

# CONTINUITY WEALTH MANAGEMENT

This brochure provides information about Continuity Wealth Management, Corp. (“Continuity Wealth Management”) qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at (503) 244-8905 or by email at [support@continuitywm.com](mailto:support@continuitywm.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 Continuity Wealth Management is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select “investment adviser firm” and type in our firm name).

We are a Registered Investment Advisor Firm. Our registration does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

ITEM 1 – COVER PAGE

OCTOBER 3, 2024

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## ITEM 2 – MATERIAL CHANGES

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This brochure has been prepared by Continuity Wealth Management to meet SEC requirements. This section of the brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the public disclosure website (IAPD)

[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Since our last annual amendment dated 01/24/2024, we have the following material changes to report:

- The Firm has changed its legal name to Continuity Wealth Management, Corp.
- The Orion Custom Indexing Program has been added to our service offerings. Details are provided in Items 4 and 5.

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## ITEM 4 – ADVISORY BUSINESS

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### **Firm Description**

Continuity Wealth Management was established in May 1993. Our main office is located in Portland, Oregon. The principal owner is Justin Curtiss, who serves as the Firm's President & Chief Compliance Officer. Mr. Curtiss may be contacted by email at [justin@continuitywm.com](mailto:justin@continuitywm.com) or by telephone at (503) 244-8905.

### **Types of Advisory Services**

Continuity Wealth Management offers a variety of investment advisory services to our clients. We work with our clients to identify their investment goals and objectives as well as risk tolerance in order to create an initial portfolio allocation designed to complement their clients' financial goals and objectives. We may create a portfolio, consisting of, but not limited to individual stocks or bonds, exchange traded funds, no-load funds and/or load-waived funds (front-end commissions will not be charged).

### **Investment Management**

Our investment management services generally include financial planning as well as discretionary management of investment portfolios. Each portfolio will be initially designed to meet a particular investment goal, which Continuity Wealth Management has determined to be suitable for our client's circumstances. Once the appropriate portfolio has been determined, we will review the portfolio and rebalance the account based upon our client's individual needs, stated goals and objectives. Continuity Wealth Management's strategy, generally, will be to seek to meet client investment objectives while providing clients with access to personal advisory services.

### **Orion Custom Indexing Program**

Continuity Wealth Management has established an agreement to work with Orion Portfolio Solutions, LLC ("OPS") in a sub-advisory capacity to provide tax managed and custom index strategies through Orion's Custom Indexing Program. This Program offers a personalized portfolio that is designed to meet client's specific investment and values-based criteria in a tax effective manner. Clients opting to utilize this program will be required to authorize OPS to trade on their account and to bill their account. In this arrangement the sub-advisor is responsible for all investment-related decisions, billing and trading in the client accounts. Continuity Wealth Management is responsible for monitoring the investment recommendations of the sub-advisor and for reviewing and determining whether its services remain in the Client's best interest. Continuity Wealth Management retains the authority to hire and fire sub-advisors at our discretion.

### **Financial Planning**

Our financial planning services are rendered in conjunction with portfolio management services, as part of a comprehensive investment management engagement. We will prepare a written financial plan for all financial planning clients. The plan considers all of your assets, liabilities, goals and objectives and includes gathering all information necessary to provide you with appropriate and agreed upon services, which may include one or more of the following:

- Investment Manager Selection and Monitoring
- Asset Allocation and Investment Planning
- Retirement Planning
- Estate Planning

- Insurance Planning
- Education Planning
- Cash Flow Management
- Divorce Planning

You are encouraged to review your plans on a regular basis.

### ***Educational Workshops/Seminars***

We offer educational workshops to existing and prospective clients. These workshops feature general investment-related advice for educational purposes. No specific individualized investment advice regarding investment objectives or investment related needs of the attendees is rendered during seminars. However, participants are free to schedule follow-up meetings to discuss personalized investment advice.

### **Retirement Rollovers & Conflicts of Interest**

If we make recommendations or provide advice related to a retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

In the event we recommend a client rollover their retirement plan assets into an account to be managed by our firm or (where applicable) recommend the purchase of a retail investment product, such a recommendation creates a conflict of interest because we will be compensated if you follow our recommendation. To manage this conflict, we operate under a special ERISA rule relating to retirement assets that requires us to act in your best interest and not put our interests ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

While not always the case, a client or prospective client leaving an employer typically has the below four options regarding an existing retirement plan:

1. Retain the assets in the former employer's plan;
2. Rollover the assets to a Traditional IRA or Roth IRA;
3. Rollover the assets to the plan of a new employer; or
4. Receive a cash distribution.

