

Item 1: Cover Page

Columbia River Advisors, LLC
(doing business as):

**Columbia River Advisors
and
Summit Capital Advisors**

**2200 N. 30th Street, Suite 202
Tacoma, WA 98403**

253.589.1401

www.columbiariveradvisors.com

www.summitcapitaladvisors.net

This Part 2 A of Form ADV (Brochure) provides information about the qualifications and business practices of Columbia River Advisors, LLC dba Columbia River Advisors and Summit Capital Advisors (“Columbia, Summit, us, we, our”). If you have any questions about the contents of this brochure, please contact Don Foy, our Chief Compliance Officer at the telephone number above or via email to at don@columbiariveradvisors.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about Columbia River, Summit Capital Advisors is available on the SEC’s website at www.adviserinfo.sec.gov.

Please note that the use of the term “registered investment adviser” and description of Columbia River Advisors, LLC or Summit Capital Advisors does not imply a certain level of skill or training. You are encouraged to review this Brochure (and the Part 2 B Brochure Supplements on each of our employees who provide investment advice to you for additional details).

Item 2: Material Changes

This ADV Part 2 A has been substantially revised when compared to our Form ADV Part 2 A filed in October, 2011.

The following lists by Item number the material changes to this brochure. We define a material change as other than formatting or other, similar changes. Examples of material changes may include: Revisions to the description of advisory services; fees brokerage practices, among others.

Item 4: We have revised and clarified the description of our advisory services. We have added a new class of service (Columbia River is the general partner and investment adviser to a private fund). We have also added enhanced disclosures to all advisory services and changed the layout and formatting.

Item 5: We have expanded and clarified the disclosures related to the fees charged for each of our services; this includes the addition to the fee schedule for the newly formed private fund.

Item 7: Enhanced disclosure related to security analysis and risks. Added summary of risks for the private fund.

Item 10: Included other activity for the principals – the private fund and a tax service.

Item 11: Enhanced / clarified disclosures regarding the Code of Ethics and personal securities trading.

Item 12: Brokerage practices disclosure revised to clarify trading with TD Ameritrade, a recommended broker custodian and a required broker custodian; added directed brokerage and the custodian and broker for the private fund.

Item 13: Review of accounts and reports: enhanced disclosures.

Item 14: Enhanced disclosures due to the general partner status of Columbia River to the fund.

Item 15: Revised the disclosure regarding custody as Columbia River now has custody as the general partner to the private fund for whom we are the general partner and adviser.

Item 16: Enhanced the disclosure by adding the private fund.

Part 2 B Brochure Supplements: added to this Part 2 A for three individuals.

Item 3: Table of Contents

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Item 4: Advisory Business

Background Information

Columbia River Advisors, LLC dba¹ Columbia River and Summit Capital Advisors is owned by three limited liability companies. These companies are holding companies for each of our principal executive officers. We are a Delaware LLC, established as an investment adviser in 2010. Our principal executive officers and owners are as follows:

Don Foy, LLC (sole member: Don Foy, Member and managing member of Columbia River / Summit)

Ben Addink, LLC (sole member Ben Addink, Member and managing member of Columbia River / Summit)

Brian Scalabrino, LLC (sole member Brian Scalabrino, Member and managing member of Columbia River / Summit)

Advisory Services – Portfolio Management

We manage our Client's assets on a discretionary basis. This means we make investment decisions for your accounts without obtaining your specific consent to the transactions. We establish your investment needs and objectives through in depth personal interviews during which we establish your:

- Investment Goals
- Attitude towards risk
- Investment objectives
- Personal and Family obligations
- Cash flow needs
- Retirement goals
- Among other relevant data

The result of this effort is the development of an Investment Policy Statement which provides both of us a standard or framework on which to provide our portfolio management services.

You may, as the owner of all account assets, set limitations on our discretionary authority. However, we reserve the right to not accept an account (or to terminate an account) if we believe the restrictions are so restrictive that we cannot deliver our portfolio management services to you. Any changes to restrictions are not implemented until reviewed and approved by us.

¹ This means that the terms Columbia River Advisors and / or Summit Capital Advisors are used interchangeably to describe the same legal entity, Columbia River Advisors, LLC. Although we have two websites, for example, the services we provide under either dba name are the same. Should you have questions, please ask. Thank you.

Advisory Services – Financial Planning / Consulting

In addition to our portfolio management services, we also provide financial planning services to our clients. This may be in the form of a comprehensive plan, where we issue a formal and written plan. Or, the service may be topical with or without a report – based on your specific needs and questions.

Planning services encompass a number of areas that impact your personal life:

- Wealth accumulation and preservation
 - Retirement
 - Setting goals
 - IRA rollovers
 - 401k rollovers
 - Tax management
 - Multi-generational IRAs
 - Charitable donations
- Realistic lifestyle management
 - Education savings
- Tax consequences and solutions
- Personal portfolio tailoring
 - Investments
 - Retirement
- Estate planning
 - Management of probate expenses
 - Management of estate taxes
 - Family asset management
 - Property titles
 - Post death and tax advice
- Insurance – Risk Management
 - Current and future risk exposures
 - In place coverage for cost effectiveness
 - Long term care and independence
 - Family income in the event of disability or death

To develop your Plan or provide a consulting service, we will work closely together with your other professionals (attorney, accountant and other advisors). The comprehensive planning process is very detailed and covers all of your financial needs.

The output of a comprehensive plan includes:

- Recommended changes to assist you in meeting your goals or objectives
- Changes in your overall asset allocation
- Changes to your saving habits
- Realistic goals to achieve your retirement expectations
- Establish trusts or estate documents (to save taxes)
- Among others

Limited planning services are typically provided in the form of a discussion or a summary letter or other communication resulting from the assessment. Limited planning is less formal than the full, comprehensive plan.

Comprehensive planning services are typically completed within six (6) months of the client signing a contract with us, assuming that all the information and documents we request from you are provided in a timely manner. We may assist you in the implementation of planning recommendations; however that is solely your decision.

Our financial planning recommendations are not limited in any way to investment products, insurance solutions or other services available through Summit or any of our Investment Adviser Representatives who provide the services to you.

