

Part 2A of Form ADV: Firm Brochure

Form ADV, Part 2A, Item 1

Cover Page

Peak Financial Guidance LLC

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**FORM ADV PART 2
FIRM BROCHURE**

This brochure provides information about the qualifications and business practices of Peak Financial Guidance LLC. If you have any questions about the contents of this brochure, please contact us at (303) 667-5117. 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 Financial Guidance LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Peak Financial Guidance LLC is 305485.

Peak Financial Guidance LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Material Changes

Material Changes since the last Annual Update

The following material changes have been made from the last annual Form ADV 2A filing dated February 18, 2023:

- Item 4 has been amended to report current assets under management.
- The Fee Schedule in Item 5 has been amended to add a tier for assets of \$2,500,001 - \$3,500,000.
- Item 12 has been amended to reflect TD Ameritrade's replacement as a custodian with Charles Schwab, due to their corporate merger.

Table of Contents

Advisory Business..... 4

Fees and Compensation.....5

Performance-Based Fees and Side-By-Side Management.....8

Types of Clients..... 8

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

Disciplinary Information..... 10

Other Financial Industry Activities and Affiliations..... 10

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... 11

Brokerage Practices.....12

Review of Accounts..... 13

Client Referrals and Other Compensation.....14

Custody..... 14

Investment Discretion..... 14

Voting Client Securities.....15

Financial Information..... 15

Requirements for State-Registered Advisers..... 15

Advisory Business

Peak Financial Guidance LLC (hereinafter called "PFG") is a Registered Investment Adviser based in Parker, Colorado, and incorporated under the laws of the State of Colorado. PFG is wholly- owned by Adam Horning, Managing Principal / Chief Compliance Officer (CCO). PFG is registered with the State of Colorado and is subject to its rules and regulations.

Founded in December 2019, PFG provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies.

PFG provides investment advisory services through its Investment Advisory Representatives ("IAR") to accounts opened with PFG. Managed Accounts are available to individuals.

Asset Management

PFG provides discretionary and non-discretionary investment management services to some of its clients through various managed account programs. PFG will assist clients in determining the suitability of the managed account for the client. The firm is compensated through a comprehensive single fee. PFG will be responsible for the following:

- Providing Firm Brochure (this document)
- Performing due diligence on custodian and service partners
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections

PFG's investment advice is tailored to meet clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. If a client chooses to notify PFG of investment restrictions via e-mail, it must be understood that PFG will not be held responsible for the terms of the notification until PFG acknowledges receipt of the notification by e-mail to the client. This is to prevent there being a miscommunication between the client and PFG in an instance where an e-mail is either not received or is not seen by the staff of PFG.

Financial Planning

Financial plans and financial planning may include, but are not limited to, investment planning, life insurance, tax concerns, retirement planning, college planning, and debt/credit planning. These services are based on either hourly fees or fixed fees; the final fee structure is documented in section 8 of the Investment Advisory Agreement.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Adam Horning, Principal Executive Officer of the firm. There is only one level of review and that is the total review conducted to create the financial plan.

As of January 16, 2024, the firm has \$48,292, 068 in discretionary Asset Under Management, and no non-discretionary assets.

Form ADV, Part 2A, Item 5

Fees and Compensation

The following types of fees will be assessed:

Asset Management – Fees are charged quarterly in advance and are based on asset size and the level of complexity of the services provided. In individual cases, PFG has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial quarter will be prorated based upon the number of calendar days in the calendar quarter that the advisory agreement is in effect. Fees are based on the market value of the assets on the last business day of the quarter. Annual fees range from 0.55% - 1.35%, depending on the amount of assets under management (“AUM”) – See chart below. Financial planning and consulting services are included in these fees for asset management services with the exception of unique circumstances that may require a separate agreement for financial planning services (description and fees are discussed below). If the situation warrants separate financial planning fees, it will be discussed upfront and a separate agreement will be negotiated.

The values of accounts under management from the same household will be aggregated for fee calculation, unless the client instructs otherwise.

