



**WRAP PROGRAM BROCHURE
(APPENDIX 1 TO FIRM BROCHURE)**

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This wrap fee program brochure provides information about the qualifications and business practices of Peak Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact Nicholas Hopwood at (734) 681-7575. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Peak Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for the Firm is 166944.

ITEM 2 - MATERIAL CHANGES

Our last annual update to this firm brochure was on April 1, 2022. We have one material change to report since that date.

- We offer a financial coaching program on an ongoing basis for a fee. Please see Items 4 & 5 of the ADV Part 2A for additional details.

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ITEM 4 - SERVICES, FEES AND COMPENSATION

SERVICES

We offer ongoing portfolio management services on a wrap account basis. Our management services are based on the individual goals, objectives, time horizon, and risk tolerance of each client. We evaluate the current investments of each client with respect to their risk tolerance levels and time horizon. We will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

We offer the following model portfolios:

Peak Digital Advice at Betterment: Peak Digital Advice built by Betterment provides you with low cost models built by Betterment, Goldman Sachs, and Blackrock, which provide investors with a range of risk-based portfolios. The more conservative portfolios are designed to focus on delivering current income, with some consideration given to growth of capital. The more aggressive portfolios are predominantly focused on growth of capital. In all instances, the portfolios are constructed to achieve market exposure across both equity and fixed income markets utilizing index funds via ETF's.

Peak Passive ETF Blend (multi-managed) at TD Ameritrade Institutional: Peak Wealth Passive ETF Blend Model Portfolios seek to provide investors with a range of risk-based portfolios. The more conservative portfolios are designed to focus on delivering current income, with some consideration given to growth of capital. The more aggressive portfolios are predominantly focused on growth of capital. In all instances, the portfolios are constructed to achieve market exposure across both equity and fixed income markets, utilizing a combination of passive index models and smart beta factor index models created by providers such as State Street Global Advisors, Standard & Poors, Wisdom Tree, Fidelity, TIAA, Vanguard, and Blackrock iShares, among others and subject to change. These models may include a minority exposure to actively managed interval funds which may not have daily liquidity.

Peak Passive ETF (single manager) at TD Ameritrade Institutional: Peak Wealth Passive ETF Model Portfolios seek to provide investors with a range of risk-based portfolios. The more conservative portfolios are designed to focus on delivering current income, with some consideration given to growth of capital. The more aggressive portfolios are predominantly focused on growth of capital. In all instances, the portfolios are constructed to achieve market exposure across both equity and fixed income markets, utilizing passive index models created by providers such as Standard & Poors and Blackrock iShares. These models may include a minority exposure to actively managed interval funds which may not have daily liquidity.

Peak CORE (multi-strategist with downside aware) at TD Ameritrade: Peak Core Models blend passive and active management with a tactical downside aware feature. This portfolio is designed for clients with moderate to growth risk tolerance. This portfolio invests primarily in stock funds and bond funds (ETFs or Mutual Funds). These models may include a minority exposure to actively managed interval funds which may not have daily liquidity. Additionally, Alternative Investments may be recommended, which do not have daily liquidity.

Workplace Investing at Fidelity 401/403/457 or TIAA-CREF 401/403/457: Workplace Investing models with both Fidelity and TIAA-CREF seek to provide investors with a range of risk-based portfolios. The more conservative portfolios are designed to focus on delivering current income, with some consideration given to growth of capital. The more aggressive portfolios are predominantly focused on growth of capital. In all instances, the portfolios are constructed to achieve market exposure across both equity and fixed income markets utilizing index funds and/or actively managed mutual funds.

Peak Fixed Income: This portfolio seeks to preserve principal and provide current income. It will be primarily invested in fixed income products, consisting of mutual funds, ETF's, and alternative investments, which do not have daily liquidity.

Options Strategy: For this portfolio we screen for highly rated stocks that have been down 10% to 20% or more. We will sell put options on these stocks to generate income. The investments are held for approximately one month, which means it is not a tax efficient strategy. This strategy is meant for the aggressive investor.

