



**Part 2 A B of Form ADV: Brochure  
Item 1: Cover Page**

**Columbia River Advisors, LLC**

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

July 11, 2016

This Part 2 A of Form ADV (Brochure) provides information about the qualifications and business practices of Columbia River Advisors, LLC<sup>1</sup> (Columbia River, Columbia River Advisors or CRA). If you have any questions about the contents of this Brochure, please contact Peter Maftciu, Chief Compliance Officer, at the telephone number above or via email at [compliance@investcra.com](mailto:compliance@investcra.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 Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Please note that the use of the term "registered investment adviser" and description of Columbia River 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.

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<sup>1</sup> Effective during December, 2015 and as previously filed, Columbia River Advisors, LLC also conducts business under a dba (doing business as) name of Evergreen Asset Management, a Columbia River Advisors Company. This is to ensure continuity of services and name recognition for Evergreen Asset Management's client base that was acquired by Columbia River Advisors.

## **Item 2: Material Changes**

This ADV Part 2 A is new as of the date of this filing. When compared to our previous filing dated March, 2016, the following material changes are included in this Brochure:

### **Part 2 B Brochure Supplements:**

- The addition of Adam Q Zimmerman, Investment Adviser Representative effective April, 2016.
- The addition of Mathew Keefe and Nate Angelo as Investment Adviser Representatives effective June 2016.
- The removal of Andy Fagan, Investment Adviser Representative and CIO effective June, 2016.

There are no other material changes to this brochure.

## Item 3: Table of Contents

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## Item 4: Advisory Business

### Background Information

Columbia River Advisors, LLC (“CRA”) is directly owned by five (5) individuals as identified below:

Members are Ben Addink, Don Foy, and Brian Scalabrino, who all own 31.33%  
William Hsu and Matt Stredwick each own 3%

CRA is a limited liability corporation, established in the State of Delaware. CRA was established in 2010. Services are provided out of four offices. Our home office is in Tacoma, WA with branch offices in Bellevue, Gig Harbor, and Olympia, WA.

Acquisition: In December, 2015, Columbia River completed the acquisition of the assets of Evergreen Asset Management, LLC, Gig Harbor, WA. The acquisition (purchased the assets of Evergreen Asset Management) has caused the following changes to CRA (and dba Evergreen Asset Management):

- CRA now has a new dba (doing business as) name: Evergreen Asset Management, a CRA Company. This is to ensure that the Evergreen Asset Management client base, while transitioning and after the transition is complete, have name recognition and familiarity with the investment adviser representative servicing their accounts from Gig Harbor. It is anticipated CRA will use the dba name through 2016<sup>1</sup>.

One new service added through CRA’s acquisition of Evergreen are 401k and Retirement Services, as described below.

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### Advisory Service – Financial Planning / Consulting

CRA believes financial planning is a critical component in providing services to our clients. Based on your specific needs and questions, this may be in the form of a formal, written comprehensive plan or the service may be topical (limited in scope or focused on only one question or issue) with or without a report.

We provide comprehensive or limited financial planning services to all of our portfolio management clients for no additional fee; planning services are included in our portfolio management services and the asset based fee you pay for those services.

Of course, there are unanticipated situations where certain clients, with very complex needs or who request limited scope services, may request to enter into a separate financial planning agreement (typically ultra- high net worth individuals with complex estate / tax or related issues). In these cases, we enter into a separate financial planning agreement and charge financial planning fees *separate from our asset based portfolio management fee*. Please see Item 5. However, this situation is the exception rather than the rule for CRA.

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<sup>1</sup> Evergreen Asset Management is no longer a registered investment adviser with the U.S. Securities and Exchange Commission, effective 2/25/2016. At the same time, John Voigt and Shelly Ransom were de-registered as investment adviser representatives in the state of Washington on the same day.

Generally, our financial planning / consulting services encompass a number of areas that affect 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 with your other professional providers (attorney, accountant, and other advisors) as necessary or as you may instruct us. The comprehensive planning process is very detailed and covers all of your financial needs.

The output of a comprehensive plan or consulting service includes, or can be customized for, each separate engagement. The typical plan output 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)
- Other services as necessary

Limited planning services are 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.

For separate planning engagements:

Comprehensive planning services are typically completed within six (6) months of the client signing a contract with us. This assumes 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 Columbia River or any of our Investment Adviser Representatives who provide the services to you.

## **Advisory Services – Portfolio Management**

CRA's Investment Adviser Representatives ("IARs") serve as portfolio managers to client accounts. IARs manage client accounts with:

- Mutual Funds (open-ended), no-load or load waived
- Exchange Traded Funds
- Individual equity and fixed income securities (corporate debt, certificates of deposit, municipal securities, and US government securities); and,
- Alternative assets in the form of mutual funds and exchange traded funds (i.e., "liquid alternative securities")

To provide portfolio management services, CRA's IARs meet with you and document your risk tolerance (through RiskAlyze, a third party software program), your personal situation, family obligations and goals / objectives. The result of this effort is our understanding of your individual needs in the management of your portfolio assets. In discussion with your CRA IAR, we provide a standard, or framework that governs our portfolio management services (generally your RiskAlyze score and report). Due to your unique facts and circumstances, there may be variances between your Risk Tolerance survey and the actual portfolio composition, which may be necessary for you to achieve your stated goals and objectives. Portfolio management services are based upon internally monitored model portfolios as created by CRA's investment committee. CRA manages client accounts based on the design, implementation, and management of a diversified and risk appropriate investment portfolio.

For smaller client relationships, CRA may use primarily Exchange Traded Funds (ETFs) across model portfolios created with varying investment return expectations and associate risks. Each model has a number of variations to account for account sizes and tax needs. These models are designed to provide more passive investment management through traditional asset classes without alternative assets.

This is a lower cost solution for our clients and offers periodic rebalancing (as determined by client circumstances, market movements, or global economic or political events). Securities used include Fundamental and Smart Beta indexes.

For larger client relationships or as needs / objectives dictate, CRA also manages accounts as follows:

Core asset allocation model portfolios that are maintained for client account size and tax needs. There are tactical overlays which generally include security, industry or sector concentrations as appropriate. These models also include an allocation to liquid alternative assets. The portfolio may include:

- Exchange Traded Funds (ETFs)

- High conviction mutual funds
- Individual equities or bonds; and,
- Liquid alternative investments via mutual funds, ETFs, exchange traded real estate investment trusts (REITS), etc. Alternatives include event driven arbitrage, global macro, commodities, managed futures and hedged equity

Income focused portfolios. The CRA equity income model is designed to generate income via dividends for those clients who are retired or plan to retire in the short term. Generally, these portfolios are comprised of 60% dividend paying equity securities and 40% fixed income securities. Both domestic and foreign equities are used; we do not focus on market capitalization, although the emphasis is on larger market capitalized companies. CRA's focus is on dividends and the growth of dividends over time.

The fixed income portion of the portfolio is focused on diversification of yield and interest rate risk and in finding opportunities for enhanced income for clients.

Core asset allocation modules – used as a guide by your IAR. Our IARs use these models in the management of your account assets. The IAR has some latitude to customize the core models to meet a client's needs from a list of securities known to CRA and approved for use in blending the return and risk projections appropriate for a client. CRA's technology (internal and through a third party) allows us to support a number of investment models designed to meet certain risk levels and potential performance over time.

Investment Restrictions or Limitations: Investment restrictions or limitations you may impose on us, if any, are specifically documented on Exhibit B to the written portfolio management agreement we have entered in with you. Typically, investment restrictions include:

- Equity concentrations / holdings of a specific individual security. For example, if a client works for a company that issues stock, the restriction would be "no more" of that security.
- Restrictions for moral reasons (no sin, tobacco, foreign issuers, child labor or weapon manufacturers, etc.).
- Unmanaged assets: Those assets held in your account, but not "managed" by us are "unmanaged." Unmanaged assets **are not included** in *total account values* for fee calculations, *or performance calculations*; they are listed (whether manually input by us or held at TD Ameritrade, Fidelity or Schwab, see Item 12 below) as a convenience for clients. At Orion, our back office vendor, the term "unsupervised" is a synonym used for unmanaged assets

When placing investment restrictions, 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 CRA, in writing, by amending Exhibit B to the portfolio management agreement.

Private Funds / Private Equity<sup>2</sup>. These are categorically called an “alternative asset” and are available only to those of our clients who qualify as an Accredited Investor or as a Qualified Client; both are defined terms under federal securities laws. We will only recommend Private Equity when the recommendation is suitable for you and your overall investment objectives. Note that Private Equity investments are very risky, illiquid (not easily convertible into cash) and offer the potential for higher rates of return than are typically available to investors in public capital markets. Private Funds are included in clients overall portfolio management, valuation and fee calculations.

Householding of Accounts<sup>3</sup> When determining your investment goals and objectives, we will group your accounts by household. This allows us to better understand your full financial picture, including a risk tolerance survey that applies to most (if not all) of your assets under our management as one group or “household.” Each account so householded is identified on Schedule A of the portfolio management agreement we have with you.

Householded accounts are those that are located at your same physical address. The list below summarizes some typical types of householded accounts (however, the list is not all-inclusive).

- Individual (sole owner)
- Joint (husband, wife, with a brother / sister or parent)
- UGMA (uniform gift to minor accounts; for children under 18 years)
- IRA or Roth IRA
- Trusts or estates, among others

Some types of accounts *cannot be householded*. For example, a corporation’s capital reserve or an account subject to ERISA (a qualified plan), would have its own:

- Advisory agreement
- Risk tolerance, and
- Separate quarterly reports

If you have questions concerning the Householding of accounts, please contact your portfolio manager.

## **Advisory Services – 401k and Retirement Services**

CRA provides investment advice to 401k plans and similar accounts. Depending upon the form and organization of the retirement accounts (401k, pension / profit-sharing plan / money purchase pension plan, etc.), the services are determined with each client and include the following:

Retirement services consulting: CRA provides mutual fund evaluation and recommendation services to the retirement plan trustees. The plan itself is our client. The trustees (one or more employees of the company sponsoring the plan) are “named fiduciaries” to the plan under ERISA (Employee Retirement Income Security Act) supervised by the DOL (Department of Labor) and enter into the consulting agreement with CRA. CRA provides advice to the plan as an investment advice fiduciary under Section 3 (21) of ERISA. The plan’s named fiduciaries are charged with the final determination to accept or reject investment recommendations made by

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<sup>2</sup> Columbia River, itself, is the general partner to Blue Water Investment Fund II as described in this brochure.

