

Transaction fees may be charged to a client by your broker / custodian and are included in your transaction confirmations and/or the price of the security.

ENVIRONMENTAL, SOCIAL & GOVERNANCE INVESTING

When suitable and requested by a Client, we will manage accounts for clients according to the principles of responsible investing. These principles as outlined in the United Nations Principles of Responsible Investing are summarized thusly. As institutional investors, we have a duty to act in the best long-term interests of our beneficiaries. In this fiduciary role, we believe that environmental, social, and governance (ESG) issues can affect the performance of investment portfolios (to varying degrees across companies, sectors, regions, asset classes and through time). We also recognize that applying these Principles may better align investors with broader objectives of society. However, if you decide to ESG Investing, this may pose certain growth and return risks for your investment portfolio than if your account assets were more broadly allocated. Those risks can be further discussed between you and your IAR.

PRIVATE FUNDS/BW II

Private fund investing is substantially different from the other services provided by CRA as described in this Brochure. Securities in private funds are generally Illiquid Securities, meaning, no public market exists in which you can easily redeem (sell) these private securities.

For the clients that are limited partners in BW II, please review the BW II offering disclosure documents that you received and executed prior to investing in BW III or contact CRA. While the General Partner is not required to meet any BW II limited partner redemption requests prior to the Maturity Date, it may, at its sole discretion, attempt to allocate available net cash flow from operations and/or financing to those BW II limited partners that notify the General Partner of a redemption request prior to the Maturity Date. When the General Partner can allocate cash for the redeeming BW II, they will be proportionately allocated cash that the General Partner is paying out for redemption, based on their respective ownership percentage of BW II.

RISK OF LOSS

Investing in securities involves risk of loss that you, as the investor, should be prepared to bear. CRA does not represent or guarantee that it can predict future results, successfully identify market tops or bottoms, or insulate client portfolios and investments from losses. The prices of, and the income generated by, equities and other securities held in your portfolio may decline in response to certain events taking place around the world, including those directly involving the issuers whose securities you own.

Conditions affecting the general economy; overall market changes; local, regional, or global political, social or economic instability; governmental or governmental agency responses to economic conditions; and currency, interest rate and commodity price fluctuations are all risk factors that can affect the valuation of your investments. CRA cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance. The value of your investments will be subject to a variety of factors, such as the liquidity and volatility of the securities markets. Portfolio transactions may give rise to tax liability, for which you are responsible, including the initial transactions for new clients.

ASSET ALLOCATION RISK

Asset allocation risk is the risk that your portfolio may be allocated to an asset class that underperforms other asset classes. For example, fixed-income securities may underperform equities. Accordingly, asset allocation risk will be influenced by the allocation of your portfolio among equities, fixed income, alternative and money market securities.

INVESTMENT AND MARKET RISK

Securities purchased in your account(s) are subject to investment risk, including the possible loss of the entire principal amount invested. A recommendation or decision by CRA to invest your account in securities and other instruments may also involve market risk, which is the risk that the value of these positions, like other investments, may move up or down, sometimes rapidly and unpredictably due to adverse market conditions and not necessarily based on the individual merits of the investment. Investment holdings in your account, at any point in time, may be worth less than the original investment, even after considering the reinvestment of dividends, and / or capital gains.

INTEREST RATE RISK

Fluctuations in interest rates may cause the value of investments to fluctuate. For *example*, the value of fixed income instruments will change inversely with changes in interest rates. As interest rates rise, the market value of fixed income instruments tends to decrease. Conversely, as interest rates fall, the market value of fixed income instruments tends to increase. This risk will be greater for long-term securities than for short-term securities.

COUNTERPARTY RISK

Certain assets will be exposed to the credit risk of the counterparties when engaging in exchange-traded or off-exchange transactions as such counterparties could fail to deliver or otherwise default on their obligations. There may also be a risk

of loss of assets on deposit with or in the custody of a broker in the event of the broker's bankruptcy, the bankruptcy of any clearing broker through which the broker executes and clears transactions, or the bankruptcy of an exchange clearinghouse.

