

Item 1 Cover Page  
**Firm Brochure**  
(Part 2A of Form ADV)

**GREYLOCK PEAK INVESTMENTS LLC**

**125 S. Main Street  
Sebastopol, CA 95472  
707-515-6770  
Fax 413.485.7008  
CRD #158941**

[www.greylockpeak.com](http://www.greylockpeak.com)

**February 19, 2019**

This brochure provides information about the qualifications and business practices of Greylock Peak Investments LLC. If you have any questions about the contents of this brochure, please contact us at: 707.515.6770, or by email at: [admin@greylockpeak.com](mailto:admin@greylockpeak.com). 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. Registration does not imply a certain level of skill or training.

Additional information about Greylock Peak Investments LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

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

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated March 23, 2018, we do not have any material changes to report.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 707.515.6770 or by email at: [admin@greylockpeak.com](mailto:admin@greylockpeak.com).

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## Item 4 Advisory Business

### Firm Description

Greylock Peak Investments LLC ("Greylock Peak" or the "Firm") was founded in 2011. Greylock Peak Investments is a privately owned limited liability company headquartered in Sebastopol, California. The Firm is owned equally by CM and Company, LLC and Electrum, LLC. CM and Company is beneficially owned and controlled by Chris Martenson, the Chief Executive Officer of the Firm. Electrum is beneficially owned and controlled by Adam Taggart, an executive officer of the Firm and Ashley Taggart.

### Types of Advisory Services

PeakProsperity.com, a website providing educational economic content, refers potential clients to other unaffiliated Registered Investment Advisory ("RIA") firms through our firm. Accordingly, Greylock Peak Investments is a Solicitor for other unaffiliated RIAs, including New Harbor Financial Group (CRD# 155528), an SEC-registered adviser. PeakProsperity.com shares common ownership with our firm. We are qualified to be and act as an investment adviser under the laws of the states in which we transact business in and are familiar with the rules and the numerous requirements pertaining to the solicitation of prospective investment advisor clients. The unaffiliated RIA firm is responsible for individual client suitability and portfolio management on an initial and ongoing basis. We will not provide any additional benefit to the client. In no event shall Greylock Peak participate in the management of client accounts or render investment advice to clients on behalf of the third party investment adviser.

When soliciting clients for unaffiliated RIA's each client shall be provided with the most recent relevant brochures or equivalent disclosure documents of the unaffiliated RIA's that details their applicable programs and the compensation to be paid by you and what portion of the same is received by us for our solicitation services and the association between our Firm and the unaffiliated RIA's. Clients who engage the unaffiliated RIA will sign an investment advisory agreement with the unaffiliated RIA.

Prior to introducing any Pennsylvania or Washington clients to another investment adviser, Greylock Peak will be responsible in determining if the investment adviser Firm is properly registered, licensed, notice-filed or exempt from registration with the Pennsylvania Department of Banking and Securities, and the Washington State Department of Financial Institutions, respectively.

### Types of Agreements

Greylock Peak Investments' investment advice is limited to recommending other investment advisers. Investment advisory services are provided by the unaffiliated RIA. Accordingly, Greylock Peak Investments does not have an agreement directly with the client.

Greylock Peak Investments, will, however, provide a copy of its Solicitor Disclosure Statement to the client. The Solicitor Disclosure Statement sets forth, among other things, the amount of compensation to be received by Greylock Peak Investments for referring the client to the unaffiliated RIA.

### Assets under Management

Greylock Peak Investments operates as a Solicitor and does not have investment advisory clients; therefore, there are no assets under management at our Firm.

### Wrap Fee Programs

Greylock Peak Investments does not participate in any wrap fee programs.

## Item 5 Fees and Compensation

### Solicitor Fee Schedule

The fees payable to us for these referral services depend upon the fee arrangement between our Firm and the unaffiliated RIA to whom you are referred. We will receive a portion of the unaffiliated RIA's ongoing account management fees as compensation for our solicitation or consulting. Our fee range is 25% to 30% of the fees charged to the referred client by the unaffiliated RIA. The fee shall be paid solely from the unaffiliated RIA and will be paid to us within 30 days of the unaffiliated RIA's receipt of the advisory fee from the client. The fee paid to us will not result in any additional charge to the client of the unaffiliated RIA.

