

Columbia Ridge Capital Management, Inc.

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**Item 1 - Firm Brochure Cover Page
(Part 2A of Form ADV)**

This brochure provides information about the qualifications and business practices of Columbia Ridge Capital Management, Inc. If you have any questions about the contents of this brochure, please contact us at (607) 584-4141 or by email at www.columbiaridgecm.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. References herein to Columbia Ridge Capital Management, Inc. as a registered investment advisor, or any reference to being registered, does not imply a certain level of skill or training.

Additional information about Columbia Ridge Capital Management, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

April 1, 2019

Item 2 - Material Changes

Annual Update

As required by Securities and Exchange Commission (SEC) regulations, this Firm Disclosure Document for Columbia Ridge Capital Management, Inc. is subject to ongoing review by the Firm's management. This Material Changes section of the brochure is updated at least annually, or more frequently, if/when material changes have occurred since the previous release of the Disclosure Document. In the event there have been material changes, clients of Columbia Ridge Capital Management, Inc. will receive a copy of this Material Changes page which reflects those noteworthy changes.

Material Changes since the Last Update

The Columbia Ridge Capital Management, Inc. Disclosure Document and Brochure Supplement have been reviewed by Firm management in accordance with SEC requirements. As determined by that review, no Material Changes have occurred since its last amended submission in March 2018. In the event that significant changes should occur prior to its next annual review, Columbia Ridge Capital Management, Inc. would forward to its clients copies of this Material Changes section outlining those changes.

Full Brochure Available

Form ADV Part 2A serves as the Disclosure Document for Columbia Ridge Capital Management, Inc. as an SEC-registered investment advisory firm. Form ADV Part 2B serves as a Brochure Supplement, which outlines the history and qualifications of our advisors. While these two parts may be offered as separate documents, we have elected to incorporate both into a single, but segregated document which comprises our complete Disclosure Document and Brochure Supplement. While we offer it to clients each year in a separate mailing, it may be requested at any time by contacting Leona Hoag, the Firm's Chief Compliance Officer, either by telephone at (607) 337-6068 or by email at leona.hoag@nbtbank.com. Columbia Ridge Capital Management, Inc. will provide its clients with its most current Disclosure Document and Brochure Supplement at any time, without charge.

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Item 4 - Advisory Business

Firm Description

Columbia Ridge Capital Management, Inc., hereinafter referred to as CRCM or the Firm, is a Registered Investment Advisory firm, registered with the Securities and Exchange Commission. CRCM is a privately held corporation which is a wholly owned subsidiary of NBT Bank, N.A. NBT Bank, N.A. is headquartered in Norwich, New York. Investment Advisor Representatives of the Firm are Kenneth Rosplock, Kathleen Bartlow and John Rice. CRCM is currently notice filed to conduct advisory business in the States of New York, Alabama, North Carolina, Florida, Pennsylvania and Texas, as required by each respective states' registration requirements.

CRCM provides personalized confidential financial planning, asset management and related consulting services to individuals, high net worth individuals, pension and profit sharing plans, trusts, charitable organizations and small businesses.

Recommendations to clients are made based on consultation with the client and analysis of each client's specific financial needs and may include following services:

Determination of financial objectives	Identification of financial problems
Cash flow management	Tax planning
Insurance review	Investment management
Education funding	Retirement planning
Estate planning	

Within the context of providing these services, clients may place restrictions on the types of securities to be held within their portfolios. CRCM, at this time, does not offer its clients wrap fee programs. These programs charge a fee for an investment program that bundles together a suite of services, such as brokerage, advisory, research and management.

Investment advisory services are provided to clients on both a discretionary and non-discretionary basis. However, CRCM does not act as a custodian of client assets, opting instead to utilize the services of the following outside custodial firms at this time:

- Charles Schwab & Co., hereinafter referred to as Schwab, an independent and unaffiliated SEC-registered broker/dealer and a member of FINRA/SIPC/NFA;
- TD Ameritrade Institutional, hereinafter referred to as TD Ameritrade, an independent and unaffiliated SEC-registered broker/dealer and a member of FINRA/SIPC;
- SEI Private Trust Company, hereinafter referred to as SEI, an independent, unaffiliated SEC-registered broker/dealer and a member of FINRA/SIPC; and
- TIAA-CREF Individual & Institutional Services LLC, an independent, unaffiliated SEC-registered broker/dealer and a member of FINRA/SIPC.

CRCM may, to better serve specific client needs, elect to use the services of other custodians as well, at its discretion. The clients always maintain control of their assets but may authorize CRCM to transact trades on their behalf, without prior consultation,

by the discretion authorization contained in a discretionary advisory agreement executed with the Firm.

A written evaluation of each client's initial situation is prepared prior to the commencement of services. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews may occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be engaged directly by the client or CRCM, on an as-needed basis. Conflicts of interest will be immediately disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

As of December 31, 2018, the end of the Firm's most recent fiscal year, CRCM had assets under management in excess of \$143,300,000 in 585 advisory client accounts. Of these assets, \$103,900,000 was managed on a discretionary basis in 392 accounts and the remaining \$39,400,000 was managed on a non-discretionary basis in 193 accounts.

Principal Owners

As previously stated, CRCM is wholly owned by NBT Bank, N.A. of Norwich, New York. NBT Bank currently holds 100% ownership of CRCM stock.

Types of Advisory Services

CRCM provides both investment advisory services, also known as asset management services, as well as financial planning and consultative services to its clients. Asset management services may entail the active or passive management of investment accounts, furnishing of investment advice through consultations with clients, issuing periodic newsletters or special reports to its clients about securities and market conditions or trends and evaluating securities held by clients to foster an understanding of their assets relative to their stated goals and objectives.

Financial planning services are provided to clients to assist them in pursuing both short and long range financial goals. This is accomplished through a process of collecting client information about the client's current financial condition, clarification of their goals, identification of their past efforts and current abilities in pursuit of their goals and ongoing progress reviews relative to any actions taken.

On more than an occasional basis, CRCM furnishes consulting services to clients on matters not involving securities, such as taxation, trust management and estate planning. However, the Firm does not act in the capacity as a tax or legal advisor to its clients.

The Firm is compensated for its advisory services to clients through asset management fees, fixed fees or hourly fees as determined by the types of services elected by the clients. Clients grant the Firm discretionary powers which permit the executions of transactions on the clients' behalfs without consulting with or obtaining consent from them in advance of the transactions. As stated above, this authorization is granted in the advisory agreements initially signed by the clients.

