

## **PEAK WEALTH SOLUTIONS**

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March 1<sup>st</sup>, 2023

This brochure provides information about the qualifications and business practices of Peak Wealth Solutions. If you have any questions about the contents of this brochure, please contact us at the numbers above. 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 with the SEC does not imply a certain level of skill of training.

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

## **ITEM 2 MATERIAL CHANGES**

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Item 4 was updated to reflect

- Assets Under Management (AUM) has been updated as of December 31<sup>st</sup>, 2022

Other items within this Brochure have been adjusted to reflect these changes.

The material changes discussed above are only those changes that have been made to this brochure since the Firm's last annual update of the brochure. The date of the last annual update of the brochure was March 15, 2022

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## **ITEM 4 ADVISORY BUSINESS**

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### **Background of Peak Wealth Solutions**

Peak Wealth Solutions, Inc. (“Peak” or “Firm” or “Advisor”), is a registered investment advisory firm based in Pepper Pike, Ohio. Peak is registered with the United States Securities and Exchange Commission (SEC) under the Investment Advisers Act of 1940, and has been registered as such since 2003.

The Firm’s owners are Gregory M. Gromek, Managing Principal, Financial Advisor and Chief Compliance Officer and David P. Kocsis, Managing Principal, Retirement Plan Consultant.

Gary Hannah, Bill Russo, Keith Witkowski, Jeffrey Mucciarone, Dan Margheret and Daniel Vujanov are Financial Advisors. The Firm has an internal succession plan to support long-term continuity of the business, and to attract and retain key employees.

### **Advisory Services Offered**

- Financial Planning
- Investment Management
- Insurance Services
- Financial Education to individuals and other entities throughout the country
- Retirement Plan Consulting

We do not provide advisory services to wrap fee programs.

### **FIDUCIARY DUTY**

Investment advisors registered with the SEC or a state securities regulator are fiduciaries, subject to the duty of loyalty and due care with their clients. They are typically compensated by asset management fees and are expected to act in the best interests of their clients.

A fiduciary must act in the best interests of a client. A fiduciary is an individual who acts in the interest of another person or an organization. A fiduciary may be an agent, a broker, an attorney or a legal guardian who has a responsibility to supervise matters on behalf of someone else.

A fiduciary duty is the highest standard of care. The person who has a fiduciary duty is called the fiduciary, and the person to whom he owes the duty, is typically referred to as the principal or the beneficiary. As a result, potential beneficiaries can have greater confidence in seeking out a fiduciary.

### **FINANCIAL PLANNING**

We offer broad based consultative financial planning services. Financial plans are prepared based on the information you provide; and since your circumstances are constantly changing, your plan is regularly updated.

The planning process occurs over a number of meetings, and begins with an initial consultation in which we meet with you to discuss your financial situation, goals, and concerns. Our plans cover a number of topic areas including retirement planning, estate planning, education planning,

income tax planning, and cash flow planning. We also complete a comprehensive risk assessment and insurance needs analysis covering life, disability, and long-term care planning.

If you choose to retain our Firm for these services, you have the option to implement the recommendations set forth in your financial plan through our Firm.

Everyone who goes through the financial planning process with our Firm enters into a financial planning agreement which states the terms, conditions, and scope of our relationship. A modest initial planning fee is quoted based on expected staff preparation time and the complexity of your case. Clients wishing to use our Firm for investment management purposes do not pay for future and ongoing planning.

Clients who would like to retain our Firm for financial planning services, but not investment management services, will be charged hourly fees not to exceed \$1,000 per hour. The fees are negotiable, and will vary depending on the complexity and depth of the services provided. Under this arrangement, our Firm is under no obligation to update or monitor your financial plan, including your investment and insurance portfolios.

The financial plan is based upon your financial situation and the information you provide to us at the time we prepare the plan. It is important that you notify us promptly if your financial situation, goals, objectives, or needs change.

### **INVESTMENT MANAGEMENT**

We design investment plans that help grow and protect your wealth. By engaging you in a comprehensive financial planning process, we are better positioned to implement investment strategies that serve your long-term growth and spending needs. We believe in full transparency of transactions and investment holdings, and use individually managed accounts to provide you with flexibility and added security. By partnering with Fidelity Investments, we are able to offer a full menu of investment offerings, with the added comfort of some of the most trusted custodians in the industry.

All investment decisions are guided by your individual risk tolerance and financial goals, and management of your accounts will be done on a discretionary basis. This means that you are authorizing us to make investment decisions in your individually managed account without obtaining your approval prior to each transaction. Under this authority, we have a fiduciary duty to put your interests above all others. This discretionary authority will enable us to maneuver your portfolio quickly to ever changing market conditions.

We manage investment accounts using one or more variations of our three (3) distinct global asset allocation strategies:

- Enhanced Global Index
- Strategic Allocation
- Tactical Management

These models are comprised of combinations of investment products which include: no-load open-ended investment company shares ("mutual funds"), exchange traded funds ("ETF's"), fixed-income securities, and individual equities. Investments are selected based on past performance, manager tenure, portfolio turnover, fees, investment style, investment philosophy and objective; and a variety of investment related statistics including alpha, beta, standard deviation, and R-squared. Our Active Tactical strategy selects investments based, not only on the above criteria, but also uses price momentum, moving averages, and trading volume to identify security price trends.

Our investment strategies are based on over forty (40) years of academic research that asset allocation is the primary driver of investment returns, not market timing or security selection. We believe that markets are primarily efficient, and for investing purposes, securities are fairly priced. Asset allocation, broad global diversification, and an unemotional approach to strategic rebalancing ultimately reduce portfolio risk. All investments carry risk; and generally the riskier the investment, the greater the potential return. Even investments that are perceived to be safe carry risk. For example, returns on certificates of deposit may not be able to protect against the impact of inflation and taxes, thus a loss in purchasing power occurs.

If you wish to impose certain restrictions on investing in a certain security, or types of securities, we will address those restrictions with you so that we have a clear understanding of your requirements. However, we reserve the right to reject any account for which unreasonable or overly restrictive conditions are requested. It is our preference for you to use a combination of our various investment models.

