Part 2A of Form ADV: ***Firm Brochure***

Colson Financial Group, Inc.

dba "BellinghamFinancialPlanners.com"

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The information contained within this brochure is effective as of:
2021.02.25

This brochure provides information about the qualifications and business practices of Colson Financial Group, Inc. If you have any questions about the contents of this brochure, please contact us at 303.986.9977 or ronald@colsonfinancial.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. Registration does not imply a certain level of skill or training.

Additional information about Colson Financial Group, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 109704.

The Director of the Washington State Department of Financial Institutions, Division of Securities, is hereby notified that Colson Financial Group, Inc. fully complies with the safekeeping requirements as set forth in WAC 460-24A-106.

Item 2: Material Changes

This Firm Brochure, dated 2019.01.01, provides you with a summary of Colson Financial Group, Inc.'s (the "Advisor") advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This "Item 2: Material Changes" is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.

Material Changes: Should a material change in our operations occur, depending on its nature, we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

The following summarizes new or revised disclosures based on information previously provided in our Firm Brochure that was dated 2020.01.01:

The legal name of the custodian is "E*Trade Savings Bank." The primary business name of the custodian is "E*Trade Advisor Services." The physical location of the Custodian has not changed and is still located in Centennial, Colorado, United States. The custodian is not a related person of the Advisor. The custodian's legal entity identifier is: "549300DXPO50FJ75QA85." The managers, employees and services of E*Trade Advisor Services have not materially changed.

The Advisor periodically publishes a blog that is posted on the Advisor's website for public viewing without charge.

In all cases, Clients will receive a written invoice for fees owed immediately following the end of the quarter being billed. The invoice will include the fee(s) charged, the formula used to calculate the fee(s), the fee calculation itself, the time period covered by the fee(s), the amount of assets under management the fee is based upon, and the name of the Custodian. We urge the client to compare this information with the fees listed on the account statement that will be received from the custodian three and one-half months after receipt of the fee invoice. The Advisor utilizes a calendar fiscal year and, therefore, Q1 includes January through March, Q2 includes April through June, Q3 includes July through September, and Q4 includes October through December.

Item 3: Table of Contents

Item 4 Advisory Business

Colson Financial Group, Inc. (the "Advisor") is a state-registered investment adviser with its principal place of business located in Washington State at 4740 Austin Court, Bellingham WA 98229. Additionally, the Advisor is registered as a "notice-filer" in the states of Oregon, Texas and in Colorado at 108 Cottonwood Circle, Salida CO 81201. The Advisor began conducting business as a Colorado S-Corporation in 1991. Prior to that date Ronald Scott Colson practiced as a sole proprietor, commencing said advisory practice in 1987.

Listed below are the firm's principal shareholders. (Principal shareholders are defined as individuals and/or entities controlling 25% or more of this company).

- Ronald Scott Colson, CFP®, MBA, President (100% shareholder)

The Advisor offers the following advisory services to our clients:

INVESTMENT SUPERVISORY SERVICES ("ISS")
INDIVIDUAL PORTFOLIO MANAGEMENT

The Advisor provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, the Advisor develops a client's personal investment policy and creates and manages a portfolio based on that policy. During our data-gathering process, the Advisor determines the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, the Advisor also reviews and discusses a client's prior investment history as well as family composition and background.

The Advisor manages these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. (The Advisor does not provide income tax advice. Consult your CPA for such advice.)

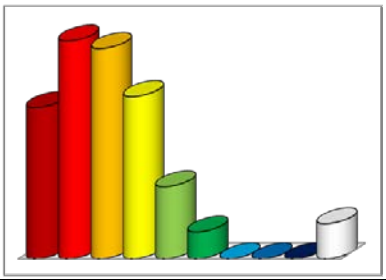
Accounts are held by an independent custodian (dba "E*Trade Advisor Services"). The custodian is selected at the discretion of the Advisor. The client grants the Advisor the limited power of attorney to buy and sell securities within the client's account. The custodian provides the Advisor with an institutional block trading platform, income tax reporting and other custodial services. The custodian protects the client by preventing any unauthorized withdrawals from the client's account except as requested by the client. (Fees are only withdrawn from the account if they have not been separately paid to the custodian by the client.) To further protect the client, the custodian independently values all securities in the account, generates and mails quarterly paper statements directly to the client and maintains a website that may only be accessed by the client to securely view all current and historical details about the account.

Accounts managed by the Advisor are considered to be "conforming" if they are structured utilizing one or more of the Advisor's model portfolio designs within the Strategic Portfolio Balance℠ Investment Discipline. Accounts are considered to be "non-conforming" if they include securities that have not been approved for use within the Strategic Portfolio Balance℠ Investment Discipline or if the client has imposed any limitations on the structure, composition or management of the account. Non-conforming accounts are not subject to additional fees as the result of their non-conformance.

Conforming Accounts within the Strategic Portfolio Balance℠ Investment Discipline

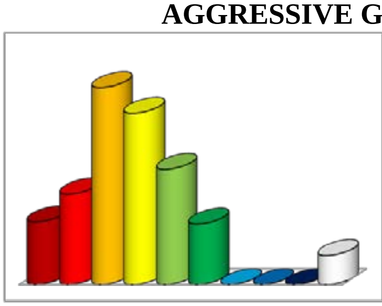
DISCLOSURE: Before investing, carefully read and understand the prospectus for any investment you are considering. All investments involve risk. You can lose money. Past performance is no guarantee of future returns. The model portfolios displayed on this page are not guaranteed to perform either better or worse than any other investment strategy. Each model has been designed to reduce risk through optimized diversification and to maximize returns by rebalancing annually to the recommended strategic targets. Patience and a long-term perspective are recommended.