Advisory Services: Cash Referral Fees – Introduction to Third Party Money Managers (TPMM)

If suitable for you, we may recommend certain TPMMs with whom Summit has entered into a Cash Solicitation Agreement in compliance with the Cash Solicitation Rule under the Investment Advisers Act of 1940.

In making such a recommendation or introduction, Summit determines if the portfolio management services are consistent with and suitable for you based on your investment objectives, IPS and investment restrictions, if any.

As a Cash Solicitor, our services are limited to the assessment and matching of those TPMMs who have entered into agreements with us for such introductions and the TPMM's acceptances of you as their client. As a result, you are required to enter into a separate portfolio management agreement with a recommended TPMM although you are not required to enter into such an agreement. In addition, the TPMM will conduct their own suitability assessment prior to accepting you as their client.

When we make such introductions, the following occur:

1. We have entered into a separate agreement with each TPMM where certain compliance requirements of the Cash Solicitation Rule are met
2. Where each party makes certain representations and warranties
3. Where our services as a Solicitor are limited; we cannot provide investment advice, other than introducing you to the TPMM

4. We acknowledge that we are required to provide you with the following at the time of initial solicitation (and recommendation of a TPMM) of:
 - a. The TPMM's Form ADV Part 2 A (Brochure)
 - b. Summit's Form ADV Part 2 A (this Brochure you are now reading), and
 - c. A separate Disclosure Brochure, which:
 - i. Identifies the TPMM
 - ii. Identifies Summit and our IAR who is providing the solicitation service
 - iii. The amount of the TPMM's fee we are paid (to Summit) if you hire the TPMM based upon the referral, and
 - iv. Your original signature on the Separate Disclosure Brochure which we are required to deliver to the TPMM for all solicited, prospective clients, regardless of whether you hire the TPMM
5. We provide initial due diligence on the TPMM (and they conduct due diligence on Summit); neither party is allowed to engage in a Cash Solicitation Agreement if either of us (as entities or for individuals) are statutorily disqualified from doing so

As of the date of this Brochure, we act as a Cash Solicitor for one Third Party Money Manager. This listing will be updated periodically (typically semi-annually); however, this list is subject to change without notice. If you need a more current list, please contact our Chief Compliance Officer, Don Foy at dfoyc@columbiariveradvisors.com. We currently solicit for:

Genworth Financial Asset Management, Inc.

Advisory Services – General Partner and Portfolio Manager for an Affiliated Hedge Fund

January 30, 2012, Columbia River created Blue Water Strategic Currency Fund I, L.P. (Blue Water or Fund).

The investment goal or strategy of the Fund is to trade in off-exchange foreign currencies, through the utilization of proprietary technical analysis and strategies we believe may outperform the U.S. Dollar.

The Fund may also invest in a broad range of investments, both cash and derivatives, on U.S. and Non-U.S. markets.

Interests in the Fund are currently being offered and will continue until August 17, 2012 or until at least \$3 million has been raised or when Summit (as general partner) closes the offering.

Interests in the Fund cannot be generally solicited via public offering (it may be offered to qualified parties on a private basis, only). The Fund is also an exempt investment company under Section 3(c)(1) of the Investment Company Act of 1940, as a result, only 100 limited partners are allowed and interests are offered in a non-public offering.

Only prospective investors who meet the qualification standards (as individuals or entities) may subscribe to interests; so called Accredited Investors as defined in Rule 501(as) under the Exchange Act of 1933. Generally, Accredited Investors are:

- Individuals who have a net worth or joint net worth of \$1 million, excluding their home or Annual income as an individual in excess of \$200,000 for the preceding 2 years or joint income with their spouse in excess of \$300,000 for each of the 2 years; and have reasonable expectations to have the same income level

There are additional qualification standards for Trusts, certain retirement plans and other entities as described in the Private Offering Document.

Minimum Subscription: To subscribe to interests as a Limited Partner investor, a minimum of \$25,000 is required. This amount may be waived by the GP at its sole discretion.

As this Fund is a private fund, interests are only offered to specific and sophisticated investors. For complete details on the Fund, its strategy, risks and qualifications, please see the Private Offering Circular for specific details.

Assets Under Management as of December 31, 2011

Discretionary	\$45,000,000.00
Non-Discretionary	\$0.00
Total	\$45,000,000.00

Item 5: Fees and Compensation

Portfolio Management Fees

Summit charges annual advisory fees that range from:

50 basis points on accounts (or households) that are in excess of \$10 million to
300 basis points (3%) of the assets under our management

Actual fees you will pay for our portfolio management services are defined in the written agreement we have with you. Our advisory fees are therefore, negotiable based on a number of factors, including but not limited to the following:

- Number of actual accounts
- Size of the relationship
- Opportunity to receive additional contributions
- Investment restrictions
- Client meetings / reporting
- Among other factors

If your account(s) is opened on other than the first day of a calendar quarter, the fee is pro-rated for the number of days in the quarter our services are provided. Initial and quarterly fees are charged in advance of the service. If you terminate the account with us, we earn our fees through the date of termination; all pre-paid and un-earned fees are returned to you within 30 days of the date of termination.

Fee Payment: You will authorize in the advisory agreement we have with you, one of two methods that you may pay your fees to us. We prefer that our clients authorize to have our advisory fee initially and quarterly thereafter deducted from your custodial account. If you do so, we will do the following:

1. We will send you a statement that reflects:
 - a. The assets on which the fee is based
 - b. The annual fee charged (and 1/4 of that fee for full calendar quarters)
 - c. The method of calculation (multiplication referenced by an X)
 - d. The total amount of the fee due for the period
2. After we mail that statement to you, we send to your custodian, a debit request for your account in the amount of the fee due. We then receive a bank transfer or wire of your fee to our account
3. You receive from your third party, independent and qualified custodian a statement (monthly or quarterly) which is mailed directly to you, which reflects all transactions, positions, income, debits and credits into or from your account, including the amount of the fees paid to Summit for the period
4. Note: You need to review the calculation of our fees in our statement we mail to you as your custodian does not perform that task
5. Note: If you do not receive directly from your custodian you're monthly or quarterly statements, contact your custodian immediately or you're Summit IAR for assistance.

Or,

Pay by check: A second option for fee payment is for you to pay by check upon our submission of an invoice (payment is requested within 30 days of the date of the invoice).