Tailored Relationships

The goals and objectives for each client are documented at the onset of services. Investment strategies are then created that reflect the stated goals and objectives of each client. Clients may impose restrictions on investing in certain securities or types of securities.

Types of Agreements

Prior to engaging CRCM's services, clients are required to sign an agreement which defines the services that will be provided by the Firm. The following agreements define the typical client relationships between CRCM and its clients. Agreements may not be assigned or transferred to parties other than the original clients entering into the agreements. Since CRCM does not maintain custody of client assets, however, separate agreements may also need to be executed between custodial firms and the client, in addition to the agreements of the Firm described below. Since neither CRCM nor its advisors act as attorneys, their recommendations should not be interpreted as legal advice.

Financial Planning and Consulting Service Agreement

Planning or consulting service clients are required to sign a Financial Planning and Consulting Service Agreement with the Firm. This agreement outlines the nature and level of advisory services to be provided, without requiring the direct management of the client's assets.

For financial planning clients, information regarding a client's personal and financial situation and objectives is collected by the advisor through a confidential interview process. This data is analyzed and a written financial plan, with specific recommendations, is presented to clients if and when appropriate to do so.

The financial plan may include, but is not limited to a net worth statement, a cash flow statement, a review of investment accounts including reviewing past asset allocations, providing asset repositioning recommendations, strategic tax planning, education planning with funding recommendations, a review of retirement accounts and plans including recommendations and one or more retirement scenarios, a review of insurance policies and recommendations for changes, if necessary and an estate planning review and recommendations.

As previously stated, the Firm does not provide legal or accounting advice relative to its financial plans. It will, however, act as a facilitator in these areas between clients

and their legal and/or tax advisors relative to the recommendations made in a financial plan.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client and may be implemented with either CRCM or with a financial advisor of the client's choosing.

Consulting services may be provided to clients regarding other financial-related concerns in situations where detailed or comprehensive financial planning is either not necessary or not desired. Common areas of concern addressed by these services include:

Education planning	Simple investment planning
Death, disability and retirement planning	Tax planning
Net worth, cash flow and financial position	Risk management (insurance)
Other investment or non-investment issues	Estate planning

Investment Management Agreement

Most clients choose to have CRCM manage their assets in order to obtain ongoing in-depth advice and life planning. These clients are required to sign an Investment Management Agreement which defines the manner in which their assets will be managed and the fees assessed by the Firm. The scope of work and fee for an Investment Management Service Agreement is provided to the client in writing prior to the start of the relationship. This Agreement includes the following services:

- An evaluation of the client's present portfolio and a determination of the client's investment objectives and risk tolerance level;
- Selection of the components of an investment portfolio based on the client's individual facts and circumstances;
- Implementation, monitoring and rebalancing of the portfolio through the purchase and sale of securities such as no load mutual funds, exchange-traded funds, individual equities and other securities that we deem appropriate for the situation;
- Quarterly performance reports;
- A periodic review of the client's portfolio allocation; and
- An update of the client's personal financial information, goals and objectives to determine if any changes in the portfolio design are warranted.

Based on each client's objectives and suitability factors identified in their suitability documents, the advisor will develop a plan with each client that focuses on capital preservation, income generation, growth of principal, speculation or a combination of two or more objectives. All aspects of the client's financial affairs are reviewed, including those of their dependents, if any. Realistic and measurable goals are set and

objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

Asset management services may be provided on either a discretionary or non-discretionary basis. Under the terms of our discretionary agreement, clients authorize the advisor to buy, sell, invest, reinvest, exchange and/or trade securities in their accounts at his/her sole discretion and without consulting with the client in advance. Non-discretionary accounts require the advisor to consult with the client to gain consent and approval prior to engaging in any of these trading activities on the client's behalf.

CRCM's standard investment management fee is based on a percentage of the client's investable assets under management by the Firm according to the following schedule:

- 1.00% on the first \$500,000
- 0.75% on the next \$500,000
- 0.50% on assets above \$1,000,000
- Minimum annual fee is \$500

The above fee structure may be negotiable based on potential deviations from our standard Investment Management Agreement services. Current client relationships may exist where the fees are higher or lower than the fee schedule above due to desired deviations in the standard service structure or because a prior fee schedule has been "grandfathered" due to our long-term relationship with the client.

Retirement Planning Agreement

The scope of work and fee for a Retirement Planning Agreement is provided to the client in writing prior to the start of the relationship. A Retirement Planning Agreement includes the following services:

- Gathering of personal financial and family data in order to assess the client's current situation. This may involve the completion of a detailed fact finding questionnaire by either the client or by our staff using supporting documents provided to us by the client;
- Conversation with the client regarding retirement goals such as age(s), income, assets, life-style, relocations, travel and other relevant matters;
- Preparation of a retirement plan projection as described in the Retirement Planning Services section;
- A thorough review of the retirement plan projection including the supporting data input and projection reports on future net worth, income, expenses and taxes; and
- Re-runs of projections based on changes in facts or assumptions geared toward helping the client achieve their retirement goals and objectives.

Our standard Retirement Planning fee is a flat fee that ranges from \$1000 to \$3000 based on the complexity of the situation and the estimated time required to effectively perform the service. This fee may be negotiable if the services desired vary from our standard service.

Retainer Agreement

In some circumstances, a Retainer Agreement may be executed in lieu of our standard Investment Management Agreement when it is more appropriate to work on a fixed-fee basis. This may be applicable in situations such as the following:

- The client requests that we periodically advise on other investments that we do not actively manage or have access to through our custodian's network, such as retirement accounts through their employer's 401(k) plan; and/or
- The client requests that we provide both ongoing Investment Management and Retirement Planning in an effort to best achieve their personal goals and objectives by integrating the two services.

Our standard retainer fee for this consolidated service ranges from \$2,500 to \$15,000 per year based on the complexity of the situation and the estimated time required to effectively perform the service. This fee may be negotiable if the services desired vary from our standard service. The fee is also reviewed periodically as the scope of services may increase or decrease over time.

401(k) Plan Consulting and Advisory Agreement

The scope of work and fee for a 401(k) Plan Consulting and Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. This Agreement includes the following services:

- Mutual fund research geared towards advising a plan trustee on the selection of an appropriate mutual fund investment menu;
- Quarterly monitoring of a plan's mutual fund performance, expenses, management tenure, style drift and other relevant mutual fund factors; and
- Periodic group and individual meetings with plan participants to provide information on plan provisions, investment education and assistance with enrollment forms.

