

March 31, 2019

Wrap Fee Program Brochure

CONTINUUM ADVISORY, LLC

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of Continuum Advisory, LLC (hereinafter “Continuum Advisory” or the “Firm”), and its wrap fee program. If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. 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 the Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, Continuum Advisory is required to discuss any material changes that have been made to the brochure since the last annual amendment. There have been no material changes since the last annual amendment.

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Item 4. Services, Fees and Compensation

Continuum Advisory (“Continuum,” or the “Firm”) was formed in February 2016 and is principally owned by Timothy S. Kerrigan, Brian J. Damiani and Michael A. Kelly. This brochure generally describes the wrap fee program offered by Continuum Advisory, additional information about the firm can be found in its Disclosure Brochure and Form ADV Part 1, which can be found at www.adviserinfo.sec.gov.

Wrap Fee Services. The wrap fee program (the “Program”) allows Clients to utilize the services of the Firm or another investment manager unaffiliated with the Firm (each a “Third-Party Manager,” and, together with the Firm, the “Asset Managers”) to manage their assets in return for the payment of asset-based fees, and also to pay for the costs of securities transactions through an additional asset-based feed to the broker-dealer that has custody of the Client’s assets (the “Custodian”). Client Accounts are regularly monitored, and are generally rebalanced on a quarterly basis.

Clients participating in the Program will be required to execute a written agreement with the Firm, any Third-Party Manager selected by the Client, and the Custodian.

Compensation. Clients pay an asset-based fee for participating in the Program. The fee consists of Continuum’s fee for operating the Program (the “Program Fee”), the fee for having an Asset Manager manage the Client’s assets in the Program, and the asset-based brokerage fee charged by the custodian of the account.

The annual Program Fee is 1.00% of Client assets, and is negotiable. Fees paid to Asset Managers for the management of Client assets in the Program, range from 0.25% to 1.00% annually of Client assets, and will be reflected in the agreement between the Client and the Asset Manager selected by the Client. The annual Custody fee is 0.10% of Client assets, and will be reflected in the agreement between the Client and the Custodian. The custody fee will be calculated by the Custodian and deducted from Client accounts, and will be charged in arrears. The annual Program Fee and fees paid to asset managers are deducted from client accounts and are charged in arrears.

Please note that participating in the Program may cost more or less than purchasing these services separately and may be impacted by the Asset Managers made available through the Program, the frequency of securities transactions, and the Program Fee, among other factors. Also, certain securities-transaction fees may be excluded from the Custodian’s fee, and would be charged to the Client’s account. These items are described in the agreement between the Custodian and the Client. Clients also will bear the costs of any fees that are internal to mutual funds or similar securities products that are held in Client accounts.

The Program Fee is shared with the Client’s Continuum financial adviser. The fee that Continuum receives for being an Asset Manager is not. The amount of the Program Fee received by your financial adviser may create an incentive for the financial adviser to recommend the Program instead of other investment advisory or brokerage services offered by the Firm, and as such, could create a conflict of interest.

Assets Under Management. As of March 31, 2019, the Firm managed \$412,124,602 in discretionary assets and \$0 in non-discretionary assets for total assets under management of \$412,124,602.

Asset Manager Fees.

The fee charged by each Asset Manager is indicated below.

Asset Manager Name	Investment Style Name	Annual Fee Rate

Item 5. Account Requirements and Types of Clients

The minimum account size for the Program is \$25,000.

Continuum Advisory offers services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities. Certain Third-Party Managers may, however, impose higher account minimums. In these instances, the higher account minimum would apply.

Clients participating in the Program will be required to execute a written agreement with the Firm, any Third-Party Manager selected by the Client, and the Custodian.

Item 6. Portfolio Manager Selection and Evaluation

Third-Party Managers. Continuum Advisory evaluates a variety of information about Third-Party Managers, which may include the Third-Party Managers' public disclosure documents, materials supplied by the Third-Party Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Third-Party Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. Continuum also takes into consideration each Third-Party Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors. Third-Party Managers may not calculate their past performance on the same basis, which may limit the effectiveness of past-performance reviews.