VERY AGGRESSIVE GROWTH (VAG) Consolidated Omnibus Portfolio



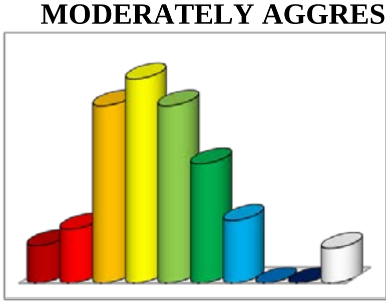
17.28%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
24.89%	FTSE All-World ex-US International Stocks
24.02%	US Aggressive Growth Stocks
18.52%	US Moderately Aggressive Growth Stocks
8.23%	US Conservative Growth Stocks
3.06%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
0.00%	US Aggressive Income Bonds
0.00%	US Moderately Aggressive Income Bonds
0.00%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

AGGRESSIVE GROWTH (AG) Consolidated Omnibus Portfolio



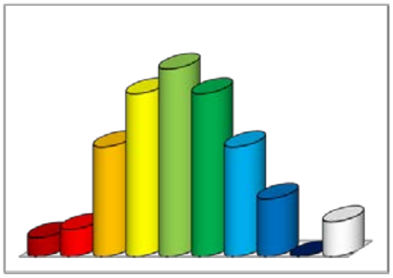
8.64%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
12.45%	FTSE All-World ex-US International Stocks
27.12%	US Aggressive Growth Stocks
23.58%	US Moderately Aggressive Growth Stocks
15.86%	US Conservative Growth Stocks
8.35%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
0.00%	US Aggressive Income Bonds
0.00%	US Moderately Aggressive Income Bonds
0.00%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

MODERATELY AGGRESSIVE GROWTH (MAG) Consolidated Omnibus Portfolio



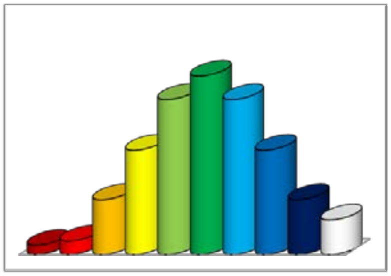
4.32%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
6.23%	FTSE All-World ex-US International Stocks
20.45%	US Aggressive Growth Stocks
23.55%	US Moderately Aggressive Growth Stocks
20.45%	US Conservative Growth Stocks
13.76%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
7.24%	US Aggressive Income Bonds
0.00%	US Moderately Aggressive Income Bonds
0.00%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

CONSERVATIVE GROWTH (CG) Consolidated Omnibus Portfolio



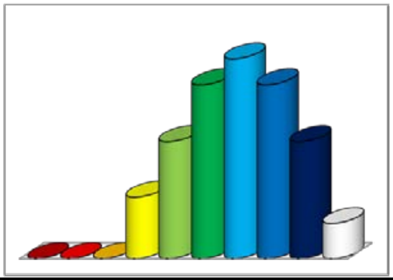
2.16%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
3.12%	FTSE All-World ex-US International Stocks
12.58%	US Aggressive Growth Stocks
18.70%	US Moderately Aggressive Growth Stocks
21.54%	US Conservative Growth Stocks
18.70%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
12.58%	US Aggressive Income Bonds
6.62%	US Moderately Aggressive Income Bonds
0.00%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

BALANCED (B) Consolidated Omnibus Portfolio



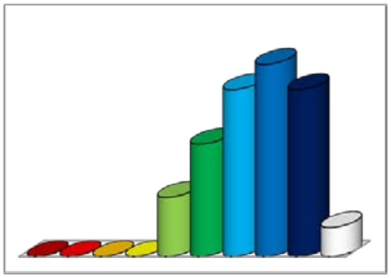
1.08%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
1.56%	FTSE All-World ex-US International Stocks
6.35%	US Aggressive Growth Stocks
12.07%	US Moderately Aggressive Growth Stocks
17.94%	US Conservative Growth Stocks
20.64%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
17.94%	US Aggressive Income Bonds
12.07%	US Moderately Aggressive Income Bonds
6.35%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

AGGRESSIVE INCOME (AI) Consolidated Omnibus Portfolio



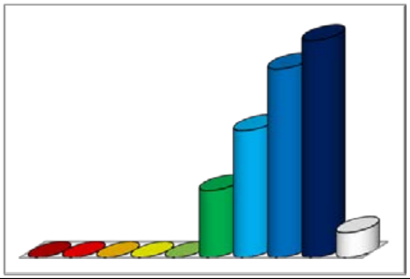
0.00%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
0.00%	FTSE All-World ex-US International Stocks
0.00%	US Aggressive Growth Stocks
7.00%	US Moderately Aggressive Growth Stocks
13.32%	US Conservative Growth Stocks
19.80%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
22.76%	US Aggressive Income Bonds
19.80%	US Moderately Aggressive Income Bonds
13.32%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

MODERATELY AGGRESSIVE INCOME (MAI) Consolidated Omnibus Portfolio



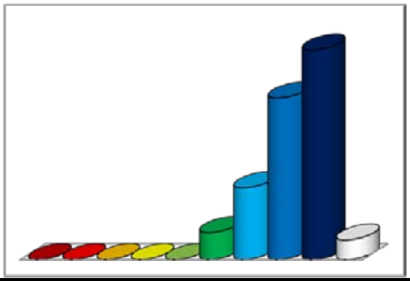
0.00%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
0.00%	FTSE All-World ex-US International Stocks
0.00%	US Aggressive Growth Stocks
0.00%	US Moderately Aggressive Growth Stocks
8.15%	US Conservative Growth Stocks
15.46%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
22.97%	US Aggressive Income Bonds
26.45%	US Moderately Aggressive Income Bonds
22.97%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

CONSERVATIVE INCOME (CI) Consolidated Omnibus Portfolio



0.00%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
0.00%	FTSE All-World ex-US International Stocks
0.00%	US Aggressive Growth Stocks
0.00%	US Moderately Aggressive Growth Stocks
0.00%	US Conservative Growth Stocks
10.72%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
20.32%	US Aggressive Income Bonds
30.21%	US Moderately Aggressive Income Bonds
34.75%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

VERY CONSERVATIVE INCOME (VCI) Consolidated Omnibus Portfolio



0.00%	Alt. Energy, Agric., Industrial & Precious Metals, etc.
0.00%	FTSE All-World ex-US International Stocks
0.00%	US Aggressive Growth Stocks
0.00%	US Moderately Aggressive Growth Stocks
0.00%	US Conservative Growth Stocks
5.52%	Balanced Stocks, Bonds, Preferred & Cnvtbl Securities
14.67%	US Aggressive Income Bonds
33.01%	US Moderately Aggressive Income Bonds
42.80%	US Conservative Income Bonds
4.00%	Cash, Money Markets, CDs and Cash Equivalents

Clients may impose reasonable restrictions on investing in and/or avoiding investing in certain securities, types of securities, or industry sectors. However, imposing restrictions will result in the account being re-classified as a non-conforming account.