Our standard 401(k) Consulting and Advisory fee may be based on a percentage of plan assets, a flat fee or a combination of both. The fee structure for each client depends on the services desired, complexity of the overall plan, demographics of the participant group, geographic location(s) and other factors unique to the client and the services provided. Fees may be paid by the plan sponsor (i.e. employer), the plan participants or a combination of both according to ERISA rules and regulations. Full disclosure is provided to plan participants regarding fees assessed to them.

Termination of Agreements

A client may terminate any existing service agreement at any time by notifying CRCM in writing. A final fee may be assessed based on the number of days that have elapsed during the current quarter for investment management services or on the amount of time already spent on retirement planning or 401(k) advisory services prior to the Firm's receipt of notification of termination from the client. The Firm may also terminate any existing service agreement at any time by notifying the client in writing.

In addition, CRCM reserves the right to terminate any advisory engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in CRCM's judgment, to providing proper financial advice.

Item 5 - Fees and Compensation

Description of Fees

CRCM bases its fees on the following methods, depending upon the nature and complexity of the service being provided:

- A percentage of Assets Under Management (AUM);
- A fixed one-time project fee;
- Flat recurring retainer fees; and/or
- Hourly Fees.

Actual fee schedules were cited previously in the Types of Agreements section. As also previously stated, fees may be negotiable and subject to change for a client as the scope and complexity of services increase or decrease over time.

Fee Billing

Fees for Investment Management and 401(k) Consulting and Advisory Services are billed quarterly, in arrears, meaning that we invoice clients after a three-month billing period has ended, as opposed to in advance at the beginning of a billing period. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account, with the consent of the client, to facilitate billing efficiencies. Fees for Retainer Services are billed quarterly, in arrears.

Other Fees

Custodians used by CRCM, such as Charles Schwab & Co., may charge transaction fees on purchases or sales of certain securities, including mutual funds and exchange-traded funds. These transaction charges, if assessed, are usually small and incidental to the purchase or sale of a security and defined in the respective custodian's agreement, which is provided to and signed by the client prior to utilizing the custodian. CRCM, however, does not receive any portion of these fees, if charged by Charles Schwab & Co. From an asset management standpoint, the selection of securities appropriate to a client's portfolio and their overall management plan is more important than these nominal fees, if any, that the custodian may charge to buy or sell the securities selected. If charged by any custodians utilized by CRCM, however, they would be further discussed in the Brokerage Practices section of this Disclosure Document.

Expense Ratios

Most mutual funds and exchange-traded funds, whether purchased directly or through custodial accounts, generally charge an internal management fee, called an expense ratio, which is separate from the advisory service fees charged by CRCM or transaction fees which might be charged by the custodians. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.50% for their services.

Performance figures quoted by mutual fund and exchange-traded fund companies in various publications are after their fees have been deducted. These fees are specific to each fund and deducted from the fund's performance annually by the respective fund company. Clients are not billed directly for these fees. Any such fees, if present, are clearly defined in each fund's prospectus.

Past Due Accounts and Termination of Agreements

CRCM reserves the right to stop work on any account that is more than ninety (90) days overdue. In addition, as previously stated, the Firm reserves the right to terminate at any time any advisory services engagement where a client has willfully concealed or refused to provide pertinent information about their financial situations when such information is deemed necessary and appropriate, in our judgment, to providing proper financial advice.

Item 6 - Performance-Based Fees

Performance-Based Fees

CRCM's fees are not based on a share of the capital gains or capital appreciation of managed securities. Such performance-based fee structures could present the Firm with a potential conflict of interest in which an advisor might be incented to recommend an investment or investment strategy that could carry a higher degree of risk to the client in pursuit of increased performance, which would in turn generate higher fees for the advisor.

Item 7 - Types of Clients

Description

CRCM's clients are comprised primarily of individuals but also include employer-sponsored retirement plans, trusts and estates. Client relationships vary in scope, complexity and length of service.

Account Minimums

The minimum Investment Management client account size is \$50,000 of assets under management, which equates to an annual fee of \$500. If an account falls below \$50,000 in value, the minimum annual fee of \$500 may be charged. CRCM may, at its discretion, waive its account minimum. Accounts of less than \$50,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total up to the minimum \$50,000 within a reasonable time. Other exceptions may apply to employees of CRCM and to employees of 401(k), pension and profit sharing clients.

Clients receiving ongoing asset management services will be assessed a \$500 minimum annual fee. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

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

Methods of Analysis

In developing investment strategies for advisory clients, the Firm may employ long- or short-term purchases, trading of securities within thirty (30) days and margin accounts. The development of these strategies is based on a variety of information sources and methods of securities analysis. Information sources are generally comprised of the following:

- Professional financial and investment journals;
- Financial newspapers and magazines;
- Mutual fund and exchange-traded fund research materials prepared by independent sources such as Morningstar and Fiduciary Analytics;
- Mutual fund, exchange-traded fund and company prospectuses;
- Stock and corporate rating services;
- Company press releases;
- SEC filings;
- Charles Schwab & Co.'s "SchwabLink" service; and/or
- Internet-posted sources.

Investment Strategies

The primary investment strategy used on client accounts is a strategic asset class allocation utilizing a Core and Explore approach. The asset classes used in our portfolios are:

- Stable Value (Money Market Funds and Certificates of Deposit)
- Fixed Income (Government, Corporate and Tax-Free Municipal Bonds)
- Stocks (US and International Large, Mid and Small Cap Stocks)
- Alternatives (Precious Metals, Natural Resources and Real Estate Trusts)

The portfolio Core component is built first, using primarily passively-managed index and exchange-traded funds. The Explore component is then built by using both actively-managed and passively-managed mutual funds, exchange-traded funds and, in some cases, individual stocks.

The Explore portion is used to achieve adequate diversification among all asset classes, to pursue strategic investment opportunities in specific industry sectors or geographic regions and to provide efficient investment flexibility when dealing with large or recurring cash deposits or withdrawals. Portfolios are also globally diversified in an effort to reduce the risk associated with investing solely in traditional markets.

Each client executes an Investment Objectives Outline that documents their specific objectives and desired investment strategy, as defined by the client during the initial consultations with their advisor. The client may change these objectives at any time. Information collected from the client is reviewed with the client periodically and strategies adapted to any changes in objectives and/or suitability.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Clients are advised of these various types of risk and the possibility of loss of their assets.

