

**Client Relationship Summary**  
**Peddock Capital Advisors, LLC (CRD# 148216)**

## Introduction

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Our firm, Peddock Capital Advisors, LLC, is registered as an investment adviser with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## Relationships and Services

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### What investment services and advice can you provide me?

**Services:** We offer investment advisory services to retail investors. Our standard service provided is a wealth management service, which is a combination of consulting, investment management, and financial planning. In certain circumstances based on the client's needs, we may also offer consulting as a separate stand-alone service. We work closely with you to identify your investment goals and objectives, as well as risk tolerance and financial situation in order to develop an investment approach specific to you.

**Accounts, Investments, and Monitoring:** We provide services to individual, joint, retirement, trust and estate accounts. We primarily use mutual funds, exchange-traded funds, stocks and bonds in constructing portfolios. We do not make available or offer advice with respect to only proprietary products or a limited menu of products or types of investments. As part of our services, we monitor portfolios and securities in accounts on a regular and continuous basis. We also meet with you at least annually, or more frequently, depending on your needs.

**Investment Authority:** We provide our services on a perpetual and discretionary basis. We execute investment recommendations in accordance with your investment objectives without your prior approval of each specific transaction. Our engagement will continue until you notify us otherwise in writing.

**Account Minimums & Other Requirements:** We do not require an account or relationship size minimum in order for you to open/maintain an account or establish a relationship.

**Additional Information:** For more detailed information on our relationships and services, please see Item 4 – Advisory Services, Item 13 – Review of Accounts and Item 7 – Types of Clients of our Form ADV Part 2A available via our firm's [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

## Fees, Costs, Conflicts, and Standard of Conduct

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### What fees will I pay?

**Asset-Based Fees:** Our asset-based fees for our standard wealth management range up to 1.00% annually. This fee is collected on a monthly basis and calculated as a percentage of the value of the cash and investments in your account[s] that we manage. This presents a conflict of interest as we are financially incentivized to encourage you to place more assets in your advisory account as you will ultimately pay more in advisory fees.

**Hourly Fees:** Our hourly fees for consulting are at a rate of up to \$500 per hour. We collect fees periodically, where fees are collected in a single installment upon invoice. Hourly fees are negotiable based on the nature and complexity of the services to be provided and the overall relationship with us.

**Other Fees & Costs:** In addition to our advisory fee, you will also be responsible for custody fees, account administrative fees, fees and expenses related to mutual funds and exchange-traded funds and applicable securities transaction fees.

**Additional Information: You will pay fees and costs whether you make or lose money on your investments.** Fees and investment expenses will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information on our fees, please see Item 5 – Fees and Compensation of our Form ADV Part 2A available via our firm's [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What are your legal obligations to me when acting as my investment adviser?  
How else does your firm make money and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.*

We will recommend that you open your account with a specific custodian, where we maintain an institutional relationship and receive economic benefits. The receipt of economic benefits presents a conflict of interest and can influence our recommendation of the custodian to you. However, you ultimately decide where to open your accounts. Choosing a different custodian may result in the loss of quality of service and/or ability to obtain favorable prices.

**Additional Information:** For more detailed information, please see Item 10 – Financial Industry Activities and Affiliations, Item 12 – Brokerage Practices and Item 14 – Client Referrals and Other Compensation of our Form ADV Part 2A available via our firm’s [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *How might your conflicts of interest affect me, and how will you address them?*

**How do your financial professionals make money?**

Our financial professionals are compensated based on an agreed-upon annual salary. In addition, our financial professionals may be compensated based on the revenue generated from advisory services, which is distributed in accordance with our partnership agreement. This means our financial professionals have an incentive to increase the asset size in the relationship or solicit new business.

**Disciplinary History**

**Do you or your financial professionals have legal or disciplinary history?**

No. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Conversation Starters:** *As a financial professional, do you have any disciplinary history? For what type of conduct?*

**Additional Information**

You can find additional information about our investment advisory services by viewing our Form ADV Part 2A available via our firm’s [Investment Adviser Public Disclosure Page](#) or by visiting <https://peddock.com>. You can request up to date information and a copy of our client relationship summary by contacting us at [msimmons@peddock.com](mailto:msimmons@peddock.com) or **(781) 848-0288**.

