



ADV PART 2A BROCHURE

SUNLIGHT PEAKS FINANCIAL PEAKS, LLC

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This Brochure provides information about the qualifications and business practices of Sunlight Peaks Financial Peaks, LLC. If you have any questions about the contents of this Brochure, please contact us at (866) 210-0158. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority. Registration of an Investment Adviser does not imply a certain level of skill or training.

Additional information about Sunlight Peaks is available on the SEC's website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser with the SEC.

Item 2. Material Changes

The purpose of this Item 2 is to disclose material changes that have been made to this Brochure since the last annual update of this Brochure. This is an annual update. There have been no material amendments since the last update filed on February 25, 2022.

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Item 4. Advisory Business

Sunlight Peaks Financial Partners (“Sunlight Peaks” or the “firm”) has been in business since 2021. Heritage Management Group, LLC, maintains 100% ownership of Sunlight Peaks; Ryan Parson is the sole owner of Heritage Capital USA, Inc., which owns and operates Heritage Management Group, LLC.

Investment Management

We provide investment consulting, investment sourcing, and investment research. We discuss each client’s financial situation, objectives and needs, and tailor our services to the individual situation and needs of the client. When providing investment management services and advice on portfolio design we identify suitable investments for the client’s portfolio and make recommendations. We assist with the completion of purchases of private investments, ongoing investment monitoring, management and administration, and advice relating to redemptions/liquidation of private investments. Private investments include alternative investments, such as pooled, privately-placed securities such as a private equity fund, a private debt fund, a private real estate fund, or a fund-of-funds managed by a private investment manager or other private placement including equity, credit, or real estate investments. These services are typically offered only to accredited and/or qualified investors. We also recommend the investment and reinvestment of the traditional investments. Traditional investments include stocks, bonds, commodities, mutual funds, and exchange-traded funds (“ETFs”).

Our services are offered on a non-discretionary basis. We do not enter transaction orders on behalf of clients. Upon your verbal or written authorization, we will communicate with issuers and/or sponsors of the private investment on your behalf.

Financial Planning Services

We may provide financial planning to clients. Financial planning services are offered on a comprehensive or on à la carte (limited focus) basis. Financial plans may encompass all or some of the following areas of financial concern to the client:

- Estate Planning
- Retirement Planning
- Education Planning
- Insurance Planning/Risk Management
- Investments
- Charitable Giving
- Asset Allocation Review and Recommendations

We obtain appropriate information from the client through personal interviews (including a discussion of current financial status, future goals and attitude towards risk) and reviews the documents and data supplied by the client. A written financial plan may be prepared and provided. The implementation of financial plan recommendations is entirely at the discretion of the client. Financial plans are not limited in any way to products or services provided by any particular company.

In performing these services, we are not required to verify any information received from the client or from the client’s other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. It is the client’s responsibility to promptly notify us of any change in the client’s

financial situation or investment objectives in order for the firm to adjust their services accordingly. Clients retain absolute discretion over all decisions regarding implementing any or all parts off the financial plan. Clients are under no obligation to act upon any of the recommendations made by firm under any non-discretionary engagement, financial planning or consulting engagement.

Investment Advice to Qualified Plans

We provide non-discretionary investment advisory services to qualified plans, including 401(k) Plans, in accordance with the Plan's investment policies and objectives. After review of the Plan's Investment Policy Statement, we assist the plan sponsor with the selection of a broad range of investment options consistent with ERISA section 404(c) and the regulations thereunder. In addition, we can monitor the funds selected and recommend replacements as appropriate, review and provide recommendations relating to the reasonableness of the fees paid to other providers.

The client retains the sole responsibility to provide all notices to participants required under ERISA section 404(c)(5). Sunlight Peaks does not provide investment advice to Plan participants unless they separately engage and become clients of the firm. We do not execute transactions at the participant level.

Assets Under Management

As of December 31, 2022, Sunlight Peaks had Regulatory Assets Under Management of \$44,386,115, all of which was managed on a non-discretionary basis.

Item 5. Fees and Compensation

Sunlight Peaks offers investment management and financial planning services on a fixed fee basis. Our annual fee for the services is based upon the size of the accounts to be managed, the complexity of the client's needs, and the level and scope of the overall services to be rendered. The fee to be charged will be stipulated within each client's agreement. Fees are negotiable at our sole discretion.

Fees are billed quarterly, in advance. The fee for the initial quarterly period will be prorated based on the opening date of the Account and number of days in the calendar quarter that services are to be provided. We may charge other clients different fees, which may be higher or lower than the fees charged with respect to your Accounts for similar services.