By entering into an investment advisory relationship with our Firm, you must agree to the terms of our “Discretionary Accounts Advisory Agreement.” This agreement sets forth the terms for managing your accounts, and may be canceled for any reason, at any time, by either party, upon receiving 30 days’ notice. Upon termination of an account’s advisory agreement, any prepaid, unearned fees will be reimbursed, and any earned, unpaid fees will be due and payable. Additionally all trading activity will stop. You have the sole right to terminate your advisory agreement without penalty, within five business days.

### **INSURANCE SERVICES**

As part of our Firm’s overall financial planning services, an advisor may recommend changes to your life, health, disability, or long-term care insurance coverage. You have the option to implement the insurance advice by purchasing a policy through our insurance agency.

Through our insurance agency, we have access to a wide range of insurance carriers. When acting in the capacity of an insurance agent, the advisor may receive a normal and customary commission for the sale of such insurance products. In such instances, there is no advisory fee associated with these insurance products.

### **FINANCIAL EDUCATION**

Our Firm has long been committed to financial education and financial literacy. Because of this commitment, we regularly hold financial education programs. These educational programs are held periodically throughout the year, and address a wide range of financial topics. Such topics include:

- |                                    |                   |
|------------------------------------|-------------------|
| • Life Planning For Retirement     | • Investments     |
| • Determining Retirement Expenses  | • Taxes           |
| • Overcoming Retirement Roadblocks | • Risk Management |
| • Retirement Income Sources        | • Estate Planning |

Our programs are educational in nature, and do not discuss any particular investment or product offering. Attendees are charged a fee to attend, which covers the cost of class materials and expenses.

**RETIREMENT PLAN CONSULTING SERVICES**

The Firm may assist clients that are trustees, plan sponsors or other fiduciaries to qualified retirement plans (“Plans”) by providing fee-based consulting and/or advisory services. The Firm advisors perform one or more of the following services, as selected by the client in the client agreement:

**Investment Policy Statement:** Advisor will assist the Plan in the preparation or review of an investment policy statement (“IPS”) for the Plan based upon consultation with Client.

**Ongoing Investment Recommendations:** Advisor will recommend, for consideration and selection by Client, specific investments to be held by the Plan or, in the case of a participant- directed defined contribution plan, to be made available as investment options under the Plan. Advisor will recommend, for consideration and selection by Client, investment replacements if an existing investment is determined by the Client to no longer be suitable as an investment option.

**Ongoing Investment Monitoring:** Advisor will perform ongoing monitoring of investments options in relation to the criteria provided by the Client to the Advisor.

**Qualified Default Investment Alternative Assistance:** Advisor may assist Client with selecting investment products or managed accounts offered by third parties in connection with the definition of a “Qualified Default Investment Alternative” (“QDIA”) under ERISA (for plans subject to ERISA).

**Non-Discretionary Model Portfolios:** Advisor will recommend, for consideration and approval by Client, (i) asset allocation target- date or risk- based model portfolios for the Plan to make available to Plan participants, and (ii) funds from the line-up of investment options chosen by the Client to include in such model portfolios.

**Performance Reports:** Advisor will prepare periodic reports reviewing the performance of all Plan investment options, as well as comparing the performance thereof to benchmarks with Client. The information used to generate the reports will be derived directly from information such as statements provided by Client, investment providers and/or third parties.

**Service Provider Liaison:** Advisor shall assist the Plan by acting as a liaison between the Plan and service providers, product sponsors and/or vendors. In such case, Advisor shall act only in accordance with instructions from the Client on investment or Plan administration matters and shall not exercise judgment or discretion.

**Education Services to Plan Committee:** Advisor will provide education, training, and/or guidance for the members of the Plan Committee with regard to plan features, retirement matters, or duties and responsibilities of the Committee, including education with respect to fiduciary responsibilities.

**Participant Enrollment:** Advisor will assist Client in enrolling Plan participants in the Plan, including conducting an agreed upon number of enrollment meetings. As part of such meetings, Advisor will provide participants with information about the Plan, which may include information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of preretirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.

**Participant Education:** Advisor will assist with participant education, which may include preparation of education materials and/or conducting investment education seminars and meetings for Plan participants. Such meetings may be on a group or individual basis, and may include information about the investment options under the Plan (e.g., investment objectives, risk/return characteristics, and historical performance), investment concepts (e.g., diversification, asset classes, and risk and return), and

how to determine investment time horizons and assess risk tolerance. Such meetings shall not include specific investment advice about investment options under the Plan as being appropriate for a particular participant, but may include use of educational investment models.

Plan Search Support/Vendor Analysis: Advisor will assist with the preparation, distribution and evaluation of Request for Proposals, finalist interviews, and conversion support.

Benchmarking Services: Advisor will provide the Client with comparisons of Plan data (e.g., regarding fees, services, participant enrollment and contributions) and data from the Plan's prior years and/or a benchmark group of similar plans.

Assistance Identifying Plan Fees: Advisor will assist Client in identifying the fees and other costs borne by the Plan for, as specified by client, investment management, recordkeeping, participant education, participant communication and/or other services provided with respect to the Plan.

Advisor may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Adviser and Client.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, advisors do not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if participants in the Plan may invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or may obtain participant loans, representatives do not provide any individualized advice or recommendations to the participants regarding these decisions. Furthermore, advisors do not provide individualized investment advice to Plan participants regarding their Plan asset.

If a client elects to engage our Firm and its advisors to perform ongoing investment monitoring and ongoing investment recommendation services in the client agreement, such services will constitute "investment advice" under Section 3(21)(A)(ii) of ERISA. Therefore, our Firm and its advisors will be deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of ERISA in connection with those services. Clients should understand that to the extent our Firm and its advisors are engaged to perform services other than ongoing investment monitoring and recommendations, those services are not "investment advice" under ERISA and therefore, our Firm and its advisors will not be a "fiduciary" under ERISA with respect to those other services.