Certain of our clients, due to the Evergreen acquisition, also own positions in the following private equity funds: Madison Capital (“MadCap”) and Madison Industries are managed by Madison Capital Partners, SEC File Number 801-73760. Chataqua is another private equity fund and is managed by Broadview Advisors SEC File Number 801-60114, Milwaukee, Wisconsin.

<sup>3</sup> Householded accounts under Evergreen Asset Management, now a dba of Columbia River Advisors are “grandfathered” in as defined at the date of acquisition, as some households do not meet the criteria as described above.



CRA. In addition, these named fiduciaries are responsible for the overall administration of the plan (and their various service providers, including a custodian, plan administrator, etc.). Services of this nature are provided typically to “daily valued 401k plans.” Advice provided by the plan’s trustees and CRA is for the sole interest of the plan and its participants.

As part of these services, we may also conduct employee training and education (including sign-up) services for the company who sponsors the 401k plan. For these plans, we have available various tools and educational materials that assist a participant in the development and determination of an “asset allocation” that makes the most sense for that individual.

Retirement plan discretionary portfolio management: For a few 401k plans and money purchase pension plans, (“pooled accounts”), CRA is provided the discretionary authority to make changes to the mutual funds (approved securities) within the plan that are made available by the plan trustees to plan participants. These approved securities are then used by the participants to achieve their stated goals and objectives (asset allocations). This authority is delegated to CRA through a portfolio management agreement with the plan’s trustees. CRA is a named investment manager under ERISA, section 3 (38). Advice provided by the plan’s trustees and CRA is for the sole interest of the plan and its participants.

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

### **Blue Water Investment Fund II, L.P.**

Columbia River launched the Blue Water Investment Fund II, L.P. (“BW II”) during May 2012. BW II was created to provide debt financing to the GP (Columbia River Advisors). The investment goal of BW II is to achieve superior risk-adjusted returns with modest volatility. This strategy / objective is achieved primarily by lending funds to the GP. As GP, CRA uses the proceeds to secure, make payments or re-finance “books of business” acquired by CRA and its overall growth and acquisition strategy. Interests in BW II were made pursuant to an exemption from registration under Reg D, 506 and, among other requirements. BW II is also an exempt investment company under Section 3 (c) (1) of the Investment Company Act of 1940, ***BW II is closed and is no longer offered to new limited partner investors (as of 9/30/14).***

The assets and books purchased are owned by Columbia River and not by the BW II, and serve as collateral to the notes issued for such loans. Proceeds may also be used to make interest payments on previous loans and to pay certain of CRA’s operating costs.

BW II receives a one percent (1%) loan origination fee for the loans it places with the GP; credited to the fund and each limited partner investor. CRA as the general partner and investment adviser does not receive advisory fees from BW II.

## Assets Under Management as of December 31, 2015

<b>Discretionary</b>	<b>\$347,809,000.00</b>
<b>Non-Discretionary<sup>4</sup></b>	<b>\$4,316,000.00</b>
<b>Total</b>	<b>\$352,125,000.00<sup>5</sup></b>

## Item 5: Fees and Compensation

### Financial Planning / Consulting Fees

Generally, we do not charge a separate fee or contract separately for financial planning or consulting services, unless requested. These services and the fees are typically included with your portfolio management services and the asset-based fee, you pay to us, as described above.

If you are a client who is of ultra-high net worth or complexity, or who requests a financial planning / consulting relationship versus a portfolio management relationship, we will enter into a separate financial planning or consulting agreement with you. If this occurs, 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 fifteen (15) minute increments.

Flat Fees: Generally, range from \$10,000 to \$50,000 or more based upon the complexity and needs of your personal situation.

Upon the execution of an agreement, we request a retainer of fifty percent (50%) of the estimated fee (flat or estimated hourly), or, for hourly consulting only, we will bill you monthly for time spent on the consulting service, as the time is used. The balance of the fees is due at the time the plan or consulting service is completed / finalized, or within thirty (30) days of that date (upon presentation of an invoice for the balance due).

Note: Our comprehensive planning services are delivered within six (6) months of the start of the service. We do not retain pre-paid planning fees of \$1,200 or more six (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.

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<sup>4</sup> CRA ceased accepting non-discretionary accounts during June of 2015. The number referenced is due to EAM and services provided to daily value 401k plans.

<sup>5</sup> The total asset under management number differs from CRA’s Form ADV Part 1 due to the requirement to identify regulatory assets under management (which includes all non-fee paying accounts, employee accounts, etc.)

## Portfolio Management Fees

The following information applies to all of CRA's portfolio management services. Effective March of 2015, *there are two fee options you may choose*. In addition, clients of the acquired firm, EAM have established fee schedules that are not available to new clients of CRA. These older fee schedules are grandfathered for clients of EAM upon the acquisition (please see the footnote on the next page).

### **Option 1: Flat Asset Based Fee on all Account (Household) Assets:**

Each client agrees to pay CRA an annual fee, in advance of the service. This fee is a percentage of the market value of all assets in the account(s), as householded on the last trading day of the calendar quarter or upon the inception of the account(s). Fees are calculated based on the daily average of the account(s) over the calendar quarter as calculated by CRA's back office vendor.

Negotiation of fees is a client-by-client basis with your IAR / portfolio manager. The actual fee agreed upon is documented in the portfolio management agreement that we have with you. Flat, asset based fees are as follows:

0.50% (50 basis points) to 2.00% (200 basis points) of all assets under CRA's management, regardless of size of the household

The factors we use when negotiating advisory fees include, but are not limited to the following:

- Number of actual Accounts (household)
- Size of the relationship
- The 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 were provided. Initial and the next 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 unearned fees are refunded to you within thirty (30) days of the date of termination.

### **Option 2: Tiered Fee Schedule on all Account (Household) Assets:**

Each client agrees to pay CRA an annual fee, in advance of the service. This fee is tiered, meaning all assets on a specific tier is charged the fee as documented in the portfolio management agreement we have with you. If the assets exceed the first tier, then the second tier fee is charged on the assets within that tier, and so on. Tiers are based upon the market value of all assets in the account(s), as householded on the last trading day of the calendar quarter or upon the inception of the account(s).

Fees charged for our services range as indicated below. Negotiation of fees is a client-by-client basis with your IAR / portfolio manager. The actual fee agreed upon is documented in the portfolio management agreement that we have with you. As indicated below, CRA negotiates the fee range for each tier; however, the asset level for each tier is not negotiable<sup>6</sup>

<b>Tier</b>	<b>Fee Range</b>
Up to \$1 million of assets, the fee is	1.00% to 2.0%
Over \$1 million to \$5 million, the fee is	0.70% to 1.50%
Over \$5 million the fee is	Negotiable

The factors we use when negotiating advisory fees include, but are not limited to the following:

- Number of actual Accounts within a household
- Size of the relationship
- The 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 were provided. Initial fees at inception include the next quarterly fee. These fees are invoiced / debited 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 unearned fees are refunded to you within thirty (30) days of the date of termination.

### **Advisory Services – 401k and Retirement Services**

Fees for the service are based on the aggregated assets of the plan served, and are determined on a flat fee basis as described above. Clients of EAM prior to CRA's acquisition have fee schedules that vary from the flat fee schedule described here. Fees are charged in advance of the service and are pro-rated for relationships established or closed during a calendar quarter. Specific fees are identified in the service agreement we enter into with you.

### **Fee Payment**

Regardless of the portfolio management fee schedule you select (one fee on all assets or tiered), you will authorize CRA in the portfolio management agreement we have with you one of two methods that you may pay your fees to us; Direct Debit (preferred) or, Pay by Check.

Direct Debit: We prefer that you authorize to have our advisory fee initially and quarterly thereafter deducted from your custodial account. If you do so, the following will occur:

1. We calculate and send a debit request to your broker / custodian to pay the fee amount indicated. The broker custodian then sends the debited advisory fees to CRA.
2. For New Clients Only: At the inception of a relationship, CRA calculates your advisory fee due and payable on a pro-rated basis, for the number of days left in a calendar quarter that our advisory

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<sup>6</sup> CRA has grown with the acquisition of books of business from other investment advisers or investment adviser representatives. In doing so, CRA tries to accommodate these new clients by honoring fee schedules that were in place at the prior firm (prior to joining or becoming a client of CRA). As a result, CRA has client relationships with fee schedules, including tiered fee schedules, that differ from those disclosed here.

services were provided. We mail you a statement, which reflects the following information (after the debit request is issued to your broker / custodian). This statement reflects the information listed below. This is the only time CRA issues such a statement:

- a. Assets on which the fee is based
  - b. Annual fee charged
  - c. Method of calculation (multiplication, pro-rated for the number of days the services were provided); and,
  - d. Total amount of the fee due for the period
3. Each subsequent full calendar quarter, the advisory fee due and payable is debited from your account. In addition, you receive directly 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 advisory fee paid to Columbia River* for the period.

Note: You need to review the calculation of our fees in the initial statement, we mail to you, as your custodian does not perform that task. If you do not receive your monthly or quarterly custodial reports directly from your custodian, it is imperative that you contact your custodian immediately or your IAR for assistance.

Pay by check: Clients of CRA, have, in the past elected to pay by check. Clients generally no longer make this request. If requested, you will pay by check upon your receipt of an invoice. Checks are due within thirty (30) days of the date of the invoice. This option *is not generally offered* to our Clients.

Valuations: For securities that trade on an exchange or are actively traded, your custodian will provide account values for performance and fee calculation purposes. CRA does not value liquid securities. All valuations are provided by your custodian as you may have selected (TD Ameritrade, Inc., Fidelity Investments, or Charles Schwab and Co., Inc.) Please see Item 12.