**Conversation Starters:** *Who is my primary contact person? Is he or she a representative of an investment advisor? Who can I talk to if I have concerns about how this person is treating me?*

**Exhibit**

**Material Changes**

The following material changes have been made to our Form CRS:

- The Advisor distinguished its wealth management services as its standard offering.



## **Peddock Capital Advisors, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: February 26, 2024**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Peddock Capital Advisors, LLC (“PCA” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

PCA is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about PCA to assist you in determining whether to retain the Advisor.

Additional information about PCA and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 148216.

*NOTE: This document includes PCA’s Form ADV 2A (“Disclosure Brochure”), each Investment Advisor Representative’s Form ADV 2Bs (“Brochure Supplement”) and PCA’s Privacy Policy.*

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of PCA. For convenience, the Advisor has combined these documents into a single disclosure document.

PCA believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. PCA encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes made to this Disclosure Brochure since its last filing and distribution to Clients.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of PCA.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching with the Advisor's firm name or CRD# 148216. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Peddock Capital Advisors, LLC (“PCA” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a limited liability company (“LLC”) under the laws of the Commonwealth of Massachusetts. PCA was founded in September 2008 and is primarily owned and operated by Peter E. Simmons (President and Managing Shareholder) and Matthew E. Simmons (Chief Operating Officer and Wealth Advisor). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by PCA. For information regarding this Disclosure Brochure, please contact John DeSimone, Chief Compliance Officer, at (781) 848-0288 or by email at [jdesimone@peddock.com](mailto:jdesimone@peddock.com).

### **B. Advisory Services Offered**

PCA offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, businesses and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. PCA’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

PCA provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services, including family office bill pay services and a broad range of comprehensive consultative services.

*Investment Management Services* - PCA works closely with each Client to identify their investment goals and objectives, risk tolerance, and financial situation in order to create a portfolio strategy. PCA will then construct a portfolio consisting of mutual funds, exchange-traded funds (“ETFs”), individual stocks, bonds, and derivatives to achieve the Client’s investment goals. The Advisor may also utilize other investments types, as appropriate, to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Additionally, PCA may render non-discretionary investment management services to Clients relative to variable life/annuity products that they may own, their individual employer-sponsored retirement plans, and/or 529 plans or other products that may not be held by the Client’s primary custodian. In so doing, PCA either directs or recommends the allocation of client assets among the various investment options that are available with the product. Client assets are maintained at the specific insurance company or custodian designated by the product.

PCA’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. PCA will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

PCA evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. PCA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. PCA may recommend specific positions to increase/decrease sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. PCA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Family Office Services* - PCA may also offer family office bill pay services to certain Clients as part of the Advisor’s wealth management services, pursuant to a wealth management agreement. PCA does accept and maintain custody of Client accounts that have engaged the Advisor for these services. Please see Item 15 for more information.

PCA will provide investment advisory services and portfolio management services and will not provide securities custodial services. All Clients must establish a custody and trading relationship with a “qualified custodian”. Please see Item 12 – Brokerage Practices.

*Consulting Services* - PCA will typically provide a variety of consulting services to Clients as a part of the Advisor’s wealth management services. Clients may also engage with PCA for consulting services as a separate, stand-alone engagement, pursuant to a written agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives.

Generally, such consulting services involve rendering a specific financial consultation based on the Client’s financial goals and objectives. Consulting seeks to address various needs of the Client’s situation, which may encompass one or more areas of need, including but not limited to: Wealth Transfers; Philanthropy; Estate Planning; Trust Administration; Real Estate Transfers; Succession Planning; Educational Funding; Insurance needs; Retirement Planning; Family Governance; Risk Management.

A financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

PCA may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

Consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for wealth management services or to increase the level of investment assets, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### Retirement Plan Advisory Services

PCA provides retirement plan advisory services on behalf of the retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Investment Oversight Services (ERISA 3(21))
- Investment Due Diligence and Oversight

- Performance Reporting
- Ongoing Investment Recommendation and Assistance

These services are provided by PCA serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of PCA’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

### **C. Client Account Management**

Prior to engaging PCA to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – PCA, in connection with the Client, will develop a strategy that seeks to achieve the Client’s investment goals and objectives.
- Asset Allocation – PCA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – PCA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – PCA will provide investment management and ongoing oversight of the Client’s investment portfolio.

### **D. Wrap Fee Programs**

PCA does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by PCA.