## Assets Under Management

As of December 31<sup>st</sup>, 2022 the Firm has the following client assets under management:

Discretionary	\$454,962,000
Non-Discretionary	\$96,000,000
FINRA Regulated	\$135,000,000
<b>Total Assets</b>	<b>\$685,962,000</b>



## **ITEM 5 FEES AND COMPENSATION**

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### **Investment Management Fees**

Pursuant to our Firm's investment advisory agreement, you will be charged a fee that is based on a percentage of assets under management. This fee ranges from 0.35% to 1.50% of assets under management, and are based on several factors such as the nature of the assets, the services provided, and the amount of assets being managed. The fee schedule under which your account is charged is contained as part of your Investment Advisory Agreement. Generally, the percentage fee decreases as the amount of assets under management increases. The minimum household account size is \$400,000. We may waive this minimum under limited circumstances. Management reserves the right to apply discounts under special circumstances.

We may allow accounts from the same household to be grouped to meet fee breakpoints. For example, accounts may be grouped for clients and their children, for spouses that have individual and joint accounts, or for similarly related accounts.

We are authorized to deduct the advisory fee directly from your account(s) under the "Discretionary Accounts Advisory Agreement"; the related fee is disclosed in "Schedule A" of the agreement." Your account(s) will be directly debited, as authorized, at the beginning of each calendar quarter, based upon the value of the account on the last business day of the previous quarter. The fee will be pro-rated based on the number of days the account is open during the period. The account custodian will send you statements monthly showing all payouts from the account, including the advisory fee.

Fees that you pay our firm for investment management services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (as described in each fund's prospectus) to their shareholders. These could include 12b-1 fees, surrender charges, variable annuity fees, and qualified retirement plan fees. Brokerage fees will be billed to you directly from the custodian.

### **Security Commission Transactions**

If you desire, you may engage certain Firm advisors as a registered representative of American Portfolios Financial Services (APFS), a FINRA member broker-dealer, to implement investment recommendations on a commission basis. In the event a client chooses to purchase products through APFS, a commission and/or servicing fee will be charged.

By having a relationship with a FINRA member broker-dealer, such as APFS, our Firm has the ability to service certain investment products that were purchased through other financial professionals. This allows us to be more holistic in nature, and put us in a better position to advise you on your total financial picture.

Whenever a commission based product is sold under a broker-dealer relationship, a conflict of interest exists. This conflict of interest exists because a broker might have an incentive to recommend one product over another simply because it has a higher commission. It is for this reason that we prefer you to engage our Firm in an investment advisory capacity where these traditional, broker-dealer based, conflicts of interest do not exist.

## Retirement Plan Consulting Fees

Retirement Plan Consulting Fees may be based on a percentage of the assets held in the Plan (up to 1.00% annually), on an hourly basis (up to \$600 per hour), or on a flat rate basis, as negotiated between the Plan and the advisor. Fees will be payable to our Firm in advance or in arrears on the frequency (e.g., quarterly, monthly, etc.) agreed upon among the client, our Firm, and the advisor. If asset based fees are negotiated, payment generally will be based on the value of the Plan assets as of the close of business on the last business day of the period as valued by the custodian of the assets. However, if the fee is paid by the Plan or the client through a third party service provider, such fee will be calculated as determined by the provider. If the fee is paid prior to the services being provided, the Plan will be entitled to a prorated refund of any prepaid fees for services not received upon termination of the client agreement. There may also be a one-time installation fee for the implementation or transition of service providers/new platform. The first year fee is intended to cover the additional services (fund selection/mapping, enrollment, additional education to committee members and participants, etc.) that the Advisor may provide as a result of the implementation or transition and is in addition to the annual fees selected. The installation fee will vary on the requirements of the implementation or transition, but will not exceed \$25,000. The installation fee is negotiable at the discretion of the Advisor.

Clients may incur fees and charges imposed by third parties other than our Firm and its advisors in connection with operating the Plan. These third party fees can include fund or annuity subaccount management fees, 12b-1 fees and administrative servicing fees, plan recordkeeping and other service provider fees. Further information regarding charges and fees assessed by a fund or annuity are available in the appropriate prospectus.

If a client engages our Firm to provide ongoing investment recommendations to the Plan regarding the investment options (e.g., mutual funds, collective investment funds) to be made available to Plan participants, clients should understand that there generally will be two layers of fees with respect to such assets.

The Plan will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. The client also will pay our Firm a fee for the investment recommendation services. Therefore, clients could generally avoid the second layer of fees by not using the advisory services of our Firm and by making their own decisions regarding the investment.

If a Plan makes available a variable annuity as an investment option, there is mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor. If a Plan makes available a pooled guaranteed investment contract (GIC) fund, there are investment management and administrative fees associated with the pooled GIC fund. As part of its services, our Firm and its advisors may recommend a mutual fund that pays asset based sales charges or service fees (e.g., 12b-1 fees) to our Firm's advisors as registered representatives of a broker-dealer to the Plan. The receipt of 12b-1 fees presents a conflict of interest because it gives our Firm and its advisors an incentive to recommend mutual funds based on the compensation received rather than on a client's needs. Our Firm addresses this conflict by using 12b-1 fees paid by product sponsors to our Firm and its advisors as registered representatives of a broker-dealer to the Plan to offset advisory fees.

Clients should understand that the fee that a client negotiates with an advisor may be higher than the fees charged by other investment advisors or consultants for similar services. This is the case, in particular, if the fee is at or near the maximum fees set out above. The advisor is

responsible for determining the fee to charge each client based on factors such as total amount of assets involved in the relationship, the complexity of the services, and the number and range of supplementary advisory and client-related services to be provided. Clients should consider the level and complexity of the consulting and/or advisory services to be provided when negotiating the fee with representative.

Clients pay the fee by check made payable to our Firm. In the alternative, clients also may instruct a Plan's service provider or custodian to calculate and debit the fee from the Plan's account at the custodian and pay such fee to Firm.

### **Financial Planning Fees**

Our Firm may charge a one-time initial fee ranging from \$350 to \$5,000 for financial plan development and presentation. By paying this fee, you are under no obligation to implement the plan with our Firm. The financial planning fee may be waived at the discretion of the advisor.

If you establish an investment advisory relationship with us, you will not pay for future and ongoing planning. If you would like to retain our Firm for financial planning services, but not investment management services, you will be charged an hourly fee not to exceed \$1,000 per hour for ongoing planning. This fee is negotiable, and will vary depending on the complexity and depth of the services provided. Under this arrangement, Firm is under no obligation to update or monitor your financial plan, including your investment and insurance portfolios.