Account values for performance and fee calculation purposes are the value as determined by your custodian (TD Ameritrade, Inc.; please see Item 12, below).

Financial Planning / Consulting Fees

You will pay us an hourly or a flat fee for Comprehensive or Limited planning services.

The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of your needs and circumstances. The specifics are outlined / defined in the Planning Agreement we have in place with you.

Hourly Fees: Range from \$150 to \$500 per hour, billed in 15-minute increments for our planning professionals.

Flat fees generally range from \$1,000 to \$25,000, again based upon the complexity and needs as you communicate to us.

Upon the execution of an agreement we request a retainer of 50% of the estimated fee. The balance of the fees due and payable is due at the time the plan or the consulting service is provided, or within 30 days of that date (upon presentation of an invoice for the balance due).

Note: Our comprehensive planning services are delivered within 6 months of the execution of the service. We do not retain your pre-paid planning fees of \$1,200 or more, 6 or more months in advance. To do so would cause us to have “custody” of your funds as defined by the Securities and Exchange Commission.

Cash Solicitor Services – TPMMs

Our Cash Referral Fee provided to us for the introduction of our Clients is a percentage of the standard advisory fees charged by the TPMM to their clients. The fees charged by TPMMs are not “marked up” to pay for our Cash Solicitor services, they are based upon and paid from the standard fees the TPMMs charge clients, including those obtained directly (without our services).

Our fees range from 10 to 50% of the standard advisory fees you pay to the TPMM. We are paid quarterly after you have paid your fees to the TPMM.

The third party money managers we recommend will not directly charge you a higher fee than they would have charged without us introducing you to them. As of the date of this Brochure, we act as a Cash Solicitor for one TPMM (see Item 4 above).

The exact fee we earn for the solicitation services is identified in the Separate Disclosure Brochure we provide to prospective clients of the TPMM at the time of the solicitation.

General Partner and Investment Adviser – Blue Water Fund

The fee payable to Columbia River as investment adviser and general partner to the fund is 4% per annum, billed quarterly (1% per quarter) based upon the Limited Partner’s Capital Account. Fees are charged in advance based upon the net asset value of the Limited Partner Capital Account on the first day of a calendar quarter or on the first day when the investor is accepted as a Limited Partner for the balance of that quarter (the fee is pro-rated for the balance of the calendar quarter).

Fees may be waived for qualified investors who are part of Summit management, employees, families, friends and their estate planning vehicles.

Valuation: The General Partner determines the value of the Fund’s holdings, in a good faith determination of assets held by the Fund. Contributions, withdrawals and full withdrawals may be made by a LP investor consistent with the Confidential Offering Circular.

General Information on Advisory Services and Fees

Termination of a portfolio management or financial planning agreement

An agreement for portfolio management or financial planning may be terminated by either party (you or us) by one party delivering written notice to the other. As you pay your fees to us in advance, if you terminate the portfolio management agreement, we will earn our fees through the date of termination (the date the written notice is received by the other party). All transactions placed on your behalf are allowed to settle, however, we take no further action on your behalf after the date of termination.

We will then pro-rate the pre-paid and un-earned advisory fees for the number of days left in the calendar quarter. This fee refund will then be returned to you via check within 30 days of the date of termination.

In the case of financial planning (comprehensive or limited), we will calculate the fee earned based on the original estimate and review that calculation with you. Un-earned and pre-paid planning fees will be returned to you. However, in the case where the time expended by Summit exceeds the retainer amount, or if the plan was delivered (or the consulting service) and you terminate the agreement, we will still invoice you and expect payment in full for services we provided to you.

Services provided to employees, family members and friends of the firm

We provide the same or similar services to our employees, members of their family and friends of the firm at no fee or fees which are lower than those provided to non-employee, family or friends. Fees lower than those disclosed above are not available to our general clients.

Similar services may be available from other sources

The advisory services available from Summit may be available from other investment advisers or investment professionals at fee schedules that are lower or higher than those charged by Summit.

Accounts subject to ERISA (the Employee Retirement Income and Security Act) and regulations under the Internal Revenue Code (applicable to Individual Retirement Accounts)

Summit is a fiduciary to ERISA accounts and IRAs; as a result, we are subject to specific duties and obligations under ERISA and the Code that include, among other things, restrictions concerning certain forms of compensation we may receive from third parties.

However, we are not fiduciaries when recommending or introducing ERISA or IRA accounts to third party investment advisers under the Cash Solicitation Services as described above under Item 4. When acting solely in the capacity of a Cash Solicitor for third party investment advisers / managers, we are not acting, directly or indirectly as a fiduciary (as we are not managing the assets of your Plan or IRA account).

Additional Compensation / Fees

The fees you pay to us for our portfolio management and financial planning services *do not include* the following. All of these fees or charges are borne by you (and we do not participate directly or indirectly in any of these items paid by you):

- Brokerage commissions
- Transaction fees
- Other related costs and expenses, and
- Charges imposed by custodians, brokers, third party investment advisers or other third parties, including but not limited to: 12

- Advisory fees and administrative fees charged by Mutual Funds (MF), Exchange Traded Funds (ETFs)
- Advisory fees charged by TPMM for whom we are a solicitor
- Custodial Fees
- Deferred sales charges (on MF or annuities)
- Deferred sales charges (charged by MFs)
- Transfer taxes
- Wire transfer and electronic fund processing fees
- Commissions or mark-ups / mark-downs on security transactions

See Item 12 (Brokerage Practices) for additional information on “other costs” you may incur.

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

We do not charge any of our clients so called performance based fees. These are fees based upon the capital appreciation of your account or invested assets. Although we do manage a private currency fund, that fund does not charge any limited partner investor a performance based fee.

All of our advisory fees are charged only as described in this Brochure.