With respect to the arrangement with New Harbor Financial Group ("New Harbor"), New Harbor uses the following fee schedule as a guideline for their asset management fees. If you become a client of New Harbor, refer to the fee schedule in your advisory agreement with New Harbor to determine the applicable fee you will pay New Harbor for their services.

<b>Assets Under Management</b>	<b>Annual Fee</b>
\$50,000 - \$100,000	2.00%
\$100,001 - \$200,000	1.75%
\$200,001 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.30%
\$1,000,001 - \$2,500,000	1.15%
\$2,500,001 - \$5,000,000	1.10%
\$5,000,001 - \$7,500,000	1.05%
\$7,500,001 - \$10,000,000	1.00%
\$10,000,001 - \$12,500,000	0.95%
\$12,500,001 - \$15,000,000	0.90%
\$15,000,001+	0.85%

New Harbor compensates our firm with a percentage of the fees collected from clients in accordance with the following fee schedule:

<b>Fee Sharing</b>	<b>Cumulative Assets Covered Under the Referral Agreement with New Harbor</b>
25%	up to \$75MM
27.50%	\$75MM - \$100MM
30%	\$100MM+

New Harbor will pay Greylock Peak its portion of the investment management fee on a monthly basis, postmarked no later than the 10TH of the month following the month for which payment is being rendered. This monthly payment will be 1/3rd of the quarterly fee described above (after applying the "fee sharing percentage"), adjusted as follows: (a) increased to account for Greylock Peak's share of prorated management fees charged by New Harbor for new clients who initiate a relationship within a given quarter; and (b) reduced to account for Greylock Peak's share of any prorated fees that New Harbor rebates to a client that terminates investment services with New Harbor during a quarter. As a matter of practice, New Harbor charges prorated fees to clients in the month after the quarter in question. As such, prorated fees, if any, will be paid to Greylock Peak in January for the 4th quarter, in April for the 1st quarter, July for the 2nd quarter, and October for 3rd quarter.

Referred Clients have no obligation to pay any compensation directly to Greylock Peak. Greylock Peak seeks payment of its compensation solely from New Harbor. Fees are only payable to Greylock Peak upon receipt of funds by New Harbor from the prospective client(s).

The duration of payments from New Harbor to Greylock Peak shall continue for as long as a given client remains a paying investment management client of New Harbor.

### **Termination**

The agreement between the unaffiliated RIA and our Firm may be terminated at any time and for any reason upon written notice to the other party. Termination of the agreement will only affect future referral prospects. We will remain entitled to continue receiving payment of our referral fees for all prospects whether they are clients at the time of termination or whether they become clients subsequent to termination as long as the unaffiliated RIA receives such fees from our referred clients and as long as we maintain the appropriate regulatory registrations.

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

We act solely as a solicitor for unaffiliated RIAs. We do not accept performance-based fees or participate in side-by-side management.

## **Item 7 Types of Clients**

Our customer base for referrals to other unaffiliated RIA's consists of individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The third party money managers to whom you are referred may impose minimum account sizes for participation in their advisory services. Please refer to the third party money manager's Form ADV Part 2A for information on applicable minimum account sizes, if any.

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

### **Methods of Analysis and Investment Strategies**

We refer clients to unaffiliated RIA's who offer a selection of different investment approaches. This includes trend following, countertrend, technical signal based, fundamental and tactical asset allocation strategies. Information of each unaffiliated RIA's method of analysis and investment strategies are described in each of their ADV Part 2A brochures or other disclosure documents that will be provided upon the referral.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. The advice offered to you is determined by the areas of expertise of the unaffiliated RIA agent providing the service and your stated objective. We advise you to notify your investment manager promptly if there are ever any changes in your financial situation or investment objective or if you wish to impose any reasonable restrictions upon their management services.