### **Educational Classes Fees**

Our retirement planning programs are offered to the public. A fee is charged for attending the program.

## **ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

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We do not charge or receive performance-based fees. Performance-based fees are fees that are based on a share of capital gains or the capital appreciation of your assets. We do not engage in side-by-side management situations where a combination of asset based and performance-based fees are collected.

## **ITEM 7 TYPES OF CLIENTS**

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We provide financial planning, investment advisory services, and retirement plan consulting services to individuals, trusts, estates, charitable organizations, pension and profit sharing plans, and small businesses. Our primary focus is on serving clients who are near or in retirement, to ensure that proper planning and investment practices are implemented and managed throughout the remainder of their retirement years.

We recommend a minimum investment of \$400,000 for investment management services. Related household accounts may be combined to reach this minimum. Occasionally we allow exceptions to this requirement. All investment management clients must complete and sign our “Discretionary Accounts Advisory Agreement.”

## **ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

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We believe that in order to succeed at investing, you must separate your emotions from investment decisions. Successful investing requires discipline and focus, and by taking a longer-term view and sticking to an investment plan, the investment outcome is biased in your favor.

Emotional investing typically results in poor investment returns. Your emotions can cause you to sell at market bottoms (causing you to miss market rebounds), and take excess risk at market tops (by chasing returns). By using a combination of our various investment strategies, we can help keep your emotions in check, thereby increasing your chances of investing success.

### **Methods of Analysis and Investment Selection**

Investments for our Firm’s various global asset allocation strategies are comprised of combinations of investment products which include: no-load open-ended mutual funds, exchange traded funds (ETF’s), fixed income securities, and individual equities. These investments are selected based on past performance, manager tenure, portfolio turnover, fees, investment style, investment philosophy and objective; and a variety of investment related statistics including alpha, beta, standard deviation, and R-squared. Our Active Tactical strategy selects investments based, not only on the above criteria, but also uses price momentum, moving averages, and trading volume to identify security price trends.

### **Investment Strategies**

#### **ENHANCED GLOBAL INDEX**

Our Enhanced Global Index strategy consists of risk adjusted models, comprised of low cost institutional indexed mutual funds, and follows an investment process and philosophy based on Nobel Prize winning investment theories.

Unlike traditional index funds, these particular mutual funds do not engage in the process of sampling when selecting stocks to own inside their funds. In other words, these funds try to own all of the stocks in a particular asset class, therefore eliminating the risk associated with both sampling and security selection.

Rebalancing is an integral part of portfolio management. This strategy systematically rebalances the portfolio back to its target allocation as market conditions warrant.

### **STRATEGIC ALLOCATIONS**

Our Strategic Allocation strategy involves risk adjusted portfolios consisting of mutual funds and Exchange Traded Funds (ETFs). The equity allocation seeks to provide long-term growth. The fixed income allocations seek stability and income.

Some models are assisted by independent research firms providing research analytics and filtering of funds to narrow down the field of available investment managers to be included in the allocation portfolios. Chosen investments are subjected to ongoing review and monitoring.

### **TACTICAL MANAGEMENT**

Tactical Management strategy is an actively managed portfolio consisting of mutual funds and ETF's (exchange traded funds) and individual equities designed to mimic broad market indices. Within the portfolio, investments are bought and sold based on a statistical analysis of recent price movements. Asset preservation for future growth is the primary goal of this strategy.

Since this model is tactical in nature, it can deviate from its target allocation, within a specified range, and increase or decrease exposure to equity positions based on market conditions. This strategy may hold significant amounts of cash or cash equivalents (up to 100%) in negative markets and may be fully invested in equities (up to 100%) in positive markets.

## **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

Some examples of risks you might face consist of:

- **Market Risk** – Economic, political, and issuer-specific events will cause the value of securities to rise and fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money, and your investment may be worth less upon liquidation.
- **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.
- **Reinvestment Risk** – This is the risk that future proceeds from investments may have to be invested at potentially lower rates of return.
- **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** – International investments are subject to fluctuations in the value of the dollar against the currency of the investments originating country. This is also referred to as “exchange rate risk.”

## **ITEM 9 DISCIPLINARY INFORMATION**

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Registered investment advisors are required to disclose all legal or disciplinary events that are material in your evaluation of our Firm and the integrity of our Firm's management. Neither our Firm, nor any member of its management team, have had any legal or disciplinary events, currently or in the past.

## **ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

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### **Broker-Dealer Services**

Our Firm's investment advisors are also registered representatives with American Portfolios Financial Services (APFS), a FINRA registered broker-dealer. When acting in the capacity of a registered representative, Our Firm advisors may receive a commission and/or servicing fee as a result of the purchase or sale of such securities.

By maintaining a relationship with a FINRA member broker-dealer, such as APFS, our Firm has the ability to service certain investment products that were purchased through other financial professionals. This allows us to be more holistic in nature, and put us in a better position to advise you on your total financial picture.

Neither our Firm, nor any member of its management team, are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Insurance Services**

In addition to its Investment Advisory business, our Firm is also a licensed insurance agency with the State of Ohio. Our Firm, and its agents, may offer insurance products and receive a commission on the sale of these products.

Clients are not obligated to use our Firm for insurance products services. However, in such instances, there is no advisory fee associated with these insurance products.

### **Conflicts of Interest**

Whenever a commission based product is sold, under either a broker-dealer or insurance agent relationship, a conflict of interest exists. This conflict may exist as a broker or agent might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

## **ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING**

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### **Code of Ethics**

Our Firm has adopted a code of ethics that is designed to ensure that all employees adhere to the highest standards of ethical conduct. Our goal is to protect your interests at all times, and to demonstrate our commitment to our fiduciary duties of honesty, good faith and fair dealing with you. This code of ethics also states that employees should avoid any practice that creates, or appears to create, a material conflict of interest that could potentially harm any client.

Our code of ethics sets forth the basic policies of ethical conduct for all managers, officers, and employees. In addition, this Code of Ethics governs personal trading by each employee, and is intended to ensure that securities transactions effected by employees are conducted in a manner that avoids any conflict of interest. Our Firm collects and maintains records of securities holdings and securities transactions effected by employees. These records are reviewed to identify and resolve any potential conflicts of interest.