Item 7: Types of Clients and Account Requirements

We provide our advisory services to the following types / categories of clients:

- Individuals and High Net Worth Individuals
- Trusts, Estates or Charitable Organizations
- Pension and Profit Sharing Plans
- Corporations, limited liability companies and/or other types of business organizations, and
- A Private Fund as described in Item 4, above

We impose the following requirements on our Advisory Services

- Portfolio Management Services: A minimum account of \$250,000 is recommended to open and maintain an account, although this account size is negotiable.
- Financial Planning: For a comprehensive financial plan, a minimum fee of \$1,000 is required for a written, comprehensive plan provided on a fixed fee basis
- Limited Partner Investors in the Blue Water Strategic Currency Fund: A minimum investment of \$25,000 is required (subject to waiver / negotiation by Summit)

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

Method of Analysis:

Summit uses several approaches when evaluating securities to use in our portfolio management services:

1. Technical analysis: Used for forecasting the direction of prices through the study of past market data. We focus primarily on price and volume by examining what investors fear or think about those developments. We also try to assess whether or not investors have the wherewithal to back up their opinions
2. Fundamental analysis: Used to examine:
 - a. Earnings
 - b. Dividends
 - c. New products
 - d. Research,
 - e. Among other criteria

We balance these two analysis methods by utilizing the resulted data together. Both have limitations inherent in their use as both include assumptions about the various stock, bond and global markets or economics.

In addition, we may employ charting which plots the span between the high and low prices of a security, industry or sector during specified trading periods.

Some price spans widen and fill during the interval between the open and close prices to emphasize the open/close relationship.

A risk of relying on charting would be similar to the weaknesses of the technical approach. The price may reflect a trend as opposed to fundamental research which holds that economic factors influence a security's price.

By examining the data (on a recurring and periodic basis) and movements in prices or other time related factors, we may also utilize cyclical analysis. Again, cyclical may be too narrow of a measure to predict price movements without the addition of or integration of other, relevant factors.

Our overall analysis methodology is to utilize various methods to eliminate risk of one method over another.

Please see the Private Offering Circular for a full explanation on the strategy and analysis methods for the Blue Water Strategic Currency Fund I.

Investment Strategies:

Although we create custom portfolios or accounts for our clients, we do not, per se, have specific investment strategies. We often use for your accounts we manage no transaction fee mutual funds or Exchange Traded Funds (ETFs) in your accounts. These mutual funds and ETFs are provided to Summit and our clients through TD Ameritrade, the recommended broker dealer and custodian as described further under Item 12 below.

We typically are long term investors for your accounts. However, we may, due to market conditions hold or trade securities for your accounts frequently (under one year or often as market or global events dictate, meaning securities could be held for 30 days or less).

For investment strategies within the Blue Water Strategic Currency Fund I, please see the Private Offering Circular.

Risk of Loss:

Investing in securities involves risk of loss that you should be prepared to bear. While the stock market may increase and your account(s) could result in appreciation, it is also possible that the stock market may decrease and your account(s) could suffer a loss of invested assets.

It is important that you understand the risks associated with investing in the stock or bond markets. It is also important that your assets are:

- Properly diversified
- Invested consistent with your stated goals, objectives and risk tolerances

If you have any questions, please contact your IAR.

We do not guarantee that your investment goals or objectives will be reached or any level of performance or success.

Our use of mutual funds, including money market mutual funds is how we invest cash balances in your accounts. Typically, cash balances are swept by your custodian into a money market fund you select in the account opening paperwork.

We may, however, as portfolio manager over your assets, purchase or sell in:

- Federal Deposit Insurance Corporation (FDIC) Insured Certificates of Deposit
- High-grade commercial paper and/or
- US Government backed debt instruments.

Ultimately, we try to achieve the highest return on your cash balances through relatively low-risk conservative investments.

Blue Water Strategic Currency Fund I: Investing in a private fund is substantially different than investing in separately managed account (or a Portfolio Management Account) as described in this Brochure. Private fund investments are restricted to certain Accredited Investors as documented in the Private Offering Circular. Interests are also not liquid, and there are no markets for a private fund limited partner investor, among other limitations which equate to risks.

In addition, there is no assurance that the objectives or strategy of the fund will be met or successful. That is one reason why private fund offerings are restricted to only Accredited Investors; it is assumed by regulation that people who meet the Accredited Investor status (and qualify for the investments) can both understand them, and can accept the risks, including losses (and the potential for gain).

Please see the Private Offering Circular of the Blue Water Fund for specific risks associated with the Fund.

Item 9: Disciplinary Information

We are required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. There are a number of specific legal and disciplinary events that we must presume are material for this Item, which, if applicable we are required to disclose to you.

As of the date of this Brochure, we have no events to disclose for you or any of our principal executive officers.

Item 10: Other Financial Industry Activities and Affiliations

Blue Water Strategic Currency Fund, I, LP:

As discussed under Items 4, 5 and 6 above, we are also the investment adviser and general partner to the Blue Water fund.

Specifically, Benjamin Addink and Donald Foy, principals of Summit are also the managing members of the Partnership. These duties, while inclusive of investment advice are also services provided to the Fund and the Fund's limited partner investors (LPIs).

Providing services to the management of the Fund and the responsibilities as a GP or Manager are separate from and in addition to their day to day duties as principals of Summit.

Benjamin Addink and Donald Foy, principals are also the co-owners of Summit Tax Services. Clients of Columbia River are not required or solicited to use this tax service company. You are free to select any professional for their services.

Benjamin Addink is also a member of a real estate company, Hornets Land, LLC. which has no material involvement with Columbia River.

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

We permit our employees and their family members to purchase, sell or hold the same securities we recommend to you, our client. We also permit our employees and their family members to use the same TPMM's we recommend (as Cash Solicitors) to you. The use of the same securities, TPMMs or being investors in our affiliated Currency Fund are all potential conflicts of interests between our own interests and yours. Simply, we follow our own advice.