LIQUIDITY RISK

Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. When investing in illiquid securities, it may not be possible to sell or redeem your ownership in such securities at the most opportune times or at prices approximating the value at which they were purchased.

EXCHANGE TRADED FUNDS ("ETFs")

While investing in ETFs has similar risks as investing in individual equities, ETFs typically invest in a diverse group of securities. The level of diversification varies by ETF. While ETFs reduce the effects of concentration risk as compared to investing in a single security, certain ETFs are susceptible to industry, commodity, or country risk. Investing in a diverse selection of ETFs may help to reduce this risk. Another important factor to consider with ETFs is that the portfolio of securities in which they invest are typically not actively managed. Leveraged and Inverse ETFs bear unique risks that investors who wish to trade in these or those that are used by CRA understand. It's important to read the appropriate prospectus or disclosure document specific to the leveraged or inverse ETF before investing.

BW II PROMISSORY NOTES

As the BW II offering documents disclosed, an investment in BW II is highly speculative and an investor could lose all or a portion of their investment. Prior to the Maturity Date, the General Partner believes that its normal business operations and financial position will allow it to obtain financing from a commercial lender to pay off the Promissory Note. The General Partner requested extensions on the maturity of the Promissory Note from BW II investors and opened the fund up to possible new investors in 2020. If in the future the General Partner is not able to refinance or receive extensions for the current Promissory Note, the General Partner may be forced to liquidate all or a portion of its Books of Business, the collateral underlying the Promissory Notes, in order to attempt to meet the Promissory Note contractual loan commitments. Furthermore, if the General Partner is forced to liquidate its Books of Business in order to pay off the Promissory Note, there is no guarantee that the proceeds from the sale of the Books of Business would be adequate to meet its loan commitments with BW II and the investors in BW II may lose all or a portion of their investment.

FIXED INCOME INVESTMENTS

One of the most important risks associated with fixed-income securities is interest rate risk, which is the risk encountered in the relationship between bond prices and interest rates. The price of a bond will change in the opposite direction of movements in prevailing interest rates. For example, as interest rates rise, bond prices will generally fall. If an investor must sell a bond prior to the maturity date, an increase in interest rates could mean that the bondholder will experience a capital loss (i.e., selling the bond below its original purchase price).

ADDITIONAL FIXED INCOME RISKS

REINVESTMENT RISK

This reinvestment risk is that the interest rate at which the interim cash flows can be reinvested will decline and thus reinvestments will receive a lower interest rate. Reinvestment risk is greater for longer holding periods. Default risk is commonly referred to as "credit risk" and is based on the probability that the issuer of the debt obligation may default. Default risk is rated by quality ratings assigned by third party commercial rating companies.

CALL RISK

This risk is related to call provisions on debt obligations. You should be aware of four (4) risks associated with call provisions.

- (a) The cash flow patterns of callable bonds are not known with certainty.
- (b) Since the issuer will typically exercise their right to call the bonds when interest rates have dropped, you may be exposed to reinvestment risk. You would have to reinvest the proceeds after the bond is called at relatively lower interest rates.
- (c) The potential for capital appreciation of a callable bond is reduced relative to that of a non-callable bond because its price may not raise much above the price at which the issuer can call the issue.
- (d) If the issue is purchased at a premium, you may lose the difference between the purchase prices and call price.

INFLATION RISK

This arises because the value of the cash flows being received from a debt obligation may lose purchasing power over the course of time because of inflation.

LIQUIDITY RISK

This depends on the ease with which an asset can be sold at or near its current value. The best indicator to measure an issue's liquidity is the size of the spread between the bid price and the ask price quoted by a dealer. A wider spread on the

asset indicates a greater liquidity risk. If you plan on holding a bond until its maturity date, liquidity risk is less of a concern.