Fee Schedule for Asset Management:

| Total Account Value | Maximum Annual Advisory Fee |
|---------------------------|-----------------------------|
| Under \$125,000 | 1.35% |
| \$125,001 – \$250,000 | 1.25% |
| \$250,001 – \$500,000 | 1.15% |
| \$500,001 – \$1,000,000 | 1.05% |
| \$1,000,001 - \$1,500,000 | 0.95% |
| \$1,500,001 - \$2,500,000 | 0.85% |
| \$2,500,001 - \$3,500,000 | 0.75% |
| \$3,500,001 - \$5,000,000 | 0.65% |
| \$5,000,001 or more | 0.55% |

All assets are charged at one level, i.e.: if you have \$550,000 under management, you will pay 1.05% annual fee for the entire amount.

As authorized in the client agreement, the account custodian withdraws Peak Financial Guidance LLC's advisory fees directly from the clients' accounts according to the custodian's policies, practices, and procedures. The custodial statement includes the amount of any fees paid to PFG for advisory services. You should carefully review the statement from your custodian and verify the calculation of fees and compare to the invoice you receive from PFG, and promptly notify PFG of any discrepancies. Your custodian does not verify the accuracy of fee calculations.

Fees are charged on a quarterly basis, meaning that advisory fees for a quarter are charged on the first day of the following quarter. There will never be an instance where more than \$500 will be required or solicited, six or more months in advance of the services to be rendered. Clients may terminate asset management services obtained from PFG, without a fee or penalty, upon written notice within five (5) business days after entering into the advisory agreement with PFG. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by PFG. Clients who terminate investment advisory services during a quarter are charged a prorated advisory fee based on the date of PFG's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable.

In addition to advisory fees paid to PFG as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. These fees vary by custodian. Clients should ask PFG for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. PFG does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with PFG and are compensation to the fund manager.

Mutual funds purchased or sold in accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in

accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of PFG or paying our advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive PFG's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary. Clients who wish to terminate the investment advisory agreement may do so with written notice. Upon receipt of written notification, any earned fee will immediately become due and payable. A client may terminate an advisory agreement without being assessed any fees or penalties within five (5) days of its signing.

Financial planning, described below, is offered at no additional charge as part of asset management service.

Financial Planning – Financial planning services are charged in arrears through a fixed fee or hourly arrangement as agreed upon between the client and Peak Financial Guidance LLC. There will never be an instance where \$500 or more in fees is charged six or more months in advance. Hourly fees are generally charged when the scope of services cannot be determined or if the services are limited to one meeting. Fixed fees are generally quoted to the client for longer term consulting projects. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. Hourly fees range from \$200 - \$500 per hour, depending on what is negotiated between PFG and the client. Similar financial planning services may be available elsewhere for a lower cost to the client. Fixed fees for longer-term consulting projects range from \$500 to \$4,000 per project. An estimate for total hours and charges is determined at the start of the advisory relationship.

Typically, clients will be invoiced in arrears for all time spent by PFG upon completion of the services. Clients who wish to terminate the planning process prior to completion may do so with written notice. Upon receipt of written notification, any earned fee will immediately become due and payable. A client may terminate an advisory agreement without being assessed any fees or penalties within five (5) days of its signing.

Certain affiliated persons of PFG are insurance licensed and creates a conflict of interest because it creates an incentive for these individuals to recommend the purchase of insurance for which they receive additional compensation. Please see Item 10 for more information regarding this conflict of interest.

For more information on the firm's custodian, please refer to Item 12 "Brokerage Practices" of this brochure.

Form ADV, Part 2A, Item 6

Performance-Based Fees and Side-By-Side Management

PFG does not charge performance-based fees or participate in side-by-side management.

Form ADV, Part 2A, Item 7

Types of Clients

PFG offers investment advisory services to individuals. There is no minimum account size to open and maintain an advisory account.