The Advisor's investment recommendations are not limited to any specific product or service offered by any broker-dealer, insurance company, stock and/or bond exchange or private placement. The Advisor offers general investment advice not limited to, but with specific expertise regarding the following types of securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Options contracts on commodities
- Futures contracts on tangibles
- Futures contracts on intangibles
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Interests in partnerships investing in other: Any investment program traded on a major exchange for which independent analysis is available.
- Other: Any investment program and/or security that is traded on a major exchange for which independent analysis is available.

Because some types of investments involve certain additional degrees of risk, they will be implemented/recommended only when they are consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

SELECT YOUR PORTFOLIO: The Advisor does NOT automatically change your Account from one SPB^{sm} Model Portfolio to another, either in response to changing market conditions or in response to changes to your personal financial situation. You must request such a change in writing. Therefore, the Advisor recommends that you understand the reasoning behind your Account's "asset allocation strategy." (If you are considering changing your Account's SPB^{sm} Model Portfolio, it is highly recommended that you first discuss this change with the Advisor.)

The Advisor manages each Account so that its structure will closely approximate one of the Advisor's nine different SPB^{sm} Model Portfolios. These models span the risk spectrum from "Very Conservative Income" on the low end to "Very Aggressive Growth" on the high end.

MODEL PORTFOLIO CODE	**SPB^{sm} MODEL PORTFOLIO Codes** *(Mix of Stocks, Bonds, Cash, Etc.)* MODEL PORTFOLIO NAME	*(Ups and Downs)* VOLATILITY (RISK)	*(Long-Term Gains)* POTENTIAL REWARD
VAG	Very Aggressive Growth	Extremely High	Extremely High
AG	Aggressive Growth	Very High	Very High
MAG	Moderately Aggressive Growth	High	High
CG	Conservative Growth	Above Average	Above Average
B	Balanced	Average	Average
AI	Aggressive Income	Below Average	Below Average
MAI	Moderately Aggressive Income	Low	Low
CI	Conservative Income	Very Low	Very Low
VCI	Very Conservative Income	Extremely Low	Extremely Low

Your decision as to which SPB^{sm} Model Portfolio will be utilized as a template for your Account should be driven by two factors.

- *FACTOR #1: Your Risk Tolerance*. If you are able to ignore dramatic volatility (gains and losses) you should select a more aggressive SPB^{sm} Model Portfolio. If you fear volatility and might liquidate your Account when it temporarily loses value, you should select a more conservative SPB^{sm} Model Portfolio.
- *FACTOR #2: Your Investment Horizon*. The more distant your investment horizon (i.e., your life expectancy or your last withdrawal date), the more aggressive SPB^{sm} Model Portfolio you should select. As your investment horizon gets closer, you should select a more conservative SPB^{sm} Model Portfolio.

Select your SPB^{sm} MODEL PORTFOLIO

YOUR RISK TOLERANCE	*0 to 8*	*2 to 14*	*6 to 22*	*12 to 30*	*20 to 36*	*28 to 40*	*34 to 42*	*Over 38*
Extremely High	**MAG**	**MAG**	**AG**	**AG**	**AG**	**VAG**	**VAG**	**VAG**
Very High	**CG**	**MAG**	**MAG**	**AG**	**AG**	**AG**	**VAG**	**VAG**
High	**CG**	**CG**	**MAG**	**MAG**	**AG**	**AG**	**AG**	**VAG**
Above Neutral	**B**	**CG**	**CG**	**MAG**	**MAG**	**AG**	**AG**	**AG**
Below Neutral	**B**	**B**	**CG**	**CG**	**MAG**	**MAG**	**AG**	**AG**
Low	**AI**	**B**	**B**	**CG**	**CG**	**MAG**	**MAG**	**AG**
Very Low	**MAI**	**AI**	**B**	**B**	**CG**	**CG**	**MAG**	**MAG**
Extremely Low	**CI**	**MAI**	**AI**	**B**	**B**	**CG**	**CG**	**MAG**
Almost None	**VCI**	**CI**	**MAI**	**AI**	**B**	**B**	**CG**	**CG**

YOUR ACCOUNT'S INVESTMENT HORIZON (number of years from today)

FINANCIAL PLANNING

The Advisor provides financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client to achieve his or her financial goals and objectives.

If a client maintains at least one investment account with the Advisor, the client is eligible to receive one fee-waived financial planning engagement per year. A client who does not maintain an investment account with the Advisor will be subject to the Advisor's hourly fees. In general, the financial plan can address any or all of the following areas:

PERSONAL: The Advisor reviews family records, budgeting, personal liability, estate information and financial goals.

TAX & CASH FLOW: The Advisor analyzes the client's income tax and spending and planning for past, current and future years; then illustrates the impact of various investments on the client's current income tax and future tax liability. (The Advisor does not provide specific Internal Revenue Code advice. Consult you CPA for such advice.)

INVESTMENTS: The Advisor analyzes investment alternatives and their effect on the client's overall portfolio.

INSURANCE: The Advisor reviews existing insurance policies to ensure adequate coverage to protect against the risks of death, health problems, disability, and the need for long-term care. Specifically excluded from analysis are liability, home and automobile insurance. (The Advisor does not sell insurance. Consult your insurance agent to purchase insurance.)