EXCHANGE RATE RISK

This is encountered in non-dollar denominated bond or bonds whose payments occur in a foreign currency, has unknown U.S. currency cash flows or conversions to the actual currency. The dollar cash flows are dependent on the exchange rate at the time the payments are received. For example, consider a bond whose coupon payment is paid out in Japanese yen. If the yen depreciates relative to the U.S. dollar, fewer net dollars will be received. Conversely, if the yen should appreciate relative to the U.S. dollar, the investor will benefit by receiving more net dollars.

ALTERNATIVE OR ILLIQUID INVESTMENT RISKS

Some portfolio managers and some strategies utilize Illiquid Investments. These are securities and other financial instruments that are not actively or widely traded and may have a limited or non-existent secondary market (i.e., non-traded REITs, Hedge Funds, Managed Futures Funds, Business Development Companies, and other private equity offerings). As a result of the limited or non-existent secondary market, it may be relatively difficult, if not sometimes impossible for CRA as the General Partner to BW II or a third-party portfolio manager to dispose of such investments rapidly and/or at a reasonable value when you make a liquidation or withdrawal request. This is particularly true during times of adverse market conditions. Adverse market conditions have, in the past, lead to a "liquidity crisis" (i.e., the inability to sell many securities at expected values). Neither CRA, nor any portfolio manager makes any assurance or guarantee that future market conditions will not result in similar liquidity issues. Investors in Illiquid Securities should carefully consider the unique risks these types of securities presents before making any investment decisions.

CASH BALANCE RISK

CRA's use of Mutual Funds, including money market mutual funds, is how we invest cash balances in your accounts. Typically, cash balances are swept by your custodian into a money market fund you select in the account opening paperwork. We may, however, as portfolio manager over your assets, place transactions for your account assets in the following securities:

- (a) Federal Deposit Insurance Corporation ("FDIC");
- (b) Insured certificates of deposit ("CDs");
- (c) High-grade commercial paper; and
- (d) US Government - backed debt instruments.

MARGIN RISK

For clients who desire debit cards and/or check writing on their managed accounts, CRA may advise the use of a margin account to ensure an account is not over drawn. However, this feature uses account assets as collateral for a loan from your broker / custodian (see Item 12) without involvement from CRA. Loans from your broker / custodian include interest rate charges you incur, which are debited to your custodial account. In certain instances, you are paying fees to CRA (the asset-based fee) for the management of your account assets that includes securities, private funds, cash, and margin (debit) balances.

Ultimately, we try to achieve the highest return on your cash balances through relatively low-risk conservative investments most of which are easily converted to cash. If you have any questions, please contact your IAR. We do not guarantee that your investment goals or objectives will be reached or any level of performance or success.

Item 9: Disciplinary Information

On July 28, 2017, CRA, Ben Addink, the Co-Managing Member of CRA and Don Foy, an IAR with CRA (together "Respondents") settled an Administrative Proceeding with the Securities & Exchange Commission, File No. 3-18084 (the "Final Order"). Without admitting or denying the allegations contained in the Final Order, respondents agreed to remedial sanctions and a cease-and-desist order. For questions or a copy of the Final Order, please contact compliance@investcra.com.

Mr. Foy settled a claim with Raymond James & Co. in 2008. That action was closed with no further action against Mr. Foy. Please see the Part 2 B, Brochure Supplement for Mr. Don Foy attached to this Brochure for further information on the settlement.

Item 10: Other Financial Industry Activities & Affiliations

Other financial industry activities and affiliations are conflicts of interest between the financial interests of CRA and our employees when compared to your interests. However, as fiduciaries to our clients, including BW II and its limited partners, we are obligated to disclose all potential and actual conflicts of interest. This section provides a summary of potential and actual conflicts of interest between clients, CRA, and CRA IARs and employees.