### **E. Assets Under Management**

As of December 31, 2023 PCA manages \$613,547,587 in Client assets, \$590,761,380 of which are managed on a discretionary basis and \$22,786,207 on a non-discretionary basis. PCA also oversees and advises on \$3,552,095 in assets under advisement. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

### **A. Fees for Advisory Services**

#### Wealth Management Services

Wealth management fees are paid monthly in arrears, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of each month. Wealth management fees range up to 1.00% annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The wealth management fee in the first month is prorated from the inception date of the account to the end of the month. All securities held in accounts managed by PCA will be independently valued by the Custodian. PCA will conduct periodic reviews of the Custodian’s valuations. Fees are determined at the sole discretion of the Advisor. Fees may vary from the fee rate above, depending on the nature and complexity of each Client’s circumstances.



The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, or costs.

The Client may make additions or withdrawals from the account[s] at any time, subject to the Advisor's right to terminate an account or the overall relationship. Additions may be in cash or securities provided that the Advisor reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets upon notice to PCA, subject to the usual and customary securities settlement procedures. However, the Advisor typically designs its investment portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. PCA may consult the Client about the implications of such transactions. Clients are advised that when such securities are liquidated, they may be subject to securities transaction fees, short-term redemption fees, and/or tax ramifications.

#### Consulting Services

PCA's consulting services are generally included under a wealth management engagement, and provided as part of the annual asset-based fee set forth above. PCA may, however, pass along certain administrative or overhead costs to clients that the firm incurs in the course of providing these services (e.g., expenses for an audit of the accounts over which PCA maintains custody).

Under certain limited circumstances, PCA also charges an hourly-based fee for consulting services. PCA may charge this hourly fee in the event 1) a non-investment management client engages the firm to provide these services, or 2) an existing client engages PCA to provide services requiring an excessive amount of time and/or substantial resources. PCA offers consulting services at rates ranging from \$150 to \$500 per hour. Fees are based on the nature and complexity of the services to be provided and the overall relationship with the Advisor.

#### Retirement Plan Advisory Services

Retirement plan advisory fees are typically paid quarterly, at the end of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are either charged a fixed fee or an annual asset-based fee. Fixed fees range up to \$10,000 per year and asset-based fees range up to 0.75% of assets under management at the end of the quarter. Retirement plan advisory fees are based on the scope and complexity of the services provided to the Plan and are negotiable at the sole discretion of the Advisor.

### **B. Fee Billing**

#### Wealth Management Services

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall communicate with the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective month-end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total market value of each account at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by PCA to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Consulting Services

Consulting fees are invoiced by the Advisor and are billed periodically in arrears based on the number of hours completed, pursuant to a consulting agreement.

#### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than PCA, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and execution

fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The investment advisory fee charged by PCA is separate and distinct from these custody and execution fees.

In addition, all fees paid to PCA for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of PCA, but would not receive the services provided by PCA which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by PCA to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Wealth Management Services

PCA is compensated for its services at the end each month after wealth management services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be responsible for wealth management fees up to and including the effective date of termination. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

##### Consulting Services

PCA is compensated for its consulting services in arrears. Either party may terminate the written agreement, at any time, by providing advance written notice to the other party. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project multiplied by the contractual hourly rate. The Client's written agreement with the Advisor is non-transferable without the Client's prior consent.

##### Retirement Plan Advisory Services

PCA is compensated for its services at the end of the quarter after retirement plan advisory services are rendered. Either party may request to terminate their services with PCA at any time by providing advance written notice to the other party. The Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

PCA does not buy or sell securities and does not receive any compensation for securities transactions in any Client account[s], other than the investment advisory fees noted above.

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

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PCA does not charge performance-based fees for its investment advisory services. The fees charged by PCA are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

PCA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## Item 7 – Types of Clients

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PCA offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, businesses and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. PCA does not impose a minimum size for establishing a relationship.

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

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### A. Methods of Analysis

PCA primarily employs a combination of inherently fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from PCA is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to Clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that PCA will be able to accurately predict such a reoccurrence.

As noted above, PCA generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. PCA determines an appropriate asset allocation target for each client, consisting of target weightings for both equity and fixed income holdings. The target allocation is based upon an evaluation of the Client's individual investment goals, risk tolerance, and anticipated liquidity needs. The allocation mix is generally kept as close to the target as possible, giving consideration to the transaction costs of rebalancing. The firm uses a tactical allocation approach when relative market valuations fall outside pre-determined thresholds.

