



# McPEAKE & COMPANY

FINANCIAL PLANNING | WEALTH MANAGEMENT

## McPeake & Company LLC

7011 Sunne Lane, Suite 336  
Walnut Creek, CA 94597

### Form ADV Part 2A – Firm Brochure

(925) 708-0390

Dated 9.29.2021

<https://mcpeakeandcompany.com>

This Brochure provides information about the qualifications and business practices of McPeake & Company LLC, “McPeake & Company”. If you have any questions about the contents of this Brochure, please contact us at (925) 708-0390. 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.

McPeake & Company is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about McPeake & Company is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification (or CRD) number #289402.

## Item 2: Material Changes

McPeake & Company LLC currently has \$2,550,336 in assets under management. McPeake & Company has joined the Zoe Advisor Network.

## Item 3: Table of Contents

<b>Item 2: Material Changes.....</b>	<b>2</b>
<b>Item 3: Table of Contents .....</b>	<b>2</b>
<b>Item 4: Advisory Business .....</b>	<b>3</b>
<b>Item 5: Fees and Compensation .....</b>	<b>6</b>
<b>Item 6: Performance-Based Fees and Side-By-Side Management.....</b>	<b>8</b>
<b>Item 7: Types of Clients.....</b>	<b>9</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.....</b>	<b>9</b>
<b>Item 9: Disciplinary Information .....</b>	<b>10</b>
<b>Item 10: Other Financial Industry Activities and Affiliations .....</b>	<b>10</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>11</b>
<b>Item 12: Brokerage Practices.....</b>	<b>13</b>
<b>Item 13: Review of Accounts.....</b>	<b>14</b>
<b>Item 14: Client Referrals and Other Compensation.....</b>	<b>15</b>
<b>Item 15: Custody.....</b>	<b>16</b>
<b>Item 16: Investment Discretion.....</b>	<b>16</b>
<b>Item 17: Voting Client Securities .....</b>	<b>17</b>
<b>Item 18: Financial Information .....</b>	<b>17</b>
<b>Item 19: Requirements for State-Registered Advisers .....</b>	<b>17</b>

## **Item 4: Advisory Business**

### **Description of Advisory Firm**

McPeake & Company is registered as an Investment Adviser with the State of California. We were founded in July 2017. Eileen McPeake, CFP® is the principal owner of McPeake & Company. As of September 29, 2021, McPeake & Company had discretionary authority over \$2,550,336 assets under management.

### **Types of Advisory Services**

#### **Wealth Management Services**

We are in the business of managing client assets in taxable accounts and tax-deferred retirement accounts (including, but not limited, to IRA's, Rollover IRA's, Roth IRA's, SEP IRA's, SIMPLE IRA's, Solo 401(k)'s). We review each client's personal goals and objectives, tax considerations, prior investment experience and risk tolerance to develop a personal investment policy or an investment plan with an asset allocation target for that client. We then create and manage a portfolio based on that policy and those allocation targets. Twice a year, we will rebalance the portfolio, to restore it to its target allocations.

We limit the securities we use in our portfolios to fifteen Exchange Traded Funds (ETF's). The ETF's we use are index funds from well-established institutions like Vanguard, Blackrock, Invesco, State Street and Wisdom Tree. These ETF's invest in domestic and international equities and fixed income, real estate investment trusts and commodities.

Clients may not impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs.

Some clients will come to us with taxable portfolios invested in a range of stocks, bonds, mutual funds or other securities that we don't typically use. They may have significant unrealized capital gains that require us to design a multi-year strategy to migrate their portfolio from its legacy holdings to those ETF's that we use.

Fees pertaining to our wealth management services are outlined in Item 5 of this brochure.

#### **Financial Planning**

Financial planning involves a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the

financial planning process, all questions, information and analysis will be considered as they affect, and are affected by, the entire financial and life situation of the client. Clients purchasing this service will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning and estate planning.

Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, when to start claiming Social Security and/or pension benefits, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also

recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients’ financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for

accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

### Educational Seminars and Speaking Engagements

We may provide seminars on an “as announced” basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual’s person’s need, nor does McPeake & Company provide individualized investment advice to attendees during these seminars.

### Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

### Wrap Fee Programs

We do not participate in wrap fee programs.

### CCR Section 260.235.2 Disclosure

For clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.