We also maintain a privacy policy that is designed to prevent the misuse or dissemination of information about you, and/or your accounts and holdings, by persons associated with our Firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

### **Participation or Interest in Client Transactions and Personal Trading**

Our Firm, or persons associated with our Firm, may buy or sell securities, or hold positions identical to clients. It is our policy that no associated person will put his or her interest before a client's interest. Associated persons may not trade ahead of any client, and cannot trade for a price better than a client would obtain. It is the associated person's responsibility to know which securities we are trading. Associated persons can consult with the Chief Compliance Officer (CCO) to decide whether a security is an acceptable purchase or sale.

Associated persons may not invest in an initial public offering (IPO) for their own accounts, or those of related household members. Associated persons are required to obtain approval from the CCO prior to investing in a private placement or other limited offering.

We do not allow market timing.

### **Insider Trading Policy**

Our Firm and its employees may, from time to time, come into possession of material non-public or other confidential information. This information, if disclosed, might affect an investor's decision to buy, sell, or hold a security. Under applicable law, our Firm and its employees are prohibited from improperly disclosing or using such information for their personal benefit, or the benefit of any other person, regardless of whether such person is a Firm client. If such persons come into contact with material nonpublic or other confidential information with respect to any company, they are prohibited from communicating this information to, or using this information for the benefit of their clients, and have no obligation or responsibility to disclose this

information to, nor the responsibility to use this information for the benefit of their clients when following the policies and procedures designed to comply with the law.

Any employee who fails to observe the above referenced policy risks serious sanctions, including personal liability, termination of employment, and suspension or revocation of security licenses.

## **ITEM 12 BROKERAGE PRACTICES**

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### **Custodian/Brokerage Selection**

When you establish an investment management/advisory relationship with our Firm, you must consent to using one of our qualified custodians/clearing firms. We have selected the following unaffiliated custodian/broker-dealers, whom are members of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC), to execute transactions, and to provide custody services for your account(s):

- Fidelity Institutional Wealth Services (As cleared through National Financial Services LLC.)

This custodian/broker-dealer provides services to our Firm that include custody of client securities, trade execution and clearing, and settlement of transactions. They also provide services that are typically available to institutional investment managers that are generally not available to retail investors. Such services include providing client statements and trade confirmations, access to block trading (which allows multiple orders in a security to be combined into one order to provide identical pricing for when more than one client or account is participating in a securities transactions), the ability to deduct advisory fees directly from client accounts, and access to mutual funds and ETF's with no transaction fees.

In selecting custodial/broker-dealers firms, we evaluate the services offered, the quality of those services offered, and the cost incurred by clients, to determine which custodian provides the best overall quality of service, for the best overall price.

Our Firm does not have an agreement to receive client referrals from any custodian/broker-dealer or third party.

### **SOFT DOLLAR ARRANGEMENTS**

Although we make every effort to avoid unnecessary fees in your account(s), occasionally a security transaction that we place inside your account(s) will incur a transaction charge. These charges range from \$0.00 for exchange traded securities, up to \$45.00 for certain mutual funds. In addition, there may be a short-term trading fee imposed by some fund companies if a fund is sold within a stated period of initial purchase. Some of these fees come back to our Firm in the form of "soft dollars", which in turn we use to pay for research and other investment management expenses. These "soft dollars," if not received by our Firm, would go directly to the custodian.

Since we use mostly no transaction fee funds and ETF's in our investment strategies, the "soft dollars" we receive are de minimis in nature. Receiving these soft dollars poses a conflict of interest by creating an incentive to use transaction fee funds over no transaction fee funds. Since transaction fees negatively impact investment performance, we try to avoid incurring these charges in your account(s).



## **Investment Allocation and Trade Aggregation Policy**

Our investment allocation and trade aggregation policy pertains to block orders. Block orders are a form of grouping or bunching, in which all accounts participating in a trade receive identical pricing. This bunching technique is appropriate to ensure fair and equitable treatment of all orders, and best execution.

It is our policy that all block orders are allocated to all participating accounts in a fair and equitable manner. There is no preferential treatment given to any particular client or account. Block orders are only applicable to exchange traded securities such as, individual fixed income securities (bonds), shares of publicly traded corporations (stocks), exchange traded funds (ETF's), closed end funds, and unit investment trusts. Block orders do not pertain to mutual funds, as each trade receives the same price at the close of trading.

## **ITEM 13 REVIEW OF ACCOUNTS**

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Accounts invested in our Firm's various investment strategies are monitored on an on-going basis, and are rebalanced based on market, or other conditions, as warranted. Accounts are reviewed by Gregory M. Gromek, Financial Advisor and Chief Compliance Officer, David P. Kocsis, Retirement Plan Consultant, Gary Hannah, Financial Advisor, Keith Witkowski, Financial Advisor and Jeffrey Mucciarone, Financial Advisor. Securities for accounts are bought or sold by The Firm subject to our limited discretionary authority. All investment strategies and securities are monitored and reviewed periodically by the Firm.

All brokerage accounts at American Portfolios Financial Services (APFS), our broker-dealer, are monitored periodically where consistent with our Firm's financial plan and client instructions.

Periodically, your financial advisor will have a conversation with you to update your financial and personal information. Your advisor will also determine what changes, if any, are needed to meet your needs, and to assess the suitability of current investment recommendations. Reviews may also be conducted at your request, and are encouraged and welcomed.

You will receive monthly statements and transaction confirmations for security portfolios managed by our Firm, directly from the custodian. Additionally, we will furnish you with an online performance reporting program, which provides you with access to numerous reports regarding the performance and transaction history of your accounts. If you do not have internet access, we will provide you with these reports at your request. These reports are prepared by an independent third party. They receive all data feeds directly from account custodians.

## **ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

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### **Client Referrals**

Our Firm does not currently receive any client referrals from third party investment advisors or custodians.

### **Additional Compensation**

Associated persons, if properly registered, may also receive compensation from transactional based business in the form of "commissions." Transaction based compensation is separate and

distinct from any other fees we receive from our investment advisory services. Commissions are normally received as a result of the sale of securities or other investment products such as mutual funds and insurance policies.