As a result, we have implemented as required by Federal and / or State law policies, procedures and controls to monitor this trading activity and the potential conflict of interest that activity creates. It is our goal to ensure our employees:

- Act as a fiduciary to all of our clients, by placing your interests before Summit or any employee (or family) account. Employee or family accounts are defined in our Code as "beneficial ownership accounts"
- Act in an honest, fair and equitable manner, not just because the regulations and our fiduciary status say so; but because it is good business

Our Code is comprised of a number of sections. Employees are required, generally to disclose:

- A prohibition on trading or communicating in any security if Summit is in possession of material, non-public information on the issuer of any security
- Personal securities transactions, if any
- Gifts given or received, (subject to limitations), if any
- Political contributions given, if any (in compliance with the Pay-to-Play Rule under the Investment Advisers Act of 1940)
- New brokerage accounts opened, if any
- Any private placement (subject to CCO pre-approval) , if any
- A prohibition on the participation of Initial Public Offerings or Secondary Offerings of securities (IPOs)
- Remedial sanctions that are imposed when employees violate provisions of the Code or our internal controls (policies or procedures) that govern our business
- Outside business activity,
- Among others

When we hire a new employee, each new employee is required, at the time of hiring to review and certify to Policies and Procedures, including the Code. In addition, each employee is required to disclose to the CCO, the following. This same information is also required annually (typically in the first quarter of each new calendar year) from each employee:

1. All members of their household
2. All brokerage accounts (a defined term in the Code) and all reportable securities held in those accounts , as defined, dated within 45 days of the hire date
3. All non-custodial securities (those in certificate form, or private placements)

Each quarter, every employee is required to disclose:

1. All reportable transactions they (or a family member / beneficial ownership account owner) have made in reportable securities during the quarter; for individuals with no reportable securities, they are required to indicate “none” for the quarter
2. Gifts given or received during the quarter, if any
3. Political contributions made during the quarter (limit of \$150 for candidates the employee cannot vote for; \$350 limit for candidates that the employee can vote for). Note: It is the policy of Summit to not make political contributions by the corporation
4. New brokerage accounts, opened

All reported transactions, gifts given or received or political contributions are reviewed to ensure compliance with our Code and to protect the interests of clients.

As we follow our own advice, we may aggregate client and employee transactions together. If we are purchasing or selling an equity security, closed-end fund or ETF traded on an exchange or NASDAQ NMS, all participating accounts (clients and employees) will receive an average price if multiple executions occur. If partial fills are completed, but not enough to cover all accounts in the block, clients are filled first, all employees after clients.

This disclosure is a summary of our Code; if you would like a complete copy of our code, please request a copy. You may do this by contacting Don Foy, Chief Compliance Officer at 253.589.1401 or via email at don@columbiariver.com.

Item 12: Brokerage Practices

Portfolio Management Clients – Services

Although we have investment discretionary authority (see Item 4 of this Brochure), we do not have brokerage discretionary authority; this means we cannot select brokers or dealers or negotiate commissions on your behalf.

As indicated further below, we recommend a broker to all of our clients. In making the recommendation, we request (and require) you to evaluate the broker and then select / direct us to use that broker for all of your account transactions. Summit recommends:

TD Ameritrade, Inc, and the
TD Ameritrade Institutional Program (TDA)

TD Ameritrade Institutional program is a division of TD Ameritrade, Inc., a securities broker dealer registered with the SEC and a member of the Financial Industry Regulatory Authority (FINRA), the Securities Investors Protection Corporation (SIPC) and a member of the Notational Futures Association (NFA).

TDA is an independent, third party and qualified custodian. TDA will hold all of your account assets for you to receive our portfolio management services (cash and securities). We do not hold or have possession of or custody of your funds or securities.

TDA offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the program. (Please see the disclosure under Item 14 of this Brochure for additional details.)

In recommending TDA to you, we have evaluated the services provided to Summit and our clients. In that evaluation, we have determined that TDA provides an excellent blend of services, commission costs, and free custody for our clients, along with other benefits that are beneficial to you and to us. Our review and assessment of TDA (and other broker / custodians) included, but were not limited to:

- Advisory service programs
- Commission charges, execution, clearance and settlement of transactions
- Ability to block trade
- Reputation and financial strength
- Free custody services
- No-transaction fee funds (mutual funds and ETFs)
- Access to institutional shares of mutual funds at no load or load waved shares
- Duplicate confirmations and reports
- Dedicated trading desks / electronic trading
- Operational support (typically back-office related services), and
- Other benefits we receive (see Item 14, below)

However, in recommending and then requiring you to select TDA and, subsequently to direct us to use TDA for all of your account transactions, please be aware of the following:

In requiring the use of TDA as your directed broker, we are unable to seek out other brokers or dealers for your account transactions, or to negotiate commissions or transaction costs. As a result, you may pay higher prices or higher commission costs through directed brokerage as compared to investment advisers who have the brokerage discretionary authority to select the broker and negotiate commissions on a transaction-by-transaction basis. As a result, best execution for your transactions may not be achieved.

We have evaluated the execution services of TDA for the securities we recommend to you or use in your portfolio accounts we manage. We use:

- ETFs
- Mutual Funds
- Closed end funds
- Individual stocks or bonds, or options on stocks or bonds,
- Among other securities

Of particular importance to our clients and Summit is the availability, through TDA of the purchase or sale of many ETFs or mutual funds on a “no-transaction” basis. This means that TDA does not charge our clients for the purchase or sale of hundreds of ETFs or institutional shares of mutual funds (which otherwise would not be available to you) for “no transaction fee”.

We believe that even with our requirement of directed brokerage to TDA, that your account transactions will achieve best execution. TDA has that obligation for all accounts held at TDA, not just those of our client’s.

Please note that best execution is not a defined term. It is comprised of a number of factors which equate the best overall execution for a particular transaction (price, commission, timing, etc.) based on the then current facts and circumstances.

Trading Activity:

When we place a transaction for your account at TDA, there is a commission charged, unless the mutual fund or ETF is one of the “no transaction” funds available to you through TDA.

In stocks, bonds or other securities (options, for example), TDA charges an advantageous commission or transaction fees to you for each transaction (for purposes of disclosure, a commission and transaction fee mean the same thing).

Block Trading: When we are purchasing or selling the same security for multiple clients at the same time, we may, but are not obligated to aggregate (block) the same transactions at the same time, when placing the transaction at your directed broker (TDA).

As indicated above (see Code of Ethics disclosure) we may include in the block employee or employee beneficial ownership accounts) in the block with those of clients. In most transactions, we are able to obtain (or sell) the full block of securities we are trying to purchase or sell. If multiple transactions occur during a trading day, TDA will average price those transactions. Each participating account will receive the average price for the number of shares represented by the account in the block trade.

Block trading allows us the ability to increase the size of orders, thus allowing us the opportunity (and TDA) to negotiate the price of the security, in an attempt to execute the transaction at a price more advantageous than placing all of the transactions separately.