For securities that are illiquid, i.e., certain private funds (Blue Water II), private equity (Chataqua, Madison Capital / Madison Industries), non-traded real estate investment trusts (REITS) and similar securities the issuer of those securities provides valuations to each client (as the owner of the security) and / or to CRA. Those valuations are then input into our portfolio accounting system (maintained for CRA by Orion Investment Services, a third party) for inclusion on your periodic reports.

CRA does not value or revise the values as provided by third party issuers of these securities, *except as described below* for Blue Water II.

If the issuer does not provide an updated value the valuation on your account reports provided by CRA are carried at the amount you initially invested for reporting and fee purposes. This carried value does not change until such time that the issuer of the security provides a statement or an updated valuation to its investors and / or CRA.

For non-traded REITS and other private, illiquid securities, there may be material variances between a reported value and the liquidation or cash value of these securities. CRA charges advisory fees for those non-traded REITS that clients purchased prior to becoming a client of CRA.

- Please note that these non-traded REITs are private securities. Non-traded REITs are illiquid, invest in real estate and although they are suitable for your account and account assets they are not easily

converted into cash nor are they always valued in an independent marketplace. When redemptions are requested, interests are redeemed at the valuation as determined by the issuer (or underwriter) of the non-traded REIT.

- CRA will, when we believe it is appropriate, recommend the sale, liquidation or continued holding of the non-traded REIT.
- These securities typically are not held by your broker / custodian, but may be included in reporting through Orion Advisor Solutions, our back office service provider. Updates to such valuations do not occur unless or until the issuer provides updated balances / valuations or statements to clients and CRA for valuation, performance and fee calculation purposes.

## **General Partner and Investment Adviser - Private Fund**

### **BW II Fund – Closed to New Investors**

Columbia River as the GP to the BW II Fund does not charge and does not earn an advisory fee. However, Columbia River, as the GP and Adviser to the Investment Fund, has been reimbursed the initial Fund set up costs by current limited partner investors. Investors in the Fund after the Fund was initially established are not responsible for these set-up fees.

In addition, a one percent (1%) origination fee of the loan amount is paid to BW II for the benefit of the Limited Partner Investors (who ultimately lend the funds). In addition, BW II is paying interest at a rate equal to the prime rate (at the time the loan is executed) plus 5%. All terms, conditions and specifics related to the purchase of Limited Partner interests, capital contributions, withdrawals and redemptions from the Investment Fund are documented in and consistent with the Confidential Offering Circular.

Valuation: The General Partner has entered into a loan and collateral agreement BW II, which specifies the amount of the loan, the interest rate and the amortization schedule for principal and interest payments. Contributions, withdrawals, and full withdrawal may be made by an LP investor consistent with the Confidential Offering Circular.

As the general partner and adviser to Blue Water II fund, CRA uses the services of a third party Fund Administrator to calculate each investor's limited partner capital account value. However, as the general partner, CRA has the obligation to value real estate holdings in the Fund. CRA obtains periodic values (Zillow estimates, real estate agent input, etc.) to value these residential real estate holdings of BW II. CRA as general partner also reviews fund and limited partner investor capital account calculations each month as prepared by APEX our fund administration firm, prior to distribution to the limited partner investors.

Actual and potential conflicts of interest related to the Blue Water II Fund: Investors in BW II are provided a copy of an Audited Financial Report, prepared in accordance with Generally Accepted Accounting Principles (GAAP) as prepared on an annual basis by a third party public accounting firm. These reports discuss valuation of the Fund and notes issued by the Fund. This audited financial report is due to CRA and limited partner investors within 120 days of the Fund's fiscal year end (12/31) each calendar year.

As the General Partner and Investment Adviser BW II, Columbia River has a number of conflicts of interest related to the investment advice provided to, and the operation of the Fund, including the following:

- Notes issued by BW II to CRA are at a fixed amount. CRA makes payments of principal and interest, according to an amortization schedule. Proceeds are used to finance books of business acquired by CRA, to re-finance those books of business and for operating expenses of CRA.

- Currently, there are three notes between CRA and BW II. Note documents specify the amount borrowed, collateral, term of the loan, the interest rate, and payment schedule (interest and principal) among other terms and conditions. To assist in the mitigation of these conflicts of interest, CRA as General Partner and Investment Adviser ensures:
  - BW II loans are subject to a written agreement, counsel review, and valuation through and with the support of APEX, the fund administrator
  - BW II is subject to an independent, annual financial audit and delivery of such audit report to each limited partner investor. Audited Financials are delivered to each limited partner investor within 120 days of the Fund's fiscal year end (on or before April 30<sup>th</sup> of each calendar year).

The performance of each limited partner capital account invested in BW II is separately calculated by the Fund's third party administrator. This valuation is included in your performance reports prepared and provided by Orion Advisor Services, our third party portfolio accounting system provider, each quarter.

## **General Information on Advisory Services and Fees**

### **Termination of a Discretionary Portfolio Management, Financial Planning / Consulting Agreement, or ERISA Services Agreement**

An Agreement for Portfolio Management, Financial Planning or ERISA services may be terminated by either 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 will take no further action on your behalf after the date of termination.

We will then pro-rate the pre-paid and unearned advisory fees for the number of days left in the calendar quarter. This fee refund will then be returned to you via check within thirty (30) days of the date of termination. If you terminate a group of accounts as part of a household, we will return a single check. The cover letter included with the check will list all closed accounts and the pro-rated refund calculations and the total amount returned.<sup>7</sup>

**Financial Planning Agreement:** In the case of financial planning (comprehensive or limited consulting), we will calculate the fee earned based on the original estimate and review that calculation with you. Unearned and pre-paid planning fees or consulting fees are returned to you. However, in the case where the time expended by Columbia River 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.

**Private Fund, BW II:** Please see the confidential offering document for the Fund for specific Limited Partner Investor redemption details.

**Services provided to employees, family members and friends of the firm:** We provide the same or similar services at reduced fees or no fee to our employees, members of their family and friends of employees. Lower fees than those disclosed above are not available to our general Clients.

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<sup>7</sup> For some clients, upon request, we will charge fees in arrears of the service. Pro-rated refunds are not applicable.

Similar services may be available from other sources: The advisory services available from Columbia River may be available from other Investment Advisers or investment professionals at fee schedules that are lower or higher than those charged by Columbia River.

Accounts subject to ERISA (the Employee Retirement Income and Securities Act) and regulations under the Internal Revenue Code (applicable to Individual Retirement Accounts): We are a fiduciary to all of our clients including those subject to ERISA and the Internal Revenue Code (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 (not applicable), prohibited transactions and class exemptions, among others.

Additional Compensation / Fees: The fees you pay to us for our portfolio management, financial planning and consulting and ERISA services *do not include* the following. All of these fees or charges are borne by you (CRA does not participate directly or indirectly in any of the costs you pay):

- 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:
  - Advisory fees and administrative fees charged by Mutual Funds (MF), Exchange Traded Funds (ETFs)
  - Custodial fees, if any
  - Deferred sales charges (on MF or annuities)
  - Deferred sales charges (charged by MF)
  - Transfer taxes
  - Wire transfer and electronic fund processing fees
  - Commissions or markups / 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. So called Performance Based fees are based upon the capital appreciation of your account or invested assets. Although we do manage a private 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,



- Private Funds as described in Item 4, above

We impose the following requirements on our Advisory Services:

- Portfolio Management Services: A minimum account of \$100,000 is recommended to open and maintain an account. This is a recommendation only.
- Financial Planning: For a comprehensive financial plan, a minimum fee of \$10,000 is required.

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

CRA has developed a process to determine which securities are approved for use in client accounts. This starts with our investment philosophy, which is addressed by our Investment Committee that then determines the securities used in our portfolio management portfolios (see Item 4).

### 1. CRA's Investment Philosophy: Buy and Manage

- Based in part on Modern Portfolio Theory, including traditional and non-traditional asset allocation (equities, fixed income and alternative asset classes)
- Diversification
- Passive and active management of account assets
- Emphasis on managing downside portfolio risks
- Strategic and tactical asset weightings

### 2. Investment Committee

The CRA investment committee evaluate securities, asset allocation for our portfolios and models by evaluating and making investment decisions, resulting in an approved list of securities, through the following:

- Economic trends, including macro market analysis (economic, political and legal factors)
- Technical analysis (described below)
- Fundamental analysis (described below)
- CAPE (cyclically adjusted price earnings ratios)
- Charting
- Interest rate trends and credit spreads
- Cyclical

Technical analysis is the evaluation of market data to forecast 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.

Fundamental analysis is used to examine an issuer (company) or other security by examining the historical and current earnings, dividends, new products / innovation, research and other criteria unique to that issuer.

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

Charting may also be used. Charting 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.

Cyclical allows CRA to examine the data (on a recurring and periodic basis) and movements in prices or other time related factors to determine what patterns occur over time related to an issuer, industry, or sector. Again, cyclical may be too narrow a measurement to predict price movements without the addition of, or integration of, other relevant factors.

Our overall analysis methodology is to use various methods to eliminate the risk of one method over another. We utilize a number of sources for financial information, including those publicly available and others received on a subscription basis (at our own expense).

### **Investment Strategies**

CRA is a long-term focused adviser and portfolio manager. Our strategies are based specifically on client needs, risk tolerance, goals / objectives, tax status and related personal factors. However, we may, due to market conditions, hold or trade securities for your accounts frequently (under one (1) year or as often as market or global events dictate, meaning securities could be held for thirty (30) days or less).

CRA creates client securities portfolios based upon client data and information as previously described. We then align these needs with our model portfolios as described under Item 4 and use the appropriate model as a guide. Securities used for client accounts selected are those included on the CRA's list of model securities (maintained by our Investment Committee at the time of purchase). Substitutions to the models are not prohibited, however, they are discussed with the Investment Committee or among committee members. As one example: if a new client comes to CRA and a mutual fund is held by the client, which is similar to a security in the model, we may decide not to replace that security in an effort to avoid tax implications and / or transaction costs or both.