RETIREMENT: The Advisor analyzes current strategies and investment plans and makes recommendations to help the client achieve his or her retirement goals.

DEATH & DISABILITY: The Advisor reviews the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.

ESTATE PLANNING: The Advisor assists the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, reviews of the potential impacts of estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law. (The Advisor does not provide legal advice. Consult your attorney for such advice.)

The Advisor gathers required information through in-depth personal interviews. Types of information gathered include the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. The Advisor carefully reviews documents supplied by the client, including a questionnaire completed by the client, and prepares a written report. Should the client choose to implement the recommendations contained in the plan, the Advisor suggests that the client work closely with his/her attorney, CPA, insurance agent, and/or stockbroker. Implementation of any financial planning recommendations is entirely at the client's discretion.

The Advisor also provides general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Typically, the financial plan is presented to the client within no more than one month of the contract date, provided that all information needed to prepare the financial plan has been promptly provided to the Advisor.

Financial Planning recommendations are not limited to any specific product or service offered by any broker-dealer or insurance company. All recommendations are of a generic nature.

PUBLICATION OF BLOGS

The Advisor publishes a blog providing general information on various financial topics including, but not limited to, estate and retirement planning, market trends, etc. No specific investment recommendations are provided in this blog and the information provided does not purport to meet the objectives or needs of any individual. The blog is posted free of charge for viewing on the advisor’s website.

CONSULTING SERVICES

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. The Advisor also provides specific consultation and administrative services regarding targeted investment and financial concerns of the client.

ELECTRONIC MEDIA AND CLIENT COMMUNICATIONS

To communicate with Clients, the Advisor utilizes certain forms of electronic media but not others. The most common forms of communication between the Advisor and Clients are as follows:

- eMail
- Telephone
- U.S. Postal Service First Class Mail (communications that are not time-sensitive)
- Priority Mail or Express Mail (time-sensitive communications)

The Advisor will NOT communicate with, or respond to Client communications via the following:

- Text messaging

- Messenger applications
- Facebook
- Instagram
- Snapchat
- YouTube
- All other forms of social media

AMOUNT OF MANAGED ASSETS

As of 12/31/2020, the Advisor was actively managing $50,063,097.90 of clients' assets on a discretionary basis.

Item 5 Fees and Compensation

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT FEES

The fees for Investment Supervisory Services will be charged according to the following schedule:

Exhibit D: FEE SCHEDULE

(This exhibit supersedes all prior such exhibits, if any.)

Financial Planning Engagement Hourly Fee--- **$250.00** **(Minimum of one hour per engagement)**

Each client who maintains one or more accounts in the Advisor's Strategic Portfolio Balance[sm] Investment Discipline is eligible to receive one financial planning engagement per year with this fee waived. This fee will apply to each financial planning engagement only when requested by the Client more often than once each 12 month period. A single financial planning engagement may include one or more of the Advisor's financial planning services including but not limited to one annual review per year, the preparation of one set of Projected Retirement Snapshots[sm] per year, one review of employer retirement plans per year, and/or the Advisor's responses to any other financial planning questions.

New Account Deferred Set Up Fee-- **$500.00**

This fee is assessed but not collected unless the new account is transferred-out in-kind within the first 90 days. After 90 days this fee is retroactively waived. This fee is intended to discourage investors who take advantage of the Advisor's expertise without proper compensation to the Advisor.

Executing Broker/Dealer's Closed-End MF and Non-MF Transaction Fee------ **$0.02 per share (min $5/trade)**

The executing broker/dealer deducts a per-share transaction fee from each participating Account at trade execution. This fee does not apply to open-end mutual fund transactions, which are executed at no charge.

Custodian's Quarterly Asset Fee – E*Trade Advisor Services, the Custodian, shall deduct from each Account a quarterly asset fee based upon the previous quarter's average daily balance, pro-rated if the Account was opened during that quarter. (A minimum Custodian's Quarterly Asset Fee of $25.00 applies to each Account.)

Accounts valued between $0.00 and $249,999.99 :	0.000825
Accounts valued between $250,000.00 and $499,999.99 :	0.000700
Accounts valued between $500,000.00 and $999,999.99 :	0.000500
Accounts valued at $1,000,000.00 and greater :	0.000250

Consolidated Accounts – Clients open a Consolidated Account with the Advisor that is composed of one or more "conforming" and/or "non-conforming" Accounts. A conforming Account is defined as one that allows the Advisor to utilize the Strategic Portfolio Balance[sm] Investment Discipline as the asset allocation template for said conforming Account. A non-conforming Account is defined as any Account that includes assets that may have been transferred to the Custodian in-kind but are not approved by the Advisor for inclusion in the Strategic Portfolio Balance[sm] Investment Discipline. All Accounts, whether conforming or non-conforming, are held by an independent Custodian, dba E*Trade Advisor Services, to prevent fraud. The Advisor is only granted the limited power of attorney to buy and sell within the Account. All Account reporting and security valuation is performed by the Custodian without any opportunity for the Advisor to alter the reports or valuations.

Advisor's Quarterly Account Fee – The Advisor assesses each Account in arrears a non-negotiable, Advisor's Quarterly Account Fee based upon the average daily balance. If more than one Account is registered at the same household or business mailing address, the sum total of all such Accounts shall be considered as one Consolidated Account for the purpose of calculating the Advisor's Quarterly Account Fee. Each Account within the Consolidated Account is assessed a proportional amount of the total of all fees. In all cases, Clients will receive a written invoice for fees owed immediately following the end of the quarter being billed. The invoice will include the fee(s) charged, the formula used to calculate the fee(s), the fee calculation itself, the time period covered by the fee(s), the amount of assets under management the fee is based upon, and the name of the Custodian. We urge the client to compare this information with the fees listed on the account statement that will be received from the custodian three and one-half months after receipt of the fee invoice. The Advisor utilizes a calendar fiscal year and, therefore, Q1 includes January through March, Q2 includes April through June, Q3 includes July through September, and Q4 includes October through December. If the Client prefers to pay the Advisor's Quarterly Account Fee by check rather than having it deducted from the Account, the Custodian must receive the Client's check on or before April 30th, July 30th, October 30th and January 30th, respectively. Make your check payable and mail it directly to the Custodian as disclosed on the Quarterly Fee Statement. If your check is not received by the Custodian by the respective due date, the total Quarterly Account Fee shall be deducted by the Custodian on the respective due date. Make your check payable and mail it directly to the Custodian as disclosed on the Quarterly Fee Statement. If your check is not received by the Custodian by the respective due date, the total Quarterly Account Fee shall be deducted by the Custodian on the respective due date.