We do not represent, warrant, or imply that the services or methods of analysis employed by our unaffiliated RIA's can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. All securities trading, whether in stocks, options, or other investment vehicles, is speculative in nature and involves substantial risk of loss that clients should be prepared to bear. Past performance is not necessarily indicative of future results. You should make every effort to understand the risks involved.

## Item 9 Disciplinary Information

Greylock Peak Investments is required to disclose whether there are any legal events, criminal or civil action, an administrative proceeding before the SEC or any other regulatory agency, or a self-regulatory organization proceeding or disciplinary events that are material to a referral's or a prospective referral's evaluation of our advisory business or the integrity of our management. The Firm and its employees have no issues to disclose.

## Item 10 Other Financial Industry Activities and Affiliations

### Financial Industry Activities

Greylock Peak Investments does not engage in any additional financial industry activities beyond those already stated in this ADV.

The executive officers of Greylock Peak Investments are also executive officers of Whitney Peak Ventures LLC, which owns and operates the website PeakProsperity.com, which is a website focused on macro trends in the economic, energy and environmental sectors, and which offers insights and guidance on how to prepare for a post-peak-oil future. Clients of Greylock Peak Investments may also be enrolled members of PeakProsperity.com. Clients are not obligated to act on any recommendation by Greylock Peak Investments to retain a third party investment adviser for money management services. However, if Clients do retain a recommended third party investment adviser for such services, they are advised through a separate disclosure document that Greylock Peak Investments will share in the compensation the Client pays to the recommended investment adviser.

### Third Party Relationships

We currently have a third party advisory relationship with New Harbor Financial Group, LLC in Leominster, MA. We may develop other solicitor arrangements with other unaffiliated RIA's at our discretion.

Upon being referred to a third-party adviser, you will receive a Solicitor's Disclosure Statement. The Solicitor's Disclosure Statement provides, among other things, disclosure regarding the affiliation, if any, between our Firm and the third-party adviser: the terms of the solicitation agreement between our Firm and the third-party adviser, including the amount of compensation to be paid to our Firm for the solicitation; and the additional cost to you if any, as a result of the solicitation agreement.

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

### Code of Ethics

The employees of Greylock Peak Investments have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The Firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### Participation or Interest in Client Transactions

Greylock Peak Investments and its employees do not and will not buy or sell securities held by clients.

### Personal Trading

The Chief Compliance Officer of the Firm reviews all employee trades as required by applicable law to ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

## **Item 12 Brokerage Practices**

Greylock Peak Investments does not recommend a particular broker-dealer to any client or prospect.

## **Item 13 Review of Accounts**

We do not review client accounts nor do we provide reports directly to clients. Clients receive performance reports of third party adviser and typical statements on their accounts from the unaffiliated RIA.

## **Item 14 Client Referrals and Other Compensation**

### **Client Referrals**

Greylock Peak Investments does not pay third parties for client referrals.

### **Other Compensation**

Greylock Peak Investments receives no other compensation other than what is already disclosed in this Brochure.

## **Item 15 Custody**

Greylock Peak Investments does not maintain custody of any funds or securities for any clients we refer to other unaffiliated RIA's. All assets are held at the designated qualified custodians with each unaffiliated RIA, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

## **Item 16 Investment Discretion**

We do not manage client accounts. We will refer you to an unaffiliated RIA whose investment style is believed to be consistent with your financial needs, investment goals, tolerance for risk and stated investment objectives to manage your portfolio. The unaffiliated RIA is granted authority by you to manage and invest your assets.

## **Item 17 Voting Client Securities**

Without exception, we will not vote proxies on behalf of your advisory accounts. Please reference the Part 2A Disclosure Brochure, Item 17 "Voting Client Securities" of the referred advisory firm for details on whether they vote proxies on your behalf along with their proxy voting policies and procedures or if you will receive proxies directly from your advisory firm, the custodian, or the transfer agent and whether you can contact your adviser about a particular solicitation.