Investment strategies are developed based on the risk tolerance of each client and the types of these risks they may be subjected to. Investment vehicles are then selected by the advisor that are deemed suitable for the client according to their respective goals, timeframes and risk tolerances to potential losses. Our investment approach constantly keeps this risk of loss in mind. Investors may face any or all of the following investment risks while pursuing their financial goals:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, mutual fund or exchange-traded fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 - Disciplinary Information

Legal and Disciplinary

Neither the Firm nor any of its associated persons have been involved in any legal or disciplinary events related to past or present investment clients.

Item 10 - Other Financial Industry Activities and Affiliations

Financial Industry Activities

CRCM is not registered as a securities broker-dealer, a futures commission merchant, commodity pool operator or commodity trading advisor. Some associated persons of the Firm are also licensed as life and/or health insurance agents and may be compensated through separate and standard commissions for the sale of insurance and insurance-related products and services.

Affiliations

As previously stated, CRCM is a wholly owned subsidiary of NBT Bank, N.A., which is a publicly traded domestic corporation whose stock may be available to both clients and associated persons of CRCM. Trading in NBT stock within advisory accounts has the potential to create real or perceived conflicts of interest, depending upon the timing of these trades and the ownership of accounts within which the stock is traded. To alleviate this potential, CRCM has implemented procedures which require the disclosure to clients of potential conflicts of interest associated with such trades coupled with the following trading requirements:

- Trades in NBT stock within advisory client accounts may be executed on an unsolicited basis only;
- Clients are required to sign a Letter of Non-Solicitation prior to the placing of trade orders for NBT stock within their advisory accounts;
- The CCO will initial each Letter of Non-Solicitation and enter the Letter into the respective client's file; and
- The CCO will conduct and document a post-trade review of each NBT stock transaction executed.

CRCM does not provide legal, accounting or tax preparation services to its clients. Should the need arise for those services, however, CRCM may refer the clients to attorneys or accountants who are independent of CRCM. If clients choose to use the services of those firms, they may be required to execute separate agreements with them which identify their specific services and fees. CRCM receives no compensation for such referrals.

As previously stated above, some Investment Advisor Representatives of CRCM may be insurance licensed, which allows them to sell insurance products for which they may receive standard commissions. The sale of such commissionable insurance products to clients is outside the scope of CRCM's discretionary advisory services, however. If an advisory client purchases a commission-based insurance product through one of our

advisors, the commission earned will be assigned to CRCM, which is separate and distinct from fees charged for the Firm's advisory services and serves to offset Firm operating costs.

The ability to sell such products and generate commissions presents a potential conflict of interest. We believe that those potential conflicts of interest are mitigated by the following Firm practices:

- CRCM has adopted a standard of conduct under its Code of Ethics which emphasizes putting the client's interest first.
- All commissionable transactions are reviewed by senior management, with an eye toward avoiding potential conflicts of interest and providing advice that's in the client's best interest.
- Commissionable products should only be sold when they are beneficial to the client as the best possible solution to an investment or financial planning issue.
- Full disclosure of all up-front sales charges, ongoing asset-based fees and potential surrender charges should always be presented to the client before purchase.
- The client is not obligated to purchase insurance products through our advisors.
- All associated persons of CRCM, including its advisors, are compensated on an hourly or salaried basis. Commissions that are earned by an advisor from the sale of insurance products are assigned to the Firm. Commissions earned by the sale of such products and assigned to CRCM are used to support compensation structures and other general expenses of the Firm.
- The Firm does not charge investment management fees on accounts that either generated a commission when purchased or that generate a service fee that is paid by a mutual fund or insurance company, even if CRCM is providing discretionary management services on the account.
- In some instances, depending on the size of the transaction, investment management fees may be discounted or offset, at the Firm's discretion.

Outside Business Activities

In addition to the potential sale of insurance products previously referenced, John Rice is also engaged as a sales consultant for a third-party administrator firm unrelated to his advisory practice. No other associated persons of CRCM are engaged in outside business activities related to advisory services above or beyond their responsibilities at CRCM.

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

Code of Ethics

CRCM places the utmost priority on maintaining high standards of integrity and professionalism by its associated persons in the conduct of its advisory business. The greatest asset held by this Firm is the trust and confidence placed in it by its clients. It is incumbent upon all members of the Firm to maintain, further and adhere to the tenet that the clients' interest is paramount in all that we do. CRCM has established a

Code of Ethics which has been specifically formulated to ensure that our fiduciary obligations are met. The employees of Columbia Ridge have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

The following is a summary of our Firm's Code of Ethics policy:

- Adoption and maintenance of Standards of Conduct which emphasize putting our client's interests first and avoiding any conflicts of interest;
- Requirement that associated persons of our Firm comply with all Federal, State and other regulatory body securities laws and governing regulations;
- Protection of clients' nonpublic, confidential information;
- Requirement that associated persons of CRCM pre-clear certain types of personal securities transactions;
- Prohibition against the use of material, nonpublic (insider) information at all times; and
- Requirement to report any violations of these policies to CRCM's senior management immediately.

In addition, since some associated persons of CRCM have received the CFP® Certification from Certified Financial Planner Board of Standards, Inc., the Firm has incorporated into its Code of Ethics the following key principles of CFP Board's Code of Ethics and Professional Responsibility:

Principle 1 – Integrity: *IARs, employees and officers of CRCM will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Certificants are placed in position of trust by clients and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.*

Principle 2 – Objectivity: *IARs, employees and officers of CRCM will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.*

Principle 3 – Competence: *IARs, employees and officers of CRCM will maintain the knowledge and skills necessary to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.*

Principle 4 – Fairness: *IARs, employees and officers of CRCM will be fair and reasonable in all professional relationships, and all conflicts of interest will be disclosed. Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interest. Fairness is treating others in the same fashion that you would want to be treated.*

Principle 5 – Confidentiality: *IARs, employees and officers of CRCM will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client’s information will remain confidential.*

Principle 6 – Professionalism: *IARs, employees and officers of CRCM will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession’s public image and improve the quality of services.*

Principle 7 – Diligence: *IARs, employees and officers of CRCM will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.*

The Firm’s Code of Ethics establishes ethical guidelines for its associated persons to adhere to relative to the following key areas of its advisory operations:

Compliance	Personal Securities Transactions
Insider Trading	Rumor Mongering
Conflicts of Interest	Outside Business Activities
Gifts and Entertainment	Code Violation Reporting and Sanctions
Recordkeeping	

All associated persons of CRCM are committed to our Code of Ethics, which is available in its entirety for review by clients and prospective clients. Copies of the Code may be requested by written request sent to Columbia Ridge Capital Management, Inc., 520 Columbia Drive, Suite 103, Johnson City, New York 13790 or by calling our office at (607) 584-4141 during normal business hours. A copy will be forwarded promptly upon receipt of a request.

