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ADV Part 2A – Firm Brochure  
January 29, 2021

**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**

Since Meadow Creek's last annual amendment dated February 10, 2020, there were no material changes.

Additional information about Meadow Creek is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website provides information about any persons affiliated with Meadow Creek who is registered or are required to be registered as investment adviser representatives of Meadow Creek.

### Item 3 – Table of Contents

Item 1 – Cover Page .....	1
Item 2 – Material Changes .....	2
Item 3 – Table of Contents .....	3
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation .....	7
Item 6 – Performance-Based Fees and Side-By-Side Management .....	11
Item 7 – Types of Clients .....	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	11
Item 9 – Disciplinary Information .....	13
Item 10 – Other Financial Industry Activities and Affiliations .....	13
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	13
Item 12 – Brokerage Practices .....	14
Item 13 – Review of Accounts .....	15
Item 14 – Client Referrals and Other Compensation .....	15
Item 15 – Custody .....	16
Item 16 – Investment Discretion .....	16
Item 17 – Voting Client Securities .....	16
Item 18 – Financial Information .....	17
Privacy Policy .....	17

#### Item 4 – Advisory Business

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

As of December 31, 2020, Meadow Creek managed \$234,334,531 on a discretionary basis and \$183,164,158 on a non-discretionary basis.

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 presentation:

- 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 is 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 would make on behalf of the client in an effort to meet those goals and expectations.

Once an Investment Plan is implemented on behalf of a new client, the Investment Plan will be 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.

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 be sold if held in the account. If a client's instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, Meadow Creek will notify the client that, unless the instructions are modified, it will cancel the instructions in the client's account. 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.

### ***Third-Party Money Managers***

Meadow Creek has also entered into additional agreements with various non-affiliated investment advisors ("third-party money managers") to offer asset allocation and asset management services to Meadow Creek advisory clients. Meadow Creek will assist the client in formulating a strategic investment portfolio based on the client's investment objectives. Once formulated, a suitable third-party money manager is selected to implement and continually manage the portfolio. In preparing the portfolio, Meadow Creek will set restrictions or limitations on the management of the account and explain to the client the continual account activity transacted by the third-party money manager. Also, Meadow Creek will periodically review the current and historical performance records of each third-party money manager.

The relationship of Meadow Creek with these third-party money managers will be clearly communicated to all clients in the third-party money manager's Client Services Agreement and/or other similar documentation. Each third-party money manager is required to provide Meadow Creek with a disclosure document statement, typically a copy of their Form ADV 2A. The third-party money manager's Form ADV 2A will be provided to the client by Meadow Creek.

### ***Financial Planning***

Meadow Creek offers advice in the form of a Financial Plan. 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:

- 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.

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. Meadow Creek specializes in the areas of investment, financial, estate, risk management, retirement, and business continuation planning. 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, Advisor will focus on the client's specific goals.

Clients are not under any obligation to engage Meadow Creek when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client and can be implemented through another RIA.

### ***Corporate Cash Management***

Meadow Creek will work with clients with corporate entities on cash management, typically when an entity has a large cash position, to provide separately managed fixed-income investment solutions consistent with the client's financial objectives. Meadow Creek will seek to invest in short-term investments, including US Treasures, commercial paper, and/or money market funds, with the goal of balancing return and risk by considering the client's liquidity needs and the changing economic and market conditions.

### ***General Consulting***

In addition to the foregoing services, Meadow Creek may provide general consulting services to clients, which can include family office and wealth planning services. 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).

With respect to any account for which Meadow Creek meets the definition of a fiduciary under Department of Labor rules, Meadow Creek acknowledges that both Meadow Creek and its Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this brochure or the written agreement between Meadow Creek and the Client.