Form ADV, Part 2A, Item 8

Methods of Analysis, Investment Strategies, and Risk of Loss

PFG's methods of analysis and investment strategies incorporate the client's needs and investment objectives, time horizon, and risk tolerance. PFG is not bound to a specific investment strategy for the management of investment portfolios, but rather consider the risk tolerance levels pre-determined gathered at the account opening, as well as on an on-going basis. Examples of methodologies that our investment strategies may incorporate include:

Asset Allocation – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

Dollar-Cost Averaging – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

Technical Analysis – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

PFG does not recommend a particular type of security, but rather we make our recommendations based on the clients' goals and investment objectives. All investments are subject to an inherent risk of loss. The value of securities in the portfolio can increase and decrease in a moment's notice. Accordingly, clients can lose money-including principal. The stock market is subject to significant fluctuations in value as a result of political, economic, and market developments. If the stock market declines in value, the portfolio is likely to decline in value. Because of changes in the financial condition or prospects of specific companies, the individual stocks selected by PFG may decline in value, causing the account to decline in value.

Below are some more specific risks of investing:

Market Risk. The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the client or an underlying fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

Management Risk. PFG's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.

Equity Risk. Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

Fixed Income Risk. The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Mutual Fund / ETF Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition,

the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above ("premium") or below ("discount") their net asset value, an ETF bought at a premium may later sell at a Net Asset Value (NAV) or discount; (ii) the ETF may employ an investment strategy that utilizes trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. PFG has no control over the risks taken by the underlying funds.

Form ADV, Part 2A, Item 9

Disciplinary Information

PFG or any management person has not been subject to a criminal or civil action.

PFG or any management person has not been subject to an administrative proceeding by the SEC, any other financial regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

PFG or any management person has not been subject to a proceeding by a self-regulatory organization.

PFG or any management person does not have any other reportable disciplinary disclosures.

Form ADV, Part 2A, Item 10

Other Financial Industry Activities and Affiliations

Adam Horning, owner and sole IAR of PFG, is not currently registered with any broker dealer.

Neither PFG nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Adam Horning is also an independent licensed insurance agent. From time to time, he may offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. PFG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to act on an insurance recommendation made by firm. If they do decide to act, they always have the right to do so through the insurance agent of their choosing.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

PFG's Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of PFG's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Peak Financial Guidance LLC are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

PFG and its employees may buy or sell securities that are also held by clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients.

The advisor may have an interest or position in a certain security, which may also be recommended to the client. As these situations present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of PFG shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor may block personal trades with those of clients but will ensure that clients are not at a disadvantage.

PFG's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Adam Horning at (303) 667-5117.

When we provide investment advice to you regarding your retirement plan account or individual retirement account (IRA), we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;

- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
 - Charge no more than is reasonable for our services; and
 - Give you basic information about conflicts of interest.
- * It should be noted that the fiduciary duties enumerated above do not differ from those we observe in all our advisory activities.

Form ADV, Part 2A, Item 12

Brokerage Practices

We recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Company, Inc. (Schwab), a registered broker/dealer, member FINRA/SIPC, to act as the custodian of clients' assets and to effect trades for their accounts. We are independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to its retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge once the custodial relationship is established. Schwab's services include custody, brokerage, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Commission rates and securities transaction fees charged to affect a client's transactions are established by Schwab.

For client accounts in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab.

“Soft Dollars”

Charles Schwab makes available various support services that may not be available to retail customers. Some of those services help manage or administer clients' accounts, while others help us manage and grow our business. These support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

Services that Benefit Clients

Charles Schwab provides clients with access to a range of investment products, execution of securities transactions, and custody of client assets. Services described in this paragraph generally benefit the client and their account. The investment products available through Charles Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by clients.

Services That May Not Directly Benefit Clients

Charles Schwab also makes other products and services available to us that benefit us but may not directly benefit the client or their account. These products and services assist us in managing

and administering client accounts. In addition to investment research, Charles Schwab also makes available software and other technology that:

- Assists with back-office functions, recordkeeping, and client reporting for client accounts.
- Provides access to client account data (such as duplicate trade confirmations and account statements).
- Provides pricing and other market data.