Deciding which of the above options are right for you can be a complex process. For that reason, we will discuss each option after we conduct a careful analysis. Additionally, we provide a written "Retirement

Advice Disclosure" to our clients to educate you so you can make a good decision. Please let us know if you did not receive the above disclosure so we can provide it to you.

#### **Client Tailored Relationships and Restrictions**

As a fiduciary, Continuity Wealth Management always acts solely in your best interests. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions regarding the investments made in your portfolio. Similarly, you are under no obligation to act upon Continuity Wealth Management' or associated person's recommendations.

#### **Wrap Fee Program**

Continuity Wealth Management does not sponsor nor provide portfolio management services to a wrap fee program.

#### **Assets under Management (AUM)**

Continuity Wealth Management as of December 31, 2023, has \$158,038,016 in discretionary and \$27,884 in non- discretionary for a total of \$158,065,900 in reportable assets under management.

## **ITEM 5 – FEES AND COMPENSATION**

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### **Investment Management Fees**

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee</u></b>
First \$1,000,000	1.00%
Next \$1,000,000 - \$3,000,000	0.75%
\$3,000,000 and above	Negotiable

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported are valued at the last reported sale price on the principal market in which they are traded. In certain circumstances, fees may be negotiable.

The fee includes the time and activities necessary to work with your attorney and/or accountant in reaching agreement on solutions, as well as assisting them in implementation of all appropriate documents. We are not responsible for attorney or account fees charged to you as a result of the above activities.

Compensation for our services will be calculated in accordance with what is set in the clients' agreement. We may modify the terms of any agreement by written changes submitted to the client for signature. All Investment Advisors are required to disclose to their clients that lower fees for comparable services may be available from other sources.

Continuity Wealth Management investment advisory fees are paid from your account by the custodian when we submit an invoice to them. The invoice we submit shows the amount of fees, the value of your assets on which the fees are based, and the specific manner in which the fees are calculated. In addition to our fees, all fund mutual fund expenses which include internal operating expenses, 12b-1 fees,

redemption fees and similar fees may be charged to client by the mutual fund. Continuity Wealth Management does not receive 12b-1 fees.

Continuity Wealth Management investment advisory fees are paid quarterly in advance, with payment due within 10 days from the date of the invoice. Our fee is determined by taking the percentage rate we charge, times the market value of the account at the end of each calendar quarter divided by the number of days in the year and multiplied by the number of days in the quarter. The market value is the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial quarters at the commencement or termination of our agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter.

#### Orion Custom Indexing Program Fees

The sub-advisor fees charged for the Orion Custom Indexing Program are 15bps per year. Orion will deduct its fee from the client's account quarterly in arrears based on the average daily balance during the quarter. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period.

#### **Financial Planning Fees**

Our financial planning services are typically rendered in conjunction with investment portfolio management services and are therefore included in the percentage of assets under management fee. We do not offer financial planning as a standalone fixed-fee service.

#### **Termination**

Either Continuity Wealth Management or our clients can terminate our agreement upon receipt of written notice to the other party, to include written agreement to changes by the client. Additionally, the client has the right to terminate the contract without penalty within five (5) business days after entering into the contract.

When an agreement is terminated, we will refund any pre-paid, unearned fees based on the number of days remaining in the quarter after termination. Refunds will be made within 30 calendar days of the effective date of termination.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all additional fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees (including 12b-1 fees) and all trading costs due to the termination. The Custodian may assess additional fees for the transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good faith estimate of these fees.

#### **Third Party Fees**

Custodians may charge transaction fees on purchases or sales of securities. These transaction charges are usually small and incidental to the purchase or sale of a security. All brokerage commissions (including 12b-1 fees), stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. In addition to statements sent by us, you will receive statements directly from these brokers, custodians or mutual funds or other investments you hold. We strongly urge you to compare these statements for accuracy.

As part of our investment management services to you, we may recommend that you invest in mutual funds and exchange traded funds. The fees that you pay to our Firm for investment management services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds to their shareholders (as described in each fund's prospectus). These fees will generally include a management fee and other fund expenses. We do not share in any portion of these fees or expenses.

## ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

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Continuity Wealth Management does not charge investment advisory fees on the performance of funds or securities in your account.

