



Form ADV Part 2A
Firm Disclosure and Privacy Policy
November 3, 2021

This brochure provides information about the qualifications and business practices of Continental Investors Services. If you have any questions about the contents of this brochure, please contact us at 360-423-5110 or mkamp@cisinvest.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. The term investment advisor does not imply a certain level of skill or training. Additional information about Continental Investors Services also is available on the SEC's website at www.adviserinfo.sec.gov.

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Material Changes

This Brochure has been prepared for you for information on your Investment Advisor Representative (“Representative”) and Continental Investors Services, Inc. (“Continental”), a registered investment advisor with the Securities & Exchange Commission.

In the future, this section will discuss specific material changes that are made to the Brochure and provide clients with a summary of such changes. Following the SEC and state rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. During the most recent calendar year the firm has modified its Form ADV to reflect changes in assets under management and juris

If you would like additional information about Continental or the Representative, please contact us at www.cisinvest.com or (800) 525-0181, or through the SEC’s website at www.adviserinfo.sec.gov.

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Advisory Business – Item 4

A - Continental Investors Services, Inc. (“Continental”) has been providing financial services to the investment community since 1991, primarily as a broker-dealer registered with the U.S. Securities and Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA). In an effort to continue a high level of service to clients through its Investment Advisor Representatives (“Representatives”) Continental filed for registration as a Registered Investment Advisor in 2012. Continentals Continental is owned by three shareholders. Max Kamp owns 53%, Betty Jane Trembley owns 38%, and Jay Marsh owns 9%.

B – Our services offered include Portfolio Management for Individuals and / or small business and Portfolio Management for non-profit organizations. The firm does not create its own model portfolios but rather offers a variety of Charles Schwab Based Envestnet Portfolios or Separately Managed Accounts through Zachs Investment Management (Zachs), the specifics of Charles Schwab and Zachs models available are listed in the offering documents that must be reviewed prior to investing. Variance in services that may constitute the basis for a negotiated fee includes additional time to create a custom portfolio for a Separately Managed Account for a Hospital or other non-profit organization that desires a portfolio not composed of ETFs through Schwab / Envestnet.

Your Representative will provide financial advice, asset management or investment management services on a discretionary basis for a fee based on a percentage of assets under management. In all cases, your investments will be tailored to match your objectives and time horizon. The representative makes the recommendation as to which model the customer will use depending on suitability and objectives.

Our investment advice is tailored to meet our clients’ needs and investment objectives using suitability information collected from clients, including time horizon, financial needs, etc. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance and other relevant information (the “suitability information”) at the beginning of our advisory relationship to determine the best investments for your needs. We will use the suitability information we gather to recommend an initial portfolio to you.

As part of our portfolio management services, we may customize an investment portfolio for you in accordance with your risk tolerance and investing objectives or we may also invest your assets using a predefined strategy or one or more model portfolios. Once we construct an investment portfolio or select a model portfolio for you, we will periodically monitor and rebalance/reallocate the portfolio as per our agreement with you.

We offer access to multiple managers and allocation services through separate account management platforms. Based on your needs and suitability, we may recommend or select various account management platforms to manage all, or a portion of your assets. Each platform includes access to sub-managers.

Advisory options include:

- Schwab Intelligent Portfolio Platform – Offers seven models with risk tolerances ranging from Conservative to Aggressive. After a risk tolerance profile is completed, a suitable model is selected for the client and invested accordingly. Models are rebalanced automatically on a continual basis.

- Envestnet Platform – Offers a wide variety of portfolio models. After a risk tolerance profile is completed, a suitable model is selected for the client and invested accordingly. Management fees will vary depending on the model.
- Separately Managed Accounts (SMAs) on Schwab Advisor Platform – Offers seven models ranging from Conservative to Aggressive. Models are rebalanced monthly. After a risk profile is completed, a suitable model is selected for the Client and invested accordingly. There are no additional transaction or other fees outside of management fee.
- Separately Managed Accounts (SMAs) – Bond Ladder portfolio. A markup or markdown is charged on a per transaction basis. No additional management or advisory fees are charged.

Investors may not impose restrictions on investing in certain securities or types of securities.

C – The firm tailors services to the individual needs of clients to the extent it assists clients in selecting portfolios offered by Charles Schwab that are most appropriate to a client's specific suitability needs. It is important for you to provide your Representative with information on your investment goals, time before you will need to use your investments, and any other information that might impact the types of investments recommended by your Representative. Representatives will learn about your investment objectives and time horizon through a variety of means, including interviews or questionnaires. All account investment options are tailored to meet the suitability needs of each client.