PCA generally retains discretion over client assets and, where liquidity and account size are sufficient, invests client assets directly in a portfolio of stocks and bonds. The equity portion of client portfolios is generally in large capitalization U.S. stocks, and is generally benchmarked against the S&P 500 Index. PCA determines its security selection utilizing a variety of sources, ranging from internal capital market expectations and analysis, to outside research services subscriptions from Zack's Advisor Tools and FactSet.

For a portion of Client assets managed in the "Global Macro" investment program, holdings consist of liquid, U.S. traded vehicles, such as ETFs or mutual funds. The Global Macro investment process is intended to reflect the firm's top-down or macroeconomic investment views. PCA develops said views through a variety of channels, including wide reading (newspapers, third-party research, blogs, SEC filings, etc.), primary research on economic data gathered from the Federal Reserve. This portion of a client's portfolio is designed in an effort to take advantage of alpha generating ideas and is not intended to be income tax sensitive. Depending upon the client's situation, this portion of the portfolio may be relatively small as compared to portfolio-wide holdings.

When constructing client bond portfolios, PCA considers the client's tax status to determine whether tax-exempt municipal bonds, U.S. Treasury bonds, or taxable corporate, municipal, or agency bonds are most appropriate. Once tax issues have been addressed, the firm selects individual bonds with yield, liquidity, duration, and time-

to-maturity that meet the client's individual goals and needs. For those clients with large, identifiable cash outflows on the horizon, PCA attempts to coordinate these cash needs using bonds of equal maturity. Accordingly, PCA generally does not invest in bonds below investment grade (i.e., S&P BBB-; Moody's Baa3).

In those client accounts for which a portfolio of direct stock and bond investments is impractical (due to small account size), PCA uses liquid, U.S. traded ETFs or mutual funds to attain the target equity and fixed income allocations.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. PCA will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are discussed with each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETF has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily, therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the

coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained or bond redemptions must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's real rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the market's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond and there could be material implications on execution price.

#### Derivative Risks

Derivatives are difficult to define but are present in a wide variety of investments. In finance, derivatives refer to contracts whose value is derived from another asset, which include stocks, bonds, currencies, interest rates, commodities, and related indexes. Often times derivatives are used as a hedge to protect against downside risk, but derivatives can also be used to speculate. Purchasers of derivatives are essentially wagering on the future performance of that asset. Derivatives include such widely accepted products as futures and options. Due to the speculative nature of derivatives, even when they are being employed to hedge, unique risks are present including a party's misunderstanding of the contract, inability of the derivative to match or derive its value from the other asset, liquidity risks, and the counterparty risk between the parties to the transaction.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

#### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving PCA or any of its management persons.**

PCA values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 148216.

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

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##### Tax and Accounting Services

The Advisor offers tax and accounting services, which is made available through Peddock Tax Services, LLC ("PTS"), a firm under the ownership of PCA and John DeSimone. The cost for these services are separate and in addition to our investment advisory fees noted above. The Advisor and Mr. DeSimone is entitled to the additional revenue generated by PTS, presenting a conflict of interest. Clients are under no obligation to engage the Advisor and PTS for these services.

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

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##### **A. Code of Ethics**

PCA has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with PCA ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. PCA and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of PCA's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (781) 848-0288 or via email at [jdesimone@peddock.com](mailto:jdesimone@peddock.com).

##### **B. Personal Trading with Material Interest**

PCA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. PCA does not act as principal in any transactions. In addition, the Advisor does

not act as the general partner of a fund, or advise an investment company. PCA does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in the Same Securities as Clients**

PCA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by PCA requiring reporting of personal securities trades made by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor also has adopted written policies and procedures to detect the misuse of material non-public information.

### **D. Personal Trading at the Same Time as Clients**

While PCA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically traded either at the same time or afterwards. **At no time will PCA, or any Supervised Person of PCA, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

PCA does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will select the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize PCA to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, PCA does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where PCA does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fees or costs associated with using a custodian not recommended by PCA. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. PCA may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices.

