achieve their financial goals. We may offer an initial complimentary meeting at our discretion; however, Investment Advisory services are initiated only after you and SilverPeak execute a client agreement.

Portfolio Management Services

We provide investment advisory services to individuals and high-net-worth individuals concerning various securities, including mutual funds, fixed income securities, real estate funds (including REITs), equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities. As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our client's interests first and must fully disclose any conflict of interest. We do not directly hold customer funds or securities and all transactions are sent to our qualified custodian which executes, compares, allocates, clears, and settles them. Our custodian also maintains our clients' accounts and may grant clients access to them.

SilverPeak offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. In almost all cases, SilverPeak creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- * Help clients to develop an investment strategy
- * Collect and assess client's risk tolerance data
- * Create a personal investment policy for each client
- * Provide regular portfolio monitoring and asset selection

SilverPeak will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction, as the firm provides strictly discretionary management. SilverPeak evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

SilverPeak seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of SilverPeak's economic, investment or other financial interests. To meet its fiduciary obligations, SilverPeak attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, SilverPeak's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time.

Selection of Other Advisers

SilverPeak may direct clients to third-party investment advisers. Before selecting other advisers for clients, SilverPeak will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where SilverPeak is recommending the adviser to clients.

Services Limited to Specific Types of Investments

SilverPeak limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities. SilverPeak may use other securities as well to help diversify a portfolio when applicable. Private or non-traded investments may be purchased only by clients signing the appropriate documents at the time of purchase.

SilverPeak offers the same suite of services to all of its clients but may create and implement "model portfolios" in order to provide a specific allocation among those models for each client based on the client's Investment Policy Statement which outlines each client's current situation (e.g., income, tax levels, targets, and risk tolerance levels).

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SilverPeak from properly servicing the client account, or if the restrictions would require SilverPeak to deviate from its standard suite of services, SilverPeak reserves the right to end the relationship.

SilverPeak has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$113,980,983	\$0.00	12/31/2020

Item 5: Fees and Compensation

Asset-Based Fees for Portfolio Management

Total Assets Under Management	Annual Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$5,000,000	0.75%
\$5,000,001 & up	0.50%

These fees are negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client. Clients may select the method in which they are billed. For client fees withdrawn directly from client accounts, the adviser will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Verify that the qualified custodian sends at least quarterly statements.
- (C) Send the qualified custodian written notice of the amount of the fee to be deducted and send the client a written invoice itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Fees are paid in advance on a quarterly basis and SilverPeak bills based on the balance on the first day of the billing period.

Either Client or SilverPeak may terminate the agreement without penalty for a full refund of SilverPeak's fees within five business days of signing the Investment Advisory Contract. Thereafter, either party may terminate the Investment Advisory Contract upon written notice. In the event of termination, refunds for unearned fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account. For all asset-based fees paid in advance, the unearned fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

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

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

Third-Party Asset Management Fees

SilverPeak may direct clients to third-party investment advisers, Breckinridge Capital Advisors, Inc or Parametric Portfolio Associates, LLC. SilverPeak will receive its standard fee on top of the fee paid to the third-party adviser. The fees are withdrawn, and the custodian pays each party TPMM and SilverPeak. The client fees are paid quarterly. SilverPeak fees are paid in advance, Breckinridge and Parametric fees are payable quarterly in arrears and will not exceed any limit imposed by any regulatory agency.

A TPMM relationship may be terminated at your or your Investment Advisor Rep.'s discretion. Factors involved in the termination of a Manager may include a failure to adhere to their stated management style or your objectives, a material change in the professional staff of the Manager, unexplained inconsistency of account performance, or our decision to no longer include the Manager on our list of approved Managers. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

SilverPeak may specifically direct clients to Breckinridge Capital Advisors, Inc and Parametric Portfolio Associates, LLC. The annual fee schedule is as follows:

Breckinridge Capital Advisors, Inc

Total Assets	SilverPeak's Fee	Breckinridge's Fee	Total Fee
\$500,000 - \$1,000,000	1.00%	0.19%	1.19%
\$1,000,001 - \$5,000,000	0.75%	0.19%	0.94%
\$5,000,001 - \$1,000,000,000	0.50%	0.19%	0.69%

Parametric Portfolio Associates, LLC

Total Assets	SilverPeak's Fee	Parametric's Fee	Total Fee
\$250,000 - \$ 1,000,000	1.00%	0.35%	1.35%
\$1,000,001 - \$5,000,000	0.75%	0.35%	1.10%
\$5,000,001 - \$10,000,000	0.50%	0.35%	0.85%
\$10,000,001 - \$1,000,000,000	0.50%	0.25%	0.75%

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

SilverPeak 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

SilverPeak offers advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is an account minimum of \$500,000, which may be waived by SilverPeak in its discretion.