D - The firm does not participate in any wrap fee program.

E - As of 10-05-2021 Continental has 553 accounts under management on a discretionary basis totaling \$97,586,000. Firm maintains no accounts on a non-discretionary basis.

If you have a retirement plan ("Plan") with Continental, services may include:

- Portfolio management for individuals and / or small businesses
- Portfolio management for non-profit organizations

Fees and Compensation – Item 5

A - Fees for services will be based on the amount of assets you have managed by the Representative. You will be provided an advisory agreement that will outline the investment management services to be provided by Continental, as well as a description of the fees charged. Your advisory fees will be automatically deducted from your account by Continental or the custodian of your account on a quarterly basis. The fee will be charged in arrears or in advance based on the platform selected. Accounts with fees deducted in advance and closed before quarter-end will be pro-rated and refunded.



All fees charged by Continental for investment management services are separate and distinct from the fees and expenses charged by mutual funds and exchange traded funds (ETFs). In these cases, the fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Accordingly, you should review both the fees charged by the funds/ETFs and the fees charged by Continental to fully understand the total amount of fees to be paid. Additionally, the investments selected for you are not exclusively available to Continental, and could be obtained through other firms. The fee for the effective period is determined by the total billable assets, multiplied by the annual fee rate divided by the number of days in the current year, and multiplied by the number of days in the effective period. Advisor shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of the client.

Fees to be charged are shown on the advisory agreement but the standard advisory fee rate for non-ERISA accounts may vary depending on model and custodian of assets being managed. Fees may be lowered or waived for clients (depending on the bargaining power or investment sophistication level), family and friends of the Representative. For ERISA plans, the standard fee may be lower or higher depending on the requirements of the client, number of participants, asset level of the plan, complexity of the Plan, etc. Fees for separately managed institutional (ie non-profit) account are negotiated as these types of services required more time to manage than ETF based portfolio options through Schwab / Envestnet. At no time will clients pay a combined fee of more than 1.25%.

Asset Management Fees

- Schwab Intelligent Portfolio: 1.1% (1% to Adviser, 0.1% platform fee) Billed quarterly in arrears.
- Third party management through Envestnet (1% to Adviser, 0.1 – 0.2 platform fee) depending on which third party money manager is chosen. Factors that contributing to variability in the Envestnet platform fee include trading frequency and account turnover rates in sub account options) Envestnet platform fees are not negotiable to Continental and are set by Envestnet. Billed quarterly in advance.
- Separately managed accounts: .75% to Adviser (to a maximum of 1.25%), no platform fee. Billed quarterly in arrears.
- Non-discretionary advice to Retirement plans: 0.75% to Adviser. Billed quarterly in arrears

With respect to a Separately managed account the fee for the effective period is determined by the total billable assets, multiplied by the annual fee rate divided by number of days in the current year, and multiplied by the number of days in the effective period. Representatives of the firm involved in Insurance activities do not receive economic benefit from third party insurance companies including incentives, marketing allowances, and other practical support or benefits from the sale for insurance products and their sponsors..

B - We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities, clients may choose which option they prefer. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. The qualified custodian will deliver an account statement to you at least quarterly. You should review all statements for accuracy.

C - In addition to Continental's Advisory Fees, you are also responsible for the transaction charges, fees and other expenses charged and imposed by the firm who holds your assets (Custodian). In the event you or Continental terminates the advisory agreement during a quarter, the fee is pro-rated for the portion of the quarter where services were provided. The termination date used is the date Continental or Client notifies the other party in writing (to address of record) of the termination. In the event the account is not available for electronically debiting the fee, Client agrees to pay the invoice for the partial quarter within 30 days of receipt. You may terminate this agreement within five (5) business days of the effective date of your agreement without any penalty or fees.

Most Continental Representatives are also Registered Representatives with the broker-dealer of Continental Investors Services, Inc. ("BD"), a FINRA member broker/dealer. Continental is both a broker dealer and an investment advisor. The Representative may recommend to clients or take an order from a client to sell or purchase securities or insurance products, which may produce additional compensation (commissions) for the Representative. This can create a conflict of interest in that there may be a financial incentive to recommend one product over another based on the amount of commissions paid. The investments, accounts, and services offered by the BD are separate and distinctly different from the investment advisory services offered by Continental, even though the values of these investments may be shown on your advisory custodian statement. If you determine that you would like to have your brokerage investment(s) moved to an advisory account it is possible that Continental will receive an advisory fee on investments that previously paid a commission. Lower fees from comparable services may be available from other sources.