Commissions from the sale of non-advisory investments may provide an advisor with an incentive to recommend these investment products based on the compensation they will receive from selling such products. This could result in a potential conflict of interest. However, we do not allow advisors to earn commissions on the products that are included within our advisory accounts.

## **ITEM 15 CUSTODY**

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Your independent custodian acts as a paying agent for our Firm. This means that they will directly debit your account(s) for the payment of our advisory fees. We do not have physical custody of any of your funds or securities. Your funds and securities will be held at an independent qualified custodian, such as Fidelity.

You will receive written statements no less than monthly from the custodian, and we encourage you to carefully review your statements for any inaccuracies. If you discover any discrepancies, please bring them to our attention immediately.

## **ITEM 16 INVESTMENT DISCRETION**

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As an investment advisory client of our Firm, you provide us with discretionary authority to invest your assets into a diversified mix of investment securities and asset classes. We are also authorized to modify and/or change this mix within your account(s), and rebalance the account(s) as necessary. This authority is granted to us pursuant to the “Discretionary Accounts Advisory Agreement” you signed at account opening. Discretion to trade in your account(s) is critical to the execution of the various investment strategies. This discretion clearly differentiates our role as a fiduciary, whose responsibility is to act in your best interest, from that of a broker, who makes recommendations that only have to be suitable at the point of sale. Effective money management requires the ability to move quickly and decisively. Any trading which may occur is based on the Firm’s Investment Policy Statement, as we receive no compensation from trading activity. Therefore no conflict of interest exists, unlike in a traditional broker/dealer agent relationship where the broker’s compensation comes directly from trading activity.

## **ITEM 17 VOTING CLIENT SECURITIES**

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As a matter of Firm policy and practice, our Firm does not, and will not, accept the authority to vote on proxies on your behalf. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolio.

## **ITEM 18 FINANCIAL INFORMATION**

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Our Firm does not require or solicit prepayment of any fees, and is not required to file a balance sheet.

Our Firm has discretionary authority over your account(s) and is not aware of any financial condition that will likely impair our ability to meet our contractual commitments to you. If we become aware of any such financial condition, this brochure will be updated, and you will be notified.

Our Firm has never filed for, or been the subject of a bankruptcy petition.

## **ITEM 19 STATE REGISTERED ADVISORS**

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Not Applicable

**GREGORY M. GROMEK, CRPC®**  
**Managing Principal**  
**Financial Advisor**  
**Chief Compliance Officer**

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Date of Brochure  
March 1<sup>st</sup> 2023

This brochure supplement provides information about Gregory M. Gromek that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact Gregory M. Gromek, Chief Compliance Officer if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about Gregory M. Gromek is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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Gregory M. Gromek was born in 1978, and is a Financial Advisor for Peak Wealth Solutions and has served in that role since July 2016. Mr. Gromek became Chief Compliance Officer of the firm in December 2016. Mr. Gromek received his Bachelor of Business Administration degree in Corporate Finance from the University of Akron in 2000. From 2013 until joining The Firm, Mr. Gromek was a Partner and Financial Advisor with Peak Wealth Solutions an investment advisor representative of Private Advisor Group and a registered representative of LPL Financial. Mr. Gromek was owner of Gromek and Associates from 2007 to 2013. Mr. Gromek was an investment advisor representative and registered representative of Ameriprise Financial Service from 2001 to 2013

Mr. Gromek is also a registered representative with American Portfolios Financial Services, Inc.

Mr. Gromek has held the designation of CHARTERED RETIREMENT PLANNING COUNSELOR (CRPC®) since 2006. The College of Financial Planning® awards the CRPC® designation to applicants who complete the CRPC® professional education program, pass a final examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CRPC® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Gromek now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Gromek is also a registered representative for American Portfolios Financial Services, Inc., a FINRA registered broker dealer. When acting in the capacity of a registered representative, Mr. Gromek may receive a commission as a result of the purchase and sale of securities.

Whenever a commission based product is sold, a conflict of interest exists. This conflict may exist as a broker might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Gromek does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.

**ITEM 6 SUPERVISION**

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David Kocsis, Managing Principal, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Kocsis monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for Mr. Gromek.

David Kocsis can be reached at (216) 370-7887.

**DAVID P. KOCSIS, AIF<sup>®</sup>**  
**Managing Principal**  
**Retirement Plan Consultant**

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Date of Brochure  
March 1<sup>st</sup> 2023

This brochure supplement provides information about David P. Kocsis that supplements Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact David P. Kocsis, Financial Advisor if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about David P. Kocsis is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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David P. Kocsis was born in 1977, and is a Retirement Plan Consultant for Peak Wealth Solutions and has served in that role since July 2016. Mr. Kocsis received his Bachelor of Science degree in Business Administration in Marketing from Bowling Green State University in 1999. From 2013 until joining the Firm, Mr. Kocsis was a Partner and Retirement Plan Consultant with Peak Wealth Solutions, and an investment advisor representative of Private Advisor Group and a registered representative of LPL Financial. Mr. Kocsis was a retirement plan consultant for River Financial Group, investment advisor representative of Valmark Advisers, and registered representative of Valmark Securities from 2007 to 2013.

Mr. Kocsis is also a registered representative with American Portfolios Financial Services, Inc.

The Accredited Investment Fiduciary® (AIF) Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics. In order to maintain the AIF Designation, the individual must annually renew their affirmation of the Code of Ethics and complete six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of Fiduciary360.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Kocsis now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Kocsis is also a registered representative for American Portfolios Financial Services, Inc., a FINRA registered broker dealer. When acting in the capacity of a registered representative, Mr. Kocsis may receive a commission as a result of the purchase and sale of securities.

Whenever a commission based product is sold, a conflict of interest exists. This conflict may exist as a broker might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Kocsis does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.



**ITEM 6 SUPERVISION**

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

Greg Gromek can be reached at (216) 370-7887.

**Gary Hannah, CFP®**  
**Financial Advisor**

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Date of Brochure  
March 1<sup>st</sup> 2023

This brochure supplement provides information about Gary Hannah that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact Gary Hannah if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about Gary Hannah is available on the Ohio License Center's website at <https://license.ohio.gov/>.

