



## **Continuum Wealth Advisors, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 19, 2020**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Continuum Wealth Advisors, LLC ("Continuum" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (518) 583-4050 or by email at [info@contwealth.com](mailto:info@contwealth.com).

Continuum is a registered investment advisor with the U.S. Securities and Exchange Commissions ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Continuum to assist you in determining whether to retain the Advisor.

Additional information about Continuum and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or firm CRD# 152895.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Continuum. For convenience, the Advisor has combined these documents into a single disclosure document.

Continuum believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Continuum encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of Continuum.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 152895. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (518) 583-4050 or by email at [info@contwealth.com](mailto:info@contwealth.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Continuum Wealth Advisors, LLC (“Continuum” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. Continuum was founded in 2010, and is owned and operated by Timothy Smith (Chief Executive Officer and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Continuum.

### **B. Advisory Services Offered**

Continuum offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans, and businesses (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Continuum’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

Continuum may provide Clients with wealth management services, which generally includes a broad range of comprehensive financial planning services in connection with discretionary management of investment portfolios. These services are described below.

*Investment Management Services* – Continuum provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary or non-discretionary investment management and related advisory services. Continuum works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Continuum will then construct a portfolio primarily consisting of mutual funds, exchange-traded funds (“ETFs”), individual debt and equity securities, and/or independent investment managers (“Independent Managers”) to achieve the Client’s investment goals. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Continuum’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Continuum will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Continuum evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Continuum may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Continuum may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Continuum may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Continuum accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. For additional information, please see Item 15 – Custody and Item 12 – Brokerage Practices.

*Use of Independent Managers* – When deemed to be in the Client's best interest, Continuum will recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers (herein "Independent Manager[s]"). In certain instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Independent Manager[s] will have investment discretion over the Client's account[s], but may allow the Client to impose reasonable investment restrictions. The Advisor will assist and advise the Client in establishing investment objectives for their account[s], the selection of the Independent Manager[s], and defining any restrictions on the account[s]. Continuum will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities of the Independent Manager[s]. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A – Disclosure Brochure (or a brochure that makes the appropriate disclosures).

*Financial Planning Services* – Continuum will typically provide a variety of financial planning services to Clients as a part of its wealth management services. Financial plans are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Continuum may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction[s] through the Advisor.

#### 401(k) and Profit Sharing Plan Platform

Continuum will provide fiduciary and non-fiduciary services to plans. Continuum will work with plan sponsors and third-party administrators to ensure that the objectives for the plan participants are achieved. Non-discretionary investment advice regarding asset classes and investment alternatives available for the plan will be provided to the plan sponsor in accordance with the plan's investment policies and objectives. However, it is up to the plan sponsor to make the final decisions regarding the initial selection, retention, removal and/or addition of investment options.

On a participant level, Continuum will assist in group enrollment meetings designed to increase retirement plan participation, as well as, conduct investment educational meetings to aid in the financial understanding by the employees. At least annually, individualized consulting will be provided to existing plan participants to discuss retirement goals and recommendations for ongoing investment allocations. Continuum acts as the client relationship manager for plan participants, providing information and answering questions including, but not limited to, account balances, loans, beneficiary designations and rollovers. They act as the liaison, when needed, with the third-party administrator.

## C. Client Account Management

Prior to engaging Continuum to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Continuum, in connection with the Client, will develop a strategy to achieve the Client's goals and objectives.
- Asset Allocation – Continuum will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Continuum will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Continuum will provide investment management and ongoing oversight of the Client's investment portfolio.

## D. Wrap Fee Programs

Continuum does not manage or place Client assets into a wrap fee program.

## E. Assets Under Management

As of December 31, 2019, Continuum manages approximately \$131,777,000 in Client assets, \$129,424,000 of which are managed on a discretionary basis and \$2,353,000 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more agreements with the Advisor.

### A. Fees for Advisory Services

#### Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined investment advisory fees for investment management and financial planning. Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 0.30% to 1.00% annually based on the following schedule:

Assets Under Management	Annual Rate
Up to \$1,000,000	1.00%
\$1,000,001 to \$1,500,000	0.90%
\$1,500,001 to \$2,500,000	0.70%
\$2,500,001 to \$3,500,000	0.50%
\$3,500,001 to \$5,000,000	0.35%
\$5,000,001 and over	0.30%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Continuum will be independently valued by the Custodian. Continuum will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

*Use of Independent Managers* – As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

#### 401(k) and Profit Sharing Plan Platform

Fees for employer-sponsored plans are based on assets under management as negotiated with the Plan Sponsor and typically range up to 0.50% of plan assets under management. The stated fees are charged quarterly in advance or arrears, based on the market value of the total plan assets and pursuant on the terms of the investment advisory agreement.