## ITEM 7 – TYPES OF CLIENTS

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Continuity Wealth Management generally provides asset management and financial planning services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit-Sharing Plans
- Trusts
- Estates
- Charitable Organizations
- Corporations

### **Minimum Account Size**

Continuity Wealth Management has an account minimum of \$100,000.00. However, in certain conditions, we may decide to accept clients with smaller portfolios.

## ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

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

Continuity Wealth Management uses multiple sources of information to obtain analysis and strategies. They include sources such as financial newspapers, financial magazines, research prepared by others, prospectuses, annual reports, timing services and filings with the SEC.

Continuity Wealth Management utilizes multiple investment strategies to meet your investment objectives. These methodologies are formulated based on a comprehensive review and assessment of your expectations, investment time horizon, risk tolerance level, present investment allocation, and current and projected financial requirements.

Ultimately, each strategy must maximize return within reasonable and prudent levels of risk. Also, the approach taken must provide exposure to a wide range of investment opportunities in various markets



while limiting risk exposure through prudent diversification. Finally, the costs of administering and managing the investments related to the strategy cannot be excessive.

### **Risk of Loss**

All investments include a risk of loss. In addition, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

Continuity Wealth Management will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks.

We primarily recommend Exchange Traded Funds and Mutual Funds. Mutual funds and exchange traded funds ("ETFs") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, alternative investments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs are reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors. ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of the underlying index or other benchmark, which may negatively affect the ETF's performance.

**Model Risk.** Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions. There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process, but we often weigh professional judgment more heavily in making trades or asset allocations.

**Structured Products.** A structured product, also known as a market-linked product, is generally a pre-packaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. The derivative component is often an option.

The note provides for periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell to the investor the security or securities at a predetermined price. Other products use the derivative component to provide for a call option written by the investor that gives the buyer of the call option the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a "principal guarantee" function, which offers protection of principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation (FDIC) insured; they may only be insured by the issuer, and thus have the potential for loss of principal in the case of a liquidity crisis, or other solvency problems with the issuing company. Investing in structured products involves a number of risks including but not limited to: fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and, other events that are difficult to predict.

## ITEM 9 – DISCIPLINARY INFORMATION

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### **Civil or Criminal Actions**

Continuity Wealth Management and its managers have never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

### **Administrative Enforcement Proceedings**

Continuity Wealth Management and its managers have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

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

Continuity Wealth Management and its managers have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, Continuity Wealth Management and its managers have never been found in violation of self-regulatory agencies rules such that they were barred, suspended, limited in advisory functions or fined.

## ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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### **Broker Dealers and Registered Representatives**

Continuity Wealth Management is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representatives.

### **Registration as a Futures Commission Merchant, Pool Operator, or a Commodity Trading Advisor**

Neither Continuity Wealth Management nor our employees hold any of the above registrations.

### **Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

The principal business of Continuity Wealth Management is that of a registered investment advisor and provider of financial planning services. Continuity Wealth Management will disclose any material conflict of interest relating to Continuity Wealth Management, our representatives, or any of our employees

which could reasonably be expected to impair the rendering of unbiased and objective advice.

Certain Investment Adviser Representatives at Continuity Wealth Management are also licensed as independent insurance agents. These individuals will earn commission-based compensation for selling insurance products. Insurance commissions earned by these individuals are separate and in addition to our advisory fees. This practice presents a conflict of interest because advisers providing investment advice on behalf of our firm, who are insurance agents, have an incentive to recommend insurance products to you for the purpose of generating commissions. You are under no obligation to purchase insurance products through any person affiliated with our firm.

#### **Selection of Other Advisors**

Continuity Wealth Management is not compensated specifically for selecting other advisors.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

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#### **Code of Ethics Description**

Continuity Wealth Management follows the Code of Ethics for Certified Financial Planners. A copy of the code can be found at <http://www.cfp.net/learn/codeofethics.asp>.

#### **Participation or Interest in Client Transactions**

Neither our firm nor any persons associated with our firm have any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

#### **Personal Trading Practices**

Continuity Wealth Management, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. In some cases, Continuity Wealth Management, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client.

Continuity Wealth Management will always maintain full disclosure with our clients so that you can make informed decisions. We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

## **ITEM 12 – BROKERAGE PRACTICES**

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#### **Selecting Brokerage Firms**

As part of our services, Continuity Wealth Management will recommend a custodial broker-dealer. We have selected our broker-dealers based on price, reliability, speed of processing, tools and “best execution” in addition to other considerations. While you are not required to effect transactions

through any broker-dealer recommended by us, we feel we have made our selections based on a totality of benefits they offer.

We typically recommend Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. Continuity Wealth Management is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as a custodian, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open an account for you, although we may assist you in doing so.