ADVISOR'S QUARTERLY AVERAGE DAILY BALANCE ACCOUNT FEE

Fee Range 1: A Consolidated Account with a quarterly average daily balance that is less than $67,000.00 is assessed a fee of 0.0075 times the Consolidated Account's average daily balance.
Fee Range 2: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $67,000.00 but less than $143,000.00 is assessed a fee of 0.0070 times the Consolidated Account's average daily balance.
Fee Range 3: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $143,000.00 but less than $231,000.00 is assessed a fee of 0.0065 times the Consolidated Account's average daily balance.
Fee Range 4: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $231,000.00 but less than $334,000.00 is assessed a fee of 0.0060 times the Consolidated Account's average daily balance.
Fee Range 5: A Consolidated Account with a quarterly average daily balance that is greater than or equal

to $334,000.00 but less than $364,000.00 is assessed a fee of 0.0055 times the Consolidated Account's average daily balance.
Fee Range 6: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $364,000.00 but less than $400,000.00 is assessed a fee of 0.0050 times the Consolidated Account's average daily balance.
Fee Range 7: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $400,000.00 but less than $445,000.00 is assessed a fee of 0.0045 times the Consolidated Account's average daily balance.
Fee Range 8: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $445,000.00 but less than $500,000.00 is assessed a fee of 0.0040 times the Consolidated Account's average daily balance.
Fee Range 9: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $500,000.00 but less than $572,000.00 is assessed a fee of 0.0035 times the Consolidated Account's average daily balance.
Fee Range 10: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $572,000.00 but less than $667,000.00 is assessed a fee of 0.0030 times the Consolidated Account's average daily balance.
Fee Range 11: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $667,000.00 but less than $800,000.00 is assessed a fee of 0.0025 times the Consolidated Account's average daily balance.
Fee Range 12: A Consolidated Account with a quarterly average daily balance that is greater than or equal to $800,000.00 is assessed a Quarterly Decimal Fee of 0.0020 times the Consolidated Account's average daily balance.

ANNUAL EXPENSE RATIOS: The previously-listed fees are in addition to the annual expense ratios that are deducted by the mutual funds, ETFs, ETNs and private managers from each investment held within each Account. Currently, the total portfolio weighted average of annual expense ratios range from approximately 0.29% to 0.47%.

PRO-RATED FEES ASSESSED FOR WITHDRAWALS AND/OR TRANSFERS-OUT: Withdrawals and/or transfers-out from closed Accounts, are subject to the deduction of the previously-listed fees on a pro-rated basis. For the purpose of calculating the applicable fees, said Accounts are not considered to be associated with any Consolidated Account and are subject to the previously-listed fees as stand-alone Accounts, not eligible for any of the discounts of a Consolidated Account. The Client's obligation to pay fees will terminate when the closed Account is finally transferred-out or distributed and its value at the Custodian is $0.00.

IMPORTANT RECOMMENDATION: To better facilitate the potential for investment success, the Advisor recommends that the total annual expenses attributable to any Account should never exceed 3% of any Account's balance. Fees are excessive to the extent they exceed 3%.

GENERAL INFORMATION

TERMINATION OF THE ADVISORY RELATIONSHIP: Pursuant to WAC 460-24A-145, the Advisor is required to deliver Form ADV Part 2 "(i) not less than forty-eight hours prior to entering into any investment advisory contract with such client or prospective client, or (ii) **at the time of entering into any such contract, if the advisory**

client has a right to terminate the contract without penalty within five business days after entering into the contract." The Client may terminate this Agreement without being subject to any fees according to the provisions of the aforementioned regulation. Either the Client or the Advisor may terminate this Agreement at any time, and for any reason, with written notice. Although no fees are paid in advance of services provided, upon termination of any account, if there are any prepaid, unearned fees, they will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

MUTUAL FUND AND ETF FEES: All fees paid to the Advisor for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These mutual fund and ETF fees and expenses are described in each fund's prospectus. Said fees will generally include a management fee, other expenses, and a possible distribution fee. If the security also imposes sales charges, a client may pay an initial or deferred sales charge. However, the Advisor goes to great lengths to avoid utilizing any security for which sales charges and/or distribution fees apply. A client could invest in a security directly, without our services. In that case, the client would not receive the services provided by the Advisor which are designed, among other things, to assist the client in determining which securities are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the securities and the Advisor's fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the value to the client of the advisory services being provided.

SEPARATELY MANAGED ACCOUNT FEES: Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by the Advisor. Such fees may include the investment advisory fees of the independent advisers. The Advisor will review with clients any separate program fees that may be charged to clients.

ADDITIONAL FEES AND EXPENSES: In addition to the Advisor's advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker-dealers, including, but not limited to, any transaction charges imposed by a broker-dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV Part 2A for additional information.

IF APPLICABLE: Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to the Advisor's minimum account requirements in effect at the time the client entered into the advisory relationship. Therefore, the Advisor's minimum account requirements (if any) may differ among clients.

ERISA ACCOUNTS: (This provision only applies to ERISA accounts. All non-ERISA accounts are subject to the Advisor's fiduciary duty to act in the best interest of the Client under the Securities Act of Washington.) The Advisor is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, the Advisor is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, the Advisor may only charge fees for investment advice about products for which the Advisor and/or the Advisor's related persons do not receive any commissions or 12b-1 fees. If the Advisor ever did receive commissions or 12b-1 fees, such fees would be used to offset the Client's advisory fees.

