



CLEARPEAK
CAPITAL MANAGEMENT

FORM ADV PART 2A BROCHURE

July 29, 2022

This brochure provides information about the qualifications and business practices of ClearPeak Capital Management LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact Jay Patel at (724) 993-3579 or via email at Jay.Patel@ClearPeak.capital.

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 ClearPeak Capital Management LLC (CRD #315374) is available on the SEC's website at www.AdviserInfo.sec.gov

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Item 2: Material Changes

Annual Update

The material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes Since the Last Update

Item 4:

“As this is the initial filing of this brochure, ClearPeak Capital has no Client assets under management.”
has changed to:

“As of July 29, 2022, ClearPeak Capital Management has a total of \$2386,000 in discretionary managed accounts.”

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the firm.

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Item 4: Advisory Business

Firm Description

ClearPeak Capital Management LLC ("ClearPeak Capital") was founded and began offering advisory services in 2021. Jay Patel is the 100% owner.

Types of Advisory Services

Asset Management:

ClearPeak Capital offers discretionary asset management services to advisory clients. ClearPeak Capital will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring, and the overall investment program will be based on the above factors. The Client will authorize ClearPeak Capital discretionary authority to execute selected investment program transactions as stated within the investment Advisory Agreement.

Client Tailored Services and Client Imposed Restrictions

The goal and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written client consent.

Wrap Fee Programs

ClearPeak Capital does not sponsor any wrap fee programs.

Client Assets under Management

As of July 29th, 2022, ClearPeak Capital Management has a total of \$2,386,000 in discretionary managed accounts.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Asset Management

ClearPeak Capital offers discretionary direct asset management services to advisory clients. ClearPeak Capital charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
Up to \$1,000,000	1.00%	.25%
\$1,000,001 to \$1,500,000	0.75%	.1875%
\$1,500,001 to \$2,000,000	0.50%	.125%
\$2,000,001 to \$3,000,000	0.25%	.0625%
Above \$3,000,001	0.10%	.025%

Fees are billed quarterly in arrears based on an average daily balance of the account for the previous quarter.

The calculation for the average daily balance is based on the formula $(A/D \times (F/P))$.

A = the sum of the daily balances in the billing period

D = number of days in the billing period

F = annual management fee

P = number of billing periods per year

For example (based on quarterly billing period):

1. Average the values of the client's account over the course of the entire quarter.

Month 1		Month 2		Month 3	
Day	Account balance	Day	Account balance	Day	Account balance
1	\$967,032.00	1	\$967,032.00	1	\$967,032.00
2	\$967,084.00	2	\$967,084.00	2	\$967,084.00
3	\$968,001.00	3	\$968,001.00	3	\$968,001.00
4	\$966,025.00	4	\$966,025.00	4	\$966,025.00
5	\$966,509.50	5	\$966,509.50	5	\$966,509.50
6	\$966,299.10	6	\$966,299.10	6	\$966,299.10
7	\$966,088.70	7	\$966,088.70	7	\$966,088.70
8	\$965,878.30	8	\$965,878.30	8	\$965,878.30
9	\$965,667.90	9	\$965,667.90	9	\$965,667.90
10	\$965,457.50	10	\$965,457.50	10	\$965,457.50
11	\$965,247.10	11	\$965,247.10	11	\$965,247.10
12	\$965,036.70	12	\$965,036.70	12	\$965,036.70
13	\$964,826.30	13	\$964,826.30	13	\$964,826.30
14	\$964,615.90	14	\$964,615.90	14	\$964,615.90
15	\$964,405.50	15	\$964,405.50	15	\$964,405.50
16	\$964,195.10	16	\$964,195.10	16	\$964,195.10
17	\$963,984.70	17	\$963,984.70	17	\$963,984.70
18	\$963,774.30	18	\$963,774.30	18	\$963,774.30
19	\$963,563.90	19	\$963,563.90	19	\$963,563.90
20	\$963,353.50	20	\$963,353.50	20	\$963,353.50
21	\$963,143.10	21	\$963,143.10	21	\$963,143.10
22	\$962,932.70	22	\$962,932.70	22	\$962,932.70
23	\$962,722.30	23	\$962,722.30	23	\$962,722.30
24	\$962,511.90	24	\$962,511.90	24	\$962,511.90
25	\$962,301.50	25	\$962,301.50	25	\$962,301.50
26	\$962,091.10	26	\$962,091.10	26	\$962,091.10
27	\$961,880.70	27	\$961,880.70	27	\$961,880.70
28	\$961,670.30	28	\$961,670.30	28	\$961,670.30
29	\$961,459.90			29	\$961,459.90
30	\$961,249.50			30	\$961,249.50
31	\$961,039.10			31	\$961,039.10
Total	\$29,890,048.10	Total	\$27,006,299.60	Total	\$29,890,048.10
Grand Total = \$86,786,395.80					