Under ERISA Section 3(21), Meadow Creek offers the following fiduciary services:

- Development of Investment Policy Statement;
- Recommendations for selecting and monitoring the plan's investments;
- Investment performance measurement and analysis;
- Recommendations for allocating and rebalancing model asset allocation portfolios; and
- Individualized investment advice to plan participants

In addition, Meadow Creek, acting in a non-fiduciary capacity, will provide employee investment education; and assistance with the management of service providers.

#### **Item 5 – Fees and Compensation**

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. Fees are based on the assets in the account per the schedule below and are billed in advance on a monthly basis.

<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 – 49,999,999	0.40%
\$50,000,000 +	0.30%

The initial fee is due in full one business day after the client's account is accepted and opened with the minimum account balance and will be based on the asset value of the account on that date. The initial fee will be prorated according to the number of days remaining in the calendar month. Thereafter, the fee will be calculated by multiplying the fair market value of the assets in the account as of the last trading day of each calendar month. The monthly fee is calculated by multiplying the annual fee by the actual number of days in the month and dividing by 365 days. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar month, and excess fees will be rebated to the client.

Advisory fees will be debited directly from the client's account as specified in the advisory agreement. We will deduct our fees only when the client has given our firm written authorization permitting the fees to be paid directly from the client's account. 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 discrepancies. Upon request, Meadow Creek will bill a client directly for advisory services. If requested, billing information must be in writing in the advisory agreement. Advisory fees are due upon receipt.

#### **Corporate Cash Management**

Our annual fee for Corporate Cash Management Services is 0.30% of the cash assets in the account. 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. Fees are billed in advance on a monthly basis.

The initial fee is due in full one business day after the client's account is accepted and opened with the minimum account balance and will be based on the asset value of the account on that date. The initial fee will be prorated according to the number of days remaining in the calendar month. Thereafter, the fee will be calculated by multiplying the fair market value of the assets in the account as of the last

trading day of each calendar month by the annual fee and then dividing that result by 12, which represents each month. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar month, and excess fees will be rebated to the client.

Advisory fees will be debited directly from the client's account as specified in the advisory agreement. We will deduct our fees only when the client has given our firm written authorization permitting the fees to be paid directly from the client's account. 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 discrepancies. Upon request, Meadow Creek will bill a client directly for advisory services. If requested, billing information must be in writing in the advisory agreement. Advisory fees are due upon receipt.

### ***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, client will be provided an estimate in advance.

Financial planning fees will be charged on an agreed-upon fixed fee, ranging from \$2500 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. Up to 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, provided that all of the relevant information needed to prepare the financial plan has been promptly provided by the client. The client may terminate its 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, ranging from \$2500 to \$10,000, 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***

Meadow Creek will require each Plan Client to make a selection of services *in writing* as part of the Retirement Plan Advisory Agreement(s) (the "Plan Agreement"), which sets forth the rights and obligations of Meadow Creek and the Client. Fees for Retirement Plan Advisory Services are negotiated prior to the signing of the Plan Agreement. The Plan Agreement is then customized to state the negotiated fee, which, *in general*, is expressed as a percentage of total Plan assets, up to 1.50%.

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 direct billed 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, asset-based fees will be prorated according to the days the account was opened during the calendar month, and excess fees will be rebated to the client.

### ***Other Charges***

The 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.

### ***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, and to the extent the following options are available, you should consider the costs and benefits of:

An employee will typically have four options:

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

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

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

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
  - a. Employer retirement plans generally have a more limited investment menu than IRAs.
  - b. Employer retirement plans may have unique investment options not available to the public, such as employer securities or previously closed funds.
2. Your current plan may have lower fees than our fees.

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

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions, contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

### ***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 done 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 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. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. Additionally, in our sole discretion, we may waive the minimum for family and for new clients that were referred to us by existing clients. We may also combine account values for clients and their minor children, joint accounts with spouses, and other types of related accounts to meet the stated minimum.

Certain Third-Party Money 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. For any risks associated with Investment Company products, please refer to the prospectuses for

additional details about these risks. 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.