ADVISORY FEES IN GENERAL: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

LIMITED PREPAYMENT OF FEES: Under no circumstances does the Advisor require or solicit payment of fees in excess of $500 more than six months in advance of services rendered.

Item 6 Performance-Based Fees and Side-By-Side Management

The Advisor does not charge performance-based fees. The Advisor does not have clients who pay performance-based fees. Therefore, we have no incentive to favor those accounts because such compensation would be more directly tied to the performance of their accounts.

Item 7 Types of Clients

The Advisor may provide advisory services to any of the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above
- State or municipal government entities
- Other: Trusts.

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

METHODS OF ANALYSIS

The Advisor may utilize one or more of the following methods of analysis in formulating our investment advice and/or managing client assets. Priority is given to Fundamental Analysis, Quantitative Analysis and Asset Allocation. All other forms of analysis are performed anecdotally to gain insight into the recommendations of other analysts who rely upon them when formulating their advice.

FUNDAMENTAL ANALYSIS: The Advisor relies mainly upon fundamental analysis to formulate investment decisions. The Advisor attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

CYCLICAL ANALYSIS: In this type of technical analysis, the Advisor measures the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Cyclical analysis carries the risk that the security being analyzed will not follow the expected movements relative to the overall market.

QUANTITATIVE ANALYSIS: The Advisor uses mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, in an attempt to predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

QUALITATIVE ANALYSIS: The Advisor subjectively evaluates non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, in an attempt to predict changes to share price based on that data.

A risk when using qualitative analysis is that the Advisor's subjective judgment may prove incorrect.

ASSET ALLOCATION: Rather than focusing primarily on the selection of individual securities, the Advisor attempts to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. This type of analysis underpins the Advisor's design of the Model Portfolios within the Strategic Portfolio Balance^{sm} Investment Discipline. (Before investing in any of the Advisor's Model Portfolios, carefully read and understand the prospectus for any investment you are considering. All investments involve risk. You can lose money. Past performance is no guarantee of future returns. The Advisor's model portfolios are not guaranteed to perform either better or worse than any other investment strategy. Each model has been designed to reduce risk through optimized diversification and to maximize returns by rebalancing periodically to the recommended strategic targets. Patience and a long-term perspective are recommended.)

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

MUTUAL FUND AND/OR ETF ANALYSIS: The Advisor looks at the experience and track record of the managers of the mutual fund or ETF in an attempt to determine if that management team has demonstrated an ability to invest over a period of time and in different economic conditions. The Advisor also looks at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. The Advisor also monitors the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as the Advisor does not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

THIRD-PARTY MONEY MANAGER ANALYSIS: The Advisor examines the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to profitably invest over a period of time and in different economic conditions. The Advisor monitors the manager's underlying holdings, strategies, concentrations and leverage as part of the Advisor's overall periodic risk assessment. Additionally, as part of the Advisor's due-diligence process, the Advisor surveys the manager's compliance and business enterprise risks.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as the Advisor does not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for the Advisor's clients. Moreover, as the Advisor does not control the manager's daily business and compliance operations, the Advisor may be unaware of any lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

RISKS FOR ALL FORMS OF ANALYSIS: The Advisor's securities analysis methods rely on the assumption that the companies whose securities the Advisor purchases and sells, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While the Advisor is alert to indications that data may be incorrect, there is always a risk that the Advisor's analysis may be compromised by inaccurate or misleading information.

OTHER: The Advisor will utilize any and all forms of analysis that the Advisor deems appropriate and enlightening for the purpose of providing investment supervisory services and investment advice.

INVESTMENT STRATEGIES

The Advisor uses the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

THE OBJECTIVES ARE:

- To maximize return within reasonable and prudent levels of risk.
- To minimize total investments in companies deriving the majority of their income from the extraction, processing and/or use of fossil fuels (coal, oil, methane, etc.).
- To provide exposure to a wide range of investment opportunities in various markets (ex-fossil fuels) while limiting risk exposure through prudent diversification.
- To establish policies based on total return rather than solely on current income, providing the greatest investment flexibility, and therefore the greatest opportunity for growth of assets.
- To control costs of administering and managing the investment.

WHAT WE AVOID: All investments selected are screened so as to avoid the following:

- Fossil fuels;
- Nuclear energy;
- Weapons;
- Factory farming;
- Deforestation;
- GMO's;
- Tobacco.

WHAT WE FAVOR: Special emphasis is placed upon investments in the following:

- Clean solar and wind energy;
- Clean water resources;
- Clean technology;
- Low carbon-footprint businesses;

- Businesses that maximize environmental advantages and minimize environmental risks;
- Businesses that support energy efficiency and emissions reductions.

CONSIDERATION GIVEN: "Socially responsible" companies are considered when selecting securities. "Social responsibility" screens include numerous corporate attributes such as paying above-average wages, offering numerous employee benefit programs, positive community involvement, philanthropy, etc. All are favorable attributes that should be encouraged. However, if the company's business operations (i.e. fossil fuels, nuclear energy, weapons manufacturing, etc.) are incompatible with our underlying investment philosophy as listed above, avoidance of that company and/or that industry will take precedence over "social responsibility."

RESEARCH SOURCE: The Advisor relies upon https://www.morningstar.com/ for all definitions and classifications of each of the above-referenced types of securities. To minimize fossil fuels held within client portfolios we rely on Morningstar's definition of fossil fuel companies as follows:

- "Fossil Fuel Involvement is the portfolio's percentage exposure to fossil fuels averaged over the trailing 12 months. Companies with fossil fuel involvement are defined as those deriving at least 5% of their revenue from the following activities: Thermal coal extraction, thermal coal power generation, oil and gas production, and oil and gas power generation. Companies deriving at least 50% of their revenue from oil and gas products and services are also included."