CONFLICTS OF INTEREST

We try to avoid all potential conflicts of interest with clients and at a minimum, disclose those conflicts to you through disclosure, which includes, of course, this Form ADV Part 2 AB. We address these conflicts and help to mitigate them through disclosure and through our business management practices, policies & procedures, controls, IAR supervision and the monitoring of our overall business activity. CRA also uses non-affiliated third-party service providers, such as custodians, accounting firms, financial auditors, and the Administrator for BW II that offer third-party reports and assistance / reviews of our business activities. It is our responsibility to ensure, as fiduciaries, that we operate our business in a manner that does not place our financial interests ahead of our advisory clients.

BW II

As previously mentioned in this filing, BW II is a private equity fund that is affiliated with CRA. BW II issued loans, subject to priority lien positions, to the General Partner, which used the loan proceeds, in combination with seller financing, to finance or refinance the acquisitions of investment advisory Book(s) of Business. The General Partner had a conflict of interest because it was the borrower and the General Partner of the lender, BW II (i.e., it was on both sides of the loan transactions). There were no assurances that the General Partner identified and pursued transactions that were in the best interests of the BW II rather than in the General Partner's self-interest.

INSURANCE SERVICES

If a CRA IAR or employee is separately registered as an insurance agent with a State Insurance Commissioner to sell an insurance product sponsored by an insurance company, that company that underwrites that insurance product pays a commission to the IAR or employee as an insurance agent. This is separate commission compensation for insurance services that are in addition to their activity as an IAR or employee. The receipt of insurance commissions for insurance products that are recommended to CRA clients, create a conflict of interest due to a recommendation of a commissionable product. No client is obligated to use a CRA IAR or employee for insurance services and can select their own insurance agent, company, or broker.

SUMMIT TAX SERVICES

Mr. Addink and Mr. Zimmerman are connected to Summit Tax Services, LLC ("Summit Tax"). Clients of CRA are not required to, or are solicited to, use Summit Tax for their tax preparation and a client may select any tax professional they desire for their tax services. If a client does choose to utilize Summit Tax for their financial tax filing needs, Mr. Addink and Mr. Zimmerman may benefit financially from fees paid to Summit Tax.

HORNETS LAND, LLC

Mr. Addink and Mr. Scalabrino are also members Hornets Land, LLC. This entity contributed money to CRA to assist in the closing of the acquisition of EAM. This contribution was partially paid back to Hornets Land from BW II assets for the acquisition of an investment advisory "book of business". Separately, Mr. Scalabrino provided CRA a contribution to assist in the closing for EAM, some of that contribution was paid back to Mr. Scalabrino.

[Item 11: Code of Ethics, Participation, or Interest in Client Transactions, & Personal Trading](#)

Code of Ethics

Pursuant to SEC Rule 204A-1, CRA has a Code of Ethics (the "Code") that promotes the fiduciary duty of CRA, employees, and its Advisor Representatives. The Code articulates the importance of trust as a foundation to the relationship between a fiduciary investment adviser and its clients and establishes policies and procedures (the "P&Ps") to ensure that CRA place the interests of the clients first. The Code requires that CRA adhere to all applicable securities laws and regulations. The Code also requires CRA follow industry "best practices" involving:

- Suitability of investments,
- Safeguarding material non-public information concerning clients,
- Personal trading on the part of CRA and its employees,
- The misuse of material, non-public information on any issuer of a security,
- Outside business activities,
- Pre-approval for any private placement desired to be purchased,
- The receipt of or providing gifts and gratuities, and
- Disclosure of and mitigation of conflicts of interest.

CRA permits its employees and their family members to purchase, sell, or hold the same securities that are recommended to CRA clients. The use of the same securities is a conflict of interest between CRA's own interests and that of its clients. Additionally, CRA has previously recommended investments to clients in BW II. As the General Partner to BW II, CRA has a conflict of interest as described under Items 4 and 5 of this Brochure in making such recommendations.