Services That Generally Benefit Only Us

By using the services of Charles Schwab, we are offered other services intended to help us manage and further develop our business. These services include:

- Educational conferences and events.
- Consulting on technology, compliance, legal, and business needs.
- Publications and conferences on practice management and business succession.

Our Interest in Charles Schwab Services

The availability of these services from Charles Schwab benefits us as we do not have to produce or purchase them independently. In addition, we do not pay Charles Schwab for these services. This presents a conflict of interest in that we have an incentive to recommend Charles Schwab based on our interest in these services. However, we observe our duty as a registered investment advisory firm to put client best interest first. We believe the selection of Charles Schwab as custodian and broker is in the best interests of clients based on the scope, quality, price, and overall value of services to clients rather than on those services that benefit us.

PFG does not receive client referrals from custodians in exchange for cash or other compensation, such as brokerage services or research.

When PFG buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single “block” in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions. No client is favored over any other client. If an order is not completely filled, it is allocated pro-rata based on an allocation statement prepared by PFG prior to placing the order. Because of an order’s aggregation, some clients may pay higher transaction costs, or greater spreads, or receive less favorable net prices on transactions than would otherwise be the case if the order had not been aggregated.

Form ADV, Part 2A, Item 13

Review of Accounts

Client accounts are reviewed at least quarterly by Adam Horning, Principal Executive Officer of the firm. Adam Horning reviews clients’ accounts with regards to their investment policies and risk tolerance levels. Asset Management Clients are encouraged to meet with PFG at least once per year to review their account as a whole, ensuring that the management aligns with their

current financial condition, goals and objectives. All accounts at PFG are assigned to this reviewer.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Clients may be provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Adam Horning, Principal Executive Officer of the firm. There is only one level of review and that is the total review conducted to create the financial plan.

Form ADV, Part 2A, Item 14

Client Referrals and Other Compensation

PFG does not compensate any individual or firm for client referrals. In addition, other than the soft dollar benefits discussed in Item 12 above, PFG does not receive compensation for referring clients to other professional service providers.

Form ADV, Part 2A, Item 15

Custody

PFG does not have physical custody of any client funds and/or securities and does not take custody of client accounts at any time. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. However, by granting PFG written authorization to automatically deduct fees from client accounts, PFG is deemed to have limited custody. You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. You should carefully review the statement from your custodian and verify the calculation of fees and compare to the invoice you receive from PFG, and promptly notify PFG of any discrepancies.

Form ADV, Part 2A, Item 16

Investment Discretion

PFG offers discretionary and non-discretionary asset management. Before PFG can buy or sell securities on your behalf, you must first sign our Investment Advisory Agreement, which states whether the accounts will be managed on a discretionary or non-discretionary basis. For accounts that the firm manages on a discretionary basis, you are required to sign a discretionary

management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary or non-discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the “Advisory Business” section of this Brochure for more information on our discretionary management services.

Form ADV, Part 2A, Item 17

Voting Client Securities

We do not vote proxies on behalf of your advisory accounts. We are available to answer any questions you may have regarding proxies that you may receive. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Form ADV, Part 2A, Item 18

Financial Information

PFG is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$500 six or more months in advance.

Form ADV, Part 2A, Item 19

Requirements for State-Registered Advisers

Adam Horning is the firm’s Principal Executive Officers and Management Persons Education and Business Background:

Adam Horning
Managing Principal and CCO

Business Background:

Peak Financial Guidance LLC, Managing Principal and CCO, December 2019 - Present

Northwestern Mutual, Wealth Management Advisor, June 2006 – October 2019

Educational Background:

Central Michigan University, BAA – Commercial Recreation and Facilities Management,
Graduated: 2001

Other Business Activities

Certain affiliated persons of PFG are insurance licensed and creates a conflict of interest because it creates an incentive for these individuals to recommend the purchase of insurance for which they receive additional compensation. Please see Item 10 for more information regarding this conflict of interest.

None of the Principal Executive Officers and Management persons listed have had any complaints or any events required to be disclosed in this section.

Neither Peak Financial Guidance LLC nor any of its Management persons have any relationships or arrangements with any issuers of securities.