LONG-TERM PURCHASES: The Advisor purchases securities with the idea of holding them in the client's account for a year or longer. Typically the Advisor employs this strategy when:

- The Advisor believes the securities to be currently undervalued, and/or
- The Advisor wants exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, the Advisor may not take advantage of short-term gains that could be profitable to a client. Moreover, if the Advisor's predictions are incorrect, a security may decline sharply in value before the Advisor makes the decision to sell.

SHORT-TERM PURCHASES: When utilizing this strategy, the Advisor purchases securities with the idea of selling them within a relatively short time (typically a year or less). The Advisor does this in an attempt to take advantage of conditions that the Advisor believes will soon result in a price swing in the securities purchased.

A risk in short-term purchases is that the timing may not be correct to realize a profit and/or unnecessary income tax consequences may be realized in taxable accounts.

TRADING: The Advisor purchases securities with the idea of selling them very quickly (typically within 30 days or less). The Advisor does this in an attempt to take advantage of the Advisor's predictions of brief price swings.

A risk in trading is that transaction costs may exceed profits and unnecessary income tax consequences may be realized in taxable accounts.

SHORT-SALES: The Advisor borrows shares of a stock for the client's portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, the Advisor buys the same stock to return the shares to the original owner. The Advisor engages in short selling based on the Advisor's determination that the stock will go down in price after having borrowed the shares. If the Advisor is correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

The risk is that the stock shorted does not lose value and must be replaced at a higher price in the future.

MARGIN TRANSACTIONS: The Advisor may purchase stocks for the client's portfolio with money borrowed from the client's brokerage account. This allows the client to purchase more stock than the client would be able to with the available cash, and allows the Advisor to purchase stock without selling other holdings.

The risk is that the shares purchased with borrowed money could lose value by the time that the borrowed money must be repaid.

OPTION WRITING: The Advisor may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset. The two types of options are "calls" and "puts:"

- A "call" gives the Advisor the right to buy an asset at a certain price within a specific period of time. The Advisor will buy a call if the Advisor has determined that the stock will increase substantially before the option expires so that the stock can be purchased at below-market prices and subsequently resold at a profit. A risk is that the stock does not increase, the option expires worthless and the premium paid for that option is lost.
- A "put" gives the Advisor the right to sell an asset at a certain price within a specific period of time. The Advisor will buy a "put" if the Advisor has determined that the price of the stock will fall before the option expires. A risk is that the stock does not fall, the option expires worthless and the premium paid for that option is lost.

The Advisor will use options to speculate on the possibility of a sharp price swing. The Advisor will also use options to "hedge" a purchase of the underlying security; in other words, the Advisor will use an option purchase to limit the potential upside and downside of a security that has been purchased for the client's portfolio.

The Advisor uses "covered calls", in which the Advisor sells an option on a security the client owns. In this strategy, the client receives a fee for making the option available, and the person purchasing the option has the right to buy the security from the client at an agreed-upon price. The risk is that the price of the security will swing “into the money” for the purchaser of the option and the client will have to deliver the security at a loss.

The Advisor uses a "spreading strategy" in which the Advisor purchases two or more option contracts (for example, a call option that the client buys and a call option that the client sells) for the same underlying security. This effectively puts the client on both sides of the market, but with the ability to vary price, time and other factors. A risk is that the upper and lower limits of the “spreading strategy” will reduce the client’s opportunity for gains.

RISK OF LOSS: Securities investments are not guaranteed and the client may lose money on any investment or strategy. The Advisor asks that the client works closely with the Advisor to help in understanding and acting upon the client’s tolerance for risk.

Item 9 Disciplinary Information

The Advisor is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the Advisor’s advisory business or the integrity of management.

The Advisor, the Advisor’s management personnel and the Advisor’s employees have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

The Advisor and the Advisor’s related persons are not engaged in other financial industry activities and have no other industry affiliations.

Item 11 Code of Ethics, Participation/Interest in Client Transactions, Personal Trading

The Advisor has adopted the Certified Financial Planner(r) Board of Standards' Code of Ethics which sets forth high ethical standards of business conduct that the Advisor requires of employees, including compliance with applicable federal securities laws.

The Advisor and related personnel owe a duty of loyalty, fairness and good faith towards clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

The Advisor's Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the Advisor's access persons. Among other things, the Advisor's Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. The Advisor's code also provides for oversight, enforcement and recordkeeping provisions.

The Advisor's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While the Advisor does not believe that the Advisor has any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of the Advisor's Code of Ethics is available to our advisory clients and prospective clients. Clients may request a copy by sending an email directly to ronald@colsonfinancial.com, or by calling the Advisor at 303.986.9977.

The Advisor and individuals associated with the Advisor are prohibited from engaging in principal transactions.

The Advisor and individuals associated with the Advisor are prohibited from engaging in agency cross transactions.

The Advisor's Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the Advisor's employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

The Advisor and/or individuals associated with the Advisor may buy or sell for their personal accounts securities identical to or different from those recommended to clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of the Advisor that no person employed by the Advisor may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

The Advisor may aggregate employee trades with client transactions where possible and when compliant with the Advisor's duty to seek best execution for clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, the Advisor will allocate all purchases pro-rata, with each account paying the average price. Accounts of employees of the Advisor will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to clients, the Advisor has established the following policies and procedures for implementing the Advisor's Code of Ethics, to ensure that the Advisor complies with its regulatory obligations and provides clients and potential clients with full and fair disclosure of such conflicts of interest: [a] No principal or employee of the Advisor may put his or her own interest above the interest of an advisory client; [b] No principal or employee of the Advisor may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public; [c] It is the expressed policy of the Advisor that no person employed by the Advisor may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.