CRA's investment committee establishes the asset allocation and securities for each of our models and the rebalancing decisions for each of the models. CRA's IAR then makes independent portfolio management decisions for each client's account. Securities used across all of our models include:

#### Equities:

- U.S. Large cap
- U.S. Small cap
- Developed international
- Emerging markets
- Growth and Value

#### Fixed Income:

- Short, intermediate and long term maturities
- Government bonds (U.S.)
- Municipals
- Investment grade corporate bonds
- Developed and emerging markets
- Asset backed securities
- Structured notes

#### Liquid Alternatives:

- Managed futures
- Commodities
- REITs
- Global macro
- Arbitrage
- Event driven
- Hedged Equity

We will utilize, to the extent available, no transaction fee mutual funds or Exchange Traded Funds (ETFs) in your accounts that we manage. These mutual funds and ETFs are available for use by CRA in the management of client portfolios through the broker / custodians that we recommend (TD Ameritrade, Fidelity Investments, and Charles Schwab). See Item 12.

**Socially Conscious Investing:** When suitable and requested by a client, we will manage accounts for clients according to a socially conscious investment strategy (meaning: those companies that generally align themselves with an investment approach that is good for the environment, humans, and those that do not invest in sin, war or similar industries or securities). However, if you decide to request socially conscious investing, this may pose different risks than if your account assets were more broadly allocated.

**Private Funds:** For investment strategies and analysis methods within the BW II Fund, please see the Private Offering Circular.

Information used in providing investment advice includes:

- Financial journals
- Research materials provided by third parties
- Shareholder reports
- Annual reports, prospectus, and filings with the Securities and Exchange Commission
- Company press releases

## **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

**Cash Balances:** 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, place transactions for your account assets in the following securities:

- 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. 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.

**BW II:** Private fund investing is substantially different from the other services provided by Columbia River as described in this brochure. Interests are also not liquid and there are no redemption rights (no withdrawal of capital) for an LPI during the term of BW II, unless granted by CRA as GP to the Fund. In addition, there are no assurances that the objectives or strategy of the fund will be met or be successful.

## **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 our firm or any of our principal executive officers. Please see the Part 2 B, Brochure Supplement or Mr. Don Foy attached to this Brochure.

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

Other financial industry activities and affiliations are conflicts of interest (between the financial interests of Columbia River and our employees when compared to your interests). However, as fiduciaries to our clients, including the Fund and LP investors, we are obligated to disclose all potential and actual conflicts of interest. In this brochure section, we provide a summary of potential and actual conflicts of interest associated with Columbia River and our employees.

When conflicts are present, we are obligated to mitigate (to the extent possible) these actual and potential conflicts of interest. We address these conflicts through disclosure (such as this ADV Part 2 A B), and through our business management practices (policies, procedures, controls, supervision and management), and through the use of non-affiliated third party service providers (such as custodians, accounting firms, other professionals, financial audits (for the Fund) and a Fund Administrator).

It is our responsibility to ensure we operate our business in a manner that does not place our financial interests ahead of our advisory clients.

- **BW II Fund:** As discussed under Items 4, 5 and 6 above, we are also the Investment Adviser and General Partner to the BW II Fund. Benjamin Addink and Donald Foy, principals of Columbia River, 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 portfolio management services in addition to the management services as the General Partner of BW II Fund is separate and in addition to their day-to-day duties as principals of CRA.

**Summit Tax Services:** 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 tax services.

BBD Holdings, LLC: Benjamin Addink, Don Foy, and Brian Scalabrino are individual owners of BBD Holdings, LLC. BBD Holdings (BBDH) is an entity that owns personal investments in real estate on behalf of the principals. In addition, BBDH also:

1. Owns 100% of Pacific Alliance Capital, LLC, (Pacific Alliance) an entity registered and licensed to do business in the island country of Nevis, effective 12/12/2012. Pacific Alliance Capital is still a registered entity in Nevis; however, there is no business activity by or with Pacific Alliance.
2. Previously owned a non-controlling interest in Veritas, LLC, an entity registered and licensed to do business in the island of Nevis. BBDH exited from its ownership in Veritas, LLC, effective December 2012, which is still a functioning company. BBDH has no further (direct or indirect) involvement with Veritas.

Hornets Land, LLC: Benjamin Addink and Brian Scalabrino are also members of a real estate company, Hornets Land, LLC. This has no material involvement with Columbia River, *except as described under BBDH, above*.

Bliss Investments LLC: Andrew Prentice is a minority owner of Bliss Investments, LLC, the holding company for his interest in the assets of Bliss Investments acquired by Columbia River (CRA previously conducted business as Bliss Investment Group). CRA established this entity solely for Mr. Prentice to receive his portion of the profits attributable to his ownership at the time of acquisition.

Insurance Agents / Insurance Licenses: Andrew Prentice, Kaleigh Prentice, Nathanael Breitenberg and Thomas Zebroski are licensed as insurance agents in Washington State. These individuals are appointed by various insurance companies. Their current registration / appointments with these insurance companies are available to Clients via the State of Washington, Division of Insurance website at the following website address (and by following the simple instructions to see the current appointments for each person):

<http://www.insurance.wa.gov/consumertoolkit/search.aspx>

This means that if you are in need of insurance services (to purchase, surrender or exchange life, health or disability insurance), Andrew Prentice, Kaleigh Prentice, Nathanael Breitenberg or Thomas Zebroski can provide these services for you. However, the commission compensation received by these listed individuals is in addition to and separate from any portfolio management fees or financial planning fees that you pay to CRA. CRA itself does not provide these insurance services; they are provided by each licensed insurance agent under the supervision of the various insurance companies with whom these individuals are appointed and the knowledge by CRA that these individuals are insurance agents in the State of Washington.

We do not credit insurance commissions against the other fees you pay us for our professional services.

Each individual licensed as an insurance agent, receives insurance commission compensation directly from the insurance company with whom they are licensed (also called “appointed”). After they deposit this compensation personally, an amount is provided to Columbia River pursuant to our agreement with each individual employee.

As a result, this insurance commission compensation is a conflict of interest between the interests of Columbia River and those of our clients. We manage and monitor this conflict of interest by monitoring the insurance services our employees provide to you and through our recognition that the insurance services provided are a

“service” of these individuals, however, this is a separate service from the advisory services provided by CRA. Please note that the volume of insurance services provided through the listed employees is very small in comparison to our primary business activities.

Of course, you are not obligated to use or consider any of our employees for insurance services or solutions; you are free to select any insurance agent, broker, company, or agency that you wish to use.

Fidelity Investments Life Insurance Company: If we recommend an annuity to you as part of your financial plan or we generally recommend you, review lower cost options for your existing annuities, our portfolio managers, / planners may recommend an “adviser” annuity. This means that the annuity is a fee based variable annuity. An adviser annuity is available for sale by firms such as Columbia River and our IARs.

We utilize these annuities as they have low internal expenses (when compared to annuities held by our clients or offered by other life insurance companies). As described under Item 12 of this Brochure, we recommend Fidelity as a broker / custodian for our clients.

We may use the services of and recommend Fidelity Investments Life Insurance Company due to their reputation, product offerings, services, and lower costs (fees and expenses) which may be beneficial for our clients. Typically, annuities addressed are 401A and 403B annuities, among others.

CRA does not receive from Fidelity (directly or indirectly) any compensation from CRA’s recommendation to purchase or exchange an annuity through Fidelity Investments Life Insurance Company.

## **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. The uses of the same securities are potential conflicts of interest between our own interests and yours. Simply, we follow our own advice, except as investors or limited partner investors in BW II.

However, CRA has previously recommended investments to Clients in BW I (a closed fund) and BW II (still an operating fund). As the GP and Adviser to BW II, CRA has a conflict of interest as described under Items 4 and 5 of this document in making such recommendations.

CRA has implemented, as required by Federal Law, policies, procedures and controls to monitor this trading activity and the potential conflict of interest that activity creates. We combine these requirements into CRA’s Code of Ethics (“Code”), part of our Policies and Procedures (PP). Under the Code, our goal is to ensure that our employees:

- Operate with our client’s interest in mind. We do this by placing your interests before our own interest or the interest of any employee (or employee beneficial ownership account). Employee / 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.

Under our Code, all reportable transactions and brokerage accounts are required to be disclosed and reported by employees when hired by CRA, quarterly and annually thereafter. The Code also:

- Limits the size, frequency, and amount of gifts (given or received) to or from third parties that are not Clients (service providers, vendors, or similar persons). Gifts given or received are reported on a quarterly basis for compliance review. Gifts to clients are excluded from the limit
- Provides guidance regarding Insider Trading Prohibitions. CRA and its employees are prohibited from communicating, taking any action for themselves or any client, when CRA is in possession of material, non-public information about the issuer of a security.
  - Restrictions are implemented by Compliance (or operations) and the reason for the restriction may not be generally known.
  - Restrictions are generally a “black list” of the security which means no transactions, advice or discussion of the security may be made or communicated until such time CRA can confirm the information is available to the investing public
- Requires pre-approval of all private placements (private equity, hedge funds, etc.)
- Does not require:
  - Pre-clearance of personal transactions
  - Holding periods for personal transactions
  - Notification or monitoring of political contributions (known as Pay-to-Play) as CRA does not seek out towns, counties, etc. as advisory clients
- Prohibits the following:
  - Investing by CRA employees in new issues of securities

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 on the NASDAQ national market system, 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 included in the block, client accounts are first filled, all employees thereafter.

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 Peter Mafteiu, Chief Compliance Officer, at 253.589.1401 or via email at [compliance@investcra.com](mailto:compliance@investcra.com).

## **Item 12: Brokerage Practices**

### Discretionary Portfolio Management Services

As indicated in Item 4, as your portfolio manager, you provide CRA with investment discretion in the written agreement we have with you.

Regarding the placement of your account transactions, we do not have brokerage discretionary authority. Although we recommend broker custodians to you, we do not choose a broker or custodian for you or negotiate commissions on a transaction-by-transaction basis. To receive our portfolio management services, CRA requires you to select one of these recommended broker custodians for all of your account assets under our management. We also require you to direct CRA to place all of your transactions at your selected broker custodian, i.e., “directed brokerage.” The selection of and direction of transactions to the broker custodian is documented in the portfolio management agreement.