On an ongoing basis, Continuum monitors the performance of those accounts being managed by Third-Party Managers. The Firm seeks to ensure the Third-Party Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Continuum. Continuum may recommend that Clients invest through the Program, if such a recommendation is believed to be in the Client's best interest. If a Client selects Continuum to manage its account in the Program, Continuum will earn a fee in addition to Program Fee. As such, Continuum may have a conflict of interest when advising Clients regarding the selection of a portfolio manager. Continuum seeks to address this conflict by monitoring all portfolio manager recommendation to ensure that they are in the Clients' best interest.

Continuum primarily allocates client assets among various exchange-traded funds ("ETFs"). The Firm also allocates assets among mutual funds, individual debt and equity securities, and independent investment managers ("Independent Managers") in accordance with their stated investment objectives. In addition, Continuum may also recommend that certain eligible clients invest in privately placed securities, which may include debt, equity and/or interests in pooled investment vehicles (e.g., hedge funds). Not all of these investments may be available when Continuum manages Client accounts in the Program.

Continuum tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Continuum Advisory consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Continuum does not charge performance fees to any Clients, nor does it vote proxies on Client Securities.

Clients are advised to promptly notify Continuum Advisory if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if Continuum determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

All investments have risks, including the risk of the loss of principal invested. For more information, Clients are urged to review Continuum's Firm Brochure, which can be obtained by contacting Continuum at (925) 462-6007, or at www.adviserinfo.sec.gov, and the Firm Brochure for any Third-Party Manager selected by the Client, which can be obtained by contacting the Third-Party Manager as described in the agreement with the Third-Party Manager, or at www.adviserinfo.sec.gov.

Item 7. Client Information Provided to Portfolio Managers

Clients will provide their personal information directly to any Third-Party Managers that they select. Continuum will not share any Client information with Third-Party Managers.

Item 8. Client Contact with Portfolio Managers

Continuum encourages Clients to contact the Third-Party Managers that they select with any questions or concerns, and also to impose reasonable restrictions on the securities that may be purchased in their account. The acceptance of any such restrictions is governed by the agreement between the Client and the Third-Party Manager.

Item 9. Additional Information

Disciplinary Information. Continuum Advisory has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Other Financial Industry Activities and Affiliations. Certain of the Firm's Supervised Persons are registered representatives of a broker-dealer and may provide clients with securities brokerage services under a separate commission-based arrangement.

A number of the Firm's Supervised Persons are licensed insurance agents and may offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that Continuum Advisory recommends the purchase of insurance products where its Supervised Persons may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

Certain of Continuum's Supervised Persons, in their individual capacities, are also investment adviser representatives with a broker-dealer and in such capacity, may provide advisory services to clients through Broker-Dealer. The Firm expects this dual affiliation to last until the Supervised Persons' clients are transitioned to the Firm. These Supervised Persons may use the business names of the Firm in acting in this outside capacity, but they will notify clients when they are acting as investment adviser representatives of a broker-dealer.

These arrangements are described at length in Items 5 and 10 of the Firm's Brochure.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Continuum has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. Continuum's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of Continuum's personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person will access to this information may knowingly effect for themselves or for

their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact Continuum to request a copy of its Code of Ethics.

Review of Accounts. Continuum monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with Continuum and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the custodian where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from Continuum and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from Continuum or an outside service provider.

Client Referrals and Other Compensation. Continuum receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors using their services. Specifically, the Additional Services include Orion Advisor Services and Greenrock Research. TD Ameritrade provides the Additional Services to Continuum in its sole discretion and at its own expense, and Continuum does not pay any fees to TD Ameritrade for the Additional Services. Advisor and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Continuum's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Continuum, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional

Services Addendum with Continuum, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to receive the Additional Services from TD Ameritrade, Continuum may have an incentive to recommend to Clients that the assets under management by Continuum be held in custody with TD Ameritrade. Continuum's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to the obligation seek best execution of trades for Client accounts.

Continuum participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Continuum receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, Continuum participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Continuum's participation in the program and the investment advice it gives to its Clients, although Continuum receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Continuum participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Continuum by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Continuum's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Continuum but may not benefit its Client accounts. These products or services may assist Continuum in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Continuum or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Continuum endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Continuum or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Continuum's choice of TD Ameritrade for custody and brokerage services.

Financial Information. Continuum is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.