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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Gary Hannah was born in 1961, and is a Financial Advisor for Peak Wealth Solutions and has served in that role since May 2018. Mr. Hannah received his Bachelor of Business Administration degree in Marketing from The University of Akron in 1983. From 1984 until 2008, Mr. Hannah worked in business to business sales and sales management. Beginning in 2008 he started his career in the Financial Services industry for Merrill Lynch, Thrivent Financial, New England Securities, Met Life and Mass Mutual providing financial advice in Cleveland, Ohio. (The changes of New England Securities, Met Life and Mass Mutual were all a result of mergers and acquisitions of the Broker Dealer.)

Gary's 24 years of practical business knowledge and 11 years of financial and investment experience provides clients with a diverse and deep background in financial planning. He is fully licensed, possessing a FINRA Series 7, NASAA Series 66, Ohio Insurance licenses and certified in Medicare Advantage and Medicare Supplement products.

Mr. Hannah is also a registered representative American Portfolios Financial Services, Inc.

Mr. Hannah has held the designation of CERTIFIED FINANCIAL PLANNER™ OR (CFP®) since 2019. To obtain the CERTIFIED FINANCIAL PLANNER™ certification, practitioners must complete a college-level program of study in personal financial planning, pass the CFP® Certification Examination, complete the CFP® Board's 3 year experience requirement, and adhere to the Board's Code of Ethics, Rules of Conduct and Practice Standards.

Continued use of the CFP® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CFP® designation by completing 30 hours of continuing education and reaffirming to adhere to the Board's Code of Ethics, Rules of Conduct and Practice Standards.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Hannah now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Gary Hannah is also a licensed insurance agent with Peak Wealth Solutions, Inc., a licensed insurance agency with the State of Ohio. Peak Wealth Solutions, Inc., and its agents, may offer insurance products and receive a commission on the sale of insurance company products. Clients are under no obligation to use our Firm for insurance product services. In instances where clients choose to use us for insurance services, there is no advisory fee associated with the insurance products.

Mr. Hannah is also a registered representative for American Portfolios Financial Services, Inc., a FINRA registered broker dealer. When acting in the capacity of a registered representative, Mr. Hannah may receive a commission as a result of the purchase and sale of securities.

Whenever a commission based product is sold, a conflict of interest exists. This conflict may exist as a broker might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

Mr. Hannah is also certified to provide Medicare Supplement and Medicare Advantage products. He is required to take the ACAT test to renew his license annually and pass classes sponsored by each line represented to be able to represent their products. When acting in that capacity, Mr. Hannah may receive a commission. This service is not provided through the firm and outsourced since the focus of the firm is to provide financial planning services.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Hannah does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.

## **ITEM 6 SUPERVISION**

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

Greg Gromek can be reached at (216) 370-7887.

## **INFORMATION ABOUT INDUSTRY DESIGNATIONS AND EXAMINATION**

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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 71,000 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 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.

**William Russo, CFP®**  
**Financial Advisor**

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Date of Brochure  
March 1<sup>st</sup>, 2023

This brochure supplement provides information about William Russo that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact William Russo if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about William Russo is available on the Ohio License Center's website at <https://license.ohio.gov/>.

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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William I Russo was born in 1953 and is a Financial Advisor for Peak Wealth Solutions starting June 2019. Mr. Russo received his Bachelor of Business Administration in Accounting from John Carroll University in 1976 and Masters in Business Administration in Finance from Wright State University in 1991. From 1993 until June, 2019 Mr. Russo owned Securus Financial Strategies in Solon, OH.

Mr. Russo has been President and Chairman of the North East Ohio Chapter of the Financial Planning Association, Chairman of the Northern Ohio Area Chambers of Commerce and the Solon Chamber of Commerce, and continues to serve as Treasurer of the Cuyahoga County Public Library Foundation since 2004.

He is fully licensed, possessing a FINRA Series 7, 24, NASAA Series 63, and Ohio Insurance licenses. Mr. Russo is also a registered representative with American Portfolios Financial Services, Inc.

Mr. Russo has held the designation of CERTIFIED FINANCIAL PLANNER™ OR (CFP®) since 2003. To obtain the CERTIFIED FINANCIAL PLANNER™ certification, practitioners must complete a college-level program of study in personal financial planning, pass the CFP® Certification Examination, complete the CFP® Board's 3 year experience requirement, and adhere to the Board's Code of Ethics, Rules of Conduct and Practice Standards.

Continued use of the CFP® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CFP® designation by completing 30 hours of continuing education and affirming to adhere to the Board's Code of Ethics, Rules of Conduct and Practice Standards.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Russo now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Russo is also a registered representative for American Portfolios Financial Services, Inc., a FINRA registered broker dealer. When acting in the capacity of a registered representative, Mr. Russo may receive a commission as a result of the purchase and sale of securities. Whenever a commission based product is sold, a conflict of interest exists. This conflict may exist as a broker might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

Mr. Russo is a Councilman for the City of Solon and President of Greater Cleveland Adult Baseball. Neither of these positions involves the offering of financial services and presents no conflict of interest.

**ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Russo does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.

**ITEM 6 SUPERVISION**

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

Greg Gromek can be reached at (216) 370-7887.



**KEITH WITKOWSKI, CFP® CPA**  
**Financial Advisor**

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Date of Brochure  
March 1<sup>st</sup>, 2023

This brochure supplement provides information about Keith R Witkowski that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact Keith R. Witkowski if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about Keith R. Witkowski is available on the Ohio License Center's website at <https://license.ohio.gov/>.

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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Keith R. Witkowski was born in 1983, and is a Financial Advisor for Peak Wealth Solutions and has served in that role since January 2018. Mr. Witkowski received his Bachelor of Business Administration degree in Finance and Accounting from Ohio University in 2006. From 2006 until joining The Firm, Mr. Witkowski worked in public accounting and corporate finance, and also the financial advising industry with HW Financial Advisors in Beachwood, Ohio.

Mr. Witkowski has held the designation of CERTIFIED FINANCIAL PLANNER™ OR (CFP®) since 2015. To obtain the CERTIFIED FINANCIAL PLANNER™ certification, practitioners must complete a college-level program of study in personal financial planning, pass the CFP® Certification Examination, complete the CFP® Board's 3 year experience requirement, and adhere to the Board's Code of Ethics, Rules of Conduct and Practice Standards.