Participation or Interest in Client Transactions

CRCM and its employees may buy or sell securities that are also held by clients. Associated persons are prohibited, however, from trading securities within their personal accounts ahead of trades of the same securities in client accounts, a practice commonly known as “front running”. They are also prohibited from conducting sales of securities between their personal accounts and those of advisory clients.

Personal Trading

It is CRCM’s policy to prohibit personal securities transactions by its associated persons which are or could lend the appearance of being in conflict with either client transactions or the Firm’s fiduciary responsibility to its clients. The Firm has designated Leona Hoag as its Chief Compliance Officer (CCO). As such, she conducts reviews of all associated person trading activity on a quarterly basis. These personal trading reviews ensure that the personal trading of the Firm’s associated

persons does not affect the markets and that clients of the Firm receive preferential treatment at all times.

Item 12 - Brokerage Practices

Selecting Brokerage Firms

CRCM does not maintain direct physical custody of advisory client assets. All client accounts are held by outside qualified custodians, as defined by the SEC, such as a broker/dealer or bank. CRCM currently recommends that our clients utilize Charles Schwab & Co. as their qualified custodian. While we recommend that clients use Schwab as their custodian, the decision to do so ultimately rests with the client. In fact, some of our clients' accounts are held by other custodians such as TD Ameritrade and TIAA-CREF.

CRCM is independently owned by NBT Bank and is not directly affiliated with these qualified custodians beyond their retention as custodial platforms for our advisory clients' accounts. Custodians hold client assets in their respective brokerage accounts and buy and sell securities within those accounts when directed to do so by CRCM.

Although CRCM does not maintain direct custody of advisory client assets, recent government regulations issued by the SEC have deemed that we have indirect custody of your assets if you authorize CRCM to instruct Schwab to deduct our advisory fees directly from your account or, if you grant us authority to move money from your Schwab account to another account with a separate registration (i.e. from one spouse's IRA to an account owned jointly by the IRA owner and their spouse).

How We Select Custodians/Brokers

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors in our selection process including:

- Combination of transaction execution and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, and stability;
- Prior service to us and our other clients; and

- Availability of other products and services that benefit us, as discussed below (see “*Products and Services Available to Us From Schwab*”).

Your Brokerage and Custody Costs

For our client accounts held with Schwab, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle in your Schwab account. CRCM, however, does not share in any of these fees assessed by Schwab.

Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is the arm of Schwab that serves independent investment advisory firms like CRCM. They provide CRCM and our clients with access to its institutional brokerage trading, custody, reporting and related services. Many of these services are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. The following is a more detailed description of Schwab’s support services:

- **Services That Benefit You.** Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account directly.
- **Services That May Not Directly Benefit You.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
 - Provide access to client account data (such as duplicate trade confirmations and account statements);
 - Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
 - Provide pricing and other market data;
 - Facilitate payment of our fees from our clients’ accounts; and
 - Assist with back-office functions, recordkeeping and client reporting.

- **Services That Generally Benefit Only Us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
 - Educational conferences and events;
 - Consulting on technology, compliance, legal and business needs;
 - Publications and conferences on practice management and business succession; and/or
 - Access to employee benefits providers, human resource consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees and may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them, as long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody.

The \$10 million minimum may give us an incentive to require that you maintain your account with Schwab, based on our interest in receiving services that benefit our business, rather than based on your best interest in receiving the best value in custody services and the most favorable execution of your transactions. This creates a potential conflict of interest for our Firm. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us. We currently have over \$100 million in client assets with Schwab but do not believe that requiring our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Best Execution

CRCM reviews the execution of trades at each custodian each quarter. Our review process is documented in the Firm's Written Policy and Procedures Manual. Trading fees charged by the custodians are also reviewed on a quarterly basis. CRCM does not receive any portion of the trading fees.

In addition to these best execution reviews, the Firm's CCO may also conduct quarterly reviews of their custodians' trading accuracy and efficiency utilizing Rule 605 reports drawn from publicly available data. If any issues of potential concern are noted in these reports, relative to trading activities effecting the Firm's advisory clients, they are

addressed by the CCO directly with the respective custodian at that time, resolved immediately in the client's favor and all relevant information documented accordingly.

Additionally, on an annual basis, the CCO may request and review a Rule 606 report which compares the relative performance of Schwab, as a broker/dealer, to other broker/dealers in the market place across a variety of parameters. In seeking best execution for clients, lowest transaction cost may not always be the key determinative factor however. CRCM also examines qualitative factors such as speed and accuracy of executions, value of research provided, commission rates and responsiveness to client and advisor concerns, for example. As a result, some trades may not necessarily obtain best price, within reason, but the Firm may likely achieve higher quality service across its entire trading platform and, therefore, best overall execution for its clients.

Based on these comparisons, the Firm continually seeks to ensure that the overall trading execution performance of its custodians compare favorably in the marketplace. Documentation of the Firm's ongoing Best Execution review is maintained by the CCO as a key component of its compliance books and records.

Soft Dollars

Soft dollar practices generally refer to arrangements under which investment advisors or money managers obtain products or services (other than execution of securities transactions) from or through a broker/dealer in exchange for the advisor directing client brokerage transactions to that broker/dealer.

CRCM does not have any soft dollar arrangements in existence at this time, nor does it intend to have any in the future.

Order Aggregation

Most trades that we execute for clients are mutual funds. Trade aggregation, commonly referred to as "block trading", does not benefit our clients because all buys and sells of the same mutual fund during a day receive the per share closing price at the end of the day. For exchange-traded funds and individual stocks, it is our policy to process block trades when we buy or sell the same security for multiple clients at approximately the same time. Block trades will be averaged as to price and transaction costs and will be allocated equitably among all clients for whom we are buying or selling a security. In the case of an order which is only partially filled, we will allocate the shares pro-rata based on the percentage of shares each client's order bears to the total order amount. CRCM receives no additional compensation of any kind as a result of aggregating client trades. Trades for employees of CRCM are not aggregated with those of clients.

Item 13 - Review of Accounts

Periodic Reviews

CRCM periodically monitors the composition and performance of client portfolios as a key component of its ongoing service commitment to its clients. Account reviews

are conducted quarterly by our advisor team, which consists of the Firm's President and COO. Reviews at either level may be performed more frequently in response to client requests or at any time when the Firm or the individual advisor feels that specific events or market conditions dictate. Account reviews may also be performed when a client makes a relatively large deposit to or withdrawal from their managed portfolio.