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

Methods of Analysis & Investment Strategies

SilverPeak's methods of analysis include fundamental analysis and modern portfolio theory.

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

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset. Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

SilverPeak's investment strategy entails long term trading.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Clients should be aware that there is a material risk of loss using any investment strategy. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below).

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions, and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share principal value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Non-Traded Real Estate Investment Trusts (REITS)

A REIT is a tax designation for a corporate entity that pools capital of many investors to purchase and manage real estate. Many REITs invest in income-producing properties in the office, industrial, retail, and residential real estate sectors. REITs are granted special

tax considerations that can significantly reduce or eliminate corporate income taxes. In order to qualify as a REIT and for these special tax considerations, REITs are required by law to distribute 90% of their taxable income to investors. REITs can be traded on a public exchange like a stock, or be offered as a non-traded REIT. REITs, both public exchange-traded and non-traded, are subject to risks including volatile fluctuations in real estate prices, as well as fluctuations in the costs of operating or managing investment properties, which can be substantial. Many REITs obtain management and operational services from companies and service providers that are directly or indirectly related to the sponsor of the REIT, which presents a potential conflict of interest that can impact returns on investments. Non-traded REITs include: (i) A REIT that is registered with the Securities and Exchange Commission (SEC) but is not listed on an exchange or over-the-counter market (non-exchange traded REIT); or, (ii) a REIT that is sold pursuant to an exemption to registration (Private REIT). Non-traded REITs are generally blind pool investment vehicles. Blind pools are limited partnerships that do not explicitly state their future investments prior to beginning their capital-raising phase. During this period of capital-raising, non-traded REITs often pay distributions to their investors. The risks of non-traded REITs are varied and significant. Because they are not exchange-traded investments, they are often lack a developed secondary market, thus making them illiquid investments. As blind pool investment vehicles, non-traded REITs' initial share prices are not related to the underlying value of the properties. This is because non-traded REITs begin and continue to purchase new properties as new capital is raised. A significant risk for non-traded REITs is the possibility that the blind pool will be unable to raise enough capital to carry out its investment plan. After the capital raising phase is complete, non-traded REIT shares are infrequently re-valued and thus may not reflect the true net asset value of the underlying real estate investments. Non-traded REITs often offer investors a redemption program where the shares can be sold back to the sponsor, however, those redemption programs are often subject to restrictions and may be suspended at the sponsor's discretion. While non-traded REITs may pay distributions to investors at a stated target rate during the capital-raising phases, the funds used to pay such distributions may be obtained from sources other than cash flow from operations, and such financing can increase operating costs.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Options: Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling an

option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

Interval Funds: An interval fund is a type of investment company that periodically offers to repurchase its shares from shareholders. That is, the fund periodically offers to buy back a stated portion of its shares from shareholders. Shareholders are not required to accept these offers and sell their shares back to the fund. Interval funds are classified as closed-end funds, but they are very different from traditional closed-end funds in that:

- Their shares typically do not trade on the secondary market. Instead, their shares are subject to periodic repurchase offers by the fund at a price based on net asset value.
- They are permitted to (and many interval funds do) continuously offer their shares at a price based on the fund's net asset value.

An interval fund will make periodic repurchase offers to its shareholders, generally every three, six, or twelve months, as disclosed in the fund's prospectus and annual report. The interval fund also will periodically notify its shareholders of the upcoming repurchase dates. When the fund makes a repurchase offer to its shareholders, the repurchase announcement will specify a date by which you must accept the repurchase offer and the percentage of all outstanding shares the fund will buy – usually 5% and sometimes up to 25%. Since repurchase is done on a pro-rata basis, there is no guarantee you can redeem the number of shares you want during a given redemption.

The actual repurchase will occur at a later, specified date. The price that shareholders will receive on a repurchase will be based on the per share NAV determined as of a specified (and disclosed) date. This date will occur sometime after the close of business on the date that shareholders must submit their acceptances of the repurchase offer (but generally not more than 14 days after the acceptance date).