2. Divide the sum of the daily balances by the number of days in the billing period:

- a. $\$86,786,395.80/90 = \$964,293.29$ (average daily balance)

3. Calculate the quarterly fee: $\$964,293.29 \times 0.25\% = \$2,410.73$ (quarterly fee)

The annual fee is not negotiable.

If margin is utilized, the fees will be billed based on the gross value of the account. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by ClearPeak Capital with thirty (30) days written notice to Client and by the Client at any time with written notice to ClearPeak Capital. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to ClearPeak Capital.

Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options, and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. ClearPeak Capital does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to ClearPeak Capital. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

ClearPeak Capital does not require any prepayment of fees.

External Compensation for the Sale of Securities to Clients

ClearPeak Capital does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of ClearPeak Capital.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not on a share of the capital gains or capital appreciation of managed securities.

ClearPeak Capital does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for ClearPeak Capital to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

ClearPeak Capital generally provides investment advice to individuals and high net worth individuals

Account Minimums

ClearPeak Capital does not require a minimum to open an account.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, cyclical analysis and macro analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Macro analysis studies the economy. It usually focuses on trends in GDP, inflation, employment, spending, monetary

policy, and fiscal policy. The macro-environment is closely tied to the business cycle and can help make an understanding of cyclical analysis. Understanding the broad market and economic conditions using macro analysis can help allocate funds to parts of the market that stand most to potentially benefit from those macro forces.

The main sources of information include Equity, Fixed Income, and Economic Outlooks, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to ClearPeak Capital. Each Client executes a client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with ClearPeak Capital:

- *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 a 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.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the 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 held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly

bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, 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 or below their net asset value or (ii) 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. Adviser has no control over the risks taken by the underlying funds in which client invests.

- *Derivatives Risk:* Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

Item 9: Disciplinary Information

Criminal or Civil Actions

ClearPeak Capital and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

ClearPeak Capital and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

ClearPeak Capital and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of ClearPeak Capital or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

ClearPeak Capital is not registered as a broker-dealer and no affiliated representatives of ClearPeak Capital are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither ClearPeak Capital nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Jay Patel does not have any material relationships to disclose.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

ClearPeak Capital does not select or recommend other investment advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of ClearPeak Capital have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of ClearPeak Capital affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of ClearPeak Capital. The Code reflects ClearPeak Capital and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

ClearPeak Capital's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of ClearPeak Capital may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

ClearPeak Capital's Code is based on the guiding principle that the interests of the Client are our top priority. ClearPeak Capital's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

ClearPeak Capital will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

ClearPeak Capital and its affiliated persons do not recommend to client's securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

ClearPeak Capital and its affiliated persons may buy or sell securities that are also held by Clients. To mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide ClearPeak Capital with copies of their brokerage statements.

The Chief Compliance Officer of ClearPeak Capital is Jay Patel. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

ClearPeak Capital does maintain a firm proprietary trading account and affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, the firm and affiliated persons are required to disclose all reportable securities transactions as well as provide ClearPeak Capital with copies of their brokerage statements.

The Chief Compliance Officer of ClearPeak Capital is Jay Patel. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

ClearPeak Capital will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. ClearPeak Capital will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. ClearPeak Capital relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by ClearPeak Capital. ClearPeak Capital does not receive any portion of the trading fees.

ClearPeak Capital will require the use of Interactive Brokers.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by ClearPeak Capital from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although ClearPeak Capital has no formal soft dollar arrangements, ClearPeak Capital may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, ClearPeak Capital receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts

of ClearPeak Capital. ClearPeak Capital cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. ClearPeak Capital does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when ClearPeak Capital receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that ClearPeak Capital has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

ClearPeak Capital does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

ClearPeak Capital does not allow directed brokerage accounts.