Review Triggers

The Firm's advisors monitor economic and market conditions, perform due diligence reviews of securities and financial products and investigate significant gains or losses in client portfolios. Concerns in any of these areas, changes in tax laws and/or changes in client objectives or suitability may trigger the need for off-cycle account reviews with clients as well.

Regular Reports

Clients receive regular reports regarding their advisory accounts from their advisor on at least an annual basis. Investment Management and Retainer Agreement clients, however, receive written quarterly updates. These updates may include a net worth statement which includes their investable assets, a portfolio statement which summarizes the quarter and year-to-date return on their Schwab accounts, a general Investment Review client letter and a brief note addressing high priority issues related to their overall financial objectives.

Clients are provided with transaction confirmations, notices and regular account statements directly from the custodian of their accounts on a quarterly basis. Copies of these items sent to clients are also simultaneously copied to CRCM.

Item 14 - Client Referrals and Other Compensation

Incoming Referrals

CRCM may receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Brokerage Practices).

We have been fortunate to receive many client referrals over the years. These referrals have come primarily from current or former clients, estate planning attorneys, accountants, our employees and their personal friends and other similar sources. At this time, CRCM neither utilizes the services of paid solicitors to promote our advisory practice nor do we compensate anyone for referrals to prospective clients.

Referrals Out

CRCM does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them for services.

Other Compensation

The Firm receives commissions assigned to it from the sale of certain types of insurance products by its advisors which may result from their activities as licensed insurance agents.

Item 15 - Custody

Account Statements

Under current government regulations, we may be deemed by the SEC to have indirect custody of your assets if you authorize CRCM to instruct Schwab to deduct our advisory fees directly from your account or, if you grant us authority to move money from your Schwab account to another account with a separate registration (i.e. from one spouse's IRA to an account owned jointly by the IRA owner and their spouse). Only Schwab, or other qualified custodians, however will maintain actual custody of your assets. You will receive account statements directly from Schwab at least quarterly, with copies forwarded to CRCM as well. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements with the periodic account statements or portfolio reports that you may receive from CRCM.

Each quarter, we send a letter to a sample group of clients asking them to confirm that they are, in fact, receiving account statements directly from Schwab or other custodians.

Performance Reports

Clients are urged to review the performance of their investments as reported on their account statements received directly from their account custodian. These statements, along with market and portfolio performance, are reviewed with each client during periodic account reviews with their respective advisor.

Net Worth Statements

Clients are periodically provided Investment Summary statements which include account balances and asset class allocations of their accounts that we manage and, in some instances, other accounts which we do not manage if the client provides us with that information on a timely basis. The main purpose of the Investment Summary is to provide a simple one-page snapshot of a client's invested assets and the asset class allocation of those investments.

Occasionally, an Investment Summary may include approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. In this case, the purpose of the Investment Summary may be for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Item 16 - Investment Discretion

Discretionary Authority for Trading

CRCM accepts discretionary authority to manage securities accounts on behalf of its clients. This discretionary authority allows us to determine and implement, without obtaining specific client consent for each trade, the securities to be bought or sold and the amount of the securities to be bought or sold as long as such trades are done within the framework of the Investment Policy Statement or Investment Objectives Agreement that the client has previously agreed to.

The client approves the custodian to be used and the commission rates paid to the custodian. CRCM does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades. Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment strategy that you have approved in writing. The clients do retain the right to place limitations on the advisor's discretionary powers. If any such limitations or restrictions are specified, they are clearly defined within the advisory agreement or Investment Policy Statement at the outset of services. Subsequently, restrictions may be added or dropped from the client's authorization by submitting a request in writing to the Firm.

Limited Power of Attorney

A limited power of attorney (LPOA) for a brokerage account is a trading authorization that you provide us so that we can make trades in your account(s) on a discretionary basis as stated above. The LPOA approval requires your signature or initials on the custodian's account application form and may be revoked by you at any time.

Item 17 - Voting Client Securities

Proxy Votes

CRCM does not vote proxies on securities. Clients are expected to vote their own proxies and account custodians are directed to forward all proxy voting materials directly to the clients. If assistance on voting proxies is requested by a client, CRCM will provide recommendations only. If any conflict of interest might exist relative to advising the client on proxy issues, it will be disclosed to the client.

Item 18 - Financial Information

Financial Condition

CRCM does not have any financial impairment that will preclude the Firm from meeting contractual commitments to clients. Neither the Firm nor any associated persons have been a party in any bankruptcy proceedings. Since CRCM does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1200 per client six months or more in advance, it is not required to prepare or provide a financial balance sheet to clients.

Item 19 - Business Continuity Plan

General

CRCM has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key personnel.

Disasters

It is CRCM's policy to provide uninterrupted service to its clients and to minimize the downtime should any unforeseen event cause disruption to its business operations. A Business Continuity Plan has been developed and implemented by the Firm to accomplish this. The plan makes provision for most natural or man-made disasters which could conceivably disrupt the day-to-day operations of the Firm and/or access by clients to their account information. CRCM's computer system is backed-up automatically at the end of each day to its server and archived off-site.

Alternate Offices

An alternate office has been designated to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients in the event of a disaster that dictates moving our office to an alternate location. At that time, they will be provided with alternate contact information and will be periodically kept abreast of the status of the office facility restoration or relocation.

CRCM maintains two fully-equipped and staffed offices in both Johnson City, New York and Raleigh, North Carolina. This automatically provides us with an alternate office arrangement to support ongoing operations in the event either office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving either office to an alternate location.

Loss of Key Personnel

CRCM operates on a team approach as to providing investment advisory services and maintaining administrative support functions for our clients. Our staff includes multiple investment advisors and an experienced administrative staff at both offices. This combination of a multiple office and staff structure, as well as our team approach, provides a strong level of security to our clients in the event of an untimely death or disability among any of our owners, advisors or administrative personnel.

Item 20 - Information Security Program

Information Security

The Firm is committed to safeguarding client information by holding it in the strictest confidence. Only information that is necessary to effect, administer or enforce a transaction is gathered. Such information may include, but is not limited to, health and financial data submitted with account applications or other forms.

To protect its client's privacy, the Firm has implemented internal procedures designed to restrict access to personal information. It may, as necessary, disclose limited personal information to other financial institutions to facilitate the completion of their authorized activities or as otherwise authorized by the client. It is the policy of the Firm not to disclose non-public personal information to any non-affiliated third parties, except as required by law, and no change is anticipated in this policy in the future. Clients will be notified prior to the implementation of any changes to this policy, should that occur.