CRA has implemented, as required under the Advisors Act, policies, procedures, and controls to monitor this trading activity and the potential conflicts of interest. We combine these requirements into CRA's Code of Ethics ("Code"), as part of our P&Ps. You may request a copy of our Code by contacting our Compliance Committee at the number or email on the cover page of this Brochure. Under the Code, our goal is to ensure that our employees:

Part 2 B of Form ADV: Brochure Supplement: Foy

January 27, 2022

Donald “Don” A. Foy

Columbia River Advisors

**827 SW 152nd Street
Burien, WA. 98166**

206-409-0435

www.investcra.com

This brochure supplement provides information about Don Foy that supplements our Part 2 A, Firm Brochure. If you have any questions about the contents of this Supplement, please contact CRA at the information listed above.

Additional information about Don Foy is available on the SEC website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Donald A. Foy (CRD# 4821689)

Year of Birth: 1971

Formal Education after High School:

University of Washington, Economics Major, through 1993

Business Background for Previous Five Years:

Investment Adviser Representative (IAR)	09/2010 to Present
Direct Shareholder	01/2014 to 2019
<u>Columbia River Advisors</u>	
Member	01/2018 to Present
<u>Seahurst Advisor, LLC</u>	
Member	01/2018 to Present
<u>Foy Family LLC</u>	
Member	01/2018 to Present
<u>Three Tree Advisors, LLC</u>	
Member	03/2017 to Present
<u>Petriage, Inc</u>	
Member	10/2011 to 12/2017
<u>BBD Holdings, LLC</u>	
Member	09/2010 to 12/2017
<u>Summit Tax Services, LLC</u>	

Licensing/Exams:

NASD / FINRA Series 7 and Series 66

Item 3: Disciplinary Information

For a claim against Don and Raymond James in 2008 that was settled and closed, with no action against Don, please see www.adviserinfo.sec.gov.

On July 28, 2017, Don settled an Administrative Proceeding with the Securities & Exchange Commission, File No. 3-18084 (the "Final Order"). For questions or a copy of the Final Order, please contact compliance@investcra.com.

Item 4: Other Business Activities

None

Item 5: Additional Compensation

None

Item 6: Supervision

Don Foy is an IAR that is permitted to act independently by management and is not supervised directly by a CRA investment professional.

If you would like additional information on our supervisory structure, please contact the Compliance Committee at 253-589-1401 or via email at compliance@investcra.com.

Part 2 B of Form ADV: Brochure Supplement: Addink

January 27, 2022

Benjamin "Ben" J. Addink

Columbia River Advisors
2115 N. 30th Street, Suite 102
Tacoma, WA 98403

253-589-1401

www.investcra.com

This Brochure supplement provides information about Ben Addink that supplements our Part 2 A, Firm Brochure. If you have any questions about the contents of this Supplement, please contact CRA at the information listed above.

Additional information about Ben Addink is available on the SEC website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Benjamin J. Addink (CRD# 387214)

Year of Birth: 1978

Formal Education after High School:

University of Hawaii at Hilo, BA Business Administration, 2000

Business Background for Previous Five Years:

Member <u>Columbia River Holdings Investment Group LLC</u>	02/2021 to Present
Co-Managing Member, Investment Adviser Representative (IAR) Direct Shareholder Chief Compliance Officer <u>Columbia River Advisors, LLC</u>	09/2010 to Present 01/2014 to Present 11/2017 to 12/2019
Member <u>Summit Tax Services</u>	09/2010 to Present
Member <u>BBD Holdings, LLC</u>	10/2011 to 12/2018
Member <u>Whitestone Land Management, LLC</u>	10/2006 to Present
Member <u>Hornets Land, LLC</u>	09/2010 to Present
Member <u>Desert Lilly LLC</u>	06/2006 to Present

Licensing/Exams:

NASD / FINRA Series 65

Item 3: Disciplinary Information

On July 28, 2017, Ben settled an Administrative Proceeding with the Securities & Exchange Commission, File No. 3-18084 (the "Final Order"). For questions or a copy of the Final Order, please contact compliance@investcra.com.