In cases where the full block is not or cannot be executed, the purchase or sales executed, if any, are averaged to price, and then are allocated on a pro-rated basis to all participating accounts. An exception: employee or related accounts. Our employee / related accounts will be traded after the full allocation for client accounts are executed.

You will receive, directly from TDA a confirmation of each transaction we place on your behalf as your registered investment adviser and portfolio manager. These confirmations are provided directly to you via US Postal Service or electronically as you may elect. Summit also is provided a copy of all confirmations for our information and reconciliation purposes.

In addition, you will typically receive a monthly custodial report directly from TDA on your account. This report will reflect all current positions, all transactions, including debits and credits made to your account during the time period. These are sent directly to you.

Due to the nature of our business and portfolio management services, the following are brokerage activities we do not engage in:

- Receipt of commission compensation (direct or indirect) from security transactions we place on your behalf
- Client directed brokerage to any broker or dealer (other than TDA)
- Soft dollars
- Brokerage for client referrals
- Cross, Agency cross or principal transactions

For clients subject to ERISA:

In selecting and directing Summit to place all transactions for your account at TDA, you have independently evaluated TDA and, as the plan fiduciaries, have determined that the selection and directed brokerage to TDA is in the best interests of the Plan and the Plan's participants. You have also evaluated and will continue to evaluate the brokerage and execution services (including the commissions or transactions charges) to ensure they reasonable in light of the services provided to the Plan and its Participants.

Blue Water Strategic Currency Fund 1, LP:

Columbia River, as the GP and Adviser to the Fund is authorized by the Fund to have brokerage discretionary authority and select brokers or dealers to effect the Fund's transactions.

As a result, the Fund does not utilize TDA for brokerage or custodial services. As fully described in the Confidential Offering Circular, the following is a summary of the custodial and trading activity by the fund:

Trading Broker used: Veritas Capital Markets LLC organized in the Island of Nevis pursuant to the Nevis Limited Liability Company ordinance 1995 as amended. BBD Holdings, LLC, a Washington Limited Liability Holding Company holds a non-controlling interest in Veritas. Principal Members of BBD Holdings are the principals of Columbia River, the IA and GP to the Fund.

When transactions for the fund are executed at Veritas by the fund, an economic benefit may result to BBD holdings and its members. This additional compensation is a potential conflict of interest (describe in greater detail in the Confidential Offering Circular).

Prime Broker / Custodian of Fund Assets: The GP has retained Rabobank (London, England) to service as the partnership's prime broker and custodian.

Soft Dollars: The fund and GP may receive from Rabobank certain services and access to services which may be considered as soft dollars within and possibly outside of the safe harbor of Section 28e under the Exchange Act. All potential benefits are specifically identified in the Confidential Offering Circular.

Trade Aggregation: as the fund is a private partnership, the trades for all investors in the fund are placed at the same time (the fund is managed as a pool or one account). However, if other accounts of the Adviser are in the same investment strategy (which they are not, as of the date of this Brochure), then aggregation of multiple clients (fund and non-fund) may occur.

Item 13: Review of Accounts

Review of Accounts:

Portfolio Management:

All client accounts are reviewed on at least a quarterly basis. Reviews include a comparison of your stated investment goals / objectives in your IPS with the current portion and any rebalancing or adjustments that may be necessary, among other review activity. We request to meet with our clients periodically; some clients request quarterly meetings to review the account and performance, others semiannually or annually. Regardless, we are pleased to meet with you as frequently as your request.

Our IARs or portfolio managers conduct reviews. Additional reviews may be provided when you request them, or whenever you notify us of changes in your personal circumstances. Examples include:

- Marriage
- Divorce
- Birth of a child
- Death in the family
- New job or loss of job
- Disability or sickness
- Among others

Note: We rely on you to notify us of any significant change in your personal circumstances or family obligations that would impact the investment advice we provide to you.

Financial Planning (comprehensive or limited):

Reviews are not applicable unless you contract with us to review a comprehensive plan or recommendations related to limited or consultative planning services.

Cash Solicitation Services:

Not applicable. The reviews are conducted by the TPMM that manages your assets and from whom we receive the Cash Solicitation Fee. However, you may authorize the TPMM to provide copies of your quarterly reports to us, however, we do not facilitate reviews or comment on (or provide investment advice) on the services provided to you by the TPMM.

Blue Water Currency Fund:

The fund is a private, un-registered investment company. As such, the fund's investments are consistently monitored and reviewed by the Fund's general partners and portfolio manager. We do not specifically review a Limited Partner's capital account unless a contribution is made or redemption is requested.

Please see the Confidential Offering Circular for specific details.

Reports:Portfolio Management:

Not applicable. Summit does not provide reports to clients, unless requested. The content of the reports may vary client-by-client, but will generally supplement the TDA quarterly reports you receive directly from TDA, your custodian.

Financial Planning:

Comprehensive planning clients receive a written report which is the plan. Updates to the plan may be contracted for; however, they are updated for an additional fee.

Limited planning clients: not applicable.

Blue Water Fund:

Limited Partner investors receive a monthly report on their capital account directly from our third party administrator, Yulish and Associates. This monthly report will reflect the performance of your capital account during the previous month, and will show, for the first month of each calendar quarter the 1% advisory fee due to Summit through your direct debit authorization in the subscription agreement with the fund.

At this time we do not provide additional reports to LP investors, except as noted:

Within 120 days of the Fund's fiscal year end, each LP investor will receive a financial audit of the Fund prepared according to generally accepted accounting principles by an independent, third party qualified accounting firm.

Item 14: Client Referrals and Other Compensation

Client Referrals:

Not applicable. We do not pay any party for the introduction (directly or indirectly) for client referrals. We also do not direct brokerage transactions in exchange for client referrals.