We will send you an invoice electronically. If you provide us with bank account information to pay our invoices, you are thereby authorizing the bank to charge your account for the amount of our fee, and to remit the fee payment to us in compliance with the bank's procedures and in accordance with regulatory requirements.

Clients may elect to provide bank account information, each billing period, in this instance we will automatically initiate an ACH transfer from the client's designated bank account in the amount of the fee. The fee charged will be reflected on your bank account statements. You can withdraw your authorization to charge fees directly to the bank account at any time by notifying us in writing. If your balance in the designated bank account is insufficient to pay any fees, costs or expenses, the client must pay the amount due promptly upon receipt of our invoice.

GENERAL INFORMATION ON ADVISORY SERVICES AND FEES

Fee Differentials. All fees are negotiable at the sole discretion of the firm. As a result, any client could pay fees that are higher or lower than the fees charged to other clients, based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall services to be rendered. Further, the services to be provided by Sunlight Peaks to any particular client could be available from other advisers at lower fees.

Additional Fees and Expenses. In addition to the investment management fee paid to the firm, clients also incur charges imposed by third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions. These additional charges include securities brokerage commissions, transaction fees, custodial fees, fees and expenses charged to owners of private investments, fees attributable to private investments, fees charged by investment managers, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The firm's brokerage practices are described in Item 12, below. Sunlight Peaks does not share in any of these third-party fees.

Use of Margin. Purchasing securities on margin amplifies potential returns and losses. Purchasing securities on margin can result in losses greater than a client's original principal. Clients and potential clients should carefully review disclosures regarding risks, fees, and other considerations appearing in margin account agreements prior to opening margin accounts. The firm charges a fixed investment management fee, therefore recommending that clients engage in margin transactions does not create a conflict of interest for the firm because there is no financial incentive. Nonetheless, we generally refrain from recommending that clients use margin, and we take steps to ensure that in the few instances when we recommend the use of margin, the recommendation is in the client's best interest.

Termination. All advisory agreements may be terminated in accordance with the written advisory agreement with the client. Upon termination, clients will receive refunds of any prepaid and unearned advisory fees (prorated for the balance of the billing period), or clients will be billed for any amount due. Any transactional or custodial charges levied by any custodian or third party after the termination of the advisory agreement will remain the client's responsibility and are not the responsibility of Sunlight Peaks. We have no obligation to refund these fees to clients.

Item 6. Performance-Based Fees and Side-by-Side Management

Sunlight Peaks does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7. Types of Clients

Sunlight Peaks offers services to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations and business entities and pension plans (401K plans).

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

The firm's representatives strive to learn the client's goals, risk tolerance and time horizon through an interview process. Based on the information obtained, the firm will recommend investment management strategies to help a client pursue its financial goals.

Our primary investment strategy is buy-and-hold investing using strategic asset allocation. This approach seeks to maximize gains while minimizing risk through the use of diversification of investments across a broad spectrum of traditional and alternative investments. Sunlight Peaks consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios.

We may provide investment advice regarding unaffiliated private investment funds. Sunlight Peaks, on a non-discretionary basis, may recommend that certain accredited and/or qualified clients consider an investment in unaffiliated private investment funds. Sunlight Peaks's role relative to the private investment funds is limited to its initial due diligence and investment monitoring services. Clients are under no obligation to consider or make an investment in a private investment fund(s). Private investment funds generally involve unique risks, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. Some private investment funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the certain private investment funds are not registered as investment companies, there is an absence of regulation.

Unlike other investments that a client may maintain, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund, and shall acknowledge and accept all risk factors that are associated with such an investment. If Sunlight Peaks references private investment funds owned by the client on any supplemental account reports prepared by Sunlight Peaks, the value(s) for all the private investment funds will reflect either the initial purchase and/or the most recent valuation provided by fund sponsor. If the valuation reflects the initial purchase price (and/or a value as of a previous date), the current value(s) (to the extent ascertainable) could be significantly more or less than the original purchase price.

Our portfolio recommendations are designed to target specific risk-adjusted returns, employing a liability-based approach. This methodology considers the risks of the specific goals of the portfolio in conjunction with the risks of the assets (represented primarily by liquidity and volatility) designed to meet those liabilities. Each investment is evaluated based on its expected date of liquidity, i.e., the date at which it can be reasonably expected to be converted to cash, and its volatility, i.e., the likelihood it can be converted to the expected level of cash on the date of liquidity. Liquidity is a function of the capital demand for an investment, its duration, and its legal transferability, among other factors.