Peak Money Plus: Assets in this strategy will be invested in a money market fund, certificate of deposit or short-term bond fund. This strategy is meant for the short-term investments.

FEES

Fees for wrap accounts, except the Options Strategy and Peak Money Plus, are calculated and billed quarterly in advance using the annualized rates below.

Custodian Reported Value of Account	Management Fee
Up to \$1,000,000	1.25%
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 and Above	0.75%

The Options Strategy's annual management fee is 2.00%.

The Peak Money Plus portfolio's annual management fee is 0.25%.

The pro-rated first quarter's management fee will be calculated on the Account's initial value as reported by the Account's custodian. Thereafter, the management fee will be calculated on the Account's previous quarter-end value as reported by the Account's custodian. Certain clients may be billed based on previous retired fee schedules.

In a wrap account, clients pay a single annual advisory fee for advisory services and execution of transactions. Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee. However, please see the following disclosures regarding the conflicts of interest associated with a wrap-fee program.

Conflict of Interest Disclosure

Although clients do not pay a transaction charge for transactions in a wrap fee account, clients should be aware that we pay your custodian the transaction charges for those transactions. The transaction charges paid by us vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether or not the mutual fund pays 12b-1 fees and/or recordkeeping fees to the custodian. Transaction charges paid by us for equities and ETFs are \$4.50 to \$9. For mutual funds, the transaction charges range from \$0 to \$26.50. Clients should

understand that the cost to us of transaction charges can be a factor that we consider when deciding which securities to select and how frequently to place transactions in an account. We attempt to mitigate this conflict of interest by placing the clients' interest ahead of our own through our fiduciary duty and by implementing policies and procedures designed to address the conflict.

With Betterment Securities, the client pays an asset-based fee of 0.25% of the account value. Betterment Securities will directly deduct its fee from the client's account. Please see the Betterment client agreement for additional details.

Termination of Portfolio Management Services

A client may terminate the Investment Management Agreement for any reason at any time and, within the first five (5) business days after signing the contract, without any cost or penalty. Thereafter, the contract may be terminated at any time by giving seven (7) days written notice. To cancel the Agreement, the client must notify firm in writing at to Peak Wealth Management LLC, 41011 Ann Arbor Road, Plymouth, MI 48170 and return any materials received to that date. Because we charge in advance, any client that terminates their contract within a month will receive a prorated refund of fees that is based on the amount of time elapsed during the month. For example, if a client cancels on 45 days in to a 90-day quarter, the client will receive a refund of 50% of the fees. (45 days divided by 90 days equal 50 percent.) Please note the prorated refund may be adjusted for additional deposits and withdrawals to the advisory account within the termination quarter.

Other Types of Fees and Charges

Program accounts will incur additional fees and charges from parties other than us as noted below. These fees and charges are in addition to the advisory fee paid to us. We do not share in any portion of these third-party fees.

In our wrap program, we require the client to use TD Ameritrade, Betterment Securities, Fidelity or TIAA as the broker-dealer to execute transactions in the account (collectively the "custodians"). The custodians providing brokerage and execution services on program accounts, will impose certain fees and charges. The custodians notify clients of these charges at account opening and makes available a list of these fees and charges on their websites. The custodians will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay us the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using our management services and by making their own investment decisions.
- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.

- Although only no-load and load-waived mutual funds can be purchased in a program account, client should understand that some mutual funds pay asset-based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.
- If client holds a variable annuity as part of an account, there are 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.

Further information regarding fees assessed by a mutual fund, or variable annuity is available in the appropriate prospectus, which is available upon request from us or from the product sponsor directly.

Other Important Considerations

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.
- The advisory fee also may cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.
- When we recommend the program to the client, we receive compensation as a result of the client's participation in the program. This compensation includes the advisory fee and may include other compensation, such as bonuses, awards or other things of value offered by the custodians to us or our associated persons. The amount of this compensation may be more or less than what we would receive if the client participated in other programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, we may have a financial incentive to recommend a program account over other programs and services.
- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers or other investment firms not affiliated with us.