## Item 5: Fees and Compensation

Please note, unless a client has received the firm’s disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## Investment Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

<b>Combined Assets Under Management</b>	<b>Annual Advisory Fee</b>
First \$1,000,000	0.50%
Next \$1,000,000	0.25%
Amounts above \$2,000,000	0.00%

The annual fees are pro-rated and paid in advance on a quarterly basis. The advisory fee is tiered and is calculated by assessing the percentage rates using the predefined levels of assets shown in the above chart, and applying the fee to the account value as of the last day of the previous quarter. For example, a client with a combined account value of \$1,000,000 will pay an annual advisory fee of \$5,000. ( $\$1,000,000 \times 0.50\% = \$5,000$ .) A client with a combined account value of \$1,500,000 will pay an annual fee of 0.50% on the first \$1 million and an annual fee of 0.25% on the next \$500,000 resulting in a total annual fee of \$6,250. ( $(\$1,000,000 \times 0.50\%) + (\$500,000 \times 0.25\%) = \$5,000 + \$1,250 = \$6,250$ .) Clients with combined account values of \$2,000,000 or higher will not be charged an annual advisory fee for those amounts greater than \$2,000,000, effectively capping their annual advisory fee at \$7,500. ( $(\$1,000,000 \times 0.50\%) + (\$1,000,000 \times 0.25\%) = \$5,000 + \$2,500 = \$7,500$ .)

For accounts opened mid-quarter, the advisory fees will be pro-rated. For existing accounts, there will be no charge on funds added during the quarter nor adjustments made for funds withdrawn during the quarter. Our compensation does not include any third party fees (including brokerage, custodian or other transaction fees) which will be charged separately to your Account(s).

Advisory fees are directly debited from client accounts, or the client may choose to pay by check. Clients may terminate this agreement at any time by providing five day's written notice. A pro-rata refund of advisory fees will be returned to the client, by check, for any unearned fees during the quarter after the termination request has been received. The amount of the advisory fee to be refunded will be calculated as follows: (Advisory Fee paid for that calendar quarter)  $\times$  (Number of days remaining in the calendar quarter from the date termination notice was received by McPeake & Company) = Pro-rated fee to be returned.

## Financial Planning Hourly Fee

We charge \$300 per hour for financial planning. The fee may be negotiable in certain cases. At the start of a financial planning engagement, we will agree on the scope of work to be completed and will make an estimate of the time required to complete the project and likely total cost. The client must sign a contract signaling their desire to continue and pay a deposit of \$500 before work commences. Upon completion of the engagement and delivery of the financial plan, we will invoice clients for the actual number of hours worked, less the deposit. In cases where the financial planning project stretches across three months or more, clients will be invoiced monthly for work completed during the month. Clients may pay by electronic funds transfer or check.

## Educational Seminars and Speaking Engagements

Educational Seminars and Speaking Engagements may be provided pro-bono at McPeake & Company's discretion.

## Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that may be incurred by the client. When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses.

Mutual fund and ETF's also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of, and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

## CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

## Item 6: Performance-Based Fees and Side-By-Side Management

We do not offer performance-based fees.



## Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, including high net-worth individuals.

We have a \$500,000 initial account minimum. This minimum may be satisfied cumulatively across multiple client accounts (e.g., individual IRA's and jointly-held taxable accounts). This minimum may be waived based on the needs of the client and the complexity of the situation. For existing clients whose accounts dip below \$500,000 due to adverse market conditions or the need for unexpected withdrawals by the client, we will waive this account minimum.

## Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

### Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are low-cost index Exchange Traded Funds (ETF's).

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

We limit the securities we use in our portfolios to fifteen Exchange Traded Funds (ETF's). The ETF's we use are index funds from well-established institutions like Vanguard, Blackrock, Invesco, State Street and Wisdom Tree. These ETF's invest in domestic and international equities and fixed income, real estate investment trusts and commodities.

All securities investments carry risk, including the risk that an investor may lose a part or all of his or her initial investment. Risk refers to the uncertainty that the actual return the investor

realizes could differ from the expected return. Investors face a variety of risks either through direct ownership of securities or indirectly through securities owned by pooled investment vehicles such as mutual funds and ETF's. Risks include the following: interest rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk and financial risk. Due to these factors, we believe in building globally diversified portfolios.

All investments involve different degrees of risk. You should be aware of your risk tolerance level and financial situation at all times. We cannot guarantee the successful performance of an investment and we are expressly prohibited from guaranteeing accounts against losses arising from market conditions.