Interval funds are permitted to deduct a redemption fee from the repurchase proceeds, not to exceed 2% of the proceeds. The fee is paid to the fund, and generally is intended to compensate the fund for expenses directly related to the repurchase. Interval funds may charge other fees as well.

An interval fund's prospectus and annual report will disclose the various details of the repurchase offer. The rules for interval funds, along with the types of assets held, make this investment largely illiquid compared with other funds. Overall fees for interval funds tend to be much higher than those for open-end mutual funds. There is both a transparency and conflict-of-interest issue if the fund's portfolio manager is allowed to invest in other funds of the fund sponsor. Interval funds investing in securities of companies with smaller market capitalizations, derivatives, or securities with substantial market and/or credit risk tend to have the greatest exposure to liquidity risk. Before investing in an interval fund, you should carefully read all of the fund's available information, including its prospectus and most recent shareholder report to be sure you understand the total costs and risks involved in holding such illiquid investments.

Commodity ETFs represent an investment fund traded on stock exchanges, similar to stocks, providing exposure to the commodities market. Commodities are tangible assets used to manufacture and produce goods or services and their prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints, weather, and a significant change in the attitude of speculators and investors. Investment in commodity ETFs, much like investing in other ETFs or securities, carries the risk of capital loss.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

The investment types listed above are not guaranteed or insured by the FDIC or any other government agency. Past performance is not indicative of future results. 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 criminal or civil actions, administrative proceedings, or self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

Neither SilverPeak nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Neither SilverPeak nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

SilverPeak is completely independent. We have no ownership interest in any other organization, and no other organization owns any portion of SilverPeak.

We occasionally are offered and accept discounts from software vendors, and invitations to attend business research and/or training events where part or all of the full cost is paid by a third party (see Item 12 below for more detail.)

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

Code of Ethics

SilverPeak has 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
- Reporting Violations
- Compliance Officer Duties
- Training and Education
- Recordkeeping
- Annual Review
- Sanctions

SilverPeak will always act in the best interest of the client. All conflicts of interest have been disclosed in this brochure document.

ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE OUR CODE OF ETHICS. OUR CODE OF ETHICS IS AVAILABLE FREE UPON REQUEST TO ANY CLIENT OR PROSPECTIVE CLIENT. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK YOUR FINANCIAL ADVISOR AT ANY TIME.

Recommendations Involving Material Financial Interests

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

Investing Personal Money in the Same Securities as Clients Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SilverPeak may buy or sell securities for themselves that they also recommend to clients and may do so at or around the same time as clients. This may provide an opportunity for representatives of SilverPeak to buy or sell the same securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create conflicts of interest. To address these conflicts of interest, SilverPeak will always document any transactions and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

Custodians/broker-dealers will be recommended based on SilverPeak's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

Schwab Advisor Services™, a division of Charles Schwab & Co., Inc., (CRD # 5393), is SilverPeak's preferred custodian. We are independently owned and operated, and unaffiliated with Schwab. Schwab will hold client assets in a brokerage account and buy and sell securities when we instruct them to.

While we recommend that clients use Schwab as custodian/broker, the client must decide whether to do so and open accounts with Schwab by entering into account agreements directly with them. The accounts will always be held in the name of the client and never in SilverPeak's name.

Client Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge separately for custody services. However, Schwab receives compensation by charging ticket charges or other fees on trades that it executes or that settle into clients' Schwab accounts.

Products and Services Available to Us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like us. They provide SilverPeak and our clients with access to its institutional brokerage, trading, custody, reporting, and related services, many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts; others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis and at no charge to us.

Following is a more detailed description of Schwab's support services:

Services That Benefit Our Clients

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Any research products and services received by us from broker-dealers will be used to provide services to all our clients. The Schwab Security Guarantee guarantees that Schwab will cover 100% of any losses in any Schwab account due to unauthorized activity. The Schwab Security Guarantee applies to unauthorized activity in client accounts managed by Independent Investment Advisors.

Services That May Not Directly Benefit Our Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit our clients or their accounts. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

1. Provide access to client account data (such as duplicate trade confirmations and account statements)
2. Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
3. Provide pricing and other market data
4. Facilitate payment of our fees from our clients' accounts
5. Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

1. Educational conferences and events
2. Consulting on technology, compliance, legal, and business needs
3. Publications and conferences on practice management and business succession
4. Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions. We believe that our selection of Schwab as custodian and broker is in the best interest of our clients.