D – Clients pay fees (as described above) in advance and may receive a refund by calling their investment advisor representative and placing a refund request if the contracted is terminated prior to the end of the billing period. Refunds are calculated on a pro rate basis of remaining quarterly billing cycle.

E. Advisors do not accept compensation for the sale of securities, or other investment products.



Performance Based Fees – Item 6

Continental does not manage advisory services in a performance-based fee structure. Fees are calculated based on your asset level.

Types of Clients – Item 7

Most of Continental Representatives' clients are individuals, small businesses, and non-profits. The minimum account size for an advisory account size is \$25,000.



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

A - While the methods of analysis are constantly evolving, many decisions and recommendations are made using the following:

- Quantitative Analysis: The material risks associated with Quantitative analysis include imperfections, limitations or inaccuracies in data that could affect the accuracy of the analysis. Quantitative analysis

methods cannot guarantee nor predict any level of performance nor that any client will avoid a loss of account assets.

- Qualitative Analysis (QA) in finance is an approach that emphasizes mathematical and statistical analysis to help determine the value of a financial asset, such as a stock or option. Quantitative trading analysts (also known as "quants") use a variety of data—including historical investment and stock market data—to develop trading algorithms and computer models.

To perform qualitative analysis Continental must rely on security and market information. Continental has no control over the dissemination rate of market information; therefore, unbeknownst to Continental certain analyses may be compiled with outdated market information, severely limiting the value of the analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities. Qualitative analysis methods cannot guarantee nor predict any level of performance nor that any client will avoid a loss of account assets.

- Modern Portfolio Theory – is a mathematical framework for assembling a portfolio of assets such that the expected return is maximized for a given level of risk. It is a formalization and extension of diversification in investing, the idea that owning different kinds of financial assets is less risky than owning only one type. Its key insight is that an asset's risk and return should not be assessed by itself, but by how it contributes to a portfolio's overall risk and return. It uses the variance of asset prices as a proxy for risk.

Modern Portfolio Theory cannot guarantee nor predict any level of performance nor that any client will avoid a loss of account assets. Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

- Investment Scoring Analysis – Investment analysis is a broad term for many different methods of evaluating investments, industry sectors, and economic trends. It can include charting past returns to predict future performance, selecting the type of investment that best suits an investor's needs, or evaluating individual securities such as stocks and bonds to determine their risks, yield potential, or price movements.

Continental may employ a proprietary or a third-party system that scores investments based on quantitative methods. This scoring may be used in the analysis of investments to a desired performance level. Investment Scoring Analysis techniques using quantitative models perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models. Investment Scoring Analysis relies on data and information where Continental has no control over the accuracy or rate of dissemination. Investment Scoring Analysis methods cannot guarantee nor predict any level of performance nor that any client will avoid a loss of account assets.

Continental has the ability to construct your portfolio using a wide variety of investments, including stocks, bonds, exchange traded funds, mutual funds, closed end funds, unit investment trusts, and other investments available through the brokerage firm where your assets are held in custody. Additionally, a large cash position may be utilized, the value of which is included in the calculation of your advisory fee. However, there will be no charge for static cash position held in your portfolio. Various investment strategies may be used: Long Term

Purchases – investments purchased with the expectation to hold the position over a long period of time, typically longer than one year. Short Term Purchases – investments purchased with the expectation that the will be quickly sold within a short time period.

B - Investing has various risks as all investments have the risk of losing value. Some investments have the risk of defaulting on interest or principal payments. Investors are also faced with the risk that inflation will outpace the returns of the investment, which lowers the purchasing power of that investor. Rebalancing your portfolio may cause taxable events, which could raise your taxes. Investing in options incurs the risk of the option expiring as well as going down in value. It is important that you understand that there are numerous risks associated with your investments. Please discuss any concerns you have with risks with your Representative.

Third party advisers or sub managers on the Schwab / Evnestnet Platform do have a risk profile to the extent their actions are not directly controlled by Continental. This risk is mitigated by regulatory oversight of the sub advisor and the fact Continental reviews investment decisions of the advisor which are compared to client suitability standards. Advisor created portfolio models may yield less than expected results due to market conditions, unforeseen events, currency fluctuations, human error, geopolitical events, and other circumstances that can not be anticipated ahead of time.