Other Securities Compensation

Some of our advisers are registered representatives of Mutual Securities, Inc., member FINRA/SIPC. Through Mutual Securities, Inc., they may sell securities to Peak Wealth Managements, LLC's clients for a commission. This causes a conflict of interest because the commissions from Mutual Securities, Inc. are separate from the fees outlined above. Our advisers attempt to mitigate this conflict of interest to the best of their ability by placing the client's interest ahead of their own through their fiduciary duty. Additionally, it is our policy that

recommended securities purchases do not have to be purchased through our advisers or any affiliate.

Our advisers can also sell mutual funds through Mutual Securities to clients. Some mutual funds have 12b-1 fees which are operation expenses charged annually to the mutual fund. As a registered representative our advisers receive a portion of the 12b-1 fees. This creates a financial incentive to recommend mutual funds with 12b-1 fees. Our advisers attempt to mitigate this conflict of interest to the best of their ability by placing the client's interest ahead of their own through their fiduciary duty. We require our advisers to disclose to the client whether a recommended mutual fund has a 12-b1 fee. It is our policy that recommended mutual fund purchases do not have to be purchased through any of our advisers. Additionally, any mutual funds sold through Mutual Securities and any mutual funds with 12b-1 fees will not be used in any client's investment advisory portfolio.

Retirement Rollover Conflicts of Interest

When we recommend you rollover a retirement account for us to manage, this creates a financial incentive because we charge a fee for our services. We attempt to mitigate the conflict of interest by acting in your best interest and applying an impartial conduct standard to all rollovers. Please note that you are not under any obligation to roll over a retirement account to an account managed by us.

ITEM 5 - ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

We offer our services to individuals. We require a minimum account size of \$500,000, which can be waived at our discretion.

ITEM 6 - PORTFOLIO MANAGER SELECTION AND EVALUATION

In our wrap program, we do not select, review or recommend other investment advisors or portfolio managers. We, through our investment adviser representatives ("IAR"), are responsible for the investment advice and management offered to clients. For more information about our IAR's managing the account, client should refer to the Brochure Supplement (ADV Part 2B) for the associated person, which client should have received along with this Brochure at the time client opened the account. By having our IARs act as the portfolio managers to the program there is a conflict of interest because our evaluation of the IARs as the managers may not be objective. We attempt to mitigate this conflict of interest by holding our IARs to the same standards that we would hold a non-affiliated portfolio manager. Additionally, we attempt to mitigate this conflict of interest to the best of our ability by placing the client's interest ahead of our own through our fiduciary duty.

A description of our wrap fee program can be found above in Item 4. It is important to note that our services are tailored to the client's stated goals, needs and objectives. We allow them to impose restrictions on investment in certain securities or types of securities. All restrictions must be presented to us in writing. Additionally, our investment management services are only offered in a wrap fee program and our investment adviser representatives are the portfolio managers. Therefore, we receive a portion of the wrap fee because we provide portfolio management services. The wrap fee does not include performance-based fees.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We use a combination of fundamental and technical analysis to form client portfolios.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's *actual* business and its future prospects. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

Technical Analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. It is also important that the client understands the concept and risks inherent in exchanging an investment from one position to another. Some investment decisions result in profit and others in losses. Our firm and the client's representative cannot guarantee that the objectives of any investment program will be achieved. Furthermore, it is important that the client understand that the exchange of shares of one mutual fund for shares of another mutual fund is treated as a sale for federal income tax purposes, and that capital gains or losses may be realized unless the client is eligible for tax deferral under a qualified retirement plan.

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear.** While we use investment strategies that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. The client needs to ask questions about risks he/she does not understand, we would be pleased to discuss them.

The account investment management is determined by the client's stated investment objectives (i.e., aggressive, growth, balanced, moderate or conservative). The client's representative is responsible for developing and determining the investment strategies that will be used when managing your accounts. This strategy is based on the client's individual financial situation, goals, and objectives. The client's representative is responsible for monitoring his or her portfolios and, when appropriate, reallocating the portfolios based on changing market conditions, changes in the client's individual circumstances, or other factors. If the account is managed on a non-discretionary basis, your representative will consult you prior to reallocating securities in the account. Reallocations are implemented in discretionary accounts without prior notice to clients.