## **Item 18 Financial Information**

### **Financial Condition**

Greylock Peak Investments does not have any financial impairment that will preclude the firm from meeting contractual commitments.

A balance sheet is not required to be provided because Greylock Peak Investments does not serve as a custodian for client funds or securities, and does not charge more than \$500 in fees per client, six months or more in advance nor have we filed a bankruptcy petition at any time in the past ten years.

## Item 19 Requirements for State-Registered Advisers

### Principal Executive Officers and Other Business Activities

#### **Christopher Martenson, PhD**

Born 1962

CRD# 5979732

Educational Background:

- Cornell University - 1998, MBA
- Duke University - 1994, PhD (field of study: neurotoxicology)
- Lewis and Clark - 1988, BS

Business Experience:

- Greylock Peak Investments LLC, Chief Executive Officer, 09/2011 to Present
- Whitney Peak Ventures, CEO, 2011 to present
- CM and Co., LLC, CEO, 2005 to present
- Crossroads Partners, Owner 2007 to 2009
- CMAL LLC, Owner, 2005 to 2010
- SAIC, Vice President, 2002 to 2005

Dr. Martenson does not have any reportable disciplinary disclosure.

Dr. Martenson is CEO of Whitney Peak Ventures and CM and Co. LLC and devotes approximately 80% of his professional time as such.

Dr. Martenson does not receive any additional compensation for providing financial advisory services beyond that received as a result of his capacity as Chief Executive Officer of Greylock Peak Investments LLC.

Dr. Martenson does not have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceedings, and has not been the subject of a bankruptcy petition.

#### **Adam Taggart**

Born 1971

CRD# 2522524

Educational Background:

- Stanford University Graduate School of Business - 1999, MBA
- Brown University - 1994, BA

Business Experience:

- Greylock Peak Investments LLC, Executive Officer, 09/2011 to Present
- Whitney Peak Ventures LLC, President and Managing Member, 07/2010 to present
- Electrum LLC, Founder and CEO 06/2010 to Present
- Yahoo, Inc., Vice President, Marketing, 10/2009 to 06/2010
- Yahoo, Inc., Head of Global Marketing & Americas Product Development, 01/2009 to 11/2009
- Yahoo, Inc., Senior Director, Product Development & Product Marketing, 09/2006 to 01/2009
- Yahoo, Inc., Director of Marketing, 04/2001 to 09/2006

Mr. Taggart does not have any reportable disciplinary disclosure.

Mr. Taggart divides his time between Greylock Peak Investments, Whitney Peak Ventures and Electrum LLC. The amount of time spent at each of the affiliated entities may vary at any given time.

Mr. Taggart is President and Managing Member of Whitney Peak Ventures and CEO of Electrum, LLC and devotes approximately 80% of his professional time as such.

Mr. Taggart does not have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceedings, and has not been the subject of a bankruptcy petition.

Mr. Taggart and Dr. Martenson may provide consulting and marketing services to funds and other investment entities. These activities are distinctly separate from, unrelated to, and outside of their work with Greylock Peak Investments. Mr. Taggart is not an investment adviser representative and will not provide investment advice.

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance-based fees.

Neither our firm nor any persons associated with our firm have a material relationship or arrangement with any issuer of securities.

## **Item 20 Additional Information**

### **Information Security Program**

Greylock Peak Investments maintains an information security program to reduce the risk that your personal and confidential information may be breached. In addition to meeting federal standards, this policy also complies with Massachusetts General Law Chapter 93H, the Security Breaches Act which was adopted by the Massachusetts legislature to protect the personal information of residents in the Commonwealth of Massachusetts.

### **Privacy Notice**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, if you choose to discuss the services available through our unaffiliated investment adviser(s), we will share some information with the unaffiliated investment adviser(s), and our other service providers, such as accountants, consultants, and/or attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to further a relationship with the unaffiliated investment adviser at your request, or required by law.