In some instances, federal and/or state regulators may be permitted by law to review Firm and client records. CRCM will comply with such requests whenever mandated by law. The Firm does not, however, provide non-public personal information to mailing list vendors or solicitors under any circumstances. Any client information gathered by CRCM will be maintained for the duration of that client's relationship with the Firm and beyond for a period of time specified by current or future regulations.

Privacy Notice

The Firm is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies (i.e. credit reports). We use this information to help you meet your personal financial goals.

With your permission, we may disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we may share a limited amount of information about you with your brokerage firm (i.e. Schwab, TD Ameritrade, etc.) in order to execute securities transactions on your behalf. We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors. Federal and state securities regulators may review our company records and your personal records only as permitted by law. In addition, all of associated persons of CRCM are required to sign an acknowledgement each year stating that they understand and will abide by the Firm's privacy policy.

Personally identifiable information about you will be maintained while you are a client and for the required period thereafter that records are required to be maintained

by federal and state securities laws. After that time, your information on file with CRCM may be destroyed.

All prospective clients of the Firm are provided with a copy of CRCM's Privacy Policy at their initial meeting. Subsequently, a copy of Firm's Privacy Policy may be sent annually to each existing client, at the discretion of the Firm, during the first quarter of the calendar year.

Columbia Ridge Capital Management, Inc.

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**Item 1 - Brochure Supplement Cover Page
(Part 2B of Form ADV)**

**Brochure Supplement for
Kenneth D. Rosplock, CFP®**

Kathleen Bartlow, CFP®

John E. Rice

This brochure supplement provides information about Investment Advisor Representatives of Columbia Ridge Capital Management, Inc. that supplements the information provided in the Firm's Form ADV Part 2A Brochure. You should have received a copy of that brochure. Please contact Leona Hoag, the Firm's Chief Compliance Officer if you did not receive one or if you have any questions about the contents of this supplement. Additional information about the Investment Advisor Representatives referenced in this Brochure Supplement is available on the SEC's website at www.adviserinfo.sec.gov.

April 1, 2019

Item 2 - Educational Background and Business Experience

At this time, Columbia Ridge Capital Management, Inc. is owned by NBT Bank, N.A. and managed through the collective efforts of Kenneth D. Rosplock (President) and Kathleen Bartlow (Chief Operating Officer). Leona Hoag serves as CRCM's Chief Compliance Officer and is responsible for the day-to-day supervision of the Firm's advisory activities. Kenneth Rosplock, Kathleen Bartlow and John Rice serve as the Investment Advisor Representatives of CRCM in the conduct of its advisory business. This Brochure Supplement provides information specific to these individuals in addition to that provided in the Columbia Ridge Capital Management, Inc. Part 2A brochure, which you should have received a copy of. If not, please contact Leona Hoag to receive one or if you have any questions about the contents of the brochure or this supplement. Additional information about Kenneth Rosplock, Kathleen Bartlow and John Rice is available on the SEC's website at www.adviserinfo.sec.gov.

Education and Business Standards

CRCM requires its advisors to have acquired either a Bachelor's degree with a minimum two years of related work experience or at least five years of related work experience that demonstrates their aptitude for investment management and financial planning. In addition, all advisors are required to complete various continuing education courses annually which are relevant to the investment, tax and financial planning professions.

Professional Certifications

Some Investment Advisor Representatives of CRCM have earned the following professional designations, certifications and/or credentials that are required to be explained in further detail:

Certified Public Account (CPA): Certified Public Accountants are licensed by the American Institute of CPAs (AICPA) to use the CPA designation contingent on meeting and maintaining the following qualifications:

- Candidates must possess a Bachelor of Science degree after completing 120 credit hours of undergraduate study to qualify for sitting for the CPA examination.
- Successful completion of the 14-hour Uniform CPA Exam which consists of the following components:
 - Auditing and Attestation
 - Financial Accounting and Reporting
 - Regulation
 - Business Environment and Concepts
- For each three-year reporting period, AICPA members shall complete 120 hours or its equivalent, of continuing professional education.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- Continually gain relevant work experience and meet continuing education requirements.

Certified Fund Specialist (CFS): The Certified Fund Specialist designation is sponsored for investment professionals by the Institute of Business & Finance (IBF) provide specialized training in a variety of investment vehicles such as mutual funds, exchange-traded funds, REITs and closed-end funds. Candidates for this designation must achieve and maintain the following qualifications:

- Bachelor's degree from an accredited college or university or one year of financial services work experience.
- Successfully complete the CFS Six Module Study program which covers the following topics:
 - Modern Portfolio Theory;
 - Risk measurements and minimization;
 - Fund and personal tax issues;
 - REITs, ETFs, CEFs, UITs, and structured notes;
 - Time value analysis and market indicators;
 - Fund management and selection;
 - Mutual fund costs; and
 - Asset class description, historical returns and risks.
- Successfully complete three (3) exams and a case study; and
- Continually meet ongoing continuing education requirements.

Kenneth D. Rosplock

President, Investment Advisor Representative

Educational Background:

- Born 1954
- Post-Secondary Education
State University of New York/Albany – Bachelor of Science (1976)
- FINRA Securities Licenses:
Series 24 Series 7 Series 6 Series 63
- Other Professional Licenses
Licensed in States of New York, North Carolina, Pennsylvania, District of Columbia and Florida for life, health and traditional insurance products.
- Professional Designations
Certified Public Accountant (CPA) – Obtained 1978
Certified Financial Planner® (CFP) – Obtained 2003

Business Experience:

- December 2016 to Present President and Investment Advisor Representative of Columbia Ridge Capital Management, Inc., a SEC-registered investment advisory firm.
- July 2004 to November 2016 President, Chief Executive Officer, Chief Compliance Officer and Investment Advisor Representative of Columbia Ridge Capital Management, Inc., a SEC-registered investment advisory firm.
- March 1992 to September 2005 President for Bay Ridge Group/Bay Ridge Advisors, a SEC-registered investment advisory firm.
- 1989 to November 2016 President & Co-owner of Columbia Ridge Capital Management, Inc., a registered branch office of Cadaret, Grant & Co., Inc., a FINRA and SIPC member securities broker/dealer.
- August 1987 to December 2016 Registered Representative and Investment Advisor Representative of Cadaret, Grant & Co., Inc., a FINRA and SIPC member securities broker/dealer and SEC-registered investment advisory firm.
- January 1986 to August 1987 Registered Representative of Nathan & Lewis, Inc., a FINRA and SIPC member securities broker/dealer.
- November 1984 to October 1986 Registered Representative of Investment Distributors, Inc., a FINRA and SIPC member securities broker/dealer.
- May 1983 to January 1986 Registered Representative of Brian M. Prew & Associates, Inc., a FINRA and SIPC member securities broker/dealer.