PCA will generally recommend that Clients establish their account[s] with Fidelity Clearing & Custody Solutions and affiliated entities of Fidelity Investments, Inc. (collectively "Fidelity"), where the Advisor maintains an institutional relationship Fidelity, whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below. In addition, PCA maintains Prime Brokerage relationships with several institutions primarily utilized for Client's fixed income needs.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **PCA does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodians. However, the Advisor may receive certain economic benefits from Fidelity. Please see Item 14 below.**

**2. Brokerage Referrals** - PCA does not receive any compensation from any third-party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis” where PCA will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account). PCA will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

From time to time, the Client may need to sell a security that the Advisor thinks is a good fit for another Client’s account. In this case, PCA may wish to execute an internal cross transaction of fixed income securities between clients. PCA will only do this when the proposed transaction is in the best interests of both clients. PCA acknowledges its duty to seek best execution for Clients and acknowledges that the use of cross transactions raises conflict of interest concerns under the Investment Advisers Act of 1940, Section 206(3) and Section 206(4). Therefore, cross transactions are only considered when the need to liquidate securities results in an availability of securities that are appropriate for another Client account[s]. PCA prohibits the need to purchase securities as the sole reason for identifying sale candidates nor does it allow the need to sell an issue as the sole reason for purchase of such by another client. When affecting a cross transaction, PCA does not act either as principal or agent through a broker/dealer or otherwise receive commissions or any type of compensation for effecting cross trades. PCA’s sole intent for doing a cross trade is to act in the best interest of each client in accordance with their respective investment objectives. Cross trades are an exception to PCA’s normal operating procedures and are only used when it is advantageous to both Client accounts in the absence of appropriate and comparable alternatives. PCA prospectively requires written consent from all participating parties to authorize cross trades. Additionally, PCA will deliver written confirmations before or at the completion of the cross trade that includes 1) the nature of the trade; 2) the date of the transaction; 3) an offer to furnish the time of the trade; and 4) the source and amount of any remuneration received by the Advisor. The Advisor will deliver annual written reports to each client that participated in cross transactions containing the total number of transactions enacted since the last distribution. All confirmations and reports provided by the Advisor will contain language that the cross transaction may be revoked upon written notice.

#### **B. Aggregating and Allocating Trades**

PCA may aggregate or “batch” trades as the primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. PCA will execute each transaction through the Custodian designated by the Client. PCA will seek to execute securities transactions by the close of each business day and securities will be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients’ accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of PCA. Formal reviews are generally conducted at least annually. For those clients for whom PCA provides family office and/or consulting services, reviews are conducted on an “as needed” basis.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13A above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify PCA if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

## **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity online. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports detailing their holdings, allocations, and performance.

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

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### **A. Compensation Received by PCA**

#### Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

### **B. Compensation for Client Referrals**

If a Client is introduced to the Advisor by either an unaffiliated or affiliated party (herein a "Promoter"), the Advisor compensates that Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor, and shall not result in any additional charge to the Client.

## **Item 15 – Custody**

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PCA has "custody" of client accounts as defined in Rule 206(4)-2 under the Investment Advisers Act of 1940 as the Advisor may also serve as Trustee of certain Client's account[s]. In addition, the Advisor offers family office bill pay services to certain Clients as part of its comprehensive wealth management services. All Clients must place their assets with a "qualified custodian". Clients are required to enter into an agreement with the Custodian to retain their funds and securities and direct PCA to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by PCA to ensure accuracy as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may be deemed to have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### Surprise Independent Examination

As PCA is deemed to have custody over certain Client accounts and/or securities as part of its family office and/or trustee services, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which PCA maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).



## **Item 16 – Investment Discretion**

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PCA generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by PCA. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by PCA will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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PCA may vote client securities (proxies) on behalf of its clients. When PCA accepts such responsibility, it generally will cast proxy votes in alignment with management, and in a manner consistent with the best interest of its clients. Clients may contact PCA to request information about how PCA voted proxies for that client's securities. If PCA and/or its Advisory Persons have interest in the outcome of certain proxy votes due to business or personal relationships, this is a conflict of interest, where PCA takes appropriate steps to ensure that its proxy voting decisions are made in the best interest of its clients and are not the product of such conflict.