Corporate Cash Management clients have unique risks. Investments are not guaranteed, and it is possible to lose money investing. Investing in the bond market is subject to risks, including market, interest rate, issuer, credit, inflation risk, and liquidity risk. The value of most bonds and bond strategies are impacted by changes in interest rates. Bonds and bond strategies with longer durations tend to be more sensitive and volatile than those with shorter durations; bond prices generally fall as interest rates rise, and the current low interest rate environment increases this risk. Current reductions in bond counterparty capacity may contribute to decreased market liquidity and increased price volatility. Bond investments may be worth more or less than the original cost when redeemed. Investing in foreign denominated and/or domiciled securities may involve heightened risk due to currency fluctuations, and economic and political risks, which may be enhanced in emerging markets. High-yield, lower-rated, securities involve greater risk than higher-rated securities; portfolios that invest in them may be subject to greater levels of credit and liquidity risk than portfolios that do not. Equities may decline in value due to both real and perceived general market, economic, and industry conditions. Money market funds may only invest in certain high quality short-term investments issued by the U.S. government, U.S. corporations, and state and local governments that are subject to strict diversification and maturity standards and ultra-short bond funds are not subject to these requirements. Further, money market funds seek to maintain a stable NAV of \$1.00 per share.

### **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 provides 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 discourage and prohibit personal trading that would disadvantage clients.

Trades may be done on an aggregated basis. In such circumstances, the Advisor (or related account) may be included in the aggregated order and all participating accounts will receive securities at a total average price. Meadow Creek will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. It is expected that the majority of aggregated orders will be executed in full. Nonetheless, partially filled orders will be prorated and allocated to client accounts. The prorated allocation will allocate shares to allocations with the largest share quantity first. For example, in a total aggregated order for 15,000 shares, the first account in the allocation is 5,000 shares and the second account in the allocation is 10,000 shares. If 7,000 shares are executed, then the account with the larger allocation would get the entire allocation. Any exceptions will be explained on the order.

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**

We recommend the custodial services of Raymond James Financial Services, Inc. ("Raymond James"). Raymond James is a registered broker-dealer that charges commissions or transaction fees for effecting securities transactions. 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. 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.

The custodian makes a 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. When client brokerage commissions are used to obtain research or other products or services, Meadow Creek receives a benefit because we do not have to produce or pay for the research, products or services ourselves. As a result of these services provided, commissions may be higher than those charged by other broker-dealers. We use soft dollar benefits to service all of our accounts, instead of using them exclusively for the accounts that generated the soft dollar benefits. We make no effort to allocate soft dollar benefits to clients in proportion to the amount of soft dollar benefits generated by each client. Within our last fiscal year, we used client brokerage commissions to acquire the products and services listed above under soft dollar benefits.

If we maintain a certain dollar amount of our client assets at Raymond James, they will provide us with a rebate representing a portion of costs paid. This economic benefit provides an incentive for us to recommend Raymond James as custodian.

Trade aggregation refers to the practice of combining orders for execution. Aggregated orders generally seek to obtain a more advantageous net price, potentially avoid an adverse effect on the price which could result from simultaneously placing a number of separate competing orders, and simplify the administration and efficiency of trading across a potentially large number of accounts. When orders are aggregated for execution, the accounts will receive an average price of all transactions effected to fill the order. As a result, the average price received by the client may be higher or lower than the price that an individual client may have received had the transaction been effected for the client independently from the block transaction. Meadow Creek will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. It is expected that the majority of aggregated orders will be executed in full. Nonetheless, partially filled orders will be prorated and allocated to client accounts. The prorated allocation will allocate shares to allocations with the largest share quantity first. For example, in a total aggregated order for 15,000 shares, the first account in the allocation is 5,000 shares and the second account in the allocation is 10,000 shares. If 7,000 shares are executed, then the account with the larger allocation would get the entire allocation. Any exceptions will be explained on the order.