C – Continental does not utilize leveraged or inverse ETFs as part of its portfolio construction.

Disciplinary Information – Item 9

As a Registered Investment Advisor, Continental is required to disclose material facts regarding legal or disciplinary events that would be material to an evaluation of Continental or its Representatives. Continental has not been the subject of any criminal, civil or other disciplinary actions directly related to its investment advisory business.



Since being a registered since 1991, there are three issues to disclose that have occurred with Continental's broker-dealer ("BD"), which may or may not include advisory clients. During an audit in 2011, FINRA determined that 9 transactions out of several hundred were executed during the financial crisis of 2008 were at higher than market levels at the time. While there was extreme volatility in the markets at this time the firm was found to be violation of MSRB Rules G-17, G-27, and G30 (A) and sanctioned \$35,000.

In 2000 the BD inadvertently affected a client transaction in the State of New Mexico prior to being registered in the State of New Mexico due to misinterpretation of New Mexico de minimis registration requirements. Upon being made aware of the oversight in September 2003 the firm registered with the State of New Mexico, paid a penalty of \$500 and made a rescission offer to the firm's client who was a resident in the State of New Mexico.

During 2003 the BD was fined after experiencing technical difficulties reporting 734 TRACE eligible securities within 75 minutes of execution. No client complaints or losses were associated with the violations.

If you would like further information, please call (800) 525-0181.

Other Financial Industry Activities and Affiliations – Item 10



A - As mentioned above, Continental is both a broker dealer and registered investment advisor which share a common CRD number 29775. It is possible that Representatives may have non-advisory income producing activities from the sale of life insurance.

Continental's primary business is a full service brokerage firm, incorporated in Washington, with a discount division and a Fixed Income trading desk. Representatives may hold a life insurance license enabling them to sell life insurance and fixed annuities. Northwest Financial Services is an insurance agency completely owned and operated by Max Kamp, CEO, President and Chief Compliance Officer of Continental where he spends less than 5% of his time offering insurance products. Should an investment advisory client wish to purchase life insurance from Continental or its Representatives with assets that are not advisory assets, the client will pay the premium or commission on those assets that are separate

and distinct from any advisory fees paid on advisory assets. In addition, clients must be aware that annuities have surrender fees, as well as upfront commissions paid. Continental may receive trailers from the sale of insurance products. Neither Continental nor any of its associates will be registered, or apply to be registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities. Continental does not utilize third-party investment advisers but if they did it would only be after ensuring the third party advisers are properly licensed or reported.

Sale of Life Insurance products presents a conflict of interests as the sale of insurance products and/or services can generate additional income for the investment adviser. Continental addresses this conflict of interest by advising clients of the income from Insurance prior to a transaction and advising of other investment options.

B – Continental does not recommend investment advisors outside from the above referenced relationships with Schwab, Envestnet, and Zachs none of which it receives compensation from.

Max Kamp donates approximately 4-5 hours a month as an Advisory Board Member of the Southwest Washington Community Foundation.

Code of Ethics, Participation or Interest in Client Transactions, Personal Securities Accounts – Item 11

A - Continental is committed to conducting its business affairs honestly and in an ethical manner. This Code of Ethics (“Code”) provides a general statement of the expectations of Continental regarding the ethical standards that each director, officer and employee should adhere to while acting on behalf of Continental. It does not cover every issue that may arise, but it sets out basic principles to guide all employees, officers and directors of Continental. At no time does a Continental representative recommend to client’s securities in which the Adviser or a related person has a material financial interest. No Continental representative engages in Principal transactions with client accounts or agency cross transactions.



B – Continental Advisers & their related person does not invest in the same securities as clients nor does it recommend held securities to clients of the firm. An example of a materiality exception to this policy might involve a scenario where a representative of the firm might own an immaterial amount of shares in a publicly held company such as Apple and recommend another immaterial amount of shares in Apple to be purchased by a client.


C - All employees, officers and directors must conduct themselves in accord with this Code of Ethics and seek to avoid even the appearance of improper behavior. This Code of Ethics applies to all officers, full and part time employees, contract workers, consultants, directors and anyone who conducts business with Continental. Conduct in violation of this policy is unacceptable and any person who violated this Code will be subject to disciplinary action, up to and including termination of his/her employment or engagement. A copy of our Code of Ethics is available upon request by calling us at (360) 423-5110.