Some of the products, services and other benefits provided by Schwab benefit SilverPeak and may not benefit our client accounts. Our recommendation that you place assets in Schwab's custody may be based in part on benefits Schwab provides to us and not solely on the nature, cost or quality of custody, and execution services provided by Schwab.

We place trades for our clients' accounts subject to its duty to seek best execution and its other fiduciary duties. We may use broker-dealers other than Schwab to execute trades for your accounts maintained at Schwab, but this practice may result in additional costs to clients so that we are more likely to place trades through Schwab rather than other broker-dealers. Schwab's execution quality may be different than other broker-dealers.

Brokerage for Client Referrals

SilverPeak does not receive client referrals from any broker-dealer or third party in exchange for using that broker-dealer or third party.

Directed Brokerage

SilverPeak routinely recommends that clients use a specified broker-dealer, such as Schwab. Not all advisers require their clients to direct brokerage to a specific broker-dealer. By directing brokerage to only the recommended broker-dealer, we may be unable to achieve the lowest execution costs and you may pay more for these services than you would pay for comparable services available through other broker-dealers. However, consistent with our fiduciary duties and due diligence, we have determined that the broker-dealer recommended provides our clients with quality services at competitive prices.

Aggregation of Transactions

If SilverPeak buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, SilverPeak would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SilverPeak would determine the appropriate number of shares to place with its broker-dealer, Schwab Advisor Services™, a division of Charles Schwab & Co., Inc., (CRD # 5393), consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

All client portfolio management accounts are reviewed at least quarterly by Kirsten Roeber, Henry Nicholson, III, or Elizabeth Jacques with regard to clients' respective investment policies and risk tolerance levels.

In addition to the quarterly reviews discussed above, additional review 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).

Each client will receive from the custodian a quarterly statement detailing the client's account, including assets held, asset value, and calculation of fees. SilverPeak will also provide at least quarterly a separate written report to the client reflecting the client's assets held, asset value, and calculation of fees.

Item 14: Client Referrals and Other Compensation

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

SilverPeak does not directly or indirectly compensate any person for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, SilverPeak will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. For client fees withdrawn directly from client accounts, the adviser will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Verify that the qualified custodian sends at least quarterly statements.
- (C) Send the qualified custodian written notice of the amount of the fee to be deducted and send the client a written invoice itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

SilverPeak will require discretionary authority from all clients, as the firm provides strictly discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Since investment discretion granted by the client, SilverPeak will manage the client's account and makes investment decisions without prior consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

SilverPeak 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

SilverPeak neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Neither SilverPeak nor its management has any financial condition that is likely to reasonably impair SilverPeak's ability to meet contractual commitments to clients.

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

This brochure supplement provides information about Henry M. Nicholson, III that supplements the SilverPeak Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Henry M. Nicholson, III if you did not receive SilverPeak Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Henry M. Nicholson, III is also available on the SEC's website at www.adviserinfo.sec.gov.

SilverPeak Wealth Advisors, LLC
Form ADV Part 2B – Individual Disclosure Brochure

for

Henry M. Nicholson, III, CFP®

Personal CRD Number: 2369688

Investment Adviser Representative

SilverPeak Wealth Advisors, LLC
1728 16th Street, Suite 210
Boulder, CO 80304
720-465-5055
Hank@SilverPeakWealth.com

Item 2: Educational Background and Business Experience

Name: Henry M. Nicholson, III, CFP®

Born: 1969

Educational Background and Professional Designations:

Education:

CFP Personal Wealth, College of Financial Planning - 2006

BA Economics and English, University of Colorado at Boulder - 1991

Designations:

CFP® - Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

09/2018 – Present	Co-President
02/2014 – 09/2018	President and Chief Compliance Officer SilverPeak Wealth Advisors, LLC
10/2000 – 04/2014	Vice President Colorado Capital Management, Inc.

Item 3: 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.

Item 4: Other Business Activities

SilverPeak Wealth Advisors, LLC is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Henry M. Nicholson, III does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through SilverPeak Wealth Advisors, LLC.

Item 6: Supervision

As the Co-President of the firm, Henry M. Nicholson, III works closely with the CCO, Kirsten Roeber. Henry M. Nicholson, III adheres to applicable regulations regarding the activities of an Investment Adviser Representative, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. Kirsten Roeber's phone number is (720) 465-5055.