Additional Compensation:

Although we do not per se, receive “compensation” from any person, our participant in TD Ameritrade’s Institutional program, we receive economic benefits. However the benefits we receive from TDA are benefits we do not pay for. There is no expected volume of trading activity or other requirements for us (or any other adviser) to receive these benefits. The listed benefits are beneficial to Summit and our clients; these benefits include but are not limited to the following:

- Market data and information, including financial publications; this is provided whether we request the information, or not
- Access to their portfolio accounting system to monitor client accounts
- Portfolio management tools
- Access to databases and related data
- Electronic news / pricing services
- Access to institutional mutual funds without having to reach certain size of the transaction
- Access to hundreds of mutual funds or ETFs at “no commission”
- Custodial services for no fee No charge for client’s custodial services
- Discounted commissions on equity, fixed income and other securities
- Back office support services
- A dedicated trade desk
- Block transactions ability
- Electronic communication network for order entry and access to client accounts
- Discounts on compliance, marketing, technology, practice management vendors
- Duplicate confirmations and statements on all client transactions
- Ability to have our advisory fees directly debited from your custodial account
- Among others

None of the listed products, services or other benefits are considered soft dollars under the safe harbor of Section 28e of the Exchange Act. We do not contract for or negotiate the provision of these services; they are all offered to all investment advisers (including Summit) who participate in the TDA program.

Blue Water Strategic Currency Fund I, LP: Through the Fund's prime broker, see Item 12, above and the Confidential Offering Circular), Columbia River as the GP and Adviser to the Fund may receive economic benefits from the prime broker that will benefit Columbia River and the services provided to the Fund, including the deferral of hard dollar costs that would otherwise have to be paid. The economic benefits that may be received include soft dollars in compliance with the protection available under Section 28e of the Exchange Act. In addition, some of the economic benefits to the Fund or Columbia River may be outside of the safe harbor of Section 28e; but still beneficial to the Fund and its limited partner investors. Please see the Confidential Offering Circular for specific details (including a description of potential benefits – brokerage and research services).

Item 15: Custody

Technical Custody: Direct debiting of advisory fees

If you engage us for portfolio management services, your authorization to have our advisory fees directly debited from your account is constructive custody of a Clients funds.

As a result (and as described under Item 5, above, we deliver a work sheet to you of the fee calculation and debit request.

We also remind you to review the statement and ensure you receive, directly from your custodian (TDA) a monthly or quarterly report on your account showing all debits and credits including our fee.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Actual Custody - Blue Water Strategic Currency Fund I, LP

As the general partner and investment adviser to the Fund, Columbia River is deemed to have custody of the Partnership's cash and securities. This is due to the broad authority provided to Columbia River by the Fund, including and not limited to:

- Possession of the Fund's check book and the authority to direct the cash movements of the Fund and its LP investors, to pay bill, pay for services and other duties provided to the GP
- Among others as provided in the Agreement with the Fund

To ensure compliance with the Custody Rule under the Investment Advisers Act of 1940,

Columbia River (as GP and Adviser) will contract for and have completed within 120-days of the Fund's fiscal year end a Financial Audit, according to generally accepted accounting principles by a third party qualified accounting firm. Please see the Confidential Offering Circular for specific details.

Item 16: Investment Discretion

As indicated under Item 4, above, we have investment discretionary authority over Portfolio Management Client accounts. Our discretionary authority is provided to us in the written agreement we have with you. As indicated, you may place limitations on our discretionary authority; such limitations must be in writing.

We may determine, at our sole discretion, if we should not accept or continue a relationship with you if the investment restrictions are determined by us to be too restrictive (meaning we cannot fulfill our contractual obligations to you) by managing your account assets with proper asset allocation or diversification.

You may amend or change your investment restrictions at any time, by providing written updates to us. However, changes are not implemented until reviewed and approved (accepted) by us.

Blue Water Strategic Currency Fund I, LP:

In the agreement between the Fund and Columbia River (as GP and Adviser), we have the investment discretionary authority to direct the investments of the Fund. As a private fund, Limited Partner investors are not permitted to identify any investment restrictions or limitations on the securities or transactions entered into by the Fund on the investor's behalf.

Please see the Confidential Offering Circular for complete details.

Item 17: Voting Client Securities

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

If you are referred to and open an account with a TPMM (under Cash Referral Service), the TPMM may vote proxies for your assets they manage; please see the TPMM's Form ADV Part 2 A for specific details).

Blue Water Strategic Currency Fund I, LP: Columbia River, as the GP and Advisor to the Fund, has the responsibility, if applicable to vote proxy ballots or corporate actions, if any are received by Columbia River (if any are received. We do not believe this is the case due to the nature and focus of the Fund's investments, as described in the Confidential Offering Circular).

Item 18: Financial Information

We do not require nor do we solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore we have not included a balance sheet for our most recent fiscal year.

Additional Disclosure:

Don Foy (a principal executive and managing member of Columbia River) has been the subject of a bankruptcy petition on November 13, 2003. A chapter 7 bankruptcy was filed in the United States Bankruptcy Court for the Western District of Washington located in Seattle; Case Number: 03-24710. The petition was discharged on March 3, 2004, as the Mr. Foy's debts exceed his income and the discharge was granted.

Item 19: Requirements for State-Registered Advisers

As of the date of this Brochure, we are registered with the US Securities and Exchange Commission and a notice filer in the State of Washington.

We may be required to register with the State of Washington due to the implementation of Dodd Frank requirements which increase the threshold for SEC registration from \$25 million of assets under management to \$100 million of assets under management.

If we must register with Washington State, we will then amend Form ADV as required and de-register from the SEC, as required.

ITEM 1: Cover Page

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

Donald (“Don”) Foy

**COLUMBIA RIVER ADVISORS, LLC
dba**

Columbia River Advisors and Summit Capital Advisors

**2200 N. 30TH Street, Suite 202
TACOMA, WA 98403**

FIRM CONTACT: DON FOY, CHIEF COMPLIANCE OFFICER

**WWW.COLUMBIARIVERADVISORS.COM
WWW.SUMMITCAPITALADVISORS.NET**

This brochure supplement provides information about Don Foy that supplements our Part 2 A, Firm Brochure. You should have received a copy of the Firm Brochure as we “attach” these Part 2 B’s together. Please contact Don Foy, Chief Compliance Officer, if you did not receive of the Part 2 A brochure, or if you have any questions about the contents of this supplement.

Additional information about Don Foy is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Donald Allen Foy

Year of Birth: 1971

Formal Education after High School:

University of Washington, B.A. Economics, 1990-1993.