If you open an account with Continental who is both a broker dealer and a registered investment advisor, trades may generate commissions from a broker dealer transaction which is different than fee based payments made in connection with the Investment Advisory side of the business. It is the policy of Continental to permit the firm, its employees, and Representatives to buy, sell, and hold the same securities that the Representative also recommends to clients. It is acknowledged and understood that Continental performs investment services for various clients with varying investment goals and risk profiles. As such, the investment advice may differ between clients. Continental will have no obligation to recommend for purchase or sale a security which Continental, its principals, affiliates, employees, or Representatives may purchase, sell, or hold. When a decision is made to trade a security from all applicable accounts, priority is always given to the client’s orders, although there are no internal trading rules that state the client orders must be before or after trades of a Representative. This may

result in different execution prices for the client that may be higher or lower than the price received or paid by the Representative.

A trade may be made in a customer's broker dealer account at the BD and generate commissions for the broker dealer. The RIA and BD both have different custodians over which Continental has no control. One for the transactional business (commissions) and one for the fee business (fees). Continental Investors Services, Inc. does not have custody of any accounts, advisory or BD. BD accounts are under the custody of the BD's clearing firm and managed accounts are under a separate custodian agreement. The two accounts do not have the same custodian.

Brokerage Practices – Item 12



A - All transactions enacted by your Representative are made through the Custodian you have selected. The Custodian holds your assets and provides the trading and custody platform used by the Representative. Neither Continental nor your Representative has the authority to determine which brokers or Custodians its clients use or the fees that they charge. Continental does not engage in research, soft dollar benefits, brokerage for client referrals, or directed brokerage.

B - However, for reasons of familiarity and efficiency Representatives tend to recommend a single Custodial location for clients. Factors used to determine which Custodian to recommend include trading costs, electronic access to trading and client accounts, discounts on software, products and services, compliance, research and technology and other operational support that may benefit Continental or the Representative, but not you. This could create a conflict that the recommendation of the Custodian is based on the research and products or services and not based on the Custodian providing the best execution for transactions in your accounts. The Custodian recommended by Advisor for non-ERISA accounts is Charles Schwab & Co., Inc. (Schwab) is an independent and unaffiliated broker-dealer that also provides custodial services for assets on the Envestnet platform. Continental does not permit clients to direct brokerage services.

In some cases, Continental or the Representative may aggregate or block trade multiple client accounts. Doing so allows some efficiency in the transactions, although it does not ensure you will receive a reduction in trading costs or a better execution price than if your trade was enacted separately. Cost efficiencies lost from not aggregating block trades vary but will generally be higher than non-aggregated account transactions.

C – The firm does not engage in soft dollar arrangements.

Review of Accounts – Item 13

A - Accounts are reviewed by the Representative on a periodic basis. Each transaction in a client account triggers a review of the account by the representative of the account. Clients may request other reviews as the personal circumstances dictate. All representatives review their client accounts on an annual basis with a centralized review of activity based accounts on an annual basis by the firm's Chief Compliance Officer.

B - Triggers for reviews could include economic or market activity, life changes indicated by the client, client requests, or other factors. Continental may provide you with reports which may have a different value than statements provided by the Custodian. Annual Compliance reviews also entail random account selection for suitability review. This difference could be attributed to trade date versus settlement date reconciliations or accrued interest. Please rely on the Custodian statement for the value of your account. We ask that you immediately contact your Representative if any material changes occur in your personal financial situation, such as a loss of a job, illness, inheritance, or any other factor that could materially change your investment objectives and/or risk tolerance.

C - Additionally, all accounts will be monitored under current FINRA/SEC Broker/Dealer

guidelines. Quarterly reports from the custodian are delivered to clients, spot checks will occur by Max Kamp to ensure the accuracy of the reports from the Custodian.

Representative activities are reviewed and supervised by the Continental home office. Reviews are conducted on a regular basis and will be completed by Max Kamp, the Chief Compliance Officer. The review includes the pre-approval of new accounts, the appropriateness of the investments and the general activities of the accounts. Reports are not distributed to clients. For questions on supervision of Representatives, please call us at (360) 423-5110. Additionally, you will receive quarterly reports from the custodian to help you review and track your account activities. In most cases, you are provided electronic access to review your accounts.