This brochure supplement provides information about Kirsten Roeber that supplements the SilverPeak Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Kirsten Roeber if you did not receive SilverPeak Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kirsten Roeber is also available on the SEC's website at www.adviserinfo.sec.gov.

SilverPeak Wealth Advisors, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Kirsten Elizabeth Roeber, CFP®

Personal CRD Number: 6239911

Investment Adviser Representative

SilverPeak Wealth Advisors, LLC
1728 16th Street, Suite 210
Boulder, CO 80302
(720) 465-5055
kirsten@silverpeakwealth.com

Item 2: Educational Background and Business Experience

Name: Kirsten Elizabeth Roeber, CFP®

Born: 1968

Educational Background and Professional Designations:

Education:

CFP® Program, College for Financial Planning – April 2019

AAMS® Professional Designation, College for Financial Planning - 2015

BS Kinesiology/Integrative Physiology, University of Colorado - 1990

Designations:

CFP® - Certified Financial Planner

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

AAMS® - Accredited Asset Management Specialist™

AAMS® is a professional designation awarded by the College for Financial Planning to financial professionals who successfully complete a self-study program, pass an exam, and agree to comply with the Standards of Professional Conduct.

Individuals who hold the AAMS® designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

To keep the privileges associated with the designation, AAMS® professionals must complete 16 hours of continuing education every two years and pay a fee.

Business Background:

08/2018 - Present	Portfolio Manager, Chief Compliance Officer & Investment Adviser Representative SilverPeak Wealth Advisors, LLC
01/2018 - 08/2018	Portfolio Manager
04/2014 – 01/2018	Assistant Portfolio Manager
08/2011 – 04/2014	Client Services Representative Colorado Capital Management

Item 3: 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.

Item 4: Other Business Activities

Kirsten Roeber is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

Kirsten Roeber does not receive any economic benefit from any person, company, or organization, other than SilverPeak Wealth Advisors, LLC in exchange for providing clients advisory services through SilverPeak Wealth Advisors, LLC.

Item 6: Supervision

As the Chief Compliance Officer of SilverPeak Wealth Advisors, LLC, Kirsten Roeber supervises all activities of the firm. Kirsten Elizabeth Roeber's contact information is on the cover page of this disclosure document. Kirsten Roeber adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

This brochure supplement provides information about Margaret Elizabeth Jacques that supplements the SilverPeak Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Margaret Elizabeth Jacques if you did not receive SilverPeak Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Margaret Elizabeth Jacques is also available on the SEC's website at www.adviserinfo.sec.gov.

SilverPeak Wealth Advisors, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Margaret Elizabeth Jacques, CFP®

Personal CRD Number: 2548651

Investment Adviser Representative

SilverPeak Wealth Advisors, LLC
1728 16th Street, Suite 210
Boulder, CO 80302
(303) 868-0174
liz@silverpeakwealth.com

Item 2: Educational Background and Business Experience

Name: Margaret Elizabeth Jacques, CFP®

Born: 1957

Educational Background and Professional Designations:

Education:

MBA Finance, Virginia Commonwealth University - 1983

BS Psychology, James Madison University - 1979

Designations:

CFP® - Certified Financial Planner

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

09/2018 - Present	Co-President SilverPeak Wealth Advisors, LLC
12/2007 - Present	President Elsbeth, Inc
06/2012 - 08/2018	Vice-President Colorado Capital Management

Item 3: 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.

Item 4: Other Business Activities

Ms. Jacques is President of Elsbeth, Inc., a family office consulting company. Margaret Elizabeth Jacques provides financial analysis, management, and reporting for families’ personal affairs. The company is not an investment advisor. The amount of time Ms. Jacques spends in this capacity varies in accordance with the needs of the clients. On Average, 8-10 hours per month are spent working with these clients.

Item 5: Additional Compensation

Ms. Jacques receives financial compensation for her role at Elsbeth, Inc. as described above.

Item 6: Supervision

As a representative of SilverPeak Wealth Advisors, LLC, Margaret Elizabeth Jacques is supervised by Kirsten Roeber, the firm's Chief Compliance Officer. Kirsten Roeber is responsible for ensuring that Margaret Elizabeth Jacques adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Kirsten Roeber is (720) 465-5055.