## **Item 18 – Financial Information**

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Neither PCA, nor its management has any adverse financial situations that would reasonably impair the ability of PCA to meet all obligations to its Clients. Neither PCA nor any of its Advisory Persons has been subject to a bankruptcy or financial compromise. PCA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Peter E. Simmons  
Chief Executive Officer**

**Effective: February 26, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Peter E. Simmons (CRD# 4379811) in addition to the information contained in the Peddock Capital Advisors, LLC (“PCA” or the “Advisor”, CRD# 148216) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the PCA Disclosure Brochure or this Brochure Supplement please contact the Advisor at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

Additional information about Mr. Simmons is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4379811.

## Item 2 – Educational Background and Business Experience

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Peter E. Simmons, born in 1961, is dedicated to advising Clients of PCA as the Chief Executive Officer. Mr. Simmons earned a JD from Suffolk University Law School in 1990. Mr. Simmons also earned a B.S. in Business from University of Massachusetts Dartmouth in 1984. Additional information regarding Mr. Simmons's employment history is included below.

### Employment History:

Chief Executive Officer, Peddock Capital Advisors, LLC	10/2008 to Present
President, Investment Advisor, Wilmington Trust (FKA Bingham Legg Advisers LLC)	01/1999 to 03/2008
Director of Fiduciary Services, Bingham McCutchen LLP (FKA Bingham Dana & Gould)	06/1996 to 01/1999
Senior Vice-President and Senior Trust Officer, Bangor Saving Bank	04/1992 to 06/1996
Vice-President of Investment Services, Fleet Investment Services, Inc	01/1988 to 04/1992
Trust Legal Analyst, Boston Safe Deposit & Trust Company	09/1984 to 01/1988

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Simmons.** Mr. Simmons has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Simmons. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Simmons.** The Advisor encourages you to independently view the background of Mr. Simmons on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4379811.

## Item 4 – Other Business Activities

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### Treasurer/Secretary/Director:

Mr. Simmons also serves as Treasurer, Secretary, and Director of RH Investment Corporation, a personal holding company located at 50 Braintree Hill Office Park, Suite 207, Braintree, MA 02184. Mr. Simmons manages quarterly meetings, coordinates state filings, interacts with company accountants and auditors, and maintains meeting minutes. Mr. Simmons does not receive any compensation for this business activity.

### Pointe West Country Club

Mr. Simmons also serves a Member and owner of Pointe West Country Club, where performs financial oversight for the club. This activity takes up less than 10% of his time.

## Item 5 – Additional Compensation

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Mr. Simmons has additional business activities that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Simmons serves as the Chief Executive Officer of PCA and is supervised by John DeSimone, the Chief Compliance Officer. John DeSimone can be reached at (781) 848-0288.

PCA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of PCA. Further, PCA is subject to regulatory oversight by various agencies. These agencies require registration by PCA and its Supervised Persons. As a registered entity, PCA is subject to examinations by regulators, which may be announced or unannounced. PCA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Matthew E. Simmons, CFP®  
Chief Operations Officer & Wealth Advisor**

**Effective: February 26, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Matthew E. Simmons (CRD# 6704411) in addition to the information contained in the Peddock Capital Advisors, LLC (“PCA” or the “Advisor”, CRD # 148216) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the PCA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

Additional information about Mr. Simmons is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6704411.

## **Item 2 – Educational Background and Business Experience**

Matthew E. Simmons, born in 1986, is dedicated to advising Clients of PCA as the Chief Operations Officer and a Wealth Advisor. Mr. Simmons earned a B.S. in Business Administration and Management from University of Tampa in 2008. Additional information regarding Mr. Simmons's employment history is included below.

### **Employment History:**

Chief Operations Officer, Wealth Advisor, Peddock Capital Advisors, LLC	12/2008 to Present
Database Marketing Assistant, Quadrant Software, LLC	06/2008 to 08/2008
Investment Analyst Intern, Bingham Legg Advisers, LLC	05/2007 to 07/2007

### **CERTIFIED FINANCIAL PLANNER™ (“CFP®”)**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 92,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Simmons.*** Mr. Simmons has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Simmons.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Simmons.***

The Advisor encourages you to independently view the background of Mr. Simmons on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6704411.

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### **Item 4 – Other Business Activities**

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Mr. Simmons is dedicated to the investment advisory activities of PCA's Clients. Mr. Simmons does not have any other business activities.

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### **Item 5 – Additional Compensation**

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Mr. Simmons has additional business activities that are detailed in Item 4 above.