#### **Brokerage for client referrals**

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

#### **Directed Brokerage**

We routinely request that you direct our firm to execute transactions through Charles Schwab & Co., Inc. As such, we may be unable to achieve the most favorable execution of client transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

#### **Aggregation**

Continuity Wealth Management is authorized to aggregate purchases and sales and other transactions made for your account with purchases and sales and other transactions in the same or similar securities or instruments for other clients of ours. When we aggregate transactions, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price obtained. Stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise you in writing of any purchase or disposition of instruments for the account with respect to any such aggregated transaction. We will direct that confirmations of any transactions effected for the account will be sent, in conformity with applicable law, to you.

#### **Research and Other Soft Dollar Benefits**

Continuity Wealth Management does not participate in soft-dollar relationships. However, as a registered investment adviser, we do have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or another brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these custodians and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge. The availability of products and services benefits us because we do not have to produce or purchase them. They are not contingent upon Continuity Wealth Management committing any specific amount of business to a custodian in trading commissions or assets in custody. The fact that we receive these benefits is an incentive for us to recommend the use of a particular custodian rather than making such a decision based exclusively on your interest in receiving the best value in custody.

services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of a particular custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality and price of a custodian's services, and not services that benefit only us.

## ITEM 13 – REVIEW OF ACCOUNTS

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### **Periodic Reviews**

Continuity Wealth Management's investment advisors review client portfolios at least quarterly to confirm they are consistent with the client's investment objectives and risk profile.

Continuity Wealth Management will also contact each client at least annually to attempt to update contact information, risk tolerance, clients' goals and objectives, or other factors that may affect the client's overall financial position.

### **Review Triggers**

More frequent reviews are triggered by a change in your investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in economic climate.

### **Reports**

Clients will receive monthly statements from the independent custodian of account illustrating account value, transactions, and other relevant information. Continuity Wealth Management will also provide a report, at least quarterly illustrating holdings, values, earnings, and year-to-date performance.

## ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

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### **Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

Continuity Wealth Management does not receive any economic benefit directly or indirectly from any third party for advice rendered to its clients.

### **Compensation to Non-Advisory Personnel for Client Referrals**

Continuity Wealth Management does not directly or indirectly compensate any person for client referrals.

## ITEM 15 – CUSTODY

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Continuity Wealth Management does not maintain physical custody of client funds or securities. All client assets are held at qualified custodians which provide account statements on a monthly basis. Continuity Wealth Management has the authority to deduct advisory fees directly from some client accounts. The Custodian will provide clients with a quarterly statement containing account balances and holdings, and Continuity Wealth Management will provide clients with its own statement at least monthly; we recommend that clients compare the two statements for consistency and notify us if any statement is not

received promptly or if any inconsistencies exist.

Certain clients may grant Continuity Wealth Management the authority to make disbursements to third parties from the client's account at a qualified custodian via a standing letter or authorization (SLOA). This causes our firm to exercise custody. The SEC has provided seven conditions which, if satisfied, relieve Continuity Wealth Management of the custody rule's annual surprise-examination requirement. Accordingly, Continuity Wealth Management will follow the safeguards and conditions specified by the SEC, rather than undergo an annual independent verification (i.e., a surprise accountant's examination).

## ITEM 16 – INVESTMENT DISCRETION

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Continuity Wealth Management asks our clients for discretionary authority to execute transactions without our client's prior approval. These transactions may include the purchase and selling of securities, arranging for payments or generally acting on behalf of our clients in most matters necessary to the handling of the account.

In certain circumstances, we will request non-discretionary authority over our clients' accounts. Non-discretionary authority requires us to obtain your prior approval of each specific transaction prior to executing investment recommendations.

## ITEM 17 – VOTING CLIENT SECURITIES

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Our firm does not vote proxies on a client's behalf, including those accounts that we have discretionary authority over. The clients of Continuity Wealth Management retain the authority to proxy vote. You should ensure that proxy ballots are mailed directly to you by selecting this option on your custodial application forms. You are welcome to delegate said proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate custodial form.

## ITEM 18 – FINANCIAL INFORMATION

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### **Balance Sheet**

Continuity Wealth Management is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$1200 per client, six (6) months or more in advance.

### **Financial Conditions**

Continuity Wealth Management has no financial issues that could impair our ability to carry out our contractual commitments to clients.

### **Bankruptcy Petition**

Continuity Wealth Management has not been the subject of a bankruptcy petition within the last ten (10) years.