Under directed brokerage, all transactions for your account assets are *placed directly at the broker custodian you have selected.*

Due to directed brokerage, CRA is unable to seek out other brokers or dealers for account transactions, or to negotiate commissions or transaction costs. The result is that you may pay higher prices or higher (or lower) commission costs through directed brokerage when compared to investment advisers who have the discretionary authority to select the broker and negotiate commission on a transaction-by-transaction basis. As a result, best execution may not be achieved.

In addition, not all investment advisers require directed brokerage arrangements.

CRA recommends the following third party, independent and qualified custodians to you:

- TD Ameritrade
- Fidelity Investments
- Charles Schwab & Company

CRA recommends these brokers / custodians due to our industry knowledge, experience other factors, including name recognition and the industry status as the top three broker / custodians serving registered investment advisers like CRA. In some cases, you may decide to use one or more of these firms, based on your unique needs and circumstances of the advisory services we provide to you.

CRA recommends these firms; however, the selection of a recommended broker / custodian is your sole decision. When you select a broker / custodian, you have evaluated and selected one or more broker / custodians based upon criteria specific to you and your needs. Upon making your selection, we will assist you in the opening of an account with that broker / custodian.

Note: CRA is not affiliated, directly or indirectly with TDA, Fidelity or Schwab. We are all separate and independent companies.

Due to the type of securities we primarily (but not exclusively) use in client accounts, we believe that even with our requirement of directed brokerage to your selected broker / custodian, your account transactions will achieve best execution. Each of the recommended broker / custodians has that obligation for all accounts they hold as a service provider to CRA (and other investment advisers).

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

The three recommended broker / custodians are further described below:

**TD Ameritrade Inc.** sponsors the TD Ameritrade Institutional Program, of which CRA is a participant. TDA is a registered broker dealer and registered investment adviser with the US Securities and Exchange Commission; and a broker dealer registered with the Financial Industry Regulatory Authority (FINRA); a member of the Securities Investors Protection Corporation (SIPC); and, a member of the National Futures Association (NFA).

**Fidelity Brokerage Services** sponsors the Institutional Wealth Services Program, of which CRA is a participant. Fidelity is a registered broker dealer and registered investment adviser with the US Securities and Exchange Commission; and a broker dealer registered with the Financial Industry Regulatory Authority (FINRA); a member of the Securities Investors Protection Corporation (SIPC); and, a member of the National Futures Association (NFA).



**Charles Schwab and Co., Inc.** sponsors the Schwab Advisor Service Program, of which CRA is a participant. Schwab is a registered broker dealer and registered investment adviser with the US Securities and Exchange Commission; a broker dealer registered with the Financial Industry Regulatory Authority (FINRA); a member of the Securities Investors Protection Corporation (SIPC); and, a member of the National Futures Association (NFA).

Each recommended broker / custodian provides investment advisers (and their clients) like CRA services and other benefits as part of the broker / custodian's investment adviser program.

Of particular importance to our Clients (and us as portfolio managers) is the availability of many ETFs and / or mutual funds on a "no transaction fee" basis at these recommended brokers / custodians. This means that your selected broker / custodian does not charge you a commission or transaction fee 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"). Our goal is to utilize these no transaction fee mutual funds and ETFs, as we are able and as appropriate for your accounts under our management.

CRA also receives benefits from the recommended broker / custodians through our participation in the programs. Please see Item 14 disclosures. In recommending the three broker / custodians to you, we have evaluated the services provided to us and our Clients.

In that evaluation, we have determined that the recommended broker / custodians provide an excellent blend of services, commission costs, and other benefits that are beneficial to you and to us. Our review and assessment of the recommended broker / custodians included, but were not limited to:

- Commission charges, execution, clearance and settlement of transactions
- Ability to block trade
- Reputation and financial strength
- Free custody services to our clients
- No-transaction fee funds (mutual funds and ETFs)
- Access to institutional shares of mutual funds at no load or load waived shares
- Duplicate confirmations and reports
- Dedicated trading desks / electronic trading
- Operational support (typically back office related services), and
- Guidance and seminars on technology, compliance, business management and operations,
- Others

Trading Activity: When we place a transaction for your account at TDA, Fidelity, or Schwab, there is a commission charged, unless the mutual fund or ETF is one of the "no transaction" funds available to us on the platform. Commissions apply to stocks, bonds or other securities. In evaluating any of the recommended brokers / custodians, you will find that each of the recommended brokers / custodian charges a similar commission or transaction fee for each security purchase or sale (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 of multiple clients at the same time. However, we *cannot and do not block together trades for multiple clients across all of the recommended broker / custodians*. Block trades are "mini blocks" meaning that we may block client's transactions together held at Schwab, Fidelity and TDA, but not across all three broker / custodians at the same time.

In addition, our IARs are also our portfolio managers. As CRA does not have a dedicated trading desk, we also place “mini blocks” segregated by IAR as each acts as their own trader. Depending on a number of variables (new clients, cash additions or withdrawals from accounts, etc.) we may not use block trading frequently.

As indicated above (see Code of Ethics disclosure) we may include 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, Fidelity or Schwab 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. If we do not receive the full amount of securities initially requested in a block, we *exclude employee and related accounts*, and allocate the amount purchased on a pro-rated basis across all participating accounts.

Block trading allows us the ability to increase the size of orders, thus allowing us and each of the recommended broker / custodians the opportunity 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.

#### Confirmations and Statements:

**Confirmations:** For each executed transaction you receive directly from your selected broker / custodian a confirmation of each transaction placed by CRA, as your registered investment adviser and manager. These confirmations are provided directly to you via US Postal Service or electronic, as you may elect with your broker / custodian. We are also provided an electronic copy of all confirmations for informational and reconciliation purposes.

**Statements:** You also receive a monthly custodial report directly from your recommended broker / custodian on all of your accounts we manage. This report will reflect all current positions, all transactions, including debits and credits, made to your account during the time period, including the initial and quarterly advisory fees paid to CRA through your authorization of the direct debiting of advisory fees from your account(s) we manage.

**Prohibited Brokerage Activity:** Due to the nature of our business and portfolio management services, the following are prohibited brokerage activities:

- Receipt of commission compensation (direct or indirect) from security transactions, we place on your behalf at any recommended broker / custodian
- Client directed brokerage to any broker or dealer, except those identified in this brochure
- Soft dollar credits or transactions from TDA, Fidelity or Schwab
- Brokerage for client referrals
- Cross, agency cross or principal transactions

**For Clients subject to ERISA:** In selecting and directing us to place all transactions for your account at TDA, Fidelity or Schwab, you have independently evaluated TDA, Fidelity or Schwab and, as the plan fiduciaries, have determined that the selection and directed brokerage to TDA, Fidelity or Schwab 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 transaction charges) to ensure they are reasonable in light of the services provided to the Plan and its Participants.

Non-Discretionary Clients: For our non-discretionary portfolio management clients (certain 401k or pension, profit sharing plans), we have a limited power of attorney on your account which allows us to place the transactions at your designated securities broker, dealer or custodian (custodians can also include a mutual fund complex or, in some cases, the custodian of a company's 401k Plan assets). However, we will only place transactions for your accounts when we receive (verbal or written) permission to do so. Mutual funds are purchased or sold on the net asset value (NAV) as determined by the mutual fund or the mutual fund's administrator daily at market close.

Trade Errors: CRA has fiduciary responsibilities related to the correction of trade errors. If CRA creates the error, our policy is to make the client whole; meaning that you will not suffer an economic loss due to our error. We have policies and procedures related to the identification, documentation, and correction of errors. If a third party caused or created the error the third party is responsible for the correction of the error and making your account(s) whole.

We endeavor to catch all errors before settlement; typically errors are corrected by a simple cancel of the error trade and re-entry of the trade as it should have been placed. Examples of trade errors include (but are not limited to) the following:

- Are not legally authorized for an account
- Are prohibited by investment policy or style
- Are prohibited by the Advisory Services Agreement
- Include an incorrect security or transaction (buy v. sell or vice versa)
- Block trades that are incorrectly allocated

If a trade error results in a gain in the impacted client account, the gain remains in the client account, unless the client elects not to retain the profit due to moral or ethical reasons.

Charles Schwab's Trade Error Policy: For errors that result in a gain (and that you do not retain in your account), Schwab will donate the amount of any gain \$100 and over to charity. For errors that result in a gain of less than \$100 that are removed from your account, the gain is considered de minimis (small) and used by Schwab to offset Schwab's administrative time and expense related to the processing of errors. For errors resulting in a loss greater than \$100, CRA will pay Schwab for the loss which is then credited to your account to make the account whole. If the trade errors result in both gains and losses in a Schwab account, they may be netted against each other by Schwab.

CRA does not, itself, maintain a trade error account.

BW II: Trading is not applicable to this Fund managed by Columbia River. This Fund (see Item 4, above) is a private fund that provides financing to the GP for the acquisition of books of business that the Fund and GP wish to acquire or for operating capital.

## Item 13: Review of Accounts

### Portfolio Management – Discretionary

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

Indirectly, our investment committee monitors our portfolio models and the securities in the models. Specific client reviews are conducted by the IAR of your account assets. Additional reviews may be provided when you request them, or whenever you notify us of changes in your personal circumstances. It is very important for you to notify your CRA IAR of changes in your personal circumstances as these may affect the investment advice we provide to you. Examples include:

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

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 consulting planning services.

401k Consulting or Discretionary Services: CRA conducts reviews of the securities authorized for use by the trustees of the plan on a periodic basis, typically quarterly.

BW II: We review each month the capital account statements as prepared by APEX the Fund's administrator, prior to distribution by APEX to each limited partner investor. Please see the Confidential Offering Circular for specific details.

### **Reports**

Portfolio Management: We provide reports to clients on a consistent basis (quarterly). Reports are posted to a secure portal and a client is emailed a link / notice that the report is available for review, printing or download. Reports include a market commentary / overview and all of the reports for the household or group of accounts under CRA's management. As previously discussed, private placements you may hold (Madison Capital, Chataqua, and BW II), are carried at the invested amount until CRA receives updated pricing from the issuer. These values are then used for client reporting, fee and performance calculations.

Report content and frequency may vary across our clients, and will supplement the reports client receives directly from the independent, third party custodian of client's account assets.

Typically, a CRA client will receive monthly (but not less than quarterly) custodial reports directly from your broker / custodian (TDA, Fidelity, or Schwab). These reports are also copied to CRA. They are typically available electronically for CRA's review.

