

March 21, 2024

FORM CRS

46 Peaks LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at <u>http://investor.gov/CRS</u> which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me? We provide a variety of investment advisory services including financial planning, portfolio management, retirement plan consulting, discovery analysis and selection of separate account managers. Our financial planning services can be accessed on an a la carte or ongoing basis. Financial planning typically involves a variety of services regarding the analysis of your individual financial resources, objectives and needs. We do not provide specific tax or legal advice.

<u>Account Monitoring</u> - If you retain our firm for portfolio management services, as part of our standard service we will monitor the investments we manage on your behalf on a continuous basis and conduct periodic reviews with clients (subject to client availability).

<u>Investment Authority</u> - We manage investment accounts on a discretionary basis whereby we decide which investments to buy or sell for your account. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. We also offer non-discretionary investment management services whereby we provide advice, but you ultimately decide which investments to buy and sell for your account. You may choose to decline to implement any advice provided by our firm on a non-discretionary basis.

<u>Investment Offerings</u> - We primarily research and recommend investments in mutual funds, exchange traded funds, exchange traded notes, closed end funds, interval funds, interests in partnerships and other private investments, as well as the recommendation or selection of unaffiliated discretionary portfolio managers for individual client accounts.

<u>Account Minimums and Requirements</u> - Our minimum initial investment for portfolio management services is \$500,000. We may accept relationships less than this amount at our discretion.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, 13 and 16 by clicking this link: <u>https://adviserinfo.sec.gov/firm/brochure/306902</u>

Key Questions to Ask Your Financial Professional

- Given my financial situation, should I choose an investment advisory service? Why or Why Not?
- · How will you choose investments to recommend to me?

• What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay? The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. Fees for portfolio management are based on the value of your assets under our management and are payable quarterly in advance. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict. Financial

Planning, Discovery Analysis, and Retirement Plan Consulting Fees depend on the scope and complexity of the services to be rendered. The Firm may offset all or a portion of its fees for Financial Planning services based upon the amount paid for portfolio management services. Examples of the most common fees and costs applicable to our clients that are paid to other parties are: Custodian fees; Account maintenance fees; Fees related to mutual funds and exchange-traded funds; Transaction charges when purchasing or selling securities; and other product-level fees associated with your investments. You will pay fees and incur costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investment over time. Please make sure you understand what fees and costs you are paying.

For detailed information, refer to our Form ADV Part 2A by clicking this link <u>https://adviserinfo.sec.gov/firm/brochure/306902</u>.

Key Questions to Ask Your Financial Professional Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means: Since we are compensated on the value of your assets, we have a conflict of interest to recommend that you increase your assets under our management.

Key Questions to Ask Your Financial Professional How might your conflicts of interest affect me, and how will you address them?

Refer to our Form ADV Part 2A by clicking this link: <u>https://advisorinfo.sec.gov/firm/brochure/306902</u> to help you understand what other conflicts exist.

How do your financial professionals make money? Our owners are compensated based on firm profits. Employees are paid a salary, bonus, and/or profit sharing. Our firm does not engage in any practice that favors one type of investment over another. We do not sell proprietary products. We do not limit the type of customer that is solicited or the product, transaction, or strategy that is recommended. We also do not participate in sales contests, sales quotas, or provide non-cash compensation. Compensation paid to our financial professionals involves a conflict of interest because they have a financial incentive to refer clients to our firm.

Do you or your financial professionals have legal or disciplinary history? No, for our firm. Yes, for our financial professionals. Visit <u>http://investor.gov/CRS</u> for a free and simple research tool that provides more information.

Key Questions to Ask Your Financial Professional As a financial professional, do you have any disciplinary history? For what type of conduct?

You can find additional information about our investment advisory services and request a copy of the relationship summary by calling (215) 497-8310 or click the link provided <u>https://adviserinfo.sec.gov/firm/brochure/306902.</u>

Key Questions to Ask Your Financial Professional

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?