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### **Item 6 – Supervision**

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Mr. Simmons serves as the Chief Operations Officer and a Wealth Advisor of PCA and is supervised by John DeSimone, the Chief Compliance Officer. John DeSimone can be reached at (781) 848-0288.

PCA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of PCA. Further, PCA is subject to regulatory oversight by various agencies. These agencies require registration by PCA and its Supervised Persons. As a registered entity, PCA is subject to examinations by regulators, which may be announced or unannounced. PCA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Katelyn M. Simmons, CFP®  
Director of Relationship Management**

**Effective: February 26, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Katelyn M. Simmons (CRD# 620824) in addition to the information contained in the Peddock Capital Advisors, LLC (“PCA” or the “Advisor”, CRD # 148216) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the PCA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

Additional information about Ms. Simmons is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 620824.

## **Item 2 – Educational Background and Business Experience**

Katelyn M. Simmons, born in 1991, is dedicated to advising Clients of PCA as the Director of Relationship Management. Ms. Simmons earned B.S. in Financial Management from Clemson University in 2013. Additional information regarding Ms. Simmons’s employment history is included below.

### **Employment History:**

Director of Relationship Management, Peddock Capital Advisors, LLC	02/2016 to Present
Financial Advisor, Vanguard	05/2015 to 02/2016
Client Relationship Representative, Vanguard	06/2013 to 05/2015
Fitness Instructor, Clemson University	12/2010 to 05/2013
Intern, Peddock Capital Advisors	05/2010 to 08/2012
Waitress/Hostess, Country Club of New Bedford	03/2007 to 06/2009

### **CERTIFIED FINANCIAL PLANNER™ (“CFP®”)**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 92,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of



care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Simmons.*** Ms. Simmons has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Simmons.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Simmons.***

The Advisor encourages you to independently view the background of Ms. Simmons on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 620824.

### **Item 4 – Other Business Activities**

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Ms. Simmons is dedicated to the investment advisory activities of PCA's Clients. Ms. Simmons does not have any other business activities.

### **Item 5 – Additional Compensation**

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Ms. Simmons is dedicated to the investment advisory activities of PCA's Clients. Ms. Simmons does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Ms. Simmons serves as the Director of Relationship management of PCA and is supervised by John DeSimone, the Chief Compliance Officer. John DeSimone can be reached at (781) 848-0288.

PCA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of PCA. Further, PCA is subject to regulatory oversight by various agencies. These agencies require registration by PCA and its Supervised Persons. As a registered entity, PCA is subject to examinations by regulators, which may be announced or unannounced. PCA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Ian G. Browning, CFA®  
Partner and Director of Investment Strategy**

**Effective: February 26, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ian G. Browning (CRD# 6704499) in addition to the information contained in the Peddock Capital Advisors, LLC (“PCA” or the “Advisor”, CRD # 148216) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the PCA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

Additional information about Mr. Browning is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6704499.

## **Item 2 – Educational Background and Business Experience**

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Ian G. Browning, born in 1985, is dedicated to advising Clients of PCA as a Partner and Director of Investment Strategy. Mr. Browning earned a B.S. in Finance and a B.S. in Accounting from Northeastern University in 2008. Additional information regarding Mr. Browning's employment history is included below.

### **Employment History:**

Partner and Director of Investment Strategy, Peddock Capital Advisors, LLC	07/2012 to Present
Pension Fund Accountant, JPMorgan	01/2008 to 07/2012
FX Intern, State Street Global Advisors	01/2005 to 01/2007
Accounting Intern, Fidelity Investments	01/2004 to 01/2005

### **Chartered Financial Analyst ("CFA<sup>®</sup>")**

The Chartered Financial Analyst ("CFA<sup>®</sup>") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. Chartered Financial Analyst and CFA are trademarks owned by CFA Institute.

## **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Browning.*** Mr. Browning has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Browning. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Browning.*** The Advisor encourages you to independently view the background of Mr. Browning on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6704499.

## **Item 4 – Other Business Activities**

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Mr. Browning is dedicated to the investment advisory activities of PCA's Clients. Mr. Browning does not have any other business activities.

## **Item 5 – Additional Compensation**

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Mr. Browning is dedicated to the investment advisory activities of PCA's Clients. Mr. Browning does not receive any additional forms of compensation.