Volatility is a function of the market's changing expectations of the investment's value. After evaluating the liquidity and volatility of the investment, it is assigned a risk factor ranging from low to high, with cash and short-term treasury notes reflecting the least risky assets and equity investments in individual companies with no operating history the most risky assets. After assessing the risk of each investment,

Sunlight Peaks designs and recommends a diversified portfolio that balances those risks within the specified risk tolerance for the portfolio.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear, including:

- *Interest-rate Risk:* Fluctuations in interest rates may 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 may 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.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *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. Many private investments are illiquid.
- *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 may result in bankruptcy and/or a declining market value.

Clients also face the risk that securities that we recommend may not perform as well as similar securities in the same industry or the stock/bond market in general. Different types of investments involve varying degrees of risk. Diversification and asset allocation do not guarantee profits or assure against loss. Past performance is never a guarantee of future results. No one should assume that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the firm) will be profitable or equal any specific performance level(s).

Client Obligations. In performing our services, we are not required to verify any information received from the client or from the client's other professionals, and we are expressly authorized to rely on that information. It is the client's responsibility to notify us promptly of any change in the client's financial situation or investment objectives. If the client does not provide this notice or information, we will not

be in a position to perform an accurate review, evaluation or revision of our previous recommendations and/or services.

Non-Discretionary Service Limitations. Sunlight Peaks provides portfolio management services on a non-discretionary basis, meaning that the firm is not authorized to make transactions on the client's behalf in the client's account. Clients are responsible for entering their own transaction orders in their accounts.

Item 9. Disciplinary Information

This item requires investment advisers to disclose any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management. Sunlight Peaks has no information applicable to this item.

Item 10. Other Financial Industry Activities and Affiliations

Sunlight Peaks is not affiliated with any other financial services firm. Neither Sunlight Peaks nor any of its representatives receive a commission or other form of compensation in connection with any recommendations made to clients.

Item 11. Code of Ethics

Sunlight Peaks has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its supervised persons. The Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its supervised persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain firm personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). The firm's supervised persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the firm's policies and procedures. This includes purchases and sales in the supervised persons' names as well as through collective vehicles. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of those securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the firm is considering a transaction in any security on behalf of a client, no supervised person with access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless the transaction has been completed or the firm is no longer considering the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by money market funds; and, iv) shares issued by other unaffiliated open-end mutual funds.

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the firm's Chief Compliance Officer.

Item 12. Brokerage Practices

Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We do not recommend any specific qualified custodian to clients. Clients are responsible for selecting their own custodians to provide clearing, custody and brokerage services. We do not open accounts for clients. Clients are responsible for opening accounts directly with the qualified custodian(s) that they select. The qualified custodian will hold your assets in a brokerage account and buy and sell securities when you instruct them to.

Item 13. Review of Accounts

We monitor client portfolios on an ongoing basis. Sunlight Peaks offers each client a review meeting (in person, by videoconference or by telephone) at least annually. Additional reviews may be triggered by client request, or by material market, economic or political events, or by changes in the client's financial circumstances (such as retirement, termination of employment, physical move, or inheritance). All investment advisory clients are encouraged to discuss their needs, goals and objectives with Sunlight Peaks and to keep the firm informed of any changes.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the financial institutions where their assets are held in custody. Clients are urged to compare the account statements they receive from their custodian with any documents or reports they receive from Sunlight Peaks or an outside service provider, and to report any discrepancy to Sunlight Peaks and to the custodian promptly.

Item 14. Client Referrals and Other Compensation

Sunlight Peaks does not compensate any person who is not its supervised person for client referrals.

Item 15. Custody

Sunlight Peaks does not have actual custody of any client assets or accounts. The firm is deemed to have custody to the extent that it has authority to deduct its advisory fees directly from the client's accounts. Clients will receive account statements directly from the qualified custodian. Clients should carefully review those statements promptly when you receive them. The custodians' statements are the official record of the client's holdings.

Item 16. Investment Discretion

Sunlight Peaks's services are offered only on a non-discretionary basis.

Item 17. Voting Client Securities

Sunlight Peaks does not have and will not accept authority to vote client securities. Clients will receive proxies and other solicitations directly from your custodian. If clients have questions about a particular solicitation, they may contact us via email or telephone.

Item 18. Financial Information

In this Item, we are required to disclose that we are unaware of any financial condition that impairs the firm's ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy proceedings. Additionally, the firm is not required to include a balance sheet for our most recent year end, because the firm does not require or solicit more than \$1,200 in fees per client, six months or more in advance.