All internal fees charged by ETFs, mutual funds and closed end funds are separate and distinct from the fees charged by Continuum. Continuum does not at any time act as the custodian or third-party administrator for any retirement plan or employer sponsored plan Client.

### **B. Fee Billing**

#### Wealth Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Continuum at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Continuum directly from their accounts held by the Custodian as part of the agreement and separate account forms provided by the Custodian.

*Use of Independent Managers* – For Client accounts implemented through an Independent Manager, the Client's overall fees will include Continuum's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

#### 401(k) and Profit Sharing Plan Platform

Similar to wealth management services described above, investment advisory fees will either be automatically deducted from the Client account by the Custodian or may be invoiced to the Client and paid by check or other method. If directly deducting, the Client authorizes the plan's custodian or record keeper to remit the fees directly to the Advisor from the plan's assets and the Advisor shall send an invoice to the plan's custodian indicating the amount of the fees to be deducted from the Client Account[s] at the respective quarter end date. The amount due in all cases is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Continuum at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients may provide written authorization permitting Continuum to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Continuum, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and



conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The investment advisory fee charged by Continuum is separate and distinct from these custody and execution fees.

In addition, all fees paid to Continuum for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Continuum, but would not receive the services provided by Continuum which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Continuum to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Wealth Management Services

Continuum is compensated for its services in advance of the quarter in which wealth management services are rendered. Either party may terminate the investment advisory agreement with Continuum, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's agreement with the Advisor is non-transferable without the Client's prior consent.

*Use of Independent Managers* – In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. Continuum will assist the Client with the termination and transition as appropriate.

##### 401(k) and Profit Sharing Plan Platform

Continuum is compensated for its 401(k) and profit sharing plan services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement with Continuum, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Continuum does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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Continuum does not charge performance-based fees for its investment advisory services. The fees charged by Continuum are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Continuum does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.



## **Item 7 – Types of Clients**

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Continuum provides investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans, and business entities. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Continuum generally requires a minimum relationship size of \$100,000. The minimum relationship size may be waived at the sole discretion of the Advisor. Additionally, certain Independent Managers may impose minimums for their investment strategies.

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

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### **A. Methods of Analysis**

Continuum primarily employs fundamental analysis in developing investment strategies for its Clients. Research and analysis from Continuum are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Continuum generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Continuum will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Continuum may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Continuum will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

#### **Market Risks**

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## Item 9 – Disciplinary Information

**There are no legal, regulatory or disciplinary events involving Continuum or its owner.** Continuum values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider with whom the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and can be found by searching with the Advisor's firm name or firm CRD# 152895.

## Item 10 – Other Financial Industry Activities and Affiliations

### Insurance License

Certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with Continuum. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Advisory Persons are not required to offer the products of any particular insurance company. Clients are under no obligation to implement any recommendations made by an Advisory Person or the Advisor.

### Continuum Tax Advisors, LLC

Mr. Smith also owns Continuum Tax Advisors, LLC ("Continuum Tax"), an affiliated entity that provides tax preparation services to Clients. Tax preparation services are separate and distinct from the advisory services offered to Clients and based on the unique needs of each Client. The time devoted to tax preparation generally increases during tax season. Clients are not obligated to engage Continuum Tax for these services in order to have an advisory relationship with the Advisor.

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

### **A. Code of Ethics**

Continuum has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Continuum ("Supervised Persons"). The Code of

Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Continuum and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Continuum Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (518) 583-4050 or via email at [info@contwealth.com](mailto:info@contwealth.com).