### **Legacy Securities in Some Clients' Taxable Accounts**

Some clients will come to us with taxable portfolios invested in a range of stocks, bonds, mutual funds or other securities that we don't typically use. They may have significant unrealized capital gains that require us to design a multi-year strategy to migrate their portfolio from its legacy holdings to those ETF's that we use.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **Administrative Enforcement Proceedings**

There are no administrative proceedings to report.

### **Self-Regulatory Organization Enforcement Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

No McPeake & Company employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No McPeake & Company employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

McPeake & Company does not have any related parties. As a result, we do not have a relationship with any related parties.

McPeake & Company only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

### Recommendations or Selections of Other Investment Advisers

McPeake & Company does not utilize or select other Advisors or third party managers. All assets under management are managed by McPeake & Company.

### Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding McPeake & Company, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

No investment advisor representatives of the firm hold the Certified Financial Planner (CFP) designation.

### Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for

personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

## Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

## Trading Securities At/Around the Same Time as Client's Securities

From time to time, representatives of McPeake & Company may buy or sell securities in their own accounts that we use in our client portfolios. This may provide an opportunity for representatives of McPeake & Company to buy or sell the same securities before or after recommending them to clients, resulting in representatives potentially profiting off of the recommendations they provide to clients. Such transactions may result in a conflict of interest. McPeake & Company will always transact client transactions before its own transactions when similar securities are bought and sold.

## Item 12: Brokerage Practices

### Factors Used to Select Custodians and/or Broker-Dealers

McPeake & Company LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

### Research and Other Soft-Dollar Benefits

We currently receive soft dollar benefits by nature of our relationship with TD Ameritrade Institutional, Division of TD Ameritrade, Inc., member FINRA/SIPC.

### Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### The Custodian and Brokers We Use

McPeake & Company participates in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between McPeake & Company's participation in the program and the investment advice it gives to its clients, although McPeake & Company receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving McPeake & Company participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to McPeake & Company by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by McPeake & Company's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit McPeake & Company but may not benefit its client accounts. These products or services may assist McPeake & Company in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help McPeake & Company manage and further develop its business enterprise. The benefits

received by McPeake & Company or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, McPeake & Company endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by McPeake & Company or its related persons in and of itself creates a potential conflict of interest and may indirectly influence McPeake & Company's choice of TD Ameritrade for custody and brokerage services.

## Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

## Item 13: Review of Accounts

### Investment Management

Eileen McPeake, Principal and CCO, will review client accounts that are managed by McPeake & Company on at least a quarterly basis. Accounts are reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Registered Investment Advisors working for McPeake & Company will conduct regularly scheduled reviews with clients to determine if their risk profile or investment goals and objectives have changed, which might require a change to the recommended investment portfolio or portfolios.

McPeake & Company uses TD Ameritrade as custodian for client funds. Clients thus have direct access to view their account(s) through the TD Ameritrade website. Clients will receive trade confirmations from TD Ameritrade for each transaction in their accounts as well as

monthly statements and annual tax reporting statements from TD Ameritrade showing all activity in the accounts, such as receipt of dividends and interest.

## Financial Planning

Client's financial plans are reviewed during the client's "Annual Review" meeting. Clients are asked to meet for a formal review on an annual basis. An annual review includes an update of the following financial information for a client: goals and objectives, net worth, cash flow analysis, income tax review, insurance review, estate planning review and retirement forecast. Financial planning reports are provided to clients whenever they meet for their annual review.

## Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients.

The Advisor engages independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice is disclosed to the client in writing by the solicitor and the Advisor pays the solicitor out of its own funds—specifically, the Advisor generally pays the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. The Advisor's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

The Advisor may receive client referrals from Zoe Financial, Inc through its participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc is independent of and unaffiliated with the Advisor and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fiduciary personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise the Advisor and has no responsibility for the Advisor's management of client portfolios or the Advisor's other advice or services. The Advisor pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to the Advisor ("Solicitation Fee"). The Advisor will not charge clients referred through Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to its clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc, please refer to the Zoe Financial Disclosure and Acknowledgement Form.

We receive a non-economic benefit from TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of TD Ameritrade’s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## Item 15: Custody

McPeake & Company does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which McPeake & Company directly debits their advisory fee:

- McPeake & Company will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- The client will provide written authorization to McPeake & Company, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.