Note: We do not assume responsibility for the accuracy of information provided by Custodian, although we monitor custodian reports and holdings within client's account(s). Clients are requested to contact CRA or your custodian / broker *as soon as possible if you do not receive custodial statements directly from your broker / custodian.*

Financial Planning / Limited Planning: Reviews are not applicable unless you contract with us to review a comprehensive plan or recommendations related to limited planning (at an additional fee).

BW II: Limited partner investors receive a monthly report on their capital account directly from our third party administrator, Apex Fund Services. This monthly report will reflect the performance of your capital account during the previous month. Audited Financial Statements are provided to fund limited partner investors as previously described. The Audited Financial Statements are prepared by an independent, third party qualified public accounting firm that is registered with and subject to regular inspection by the PCAOB (Public Company Accounting Oversight Board).

## **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: As disclosed under Item 12; TDA, Fidelity, and Schwab (third party, qualified broker custodians) provides CRA as a participant in their advisory program certain economic benefits that we do not have to pay for. There is no expected volume of trading activity or other requirements for us (or any other adviser) to receive these benefits.

None of these 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 provided to all investment advisers (including Columbia River) who participate in these programs.

Product Wholesalers: CRA uses mutual funds and ETFs created and managed by third party broker dealers / investment advisers. These firms have sales and service representatives ("wholesalers") located regionally across the country. These firms assist CRA and other investment advisers in the growth of business. This is through mutual fund / ETF information, portfolio construction ideas / optimization, among others. In addition, these wholesalers and their firms provide economic assistance to CRA through the underwriting of client events. These events include the following examples: A holiday boat cruise, baseball game, meetings, etc. While this compensation is a potential conflict of interest, CRA is not required to hold or commit certain asset sizes to the wholesaler's mutual funds or ETFs. We maintain our objectivity in selecting securities to use with clients. The wholesalers who provide economic support are required by their companies (and CRA) to attend events where they provide economic assistance.

As disclosed under Item 10, several of our employees are engaged in other business activities: Tax preparation services and insurance agents. These individuals receive customary compensation in the form of tax planning fees and insurance commissions.

BW II: Not applicable, there is no additional compensation payable by the fund to Columbia River.

## 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 client's funds. As a result (and as described under Item 5), we deliver a worksheet to you of the fee calculation and the actual debit amount we request from your custodian.

We also remind you to review the statement and ensure you receive, directly from your custodian (TDA, Fidelity, or Schwab) a monthly or quarterly report on your account showing all debits and credits including our fee. We encourage you to raise any questions with us about the custody, safety, or security of your account assets.

Actual Custody – BW II Fund: As the General Partner and Investment Adviser to the Blue Water Fund II, Columbia River has custody of the Partnership's cash and securities. This is due to the broad authority provided to Columbia River as the General Partner to the Fund.

To ensure compliance with the Custody Rule under the Investment Advisers Act of 1940, Columbia River (as a GP and Adviser) will contract for and have completed within 120 days of each of the Fund's fiscal year ends, a financial audit, according to generally accepted accounting principles, by a third party qualified accounting firm.

## Item 16: Investment Discretion

As indicated under Item 4 above, we have investment discretionary authority over portfolio management accounts – when this authority is provided to us through 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, whether we should accept or continue a relationship with you if the investment restrictions you request are determined to be too restrictive (meaning we cannot fulfill our contractual obligations to you). We are obligated to manage your account assets with an appropriate asset allocation and 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.

BW II: In the agreement between the Fund and Columbia River (as GP and Adviser), we have the discretionary investment authority to direct the investments of the Fund. Private fund limited partners cannot impose investment restrictions or limitations on the securities or transactions entered into by the fund. The fund is managed as a single account, with each limited partner investor owning a proportional share of the fund directly related to their invested capital (limited partner's capital account).

### The following section, Un-managed Assets applies to discretionary portfolio management Clients.

Un-Managed Assets: At a client's request (and as a convenience), we may include certain un-managed assets solely for reporting purposes. These so-called un-managed assets are securities that may, or may not be held at TDA, Fidelity, or Schwab. They may be held in certificate form or at the issuer of the security or at another custodian. These securities are often, but not exclusively, "manual input securities" and are not managed by CRA. This means that these "un-managed" assets **are not**:

- Included for fee calculation purposes
- Included for performance of the account and in reporting, and are not guaranteed by CRA to reflect the actual or current liquidation values

The valuations of these assets may be “stale” or outdated in reliance on the issuer’s valuation methodologies (and neither CRA nor our data management vendor has a responsibility to provide independent and current valuations on “un-managed assets”).

## **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.

For Clients subject to ERISA:

CRA does not vote proxies unless the plan and trust documents delegate such authority to another fiduciary (e.g., CRA). However, to do so, CRA requires copies of and updates to plan and trust documents which delegate the authority to another fiduciary, and a copy of the ERISA proxy voting guidelines.

As CRA does not vote proxies, CRA does not have proxy voting guidelines. As a result, proxy vote decisions are based solely on the Plan’s Proxy Vote Guidelines, which ensure votes are cast in the best interest of the Plan and its participants.

**BW II:** Not applicable. There will be no securities owned by this Fund that generate proxy materials, except for money market mutual funds. At times, fund principal and interest payments may be placed in a money market mutual fund at the independent, third party bank where cash assets are held, awaiting financing investment. If such proxy materials are generated, Columbia River will vote such materials consistent with CRA’s fiduciary obligations to the Fund and its investors. Votes for money market mutual funds are voted with management.

## **Item 18: Financial Information**

For financial planning, CRA does not require nor do we solicit prepayment of more than \$1,200 in fees per client, six (6) months or more in advance. Therefore, we have not included a balance sheet for our most recent fiscal year.

**Part 2 B of Form ADV: Brochure Supplement - Foy**

**Item 1: Cover Page**

**Donald (“Don”) Foy**

**Columbia River Advisors**

**2407 N 31st Street, Suite 202  
Tacoma, WA 98407  
253-589-1401**

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

**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 Bs together. Please contact Peter Mafteiu, Chief Compliance Officer, if you did not receive the Part 2A brochure, or if you have any questions about the contents of this supplement.**

**Additional information about Don Foy is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



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

**Name:** Donald Allen Foy (CRD # 4821689)

**Year of Birth:** 1971

### **Formal Education after High School:**

University of Washington, no degree, Economics, 1993

### **Business Background for Previous Five Years:**

Managing Member Investment Adviser Representative (IAR)	09/2010 to Present
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Direct Shareholder Columbia River Advisors, LLC	01/2014 to Present
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Owner Summit Tax Services	09/2010 to Present
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Member Don Foy, LLC	11/2010 to 12/2013
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Member BBD Holdings, LLC	10/2011 to Present
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Secretary Pacific Alliance Capital LLC (Island of Nevis)	08//2012 to Present
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Member Veritas, LLC (Island of Nevis)	04/2012 to 12/2012
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Financial Consultant, Insurance Agent Registered Representative, LPL Financial	09/2008 to 11/2010
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Financial Consultant Raymond James Financial Services	08/2005 to 09/2008
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### **Licensing/Exams:**

NASD / FINRA Series 7 and Series 66 examinations, 2004

### **Item 3: Disciplinary Information**

For a settled claim against Don and Raymond James in 2008 that was settled and closed, with no action against Don, please see [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **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.

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

Don is also a member of BBD Holdings, LLC a holding company for personal real estate investments and is the 100% owner of the Pacific Alliance Capital LLC; an Island of Nevis registered entity. Don is the corporate secretary of the Pacific Alliance Capital.

### **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 from the profits of Summit Tax Services, if any.

### **Item 6: Supervision**

Don Foy, as a principal, 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@investcra.com](mailto:don@investcra.com).

**Part 2 B of Form ADV: Brochure Supplement – Addink**

**Item 1: Cover Page**

**Benjamin “Ben” Johan Addink**

**Columbia River Advisors**

**2407 N 31st Street, Suite 202  
Tacoma, WA 98407  
253-589-1401**

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

**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 Peter Maftiu, 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 Ben Addink is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Name:** Benjamin Johan Addink (CRD# 4387214)

**Year of Birth:** 1978

**Formal Education after High School:**

University of Hawaii at Hilo, BA Business Administration, 2000

### **Business Background for Previous Five Years:**

Managing Member, Investment Adviser Representative (IAR)	09/2010 to Present
Direct Shareholder Columbia River Advisors, LLC	01/2014 to Present
Member Salt Holdings, LLC	09/2014 to Present
President / Member Ben Addink, LLC	11/2010 to 12/2013
Owner Summit Tax Services	09/2010 to Present
Member BBD Holdings, LLC	10/2011 to Present
Manager Pacific Alliance Capital LLC (Island of Nevis)	08/2012 to Present
Member Veritas, LLC (Island of Nevis) 04/2012 to 11/2012	
Member Whitestone Land Management, LLC	10/2006 to 12/2011
Member Hornets Land, LLC	09/2010 to Present
Member Desert Lilly LLC (personal real estate holdings)	06/2006 to Present
IAR / RR Linsco/Private Ledger	04/2005 to 10/2006

## **Licensing/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 Addink is also a Member of Hornets Land, LLC, and Salt Holdings, LLC, both real estate companies. Clients of Columbia River are not solicited to invest and this position does not affect his activities on behalf of our firm.

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

Ben is also a member of BBD Holdings, LLC a holding company for personal real estate investments and is the 100% owner of the Pacific Alliance Capital LLC; an Island of Nevis registered entity. Ben is the Manager of Pacific Alliance Capital.

### **Item 5: Additional Compensation**

Ben may receive additional compensation from Clients who may engage Summit Tax Services for tax preparation or related services. If this is done, Ben as a shareholder will receive additional compensation from the profits of Summit Tax Services, if any

In addition, Ben will receive indirect compensation through his ownership interests in BBD Holdings, LLC.

### **Item 6: Supervision**

Ben Addink and Don Foy, shareholders and members meet periodically on the telephone or in person as necessary to co-manage the business. Neither individual supervises the other.