Item 3 - Disciplinary Information: Mr. Rosplock has not been the subject of any financial industry-related disciplinary actions.

Item 4 - Other Business Activities: As previously stated, Mr. Rosplock is a licensed life insurance agent. He does not conduct any other outside business activities beyond his duties at CRCM.

Item 5 - Additional Compensation: As a licensed insurance agent, Mr. Rosplock may be compensated through separate and standard commissions for the sale of commissionable insurance products and services. Any commissions received for these activities are assigned to CRCM.

Item 6 - Supervision: As an Investment Advisor Representative of a registered investment advisory firm, Mr. Rosplock is ultimately governed by financial industry regulations imposed by the SEC and individual states where the Firm is registered to conduct advisory business. Leona Hoag of NBT Bank, N.A. has been designated as the Firm's CCO and supervises the day-to-day advisory activities of Mr. Rosplock. In this capacity, she conducts ongoing reviews of Mr. Rosplock's activities to ensure his compliance with industry regulations and the Firm's established policies and

procedures. Leona Hoag can be reached by telephone at (607) 337-6068 or by email at leona.hoag@nbtbank.com.

Arbitration Claims: No arbitration actions have been filed against Mr. Rosplock.

Self-Regulatory Organization or Administrative Proceeding: Mr. Rosplock has not been a party in any such proceedings.

Bankruptcy Petition: None.

Kathleen Bartlow

Chief Operations Officer, Investment Advisor Representative

Educational Background:

- Born 1955
- Post-Secondary Education
State University of New York/Binghamton (1980-1982)
- FINRA Securities Licenses:
Series 24 Series 7 Series 63
- Other Professional Licenses
Licensed in States of New York, North Carolina, Pennsylvania, Texas and Florida for life, health and fixed and variable annuity and insurance products.
- Professional Designations
Certified Funds Specialist (CFS) – Obtained 1994
Certified Financial Planner[®] (CFP) – Obtained 2003

Business Experience:

- October 2005 to Present Chief Operations Officer and Investment Advisor Representative of Columbia Ridge Capital Management, Inc., a SEC-registered investment advisory firm.
- October 1990 to December 2016 Registered Representative of Cadaret, Grant & Co., Inc., a FINRA and SIPC member securities broker/dealer.
- March 1992 to September 2005 Director of Research for Bay Ridge Group/Bay Ridge Advisors, a registered branch office of Cadaret, Grant & Co., Inc., a FINRA and SIPC member securities broker/dealer.
- March 1985 to October 1990 Registered Representative of Cheevers, Hand and Angeline, Inc., a FINRA and SIPC member securities broker/dealer.

Item 3 - Disciplinary Information: Ms. Bartlow has not been the subject of any financial industry-related disciplinary actions.

Item 4 - Other Business Activities: As previously stated, Ms. Bartlow is a licensed life insurance agent. She does not conduct any other outside business activities beyond her duties at CRCM.

Item 5 - Additional Compensation: As a licensed insurance agent, Ms. Bartlow may be compensated through separate and standard commissions for the sale of commissionable insurance products and services. Any commissions received for these activities are assigned to CRCM.

Item 6 - Supervision: As an Investment Advisor Representative of a registered investment advisory firm, Ms. Bartlow is ultimately governed by financial industry regulations imposed by the SEC and individual states where the Firm is registered to conduct advisory business. Leona Hoag of NBT Bank, N.A. has been designated as the Firm's CCO and supervises the day-to-day advisory activities of Ms. Bartlow. In this capacity, Leona conducts ongoing reviews of Ms. Bartlow's activities to ensure her compliance with industry regulations and the Firm's established policies and procedures. Leona Hoag can be reached by telephone at (607) 337-6068 or by email at leona.hoag@nbtbank.com.

Arbitration Claims: No arbitration actions have been filed against Ms. Bartlow.

Self-Regulatory Organization or Administrative Proceedings: Ms. Bartlow has not been a party in any such proceedings.

Bankruptcy Petition: None.

John E. Rice

Investment Advisor Representative

Educational Background:

- Born 1972
- Post-Secondary Education
Spring Hill College/Bachelor of Science-Accounting (1994)
- FINRA Securities Licenses:
Series 65
- Other Professional Licenses
None at this time.
- Professional Designations
No financial advisor-related designations at this time.

Business Experience:

- December 2017 to Present Investment Advisor Representative of Columbia Ridge Capital Management, Inc., a SEC-registered investment advisory firm.

- February 2016 to Present Regional Sales Consultant for EPIC Advisors, Inc., a retirement plan consulting firm headquartered in Rochester, New York.
- April 2001 to February 2016 Vice President (Institutional Sales) for Daily Access Corp., a third-party administrator firm headquartered in Mobile, Alabama.

Item 3 - Disciplinary Information: Mr. Rice has not been the subject of any financial industry-related disciplinary actions.

Item 4 - Other Business Activities: Mr. Rice continues to serve as a solicitor of new retirement plan clients for EPIC Advisors in addition to, yet separate from, his advisory role with CRCM. While Mr. Rice may receive compensation from EPIC for his solicitations, CRCM receives no portion of any such compensation he might receive.

Item 5 - Additional Compensation: As stated above, Mr. Rice may receive compensation from his Outside Business Activities which are unrelated to his role at CRCM.

Item 6 - Supervision: As an Investment Advisor Representative of a registered investment advisory firm, Mr. Rice is ultimately governed by financial industry regulations imposed by the SEC and individual states where the Firm is registered to conduct advisory business. Leona Hoag of NBT Bank, N.A. has been designated as the Firm's CCO and supervises the day-to-day advisory activities of Mr. Rice. In this capacity, Leona conducts ongoing reviews of Mr. Rice's activities to ensure his compliance with industry regulations and the Firm's established policies and procedures. Leona Hoag can be reached by telephone at (607) 337-6068 or by email at leona.hoag@nbtbank.com.

Arbitration Claims: No arbitration actions have been filed against Mr. Rice.

Self-Regulatory Organization or Administrative Proceedings: Mr. Rice has not been a party in any such proceedings.

Bankruptcy Petition: None.