## Item 17: Voting Client Securities

McPeake & Company will not ask for, nor accept, voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

## Item 19: Requirements for State-Registered Advisers

Eileen McPeake

Born: 1968

### Educational Background

- 1990 – BA, Government, from Cornell University (Ithaca, NY)
- 1995 - MBA, Finance, from The Anderson School at UCLA (Los Angeles, CA)
- 2016 - Certificate in Personal Financial Planning from the UC Berkeley Extension

### Business Experience

- 7/2017 – Present, McPeake & Company LLC, Principal and CCO
- 9/2013 – 7/2017, Rebalance IRA, Vice President, Investment Advice
- 8/2002 – 8/2013, Stay at Home Mom
- 7/2001 – 7/2002, WestLB Panmure, Assoc. Director, Equity Sales
- 7/1999 – 7/2001, Indigogo.com, CEO
- 9/1997 – 7/1999, McKinsey & Company, Engagement Manager
- 9/1995 – 8/1997, McKinsey & Company, Associate

## Professional Designations, Licensing & Exams

CFP® or Certified Financial Planner™ - CFP® practitioners must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. They must pass a comprehensive six-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

Series 65 exam.

## Other Business Activities

Eileen McPeake is not involved with outside business activities.

## Performance Based Fees

McPeake & Company is not compensated by performance-based fees.

Please refer to Item 6 of this brochure.

## Material Disciplinary Disclosures

No management person at McPeake & Company LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Material Relationships That Management Persons Have With Issuers of Securities

Neither McPeake & Company LLC, nor Eileen McPeake, has any relationship or arrangement with issuers of securities.

## Additional Compensation

Eileen McPeake does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through McPeake & Company.

## **Supervision**

Eileen McPeake, as Principal and Chief Compliance Officer of McPeake & Company, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

## **Requirements for State Registered Advisers**

Eileen McPeake has not been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

## **Conflicts of Interest**

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

## **Business Continuity Plan**

McPeake & Company LLC maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including death of the investment adviser or any of its representatives.



# MCPEAKE & COMPANY

FINANCIAL PLANNING | WEALTH MANAGEMENT

## McPeake & Company LLC

7011 Sunne Lane, Suite 336  
Walnut Creek, CA 94597

### Form ADV Part 2B – Brochure Supplement

(925) 708-0390

Dated 9.29.2021

<https://mcpeakeandcompany.com>

For

Eileen McPeake, CRD # 2175228

Principal & Chief Compliance Officer

This brochure supplement provides information about Eileen McPeake that supplements the McPeake & Company LLC ("McPeake & Company") brochure. A copy of that brochure precedes this supplement. Please contact Eileen McPeake if the McPeake & Company brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Eileen McPeake is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification ("CRD") number #2175228.

## Item 2: Educational Background and Business Experience

Eileen McPeake

Born: 1968

### Educational Background

- 1990 – BA, Government, from Cornell University (Ithaca, NY)
- 1995 - MBA, Finance, from The Anderson School at UCLA (Los Angeles, CA)
- 2016 - Certificate in Personal Financial Planning from UC Berkeley Extension

### Business Experience

- 7/2017 – Present, McPeake & Company LLC, Principal and CCO
- 9/2013 – 7/2017, Rebalance IRA, Vice President, Investment Advice
- 8/2002 – 8/2013, Stay-at-Home Mom
- 7/2001 – 7/2002, WestLB Panmure, Assoc. Director, Equity Sales
- 7/1999 – 7/2001, Indigogo.com, CEO
- 9/1997 – 7/1999, McKinsey & Company, Engagement Manager
- 9/1995 – 8/1997, McKinsey & Company, Associate

### Professional Designations, Licensing & Exams

CFP® or Certified Financial Planner™ - CFP® practitioners must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. They must pass a comprehensive six-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

Series 65 exam.

### **Item 3: Disciplinary Information**

No management person at McPeake & Company LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Item 4: Other Business Activities**

Eileen McPeake is not involved with outside business activities.

### **Item 5: Additional Compensation**

Eileen McPeake does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through McPeake & Company.

### **Item 6: Supervision**

Eileen McPeake, as Principal and Chief Compliance Officer of McPeake & Company LLC, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

### **Item 7: Requirements for State Registered Advisers**

Eileen McPeake has not been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.