Item 4: Other Business Activities

Ben Addink is also a Member of Hornets Land, LLC, Whitestone Land Management, LLC, & Desert Lilly LLC, all are real estate companies. Clients of Columbia River are not solicited to invest in or through these companies, and this position does not affect his activities on behalf of CRA.

Ben Addink is also:

- A member of Summit Tax Services, which provides tax related services to the company's clients. No client of Columbia River is required to use Summit Tax Services.
- As a shareholder of Columbia River, is an owner of the General Partner to the affiliated private fund as described in Part 2 A, attached.

Item 5: Additional Compensation

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

Ben also benefits from insurance commissions received by employees who are agents of various insurance companies (after the IAR who is an insurance agent, deposits their commission check). After doing so, the IAR/ insurance agent may pay CRA a portion. Therefore, Ben as a shareholder participates in this addition revenue/ profits, if any.

Item 6: Supervision

Ben Addink, as a principal, is supervised by the Compliance Committee. Ben is also a co-managing member of CRA and is involved in the firm's oversight.

If you would like additional information on our supervisory structure, please contact the Compliance Committee at 253-589-1401 or via email at compliance@investcra.com.

Part 2 B of Form ADV: Brochure Supplement: Zimmerman

January 27, 2022

Adam Q. Zimmerman

**Columbia River Advisors
500- 108th Ave NE, Suite 1100
Bellevue, WA. 98404**

425-401-7220

www.investcra.com

This Brochure supplement provides information about Adam Zimmerman that supplements our Part 2 A, Firm Brochure. If you have any questions about the contents of this Supplement, please contact CRA at the information listed above.

Additional information about Adam Zimmerman is available on the SEC website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Adam Q. Zimmerman (CRD# 4321709)

Year of Birth: 1962

Formal Education after High School:

University of Massachusetts – Amherst, BS, Astronomy, 1984

Embry Riddle Aeronautical University, MS, Aerospace Science, 2000

Business Background for Previous Five Years:

Investment Adviser Representative

04/2016 to Present

Columbia River Advisors, LLC

Investment Adviser Representative

10/2014 to 04/2016

Blue Moon Wealth Advisory, LLC

Licensing/Exams:

NASD/FINRA Series 6, 7, 63, 65

Chartered Financial Consultant¹

Item 3: Disciplinary Information:

None

Item 4: Other Business Activities:

None

Item 5: Additional Compensation

As part of the tax team, Adam helps in the preparation of taxes. This service is in addition to and separate from services provided as a CRA IAR. Fees are charged separately and may be paid to Adam where he receives additional compensation.

Item 6: Supervision

Adam Zimmerman is supervised by the Compliance Committee.

If you would like additional information on our supervisory structure, please contact the Compliance Committee at 253-589-1401 or via email at compliance@investcra.com.

¹ This designation is issued by the American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning, income taxation, investments and the application of financials planning; as well as two (2) elective courses involving the application of aforementioned disciplines. Each course has a financial product exam and once issued; the individual is required to submit thirty (30) hours of continuing education every two years.

Part 2 B of Form ADV: Brochure Supplement: Keefe

January 27, 2022

Matthew “Matt” P. Keefe

**Columbia River Advisors
2115 N. 30th Street, Suite 102
Tacoma, WA 98403**

www.investcra.com

This Brochure supplement provides information about Matt Keefe that supplements our Part 2 A, Firm Brochure. If you have any questions about the contents of this Supplement, please contact CRA at the information listed above.

Additional information about Matt Keefe is available on the SEC website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Matthew P. Keefe (CRD#3273518)

Year of Birth: 1977

Formal Education after High School:

BS, Business Admin., Finance Major, Carroll University, 2000 CIMA Certification,^{®2} Wharton school of business

Business Background for Previous Five Years:

Member <u>Columbia River Holdings Investment Group LLC</u>	02/2021 to Present
Member <u>Whitestone Land Management, LLC</u>	11/2019 to 06/2021
Co-Managing Member Investment Adviser Representative <u>Columbia River Advisors, LLC</u>	07/2017 to Present 06/2016 to Present
Regional Vice President, Investment Adviser Representative <u>Morgan Stanley Investment Management Inc.</u>	08/2014 to 06/2016

Licensing/Exams:

NASD/FINRA Series 7 and 66

Item 3: Disciplinary Information

None

Item 4: Other Business Activities

Matt, as a shareholder of Columbia River, is an owner of the General Partner to the affiliated private fund as described in Part 2 A, attached.