Client Referrals and Other Compensation – Item 14



As noted in the Other Financial Industry Activities and Affiliations section above, Continental and the Representatives receive compensation from their affiliation with Continental's Broker-Dealer that is separate and distinct from registered investment adviser activities. Continental does not receive compensation from outside parties including sales awards, contests, or prizes. Continental does not directly or indirectly compensate any solicitor or person for client referrals.

Custody – Item 15

Continental allow customers to open accounts directly with our firm, a process that can constructive custody of customer funds and securities. Continental maintains safeguards and adheres to the safekeeping requirements of customer funds and securities including forwarding of customer funds and securities to third party Custodians, at no times does Continental maintain ongoing custody of client assets but rather forwards those assets to the Custodial firm. Continental will send you an invoice at the time of the fee debit to show you the calculation. It is important for you to rely on the statement from the Custodian (Charles Schwab CRD 5393, & Envestnet CRD 109662) to obtain the value of your account, a process we are happy to assist with at any time.

The Custodian will send, at least quarterly, a statement showing all transactions occurring in the account during the period covered by the account statement and the funds, securities, and other property in the account at the end of the period. For illiquid investments, Continental and the Representative will rely on the Custodian to present values based upon information provided by the issuer of that security or other nationally recognized source as reported by the Custodian.

Investment Discretion- Item 16



Representatives manage accounts for clients on a discretionary basis. If you grant Continental discretion by written authority investments can be bought or sold in your account without obtaining permission for each transaction. ERISA plans may be managed in a non-discretionary basis. If you want to place restrictions on your account, please note accordingly on the Exclusions and Restrictions Section of your Advisory Agreement. Trades may be made on a discretionary basis by Continental Investors or it's subadvisors to rebalance and /or reallocate the portfolio to maintain the objectives of the portfolio as agreed upon. Continental will secure client's permission prior to effecting securities transactions in non-discretionary accounts. Continental also provides non-discretionary services in which case the firm will secure client's permission prior to effecting securities transactions in non-discretionary accounts. Continental's discretionary authority in selecting third party managers is evidenced by client signature of the account agreement, clients may not place limitations on the discretionary authority in selecting third party managers.

Voting Client Securities (Proxy Voting) – Item 17

Continental does not have voting authority nor will give any advice for proxy voting for client securities. Clients will receive the proxies directly from the custodian, and may contract Continental anytime for assistance with proxy questions.



Financial Information – Item 18

Continental is required to provide certain financial information or disclosures about its financial condition. Continental does not require pre-payment of advisory fees of more than \$500, six months or more in advance and has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients. Additionally, Continental has not been the subject of any bankruptcy proceeding. Continental has been a Washington Corporation since 1991. To request any information about Continental, please call (360) 423-5110.



ADV Part 2B – Investment Advisor Representative Supplemental Brochure

Under the ADV Part 2B, which accompanies this brochure, you will receive information on your Representative that is specific to them and their practice. This is referred to as the Supplemental Brochure. You may find additional information at www.adviserinfo.sec.gov, or by calling us at (800) 525-0181.



Continental Investors Services, Inc. Privacy Policy & Business Continuity Plan

At Continental Investors Services, Inc. (“Continental”) we are committed to protecting your privacy and the confidentiality of your personal and financial information. The measures we take to keep your personal information private and secure are outlined below.



How We Protect Confidentiality Continental uses procedural, physical and electronic system safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities.

Persons Covered by the Privacy Policy The Continental Privacy Policy applies to anyone who is a current or former Continental brokerage or advisory client. For managed account clients, TD Ameritrade provides you with a copy of this policy when you open an account, and they will send you annual notifications thereafter. If there is a change in policy regarding the sharing of information, you will be notified in advance and given the opportunity to “opt out” of such disclosure.

How We Obtain Information About You In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you to products and services that may be of interest. This data known as non-public personal information may be collected from several sources, including: applications and other forms you file with us (e.g., name, assets, and income), records of transactions with us, our affiliates, non-affiliated third parties and others (e.g., credit report). Because we strive to provide you with the best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact your account Representative if you need to correct or update your personal information.

Sharing Information with Whom and Why Continental does not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transaction business with us and to give you more financial service choices. We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies: We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s). An example would be the company that prints and mails your account statement. We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide

information in cooperation with securities regulators or law enforcement authorities, to resolve consumer disputes, or to perform credit evaluations and authenticate checks.

Option to Opt Out and Change Notices If for any reason at any time in the future, we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure.

If you have questions or concerns, please contact us at 1-800-525-0181.

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