Continued use of the CFP® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CFP® designation by completing 30 hours of continuing education and reaffirming to adhere to the Board's Code of Ethics, Rules of Conduct and Practice Standards.

Mr. Witkowski has held the CERTIFIED PUBLIC ACCOUNTANT OR (CPA) certificate and license to practice since 2007. To obtain the CERTIFIED PUBLIC ACCOUNTANT license, candidates must complete a college curriculum including accounting and business courses (above the introductory level), pass the CPA examination, complete the Accountancy Board of Ohio's 1 year experience requirement, and adhere to the American Institute of Certified Public Accountants Code of Professional Conduct.

Maintaining an 'Active Status' CPA license requires 120 hours of Continuing Professional Education credits every 3 years, including 8 hours dedicated to professional ethics.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Witkowski now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Witkowski is not engaged in any other business activities.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Witkowski does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians.

## ITEM 6 SUPERVISION

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

Greg Gromek can be reached at (216) 370-7887.

## INFORMATION ABOUT INDUSTRY DESIGNATIONS AND EXAMINATION

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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 71,000 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 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.

**Daniel W. Margheret**  
**Financial Advisor**

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Date of Brochure  
March 1<sup>st</sup>, 2023

This brochure supplement provides information about Daniel W. Margheret that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact Daniel W. Margheret if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel W. Margheret is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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Daniel W Margheret was born in 1955 and is a Financial Advisor for Peak Wealth Solutions and has served in that role since February 2021. Mr. Margheret received his Bachelor of Business Administration from Cleveland State University in December 1976. From 2014 until joining the firm, Mr. Margheret was an Investment Adviser Representative of Stratos Wealth Partners and a Registered Representative of LPL financial. From 2009 to 2015, Mr. Margheret was an Investment Adviser Representative and Registered Representative of LPL financial. Mr. Margheret was an Investment Adviser Representative with Margheret & Associates and a Registered Representative with Mutual Service Corporation from 2000 to 2009.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Margheret now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Margheret is the owner of DJM Group, LLC that owns buildings and collects rents from this real estate venture. Mr. Margheret is also the owner of a consulting company Margheret & Associates, LLC.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Daniel W. Margheret does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.

## **ITEM 6 SUPERVISION**

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

Greg Gromek can be reached at (216) 370-7887.

**Jeffrey D. Mucciarone**  
**Financial Advisor**

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Date of Brochure  
March 1<sup>st</sup>, 2023

This brochure supplement provides information about Jeffrey D. Mucciarone that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact Jeffrey D. Mucciarone if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey D. Mucciarone is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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Jeffrey D. Mucciarone was born in 1977, and is Financial Advisor for Peak Wealth Solutions and has served in that role since August, 2021. Mr. Mucciarone received his Bachelor of Business Administration degree in Business Management from Kent State University in 2001. From 2002 until joining The Firm, Mr. Mucciarone was a Financial Advisor with Ameriprise, First Merit Bank, Huntington Bank, and Mayfield Financial Services.

Mr. Mucciarone is also a registered representative with American Portfolios Financial Services, Inc.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Mucciarone now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Mucciarone is also a registered representative for American Portfolios Financial Services, Inc., a FINRA registered broker dealer. When acting in the capacity of a registered representative, Mr. Mucciarone may receive a commission as a result of the purchase and sale of securities.

Whenever a commission based product is sold, a conflict of interest exists. This conflict may exist as a broker might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Mucciarone does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.

## **ITEM 6 SUPERVISION**

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

Greg Gromek can be reached at (216) 370-7887.



**Daniel Vujanov, CPFA®**  
**Financial Advisor**

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Date of Brochure  
March 1<sup>st</sup>, 2023

This brochure supplement provides information about Daniel Vujanov that supplements the Peak Wealth Solutions brochure. You should have received a copy of that brochure. Please contact Daniel Vujanov if you did not receive Peak Wealth Solutions' brochure or if you have any questions about the contents of this supplement.

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

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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Daniel Vujanov was born in 1995, and is Financial Advisor for Peak Wealth Solutions and has served in that role since October 2021. Mr. Vujanov received his Bachelor of Business Administration degree from the University of Akron in 2017. From 2018 until joining The Firm, Mr. Vujanov was an Associate, Financial Advisor with CBIZ Investment Advisory Services, LLC, a registered investment adviser in Independence, Ohio.

Mr. Vujanov is also a registered representative with American Portfolios Financial Services, Inc.

Mr. Vujanov has held the credential of Certified Plan Fiduciary Advisor (CPFA®) since 2018. To obtain the Certified Plan Fiduciary Advisor (CPFA®) credential, practitioners must successfully pass the NAPA CPFA® Examination.

Continued use of the CPFA® designation is subject to ongoing renewal requirements. Every year the designee must renew their right to continue using the CPFA® designation by completing 10 hours of continuing education.

## **ITEM 3 DISCIPLINARY INFORMATION**

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There have been no legal or disciplinary events or proceedings to report concerning Mr. Vujanov now or in the past.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

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Mr. Vujanov is also a registered representative for American Portfolios Financial Services, Inc., a FINRA registered broker dealer. When acting in the capacity of a registered representative, Mr. Vujanov may receive a commission as a result of the purchase and sale of securities.

Whenever a commission based product is sold, a conflict of interest exists. This conflict may exist as a broker might have an incentive to recommend one product over another because it has a higher commission. Additionally, a broker-dealer might have an incentive to churn, or place unnecessary transactions in an account, to generate additional revenue. It is for this reason that we prefer our clients retain us as a registered investment advisor where we are held to a fiduciary standard of care.

## **ITEM 5 ADDITIONAL COMPENSATION**

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Mr. Vujanov does not receive any compensation or any other economic benefits from outside parties including broker dealers and account custodians except as noted in Item 4 above.

**ITEM 6 SUPERVISION**

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Greg Gromek, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics for all Firm employees. Mr. Gromek monitors these activities using various methods that include periodic inspection and review of all security positions and transactions, obtaining certifications of compliance with company policies and procedures, and obtaining and reviewing brokerage statements or transactions and holdings reports for all Firm employees.

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