If your individual situation changes, you should notify your representative, who will assist you in revising the current portfolio and/or prepare an updated client profile so that he/she can determine if a different model portfolio would be appropriate to your new situation.

We use several types of securities in client portfolios including, but not limited to, mutual funds, stocks, bonds, government issued securities, money market funds and also the following:

- ***Alternative Strategy Mutual Funds.*** Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.
- ***Closed-End Funds.*** Client should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
- ***Exchange-Traded Funds (ETFs).*** ETFs are typically investment companies that are legally classified as open-end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.
- ***Exchange-Traded Notes (ETNs).*** An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer's ability to pay. In addition, the trading price of the ETN in the secondary market may be adversely impacted if the issuer's credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and may therefore carry specific risks.
- ***Interval Funds.*** An interval fund is a non-traditional type of closed-end mutual fund that periodically offers to buy back a percentage of outstanding shares from shareholders. Shareholders are not required to sell their shares back to the fund. The risk associated with an interval fund is the shares do not typically trade on the secondary market, which limits liquidity. Also, fees for interval funds tend to be higher than other types of mutual funds.

- Leveraged and Inverse ETFs, ETNs and Mutual Funds.** Leveraged ETFs, ETNs and mutual funds, sometimes labeled “ultra” or “2x” for example, are designed to provide a multiple of the underlying index's return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs, ETNs and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to as tracking error. Continual re-setting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and are generally not appropriate as an intermediate or long-term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax-efficient than more traditional ETFs, ETNs and mutual funds.
- Options.** Certain types of option trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.
- Structured Products.** Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even

if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

- **Variable Annuities.** If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts.

VOTING CLIENT SECURITIES

We do not accept authority to vote client securities. Clients retain the right to vote all proxies that are solicited for securities held in the account. Clients will receive proxies or other solicitations from the custodian of assets. If clients have questions regarding the solicitation, they should contact us or the contact person that the issuer identifies in the proxy materials. In addition, we do not accept authority to take action with respect to legal proceedings relating to securities held in the account.

ITEM 7 - CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

In our wrap program, we are responsible for account management; there is no separate portfolio manager involved. We obtain the necessary financial data from the client and assist the client in setting an appropriate investment objective for the account. We obtain this information by having the client complete an advisory agreement and other documentation. Clients are encouraged to contact us if there have been any changes in the client's financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Client should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Client should further be aware that achievement of the stated investment objective is a long-term goal for the account.

ITEM 8 - CLIENT CONTACT WITH PORTFOLIO MANAGERS

Client should contact us at any time with questions regarding program account.

ITEM 9 - ADDITIONAL INFORMATION

DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events within the past 10-years that would be material to your evaluation of us or the integrity of our management.

We have no information applicable to this Item because we have not been the subject of any administrative, civil, criminal or regulatory proceedings.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our owner, Nicholas Hopwood, is also licensed as a registered representative with Mutual Securities, Inc., a full-service broker/dealer and member FINRA/SIPC. As a registered representative, Mr. Hopwood is able to affect securities transactions and may receive separate yet customary compensation for effecting any securities transactions. Mr. Hopwood may spend the majority of their time involved in all or a portion of these activities.

This could present a potential conflict of interest if the client elects to implement Mr. Hopwood's recommendations and also selects them to execute those transactions. In this case, Mr. Hopwood could receive both fees as advisor representative and commissions as registered representative or insurance agents. As a registered representative, he could also receive compensation from mutual fund sales loads, 12(b)-1 distribution fees, variable annuity sales commissions or trail commissions. The 12(b)-1 distribution fees, sales charges and other fee arrangements will be disclosed upon the client's request and are typically described in the applicable fund and/or annuity prospectus. Any fees or other compensation received by Mr. Hopwood in his separate capacity as registered representative will be received to the extent permitted by applicable law.