#### **B. Personal Trading with Material Interest**

Continuum allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Continuum does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Continuum does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

Continuum allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Continuum have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Continuum requiring reporting of personal securities trades pursuant to its Code of Ethics. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While Continuum allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Continuum, or any Supervised Person of Continuum, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

Continuum does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Continuum to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Continuum does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Continuum does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker-dealer/custodian not recommended by Continuum. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Continuum may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. Continuum will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab") a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Continuum maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Continuum does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Continuum does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Continuum will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Continuum will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Continuum will execute its transactions through the Custodian as directed by the Client. Continuum may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by members of the Investment Review Committee of Continuum. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Continuum if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by Continuum**

#### Participation in Institutional Advisor Platform

Continuum has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Continuum. As a registered investment advisor participating on the Schwab Advisor Services platform, Continuum receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services to Continuum that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Continuum believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

### **B. Client Referrals from Solicitors**

Continuum does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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Continuum does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct Continuum to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Continuum to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

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Continuum generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to

by Continuum. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an agreement containing all applicable limitations to such authority. All discretionary trades made by Continuum will be in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

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Continuum does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither Continuum, nor its management, have any adverse financial situations that would reasonably impair the ability of Continuum to meet all obligations to its Clients. Neither Continuum, nor any of its advisory persons, have been subject to a bankruptcy or financial compromise. Continuum is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.





## **Form ADV Part 2B – Brochure Supplement**

**for**

**Timothy Smith, AAMS®  
Chief Executive Officer and Chief Compliance Officer**

**Effective: March 19, 2020**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Timothy Smith (CRD# 2412402) in addition to the information contained in the Continuum Wealth Advisors, LLC ("Continuum" or the "Advisor", CRD # 152895) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Continuum Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (518) 583-4050.

Additional information about Mr. Smith is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2412402.

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## Item 2 – Educational Background and Business Experience

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Timothy Smith, born in 1967, is dedicated to advising Clients of Continuum as its Chief Executive Officer and Chief Compliance Officer. Mr. Smith attended Memphis State University and St. Rose College. In addition, Mr. Smith completed the Accredited Asset Management Specialist certification in 2004. Additional information regarding Mr. Smith's employment history is included below.

### Employment History:

Chief Executive Officer and Chief Compliance Officer, Continuum Wealth Advisors, LLC	01/2010 to Present
President, Sage Wealth Management, Inc.	11/2001 to 12/2009
Registered Representative, M Holdings Securities, Inc.	08/2009 to 11/2009
Registered Representative, Prime Capital Services, Inc.	07/2007 to 08/2009

### Accredited Asset Management Specialist<sup>SM</sup> or AAMS<sup>®</sup>

Individuals who hold the AAMS<sup>®</sup> 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 adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

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## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Smith.*** Mr. Smith has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Smith.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Smith.***

However, the Advisor does encourage you to independently view the background of Mr. Smith on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2412402.

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## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Smith is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Smith's role with Continuum. As an insurance professional, Mr. Smith will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Smith is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Mr. Smith is not required to offer the products of any particular insurance company. Clients are under no obligation to implement any recommendations made by Mr. Smith or the Advisor.

### Continuum Tax Advisors, LLC

Mr. Smith is also owner of Continuum Tax Advisors, LLC ("Continuum Tax"), an affiliated entity that provides tax preparation services to Clients. Tax preparation services are separate and distinct from the advisory services offered to Clients and based on the unique needs of each Client. The time devoted to tax preparation generally increases during tax season. Clients are not obligated to engage Continuum Tax for these services in order to have an advisory relationship with the Advisor.

#### **Item 5 – Additional Compensation**

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Mr. Smith has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Smith serves as the Chief Executive Officer and Chief Compliance Officer of Continuum. Mr. Smith can be reached at (518) 583-4050.

Continuum has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Continuum. Further, Continuum is subject to regulatory oversight by various agencies. These agencies require registration by Continuum and its Supervised Persons. As a registered entity, Continuum is subject to examinations by regulators, which may be announced or unannounced. Continuum is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jennifer L. Henry  
Portfolio Services Manager**

**Effective: March 19, 2020**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Jennifer L. Henry (CRD# 2899719) in addition to the information contained in the Continuum Wealth Advisors, LLC ("Continuum" or the "Advisor", CRD # 152895) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Continuum Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (518) 583-4050.

Additional information about Ms. Henry is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2899719.

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## Item 2 – Educational Background and Business Experience

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Jennifer L. Henry, born in 1974, is dedicated to advising Clients of Continuum as a Portfolio Services Manager. Ms. Henry earned a BS in Mathematics from Hartwick College in 1996. Additional information regarding Ms. Henry's employment history is included below.