If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

**Part 2 B of Form ADV: Brochure Supplement - Grubbs**

**Item 1: Cover Page**  
**John Stephen Grubbs**

**Columbia River Advisors**

**11100 Main Street, Suite 301**  
**Bellevue, WA 98004**

**425-401-7220**

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

**This Brochure supplement provides information about John S. Grubbs 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 Peter Maftciu, 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 John S. Grubbs is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Name:** John Stephen Grubbs (CRD# 4119665)

**Year of Birth:** 1976

**Formal Education after High School:**

BA, Business, 2009, Northwest University

### **Business Background for Previous Five Years:**

Investment Adviser Representative /Adviser Columbia River Advisors, LLC	07/2013 to Present
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Registered Rep, Investment Adviser Rep / Financial Consultant Oppenheimer & Co. Inc.	01/2012 to 07/2013
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Registered Representative / Financial Consultant Charles Schwab & Co.	06/2003 to 01/2012
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Dual Bank Employee Charles Schwab Bank	02/2005 to 01/2012
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### **Licensing/Exams:**

NASD / FINRA Series 7 and 66 examinations, (2003)

## **Item 3: Disciplinary Information**

No events have occurred for Mr. Grubbs.

## **Item 4: Other Business Activities**

None.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Don Foy, member on a regular basis through a review of correspondence, investment meetings and general discussions, primarily supervises John Grubbs. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

## **Part 2 B of Form ADV: Brochure Supplement - Breitenberg**

### **Item 1: Cover Page**

**Nathanael (“Nat”) J. Breitenberg**

**Columbia River Advisors**

**2407 N 31st Street, Suite 202  
Tacoma, WA 98407**

**253-589-1401**

**[www.investcra.com](http://www.investcra.com)**

**This Brochure supplement provides information about Nathanael Breitenberg 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 Peter Maftciu, 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 Nathanael Breitenberg is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



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

**Name:** Nathanael Breitenberg (CRD #5941084)

**Year of Birth:** 1989

**Formal Education after High School:**

BS, Accounting, 2012, University of Idaho

### **Business Background for Previous Five Years:**

Investment Adviser Representative Support Columbia River Advisors, LLC	01/2013 to Present
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Investment Adviser Representative Columbia River Advisors, LLC	10/2013 to Present
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Insurance Agent	07/2011 to Present
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Student (Idaho) 08/2007 to 12/2012

Intern Columbia River Advisors, LLC	05/2012 to 08/2012
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Intern Northwestern Mutual	05/2011 to 12/2011
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### **Licensing/Exams:**

NASD / FINRA Series 65 examination 2013 Life / Health  
Insurance License (WA)

## **Item 3: Disciplinary Information**

No events have occurred for Mr. Breitenberg.

## **Item 4: Other Business Activities**

None.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Nathanael. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

**Part 2 B of Form ADV: Brochure Supplement - Prentice**

**Item 1: Cover Page**

**Andrew Thomas Prentice**

**Columbia River Advisors, LLC**

**2407 Pacific Avenue, Suite A  
Olympia, WA 98501  
360-754-0490**

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

**This brochure supplement provides information about Andrew Prentice 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 Peter Maftciu, Chief Compliance Officer, if you did not receive the Part 2 A brochure, or if you have any questions about the contents of this supplement.**

**Additional information about Andrew Prentice is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2: Educational Background and Business Experience

**Name:** Andrew Thomas Prentice (CRD# 5011928)

**Year of Birth:** 1983

### **Formal Education after High School:**

Saint Martin's College, B.A., Finance and Economics, 2005 Certified Financial Planner (CFP4), 05/2012

### **Business Background for Previous Five Years:**

Investment Adviser Representative/Adviser  
Columbia River Advisors, LLC 07/2012 to Present

Minority Owner  
Bliss Investments, LLC (holding company) 07/2012 to Present

Registered Representative, IA Representative, Insurance Agent 08/2006 to 07/2012

Administrative Associate  
Linsco Private Ledger (LPL) 05/2005 to 08/2006

Insurance Agent, Life, Health, Disability  
(Appointed directly with various insurance companies) 05/2006 to Present

### **Licensing/Exams:**

NASD / FINRA Series 7 examination, 8/2006 NASD / FINRA  
Series 66, 10/2006  
Life, Health and Disability Insurance Agent

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<sup>4</sup>CFP® 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 the 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 3: Disciplinary Information**

None for Mr. Prentice

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

See above. Andrew obtained his insurance license in Washington State for Life, Health and Disability Insurance. He receives separate commission compensation if CRA's Clients elect to implement or change insurance coverage because of a financial plan or related recommendations. These services occur through various insurance companies with whom Andrew Prentice is appointed as an agent.

See also Item 10 of Part 2 A Brochure.

**Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Andrew. If you would like additional information on our supervisory structure, please contact Don Foy 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

**Part 2 B of Form ADV: Brochure Supplement - Zebroski**

**Item 1: Cover Page**

**Thomas (“Tom”) Edward Zebroski**

**Columbia River Advisors**

**11100 Main Street, Suite 301  
Bellevue, WA 98004**

**425-401-7220**

**[www.investcra.com](http://www.investcra.com)**

**This Brochure supplement provides information about Thomas Zebroski 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 Peter Maftciu, 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 Thomas Zebroski is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2: Educational Background and Business Experience

**Name:** Thomas Edward Zebroski (CRD# 5146523)

**Year of Birth:** 1954

### **Formal Education after High School:**

Bachelors of Arts in Business Administration, University of Washington, 1982 Executive  
Certificate in Financial Planning, Seattle University, 2006  
Certified Financial Planner Professional<sup>TM</sup>, CFP Board of Standards<sup>5</sup>, 2012 Accredited Asset  
Management Specialist, College for Financial Planning<sup>6</sup>, 2006

### **Business Background for Previous Five Years:**

Investment Adviser Representative Columbia River Advisors, LLC	08/2014 to Present
Insurance Agent Ins #265787	09/2006 to Present
Unemployed	05/2014 to 08/2014
VP, Wealth Management Advisor US Bank	01/2014 to 04/2014
VP, Financial Consultant Charles Schwab & Co., Inc.	07/2007 to 01/2014
Dual Bank Employee Charles Schwab Bank	04/2008 to 01/2014

### **Licensing/Exams:**

NASD / FINRA Series 7 and 66;  
Life, Disability, and Variable Life Insurance, Licenses, Notary Public, State of Washington

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<sup>5</sup> CFP®- Please see Page 43 for a complete description of the CFP designation

<sup>6</sup> Individuals who hold the AAMS designation have completed a course of study encompassing investments, insurance, tax, retirement and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.  
All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.  
Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming their adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

**Item 3: Disciplinary Information**

No events have occurred for Thomas Zebroski.

**Item 4: Other Business Activities**

Please see above, Thomas is also a licensed insurance agent.

**Item 5: Additional Compensation**

See above, as Thomas is also a licensed insurance agent and will receive separate commission compensation if a client uses Thomas' insurance services for the purchase, sale or exchange of insurance products or services. These services occur through various insurance companies where Thomas is appointed.

**Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Thomas. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

## **Part 2 B of Form ADV: Brochure Supplement- Cottle**

### **Item 1: Cover Page**

**Mark Lee Cottle**

**Columbia River Advisors**

**11100 Main Street, Suite 301**

**Bellevue, WA 98004**

**425-401-7220**

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

**This Brochure supplement provides information about Mark Cottle 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 Peter Maftciu, 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 Mark Cottle is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## Item 2: Educational Background and Business Experience

**Name:** Mark Lee Cottle (CRD# 1322905)

**Year of Birth:** 1954

**Formal Education after High School:**

BA, Business with an emphasis in Accounting and Finance, University of Puget Sound, 1978 CPA (Certified Public Accountant), 1978, license #05458

CFP, (Certified Financial Planner Professional)<sup>TM</sup>, CFP Board of Standards<sup>7</sup>, 1987 PFS (Personal Financial Specialist) American Institute of CPAs<sup>8</sup>

### Business Background for Previous Five Years:

Investment Adviser Representative  
Columbia River Advisors, LLC

09/2014 to Present

Director of Investments, CPA  
Cottle & Swanson, CPA's

01/1981 to 09/2014

Managing Member  
Cottle Capital, LCC

05/2013 to Present

Managing Member  
Emersion Investments

02/2009 to Present

**Licensing/Exams:** NASD FINRA Series 63

**Item 3: Disciplinary Information:** No events have occurred for Mr. Cottle.

**Item 4: Other Business Activities:** Mark is also a member of personal real estate entities, including Cottle Capital and Emerson Investments. CRA clients *are not solicited to invest in these entities*.

**Item 5: Additional Compensation:** None.

### Item 6: Supervision

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Mark. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

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<sup>7</sup> CFP®- Please see Page 43 for a complete description of the CFP designation

<sup>8</sup>The PFS designation allows CPAs to gain and demonstrate competence and confidence in providing estate tax, retirement, risk management (insurance) and / or investment planning advice to individuals, families and business owners through experience examination and the credential. To obtain the PFS the candidate must hold a valid and un-revoked CPA permit, licensed or certificate. Each holder of the credential has successfully completed the rigorous CPA exam, has met the strict education and experience requirements and with membership in the AICPA has agreed to the AICPA Code of Professional Conduct. A candidate must earn a minimum of 75 hours of personal financial planning education within the five-year period preceding the date of the PFS application. Education must be in the nine areas that make up the PFP Body of Knowledge as mandated by the CPA / PFS Credential Application kit.

## **Part 2 B of Form ADV: Brochure Supplement- Voigt**

### **Item 1: Cover Page**

**John G. Voigt**

**Columbia River Advisors**

**3226 Rosedale Street, Suite 201  
Gig Harbor, WA 98335**

**253-853-5500**

**[www.investcra.com](http://www.investcra.com)**

**This Brochure supplement provides information about John Voigt 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 Peter Maftciu, 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 at [compliance@investcra.com](mailto:compliance@investcra.com).**

**Additional information about John Voigt is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Name:** John G. Voigt (CRD# 455400)

**Year of Birth:** 1947

**Formal Education after High School:**

BA, Biology, University of Puget Sound

BA, Business and MBA, University of Puget Sound

### **Business Background for Previous Five Years:**

Investment Adviser Representative  
Columbia River Advisors, LLC

01/2016 to Present

Managing Principal / Investment Adviser Representative  
Evergreen Asset Management, LLC

01/2005 to 02/2016

**Licensing/Exams:** NASD / FINRA Series 63, 1990

## **Item 3: Disciplinary Information**

John Voigt has no events to disclose.