Because of these compensation arrangements, a conflict of interest could exist in connection with Mr. Hopwood recommending particular investments for a client's account. Clients have sole discretion whether to implement any or all of the associated persons' recommendations. In addition, clients are free to select any broker/dealer they wish to implement recommendations.

Mr. Hopwood is also a licensed as an independent insurance agent (Life and Health Licensed). As such, he is able to affect insurance transactions and may receive separate yet customary compensation for effecting any insurance transactions. Mr. Hopwood may recommend these services to you. With the ability to work as a client's insurance agent and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Hopwood attempts to mitigate any conflicts of interest to the best of his ability by placing the client's interests ahead of his own and through the implementation of policies and procedures that address the conflict. Also, clients are never obligated to purchase recommended insurance products through Mr. Hopwood.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our Approach to Conflicts of Interest

Conflicts of interest that may arise in the course of providing investment management services are described throughout this brochure, as are some of our policies and procedures designed to address specific conflicts of interest, such as our Code of Ethics and personal trading practices.

We have a compliance program in place that is intended to identify, mitigate and, in some instances, prevent actual and potential conflicts of interest, ensure compliance with legal and regulatory requirements and ensure compliance with client investment guidelines and restrictions. Our compliance program includes written policies and procedures that we believe are reasonably designed to prevent violations of applicable law and regulations.

Code of Ethics

According to the *Investment Advisers Act of 1940*, an investment advisor is considered a fiduciary and has a fiduciary duty to clients. The applicant has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the *Investment Advisers Act of 1940* that reflects fiduciary obligations and those of its supervised persons and requires compliance with federal securities laws. Our Code of Ethics covers all individuals that are classified as “supervised persons”. All employees, officers, directors and investment advisor representatives are classified as supervised persons. We require our supervised persons to consistently act in their client’s best interests in all advisory activities. We impose certain requirements on its affiliates and supervised persons to ensure that they meet the firm’s fiduciary responsibilities to our clients. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is only intended to provide current and potential clients with a description of the applicant Code of Ethics. If you wish to review the Code of Ethics in its entirety, you may request a copy in writing. Your request will be provided promptly.

Participation or Interest in Client Transactions

In the event that Mutual Securities, Inc., our broker/dealer, executes securities transactions through TD Ameritrade, Betterment Securities, Fidelity or TIAA on your behalf or on behalf of your representative, your representative may receive advisory fees and broker/dealer commissions for the sale of securities placed under our management. The receipt of compensation from a variety of sources may be considered to be a conflict of interest. We encourage you to review this ADV closely and discuss any potential conflicts of interest with your representative.

We will process brokerage security transactions through TD Ameritrade so long as we determine that executing the transactions through our broker/dealer fulfills our duty of best execution. We consider certain factors when selecting a broker/dealer and determining the reasonableness of commissions. Please refer to the section titled “Brokerage Practices” for more information.

Policy Regarding Engaging in Agency Cross Transactions in Advisory Accounts

It is our policy to prohibit representatives from engaging in agency cross transactions where representatives act as brokers for both the buy and sell of a single security between two different clients for which the representatives receive compensation in the form of an agency commission or principal mark-up for the trades. Should we adopt a different policy in this area, we will observe all rules and regulations in accordance with the disclosure and consent requirements of Section 206(3) of the Advisers Act. Additionally, we are aware that such transactions can only occur if we can ensure that we meet our duty of best execution for the client.

Policy Regarding Engaging in Principal Trading Involving Advisory Accounts

We do not permit principal transactions to be affected in advisory accounts.

Personal Trading

Peak Wealth Management, LLC and our representative may recommend securities to buy, sell or hold a position in securities identical to the securities recommended to you, at or about the same

time that they or a related person buys or sells the same securities for their own or a related person's account. It is our policy that no supervised person will put his/her interest before your interests. Our firm and our representatives may not trade ahead of any client or trade in a way that would cause the supervised person to obtain a better price than the price a client would obtain.