Business Background for Previous Five Years:

Indirect Manager / Chief Compliance Officer Investment Adviser Representative (IAR) Columbia River Advisors, LLC,	09/2010 to Present
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Owner Summit Tax Services	09/2010 to Present
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Member Don Foy LLC (direct owner of Columbia River)	11/2010 to Present
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Financial Consultant LPL Financial Registered Representative, 09/2008 to 10/2011.	09/2008 to 10/2011
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Financial Consultant Raymond James Financial Services, Financial Planner	10/2005 to 09/2008
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License/Exams:

NASD / FINRA Series 7 and Series 66 examinations, 2004

Item 3: Disciplinary Information

Don was the subject of an allegation on October 22, 2008. In this allegation, a client at that time alleged that Don (as the financial advisor) misrepresented Muni Bond funds as risk free. The client lost \$17,024.82 on \$80,000 of Muni Bond purchases from August 29, 2008 to October 21, 2008. The alleged damages were \$5,000, and the complaint was settled on 01/05/2009.

Item 4: Other Business Activities

Don is a part owner of Summit Tax Services which provides tax related services to the company's clients. No client of Columbia River is required to use Summit Tax Services.

Don is also, as a shareholder of Columbia Rivers an owner of the General Partner to the affiliated private fund. Please see the Part 2 A Brochure (attached) for additional detail.

Item 5: Additional Compensation

Don may receive additional compensation from clients who may engage Summit Tax Services for tax preparation or related services. If this is done, Don as a shareholder will receive additional compensation.

Item 6: Supervision

Don Foy, as a principal and Chief Compliance Officer is one of the supervisors of the firm. Don and the other principals of Columbia River all oversee the firm and its operations.

If you would like additional information on our supervisory structure, please contact Don at 253.589.1401 or via email at don@columbiariveradvisors.com.

ITEM 1: Cover Page

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

Mark Thomas Haller

COLUMBIA RIVER ADVISORS, LLC
dba

Columbia River Advisors and Summit Capital Advisors

2200 N. 30TH Street, Suite 202
TACOMA, WA 98403

WWW.COLUMBIARIVERADVISORS.COM
WWW.SUMMITCAPITALADVISORS.NET

This brochure supplement provides information about Mark Haller that supplements our Part 2 A, Firm Brochure. You should have received a copy of the Firm Brochure as we “attach” these Part 2 B’s together. Please contact Don Foy, Chief Compliance Officer, if you did not receive of the Part 2 A brochure, or if you have any questions about the contents of this supplement.

Additional information about Don Foy is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Mark Thomas Haller

Year of Birth: 1960

Formal Education after High School:

Washington State University, BS Psychology, 1983
Certified Financial Planner, CFP Board of Standards², 2007

Business Background for Previous Five Years:

Investment Adviser Representative, 12/2011 to Present
Columbia River Advisors / Summit Capital Advisors

Financial Advisor 01/2007 to 12/2011
Linsco/Private Ledger

VP Business Development 01/2007 to 02/2011
Financial Advocates LLC

License/Exams:

NASD / FINRA Series 65

Item 3: Disciplinary Information

No events have occurred for Mark Haller.

Item 4: Other Business Activities

None for Mark Haller.

² CFP[®] are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. The CFP certification is a voluntary 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. 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).

Examination – Pass the comprehensive CFP Certification Examination. The examination, administered in 10 hours over a two-day period,

Experience – Complete at least three years of full-time financial planning-related experience

Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct

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

Ethics – Renew an agreement to be bound by the Standards of Professional Conduct.

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 5: Additional Compensation

None.

Item 6: Supervision

Mark is primarily supervised by Don Foy on a continual basis, in an informal fashion and weekly on a formal basis. However, Don and Mark have daily interaction.

If you would like additional information on our supervisory structure, please contact Don at 253.589.1401 or via email at don@columbiariveradvisors.com.

ITEM 1: Cover Page

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

**Benjamin Johan Addink
("Ben Addink")**

**COLUMBIA RIVER ADVISORS, LLC
dba**

Columbia River Advisors and Summit Capital Advisors

**2200 N. 30TH Street, Suite 202
TACOMA, WA 98403**

**WWW.COLUMBIARIVERADVISORS.COM
WWW.SUMMITCAPITALADVISORS.NET**

This brochure supplement provides information about Ben Addink that supplements our Part 2 A, Firm Brochure. You should have received a copy of the Firm Brochure as we "attach" these Part 2 B's together. Please contact Don Foy, Chief Compliance Officer, if you did not receive of the Part 2 A brochure, or if you have any questions about the contents of this supplement.

Additional information about Don Foy is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Benjamin Johan Addink

Year of Birth: 1978

Formal Education after High School:

University of Hawaii at Hilo, BA Business Administration, 2000

Business Background for Previous Five Years:

Indirect Manager, IAR Columbia River Advisors / Summit Capital Advisors	09/2010 to Present
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President / Member Ben Addink, LLC	11/2010 to Present
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Owner Summit Tax Services	09/2010 to Present
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Owner, President Whitestone Land Management, LLC	10/2006 to 12/2011
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Member Hornets Land, LLC	09/2010 to Present
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IAR / RR Linsco/Private Ledger	04/2005 to 10/2006
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License/Exams:

NASD / FINRA Series 65, 2010

Item 3: Disciplinary Information

No events have occurred for Ben Addink

Item 4: Other Business Activities

As indicated above, Ben is also a Member of Hornets Land, LLC a real estate company. Clients of Columbia River are not solicited to invest and this position does not impact his activities on behalf of our firm.

Item 5: Additional Compensation

Ben is a part owner of Summit Tax Services which provides tax related services to the company's clients. No client of Columbia River is required to use Summit Tax Services.

Ben is also, as a shareholder of Columbia Rivers an owner of the General Partner to the affiliated private fund. Please see the Part 2 A Brochure (attached) for additional detail.

Item 6: Supervision

Ben is primarily supervised by our CCO on a regular basis through a review of correspondence, including email. As a co-investment professional with Ben, both Don and Ben monitor each other's activity including advice provided to clients.

If you would like additional information on our supervisory structure, please contact Don at 253.589.1401 or via email at don@columbiariveradvisors.com.