For third party investment managers Meadow Creek recommends, we do not direct brokerage in these accounts. Brokerage practices of third-party investment managers are disclosed separately in their brochure.

#### **Item 13 – Review of Accounts**

Accounts are assigned to Investment Advisors who are responsible for performing periodic reviews and consulting with the respective client. Following these reviews, reports are prepared to assist principals in supervising and monitoring the accounts. Factors that are considered include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, number of trades, monthly distributions, concentrated positions, diversification, and outside holdings. At least annually, the firm will contact the client and request current information to determine whether there have been any changes in the information provided in the client's investment questionnaire.

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 further described under Item 12, Meadow Creek recommends clients establish brokerage accounts with Raymond James, a FINRA/SIPC member. Raymond James provides us with access to its institutional trading and operations services, which typically are not available to Raymond James retail customers. These services are generally available, without cost, to financial advisory firms who maintain a minimum threshold of client assets with Raymond James. Raymond James is recognized as a full-service registered broker-dealer and registered investment adviser. Our firm has no formal relationship with Raymond James for client referrals. However, we are expected to receive transition assistance in the form of a payment from Raymond James which is contingent on maintaining a certain dollar amount of our client assets at Raymond James. This economic benefit provides an incentive for us to recommend Raymond James as custodian.

Meadow Creek, in some instances, compensates third-party solicitors for client referrals. The solicitor's agreements entered into by Meadow Creek comply with Rule 206(4)-3 under the Investment Advisers Act of 1940. Solicitor agreements may be initiated, or existing ones terminated at any time. Compensation will be based on a percent of referred clients' account value managed by Meadow Creek. Such fees are paid pursuant to a written agreement between Meadow Creek and the solicitor. A client who is solicited will receive an additional disclosure document specifically describing the arrangement and the compensation paid to the solicitor. Solicitor's fees will be based on Meadow Creek's normal fee schedule; clients will not be charged any additional fees or expenses as a result of the referral.

#### **Item 15 – Custody**

Meadow Creek has constructive custody of client funds and securities due to the fact that we have the ability to deduct advisory fees from accounts. In accordance with custody rules, we will ensure that a qualified custodian maintains the account and that clients receive a quarterly account statement from the qualified custodian.

Clients will receive statements at least quarterly from Raymond James or other selected qualified custodian that holds and maintains client's investment assets. Meadow Creek urges clients to carefully review such statements and compare the official custodial records to the account statements that we provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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

Meadow Creek may act in a discretionary or non-discretionary capacity. If discretionary authority is granted to select the identity and amount of securities to be bought or sold, clients must authorize such discretion in writing in the advisory agreement. In all cases, 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, Meadow Creek observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Meadow Creek in writing.

Meadow Creek may recommend third party investment managers. When acting in a discretionary capacity, the firm has the ability to evaluate managers and switch money managers or reallocate assets among managers without consulting the client. When acting in a non-discretionary capacity, the Advisor will make recommendations, but only the client has the authority to hire or switch money managers or reallocate assets between programs. In all cases, the Advisor will monitor performance of the third-party investment manager and will make recommendations consistent with the client's investment objectives and risk tolerance.

#### **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.

Clients can authorize investment managers to vote proxy requests on their behalf in their client agreements. Please refer to the respective investment manager's Form ADV for a full disclosure of its proxy voting policies and procedures.



### **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.

### **Privacy Policy**

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 non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public 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 non-public 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 process a transaction, at your request, or required by law.

If the representative servicing your account leaves us to join another firm, he/she is permitted to retain copies of your information so that he or she can assist with the transfer of your account and continue to serve you at their new firm. Such information includes client name, address, phone number, email address, and account title of the clients that they serviced while at Meadow Creek.

"Opting-out" of Third-Party Disclosures: If you do not want your account representative to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact our Compliance Department by calling (470) 359-9270.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.