## **Item 4: Other Business Activities**

None.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises John. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

## **Part 2 B of Form ADV: Brochure Supplement- Zimmerman**

### **Item 1: Cover Page**

**Adam Q. Zimmerman**

**Columbia River Advisors**

**11100 Main Street, Suite 301  
Bellevue, WA 98004**

**425-401-7220**

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

This Brochure supplement provides information about Adam Zimmerman 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 Peter Maftciu, 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 at [compliance@investcra.com](mailto:compliance@investcra.com).

Additional information about Adam Zimmerman is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

**Name:** Adam Q. Zimmerman (CRD# 4321709)

**Year of Birth:** 1962

**Formal Education after High School:**

University of Massachusetts – Amherst, BS, Astronomy, 1984

Embry Riddle Aeronautical University, MS Aerospace Science, 2000

## **Business Background for Previous Five Years:**

Investment Adviser Representative Columbia River Advisors, LLC	04/2016 to Present
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Investment Adviser Representative Blue Moon Wealth Advisory, LLC	10/2014 to 04/2016
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Investment Adviser Representative Summit Asset Strategies Wealth Management	2010 – 10/2014
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**Licensing/Exams:** NASD / FINRA Series 6, 7, 63, 65 2001 – 2003; Chartered Financial Consultant<sup>8</sup>

## **Item 3: Disciplinary Information**

Adam has no events to disclose.

## **Item 4: Other Business Activities**

None.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Adam. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

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<sup>8</sup> This designation is issued by the American College and is granted to individuals whom have at least three years of full time business experience within the five years preceding the awarding of the designation. The candidate is required to take seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning, income taxation, investments and the application of financials planning; as well as two elective courses involving the application of aforementioned disciplines. Each course has a financial product exam and once issued, the individual is required to submit 30 hours of continuing education every two years.

## **Part 2 B of Form ADV: Brochure Supplement- Keefe**

### **Item 1: Cover Page**

**Matt P. Keefe**

**Columbia River Advisors**

**3226 Rosedale Street, Suite 201  
Gig Harbor, WA 98335**

**253-853-5500**

**[www.investcra.com](http://www.investcra.com)**

This Brochure supplement provides information about Matt Keefe 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 Peter Maftciu, 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 at [compliance@investcra.com](mailto:compliance@investcra.com).

Additional information about Matt Keefe t is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Educational Background and Business Experience

**Name:** Matthew P. Keefe (CRD#3273518)

**Year of Birth:** 1977

### Formal Education after High School:

BS, Business Admin., Finance Major, Carroll University, 2000  
CIMA Certification<sup>9</sup>, Wharton school of business

### Business Background for Previous Five Years:

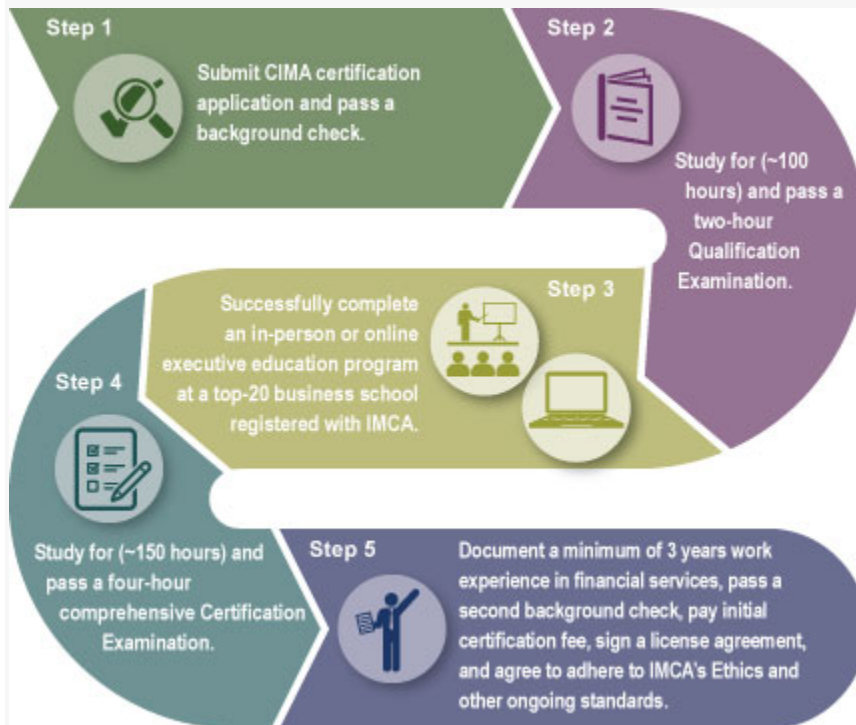
Investment Adviser Representative  
Columbia River Advisors, LLC

06/2016 to Present

Investment Adviser Representative  
Morgan Stanley Investment Management Inc.

08/2014 to 06/2016

<sup>9</sup> The CIMA certification program takes most candidates nine months to a year to complete. The process requires candidates to meet all eligibility requirements, including the “four E’s”: experience, education, examination, and ethics. Candidates must complete these five sequential steps to earn CIMA certification:



Applicants must complete and submit the CIMA **Certification Program Application** and application fee (for current application fees, [click here](#)). The application requests contact information, work experience, and disclosure of any complaints and regulatory actions. Submission of an application will result in a background check conducted by IMCA's staff. **Applications are valid for two years from the date they are processed by IMCA.**

Investment Adviser Representative  
Russell Investments  
04/2008

06/2009 – 06/2014 and 07/2005 –

Investment Adviser Representative  
MSBC Securities Corporation

04/2008 to 06/2009

**Licensing/Exams:** NASD / FINRA Series 7 and 66, 2000

**Item 3: Disciplinary Information**

Matt Keefe has no events to disclose.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

None.

**Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Matt. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).



**Part 2 B of Form ADV: Brochure Supplement- Angelo**

**Item 1: Cover Page**

**Nathaniel J. Angelo**

**Columbia River Advisors**

**3226 Rosedale Street, Suite 201**

**Gig Harbor, WA 98335**

**253-853-5500**

**[www.investcra.com](http://www.investcra.com)**

This Brochure supplement provides information about Nate Angelo 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 Peter Maftciu, 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 at [compliance@investcra.com](mailto:compliance@investcra.com).

Additional information about Nate Angelo is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

**Name:** Nathaniel J Angelo (CRD# 47637789)

**Year of Birth:** 1979

**Formal Education after High School:**

BA, Entrepreneurial Management, Texas Christian University, 2002  
MBA Seattle Pacific University, 2006

### **Business Background for Previous Five Years:**

Investment Adviser Representative Columbia River Advisors, LLC	06/2016 to Present
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Registered Rep, Investment Adviser Representative LPL Financial LLC	04/2015 to 06/2016
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Investment Adviser Representative Financial Advocates Investment Management	04/2015 to 06/2016
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Investment Adviser Representative Concert Wealth Management	07/2014 to 03/2015
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Registered Rep Frank Russell Company	02/2003 to 07/2014
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**Licensing/Exams:** NASD / FINRA Series 7, 24 and 66 2003 and 2011

## **Item 3: Disciplinary Information**

Nate Angelo has no events to disclose.

## **Item 4: Other Business Activities**

None, however, Nate volunteers as follows. No compensation is earned at all:

SowingRoots, Tacoma, WA. Need based financial grants to adoptive families.  
Tacoma Rescue Mission, Tacoma, WA. Homeless Shelter.  
Life enter Church, Tacoma, WA. Service and giving back to the church.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Don Foy, Managing Member on a regular basis through a review of correspondence, primarily supervises Nate. If you would like additional information on our supervisory structure, please contact Don Foy at 253.589.1401 or via email at [don@investcra.com](mailto:don@investcra.com).

**Privacy Disclose (See Next Page)**

**FACTS****WHAT DOES Columbia River Advisors, LLC  
DO WITH YOUR PERSONAL INFORMATION?**

<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>■ Social Security number and Personal Finance details</li> <li>■ Account balances and transactions between you and third parties</li> <li>■ Full birth dates and other financial and personal data on you and your family</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
<b>How?</b>	All financial companies need to share <b>Clients</b> personal information to run their everyday business. In the section below, we list the reasons financial companies can share their <b>Clients</b> personal information; the reasons <b>Columbia River Advisors</b> chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Columbia River Advisors share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	No	No
<b>For joint marketing with other financial companies</b>	No	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	Yes
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	No
<b>For nonaffiliates to market to you</b>	No	No

**Questions?**Call 253.589.1401 or go to [www.columbiariveradvisors.com](http://www.columbiariveradvisors.com)

Who we are	
Who is providing this notice?	Columbia River Advisors, LLC
What we do	
How does <b>Columbia River Advisors</b> protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We also have password protected computer systems, data backups and archiving among other technology protocols in place.</p>
How does <b>Columbia River Advisors</b> collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account or Provide account statements</li> <li>■ Provide wills or trusts or Provide goals, objectives</li> <li>■ Open a brokerage account with our assistance; review your investment needs, risk tolerances and personal / family obligations and career data (such as income, net worth, etc.)</li> </ul>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. We share info only where vital to servicing your needs.</p>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>We do not have affiliates under common control or ownership; our principals do have interests in other companies but not, full common ownership or control. Please see our Form ADV Part 2 A.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>We recommend TD Ameritrade, Fidelity Investments and Charles Schwab and Co. as custodians for client assets. We are not affiliated with each other; we are separate entities.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Not applicable to Columbia River Advisors, LLC.</i></li> </ul>
Other important information	
<p>Columbia River Advisors, LLC is the legal entity name of the company.</p> <p>We are a registered investment adviser with the U.S. Securities and Exchange Commission. We provide our clients and prospective clients with a "disclosure brochure" (Form ADV Part 2 A / B) available on a website maintained by the Securities and Exchange Commission at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.</p>	