### Employment History:

Portfolio Services Manager, Continuum Wealth Advisors, LLC	01/2010 to Present
Portfolio Services Manager, Sage Wealth Management, Inc.	08/1997 to 12/2009
Registered Representative, M Holdings Securities, Inc.	08/2009 to 11/2009
Registered Representative, Prime Capital Services, Inc.	07/2007 to 08/2009

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## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Henry.*** Ms. Henry has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Henry.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Henry.***

However, the Advisor does encourage you to independently view the background of Ms. Henry on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2899719.

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## Item 4 – Other Business Activities

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Ms. Henry is dedicated to the investment advisory activities of Continuum's Clients. Ms. Henry does not have any other business activities.

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## Item 5 – Additional Compensation

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Ms. Henry is dedicated to the investment advisory activities of Continuum's Clients. Ms. Henry does not receive any additional forms of compensation.

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## Item 6 – Supervision

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Ms. Henry serves as a Portfolio Services Manager of Continuum and is supervised by Timothy Smith, the Chief Compliance Officer. Mr. Smith can be reached at (518) 583-4050.

Continuum has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Continuum. Further, Continuum is subject to regulatory oversight by various agencies. These agencies require registration by Continuum and its Supervised Persons. As a registered entity, Continuum is subject to examinations by regulators, which may be announced or unannounced. Continuum is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Charles J. Mopsik**  
**Director of Advanced Planning**

**Effective: March 19, 2020**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Charles J. Mopsik (CRD# 5185894) in addition to the information contained in the Continuum Wealth Advisors, LLC ("Continuum" or the "Advisor", CRD# 152895) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Continuum Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (518) 583-4050.

Additional information about Mr. Mopsik is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5185894.



## Item 2 – Educational Background and Business Experience

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Charles J. Mopsik, born in 1984, is a Director of Advanced Planning for Continuum. Mr. Mopsik earned a Bachelor of Arts from Skidmore College in 2006. Additional information regarding Mr. Mopsik's employment history is included below.

### Employment History:

Director of Advanced Planning, Continuum Wealth Advisors, LLC	10/2018 to Present
Investment Advisor Representative and Registered Representative, Transamerica Financial Advisors, Inc.	02/2014 to 12/2016
Manager and Financial Analyst, Pet Partners LLC	04/2012 to 07/2018
Investment Advisor Representative and Registered Representative, Northwestern Mutual Investment Services LLC	07/2011 to 02/2012
Registered Representative, M Holdings Securities, Inc.	08/2009 to 11/2009
Financial Analyst, Sage Wealth Management, Inc.	07/2007 to 11/2009
Registered Representative, Prime Capital Services, Inc.	07/2007 to 08/2009

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Mopsik.*** Mr. Mopsik has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Mopsik.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Mopsik.***

However, the Advisor does encourage you to independently view the background of Mr. Mopsik on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5185894.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Mopsik is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Mopsik's role with Continuum. As an insurance professional, Mr. Mopsik will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Mopsik is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Mr. Mopsik is not required to offer the products of any particular insurance company. Clients are under no obligation to implement any recommendations made by Mr. Mopsik or the Advisor.

### Owner – Nimble Nano, Inc.

Mr. Mopsik is also an owner for Nimble Nano Inc., a manufacturer and seller of a line of magnetic aquarium glass cleaners. This activity takes up less than 10% of Mr. Mopsik's time and revenue.

### Veterinary Consulting

Mr. Mopsik is also veterinary consultant, offers consulting services to veterinary business owners who are considering or actively selling their business. This activity takes up less than 10% of Mr. Mopsik's time and revenue.

#### **Item 5 – Additional Compensation**

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Mr. Mopsik has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Mopsik serves as a Director of Advanced Planning of Continuum and is supervised by Timothy Smith, the Chief Compliance Officer. Mr. Smith can be reached at (518) 583-4050.

Continuum has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Continuum. Further, Continuum is subject to regulatory oversight by various agencies. These agencies require registration by Continuum and its Supervised Persons. As a registered entity, Continuum is subject to examinations by regulators, which may be announced or unannounced. Continuum is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective date: March 19, 2020

### Our Commitment to You

Continuum Wealth Advisors, LLC ("Continuum" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Continuum (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Continuum does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Continuum does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Continuum or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Continuum does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (518) 583-4050 or via email at [info@contwealth.com](mailto:info@contwealth.com).