Aggregating Securities Transactions for Client Accounts

ClearPeak Capital is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of ClearPeak Capital. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of ClearPeak Capital. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by ClearPeak Capital's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Performance reports will be provided by ClearPeak Capital at least monthly to Clients with assets under management

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

ClearPeak Capital does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

ClearPeak Capital does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by ClearPeak Capital.

ClearPeak Capital is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of ClearPeak Capital.

If ClearPeak Capital is authorized or permitted to deduct fees directly from the account by the custodian:

- ClearPeak Capital will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.
- ClearPeak Capital will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

Item 16: Investment Discretion

Discretionary Authority for Trading

ClearPeak Capital requires discretionary authority to manage securities accounts on behalf of Clients. ClearPeak Capital has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize ClearPeak Capital discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

ClearPeak Capital allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to ClearPeak Capital in writing.

ClearPeak Capital does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

ClearPeak Capital does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, ClearPeak Capital will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because ClearPeak Capital does not serve as a custodian for Client funds or securities and ClearPeak Capital does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

ClearPeak Capital has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

ClearPeak Capital has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither ClearPeak Capital nor its management receive performance-based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither ClearPeak Capital nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair, or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair, or unethical practices.

Material Relationship Maintained by this Advisory Business or Management Persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.



CLEARPEAK
CAPITAL MANAGEMENT

FORM ADV PART 2B BROCHURE

July 29, 2022

This brochure supplement provides information about Jay M. Patel and supplements the ClearPeak Capital Management LLC brochure. You should have received a copy of that brochure.

Please contact Jay M. Patel if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jay M. Patel (CRD # 7205857) is available on the SEC's website at www.AdviserInfo.sec.gov.

Jay M. Patel

CRD: 7205857

ClearPeak Capital Management

1471 Dominion Court

Pittsburgh, PA 15241, United States of America

+1 (724) 993-3579

Jay.Patel@ClearPeak.Capital

www.ClearPeak.Capital

Item 1: Principal Executive Officer

Jay M. Patel

Year of Birth: 1995

Item 2: Educational Background and Business Experience

Educational Background

Pennsylvania State University; Bachelor of Science in Information Sciences and Technology; 2018
South Fayette High School; Full-Time Student; 08/2010 – 06/2014

Business Experience for the Previous 5 Years

JM Metal Merchants LLC; Managing Member; 01/2022 – Present
ClearPeak Capital Management LLC; Chief Compliance Officer/Investment Advisor Representative; 06/2021 – Present
ClearPeak Capital Management LLC; Managing Member; 04/2021 – Present
Federated Global Investment Management Corp.; Investment Advisor Representative; 04/2020 – 03/2021
MDT Advisers, a Division of Federated MDTA LLC; Investment Advisor Representative; 03/2020 – 03/2021
Federated Investment Counseling; Investment Advisor Representative; 02/2020 – 03/2021
Federated Securities Corp. Registered Representative; 01/2020 – 03/2021
Federated Hermes, Inc.; Client Engagement Center Associate; 12/2019 – 03/2021
RSM; Technology Management/Consultant; 07/2018 – 11/2019
Monday Properties; Business Analyst Intern; 06/2017 – 08/2017

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Jay M. Patel and ClearPeak Capital Management, LLC. Jay M Patel has no history of legal or disciplinary events.

Item 4: Other Business Activities

Jay M. Patel is a managing member of JM Metal Merchants, LLC. JM Metal Merchants is a buyer and seller of scrap metal. JM Metal Merchants imports and exports scrap metal to buyers and sellers. JM Metal Merchants is not affiliated with ClearPeak Capital Management LLC, nor does it engage in any securities business domestically or internationally.

Item 5: Additional Compensation

Jay M. Patel does not receive any performance-based fees.

Item 6: Supervision

Since Jay M. Patel is the sole owner and investment adviser representative of ClearPeak Capital Management LLC and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at Jay.Patel@ClearPeak.Capital or (724) 993-3579.

Item 7: Requirements for State-Registered Advisors

Disciplinary Information

Jay M. Patel has not been involved in any reportable disciplinary events.

Bankruptcy Petition

Jay M. Patel has not been subject to a bankruptcy petition.