Our Pre-Clearance and Restricted Securities Policy

Due to our affiliation with other investment companies, investment advisors, and broker dealers, Mutual Securities, Inc., on our behalf, maintains a Restricted and Pre-Clearance Equity List, which may limit our firm and the representative's ability to transact in certain equities on your behalf in a discretionary advisory program. Your representative may not be able to place certain transactions or may experience delays in submitting certain transactions on your behalf based on any pre-clearance or pre-approval requirements implemented by the firm. You may receive a worse price than what you might receive if you placed the transaction through another investment advisor representative not affiliated with Mutual Securities, Inc. and not subject to any trading restrictions. These trading restrictions are subject to change without notice.

REVIEW OF ACCOUNTS

Frequency of Account Reviews

Mr. Hopwood, our owner, reviews the general holdings of client accounts on an ongoing basis. In addition to these reviews, Mr. Hopwood meets with clients, either in person or by telephone, annually or as needed basis to discuss and review their accounts.

Review Triggers

The calendar is the triggering factor. Factors triggering an account review may include material market, economic or political events, and changes in your financial or personal situation or performance of the account in general.

Reports and Account Statements

You will receive at least quarterly statements from the account custodian or clearing firm if your account(s) have activity during the month. If the account does not have any monthly activity, an account statement is provided by the account custodian or clearing firm at least quarterly. Such statements will show any activity in the account, as well as period ending position balances.

To the extent you receive performance reports from your representative, we urge you to compare performance reports received with account statements received from the custodian. Inquiries or concerns regarding the account, including performance reports, should be directed to the investment advisor firm at the phone number listed on the account statement. Each representative then decides whether to provide these reports to his or her clients. Performance information provided by your representative is believed to be accurate but cannot be guaranteed. Your representative may or may not include variable annuity account position information within performance reports. Neither our firm nor your representative can guarantee the accuracy of fund values, securities' and other information obtained from third parties.

CLIENT REFERRALS AND OTHER COMPENSATION

We do not pay for client referrals or use solicitors.

Our representatives may be incented to join and remain affiliated with our current broker/dealer, Mutual Securities, Inc., through certain compensation arrangements which could include bonuses, enhanced pay-outs, forgivable loans and/or business transition loans. The receipt of such compensation may be considered to be a conflict of interest. We encourage you to review this ADV closely and discuss any potential conflicts of interest with your representative.

FINANCIAL INFORMATION

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. Neither Peak Wealth Management nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients. However, we were eligible for and participated in the Paycheck Protection Program (“PPP”) available as part of the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act that designated billions of dollars in SBA loans to help support small businesses and independent contractors. The loan is potentially forgivable (essentially making it a grant) so long as the money is used for designated expenses, which includes maintaining staff and compensation at the levels they were prior to impact of COVID-19 as well as to make other permissible payments during the eight weeks after receiving the loan. Please contact us if you have any questions about our participation in the PPP program.

CUSTODY

TD Ameritrade, Betterment Securities, Fidelity, and/or TIAA (“custodians”) will be the qualified custodian and maintain custody of client funds and securities in a separate account for each client under the client’s name. The custodians send account statements showing all transactions, positions, and all deposits and withdrawals of principal and income. The custodians send account statements monthly when the account has had activity or quarterly if there has been no activity. Also, the account statements will be available for the client’s review on each custodians’ website. Clients should carefully review their account statements.

Although most securities available in program accounts are held at TD Ameritrade, there are certain securities managed as part of the account that are held at third parties, and not at TD Ameritrade. For example, variable annuities, hedge funds and managed futures are often held directly with the investment sponsor. For those outside positions, client will receive confirmations and statements directly from the investment sponsor.

At times, we assist some clients with the ability to move money from one account to another. In these situations, you will sign standing letter of instruction (“SLOAs”) with your custodian that grants us the ability to facilitate the transfer. When your money is transferred between accounts with different titles, this is considered a limited form of custody. In 2017, the SEC issued a no-action letter (“Letter”) with respect to the Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). We and your custodian follow the safeguards outlined in the letter. These safeguards include:

- The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.

- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client can terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.