Item 5: Additional Compensation

Matt also benefits from insurance commissions received by employees who are agents of various insurance companies (after the IAR who is an insurance agent deposits their commission check). After doing so, the IAR/ insurance agent may pay CRA a portion. Therefore, Matt as a shareholder participates in this addition revenue/ profits, if any.

Item 6: Supervision

Matt as a principal, is supervised by the Compliance Committee. Matt is also a co-managing member of CRA and is involved in the firm's oversight.

If you would like additional information on our supervisory structure, please contact the Compliance Committee at 253-589-1401 or via email at compliance@investcra.com.

² The CIMA certification program takes most candidates nine months to a year to complete. The process requires candidates to meet all eligibility requirements, including the "four E's": experience, education, examination, and ethics. Candidates must complete five steps to qualify:

- Submit CIMA application and pass a background check.
- Study for 100 hours and pass a two-hour qualification exam.
- Complete an in person or online executive education program at a top 20-tier business school registered with CIMA.
- Study for 150 hours and pass a four-hour comprehensive Certification Examination; and,

Document a minimum of three years of work experience in financial services, pass a second background check, pay initial certification fee, sign a license agreement, and agree to adhere to IMCA's Ethics and other ongoing standards. The application requests contact information, work experience, and disclosure of any complaints and regulatory actions.



PRIVACY DISCLOSURE

FACTS WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security Number and Personal Finance details ▪ Account balances and transactions between you and third parties ▪ Full birth dates and other financial and personal data on you and your family <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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How?	All financial companies need to share Clients personal information to run their everyday business. In the section below, we list the reasons financial companies can share their Clients personal information; the reason Columbia River Advisors chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information.	Does Columbia River Advisors share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
For our marketing purposes- to offer our products and services to you.	No	No
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes- information about your transactions and experiences.	Yes	Yes
For our affiliates' everyday purposes- information about your creditworthiness.	No	No
For nonaffiliates to market to you	No	No

Questions?	Call 253-589-1401 or go to www.investcra.com
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Who we are?	
Who is providing this notice?	Columbia River Advisors, LLC

What do we do?	
How does Columbia River Advisors protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also have password protected computer systems, data backups and archiving among other technology protocols in place.
How does Columbia River Advisors collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ▪ Open an account or provide account statements ▪ Provide wills or trusts or provide goals and objectives ▪ Open a brokerage account with our assistance, review your investment needs, risk tolerances and personal/family obligations and career data (such as income, net worth, etc.)
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes- information about your creditworthiness. ▪ Affiliates from using your information to market to you. ▪ Sharing for nonaffiliates State Laws and individual companies may give you additional rights to limit sharing. We share info only where vital to servicing your needs.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ <i>We do not have affiliates under common control or ownership our principals do have interests in other companies but not, full common ownership or control. Please see our Form ADV Part 2 A.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ <i>We recommend TD Ameritrade, Fidelity Investments and Charles Schwab and Co. as custodians for client assets. We are not affiliated with each other; we are separate entities.</i>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ <i>Not applicable to Columbia River Advisors, LLC.</i>

Other Important Information
<p>Columbia River Advisors, LLC is the legal entity name of the company.</p> <p>We are a registered investment advisor with the U.S. Securities and Exchange Commission. We provide our clients and prospective clients with a "disclosure brochure: (Form ADV Part 2 A/B) available on a website maintained by the Securities and Exchange Commission at www.adviserinfo.sec.gov.</p>