## **Item 6 – Supervision**

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Mr. Browning serves as a Partner and Director of Investment Strategy of PCA and is supervised by John DeSimone, the Chief Compliance Officer. John DeSimone can be reached at (781) 848-0288.

PCA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of PCA. Further, PCA is subject to regulatory oversight by various agencies. These agencies require registration by PCA and its Supervised Persons. As a registered entity, PCA is subject to examinations by regulators, which may be announced or unannounced. PCA is required to periodically

update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**John F. DeSimone, CFP<sup>®</sup>, CIMA<sup>®</sup>  
President, General Counsel, & Chief Compliance Officer**

**Effective: February 26, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John F. DeSimone, CFP<sup>®</sup>, CIMA<sup>®</sup> (CRD# 2301047) in addition to the information contained in the Peddock Capital Advisors, LLC (“PCA” or the “Advisor”, CRD# 148216) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the PCA Disclosure Brochure or this Brochure Supplement, please contact us at (781) 848-0288 or by email at [msimmons@peddock.com](mailto:msimmons@peddock.com).

Additional information about Mr. DeSimone is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2301047.

## Item 2 – Educational Background and Business Experience

John F. DeSimone, CFP®, CIMA®, born in 1970, is dedicated to advising Clients of PCA as the President, General Counsel and Chief Compliance Officer. Mr. DeSimone earned a JD MBA from University of Baltimore in 1996. Mr. DeSimone also earned a Bachelor of Science degree in Business Administration from Bryant University in 1992. Mr. DeSimone also earned a LL.M. in Taxation from Boston University School of Law in 2002. Additional information regarding Mr. DeSimone's employment history is included below.

### Employment History:

President, General Counsel, Chief Compliance Officer, Peddock Capital Advisors, LLC	01/2021 to Present
Partner, Dakota Wealth, LLC	01/2007 to 12/2020
Attorney, GML Associates, LLC	01/2019 to 12/2020

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### Certified Investment Management Analyst<sup>SM</sup> (CIMA<sup>®</sup>)

The CIMA certification signifies that an individual has met initial and ongoing experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. To earn CIMA certification, candidates must: submit an application, pass a background check and have an acceptable regulatory history; pass an online Qualification Examination; complete an in-person or online executive education program at an AACSB accredited university business school; pass an online Certification Examination; and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and have three years of financial services experience at the time of certification.

CIMA certificates must adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through the Investment Management Consultants Association (IMCA).

### Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Mr. DeSimone.*** Mr. DeSimone has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. DeSimone.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. DeSimone.***

However, we do encourage you to independently view the background of Mr. DeSimone on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2301047.

### Item 4 – Other Business Activities

#### JFD Associates, PLLC

Mr. DeSimone is an attorney with JFD Associates, PLLC and is compensated in this role. Mr. DeSimone spends less than 10% of his time in this role. Peddock will be referring business where additional compensation will be received.

#### Peddock Tax Services

Mr. DeSimone has ownership interest in Peddock Tax Services, LLC (“PTS”). Mr. DeSimone is entitled to the additional revenue generated by PTS, presenting a conflict of interest. Clients are under no obligation to engage PTS for these services.

### Item 5 – Additional Compensation

Mr. DeSimone has additional business activities where compensation is received that are detailed in Item 4 above.

### Item 6 – Supervision

Mr. DeSimone serves as the President, General Counsel, and Chief Compliance Officer of PCA. Mr. DeSimone can be reached at (781) 848-0288.

PCA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of PCA. Further, PCA is subject to regulatory oversight by various agencies. These agencies require registration by PCA and its Supervised Persons. As a registered entity, PCA is subject to examinations by regulators, which may be announced or unannounced. PCA is required to periodically

update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Privacy Policy

Effective: February 26, 2024

### Our Commitment to You

Peddock Capital Advisors, LLC (“PCA” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. PCA protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

PCA does not sell your non-public personal information to anyone, nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Date of Birth, Driver’s License Number, Social Security Number or Taxpayer Identification Number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

**How do we share your information?**

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<p><b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	Yes	No
<p><b>Marketing Purposes</b> PCA does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where PCA or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	No	Not Shared
<p><b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].</p>	Yes	Yes
<p><b>Information About Former Clients</b> PCA does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>	No	Not Shared

**State-specific Regulations**

Massachusetts	In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
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**Changes to our Privacy Policy**

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Any Questions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (781) 848-0288.