- The Advisor requires prior approval for any IPO or private placement investments by related persons of the firm.
- The Advisor maintains a list of all reportable securities holdings for the Advisor and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by the Advisor's Chief Compliance Officer or his/her designee.
- The Advisor has established procedures for the maintenance of all required books and records.
- Clients can decline to implement any advice rendered, except in situations where the Advisor is granted discretionary authority.
- All of the Advisor's principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- The Advisor requires delivery and acknowledgment of the Code of Ethics by each supervised person of the Advisor.
- The Advisor has established policies requiring the reporting of Code of Ethics violations to the Advisor's senior management.
- Any individual who violates any of the above restrictions may be subject to termination.

Item 12 Brokerage Practices

The Advisor does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

The Advisor requires that clients provide us with written authority to determine the broker-dealer to use and the commission costs that will be charged to clients for these transactions. The Advisor generally defaults to executing trades through the broker-dealer utilized by the custodian, E*Trade Advisor Services, in order to take full advantage of reduced transaction costs through block trading.

Clients must include any limitations on this discretionary authority in the written authority statement. Clients may change/amend said limitations as required. Such amendments must be provided to the Advisor in writing.

The Advisor will aggregate trades in blocks where possible and when advantageous to clients. This aggregation of trades permits the trading of large blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such trade.

Aggregated block trading may allow the Advisor to execute equity trades in a timelier, more equitable manner, at a lower average share price. The Advisor will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day. The Advisor's block trading policy and procedures are as follows:

1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with the Advisor's, or the firm's order allocation policy.
2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
3) The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable the Advisor to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
4) Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
5) If the order 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 pro-rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro-rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro-rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order, and must share in the commissions on a pro-rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.
7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to

and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.

8) The Advisor's client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
9) Funds and securities for aggregated orders are clearly identified on the Advisor's records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
10) No client or account will be favored over another.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES ("ISS")
INDIVIDUAL PORTFOLIO MANAGEMENT

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least monthly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by Ronald Scott Colson, CFP(r), MBA, President.

REPORTS: In addition to the quarterly statements and confirmations of transactions that clients receive, the custodian provides ongoing reports via their website summarizing account performance, balances and holdings.

FINANCIAL PLANNING SERVICES

REVIEWS: Reviews may occur at different stages depending on the nature and terms of the specific engagement. Typically, the offer is made to each client to participate in one annual review each calendar year. However, participation by the client in the annual review process is not required.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

CONSULTING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

REPORTS: These client accounts will receive reports as contracted for at the inception of the advisory engagement.

Item 14 Client Referrals and Other Compensation

It is the Advisor's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to the Advisor.

It is the Advisor's policy not to accept or allow the Advisor’s related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services the Advisor provides to clients.

Item 15 Custody

The Advisor previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that the Advisor directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not verify the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact the Advisor directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, the Advisor also sends account billing statements directly to clients on a quarterly basis. The Advisor urges clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

The Advisor does not have actual or constructive custody of client accounts. Actual and constructive custody of client accounts is performed by the custodian, E*Trade Advisor Services.

Item 16 Investment Discretion

Clients may hire the Advisor to provide discretionary asset management services, in which case the Advisor places trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

The Advisor’s discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients grant the advisor discretionary authority when they sign a discretionary agreement with the Advisor, and may limit this authority by giving the Advisor written instructions. Clients may also change/amend such limitations by once again providing the Advisor with written instructions.

As previously disclosed in Item 4 of this brochure, the Advisor does not provide non-discretionary asset management services.

Item 17 Voting Client Securities

The Advisor does not vote proxies for client accounts. Clients are expected to vote their own proxies. Clients may contact the Advisor for advice regarding their voting of proxies if they so choose.

The Advisor will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client’s account(s), including, but not limited to, the filing of “Proofs of Claim” in class action settlements. If desired, clients may direct the Advisor to transmit copies of class action notices to the client or a third party. Upon such direction, the Advisor will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18 Financial Information

The Advisor has no additional financial circumstances to report.

Under no circumstances does the Advisor require or solicit payment of fees in excess of $500 per client more than six months in advance of services rendered. Therefore, the Advisor is not required to include a financial statement.

The Advisor has not been the subject of a bankruptcy petition at any time since inception. No employees of the Advisor have been the subject of a bankruptcy petition at any time since inception.

Item 19 Requirements for State-Registered Advisers

The following individuals are the principal executive officers and management persons of the Advisor:

- Ronald Scott Colson, CFP(r), MBA, President -- Year of birth: 1952.

The following is a chronological list of Mr. Colson's education and business background and professional designations.

Formal Education After High School:

- Colorado Mountain College, Glenwood Springs, Colorado. Attended 1970-72. Associate of Arts degree, biology major. (Phi Theta Kappa).
- World Campus Afloat, Chapman College, Orange, California. Attended two semesters at sea. Biology major.
- University of Colorado, Boulder, Colorado. Attended two years. Graduated in 1975 with a Bachelor of Arts degree, biology major. (Phi Beta Kappa).
- University of Denver, Denver, Colorado. Attended one year. Biology major.
- University of Colorado, Boulder, Colorado. Attended three years. Graduated in 1989 with a Master of Business Administration degree, finance major. (With Honors).
- College for Financial Planning, Denver, Colorado. Attended 1990-93. Graduated in 1993 with a Certified Financial Planner®, (CFP®), designation.

Business Background Since 1987:

- Field Underwriter for New York Life Insurance Company, Denver General Office, Denver, Colorado. From May 1987 through July 1989. Voluntarily terminated.
- Sole Proprietor of Colson Financial Group, Lakewood, Colorado, an independent insurance/investment brokerage and financial planning firm. July 1989 through October 1991. Sole proprietorship terminated at incorporation, October 1991.
- Registered Representative of GDN Securities Ltd., Englewood, Colorado from July 1989 through October 1991 when the broker/dealer was purchased by Miller Financial Group.
- Registered Representative of Miller Financial Group, Minneapolis, Minnesota from October 1991 through February 1996 when the broker/dealer's name was changed to Global Financial Group.
- Registered Representative of Global Financial Group, Minneapolis, Minnesota from February 1996 through July 1996. Voluntarily terminated to eliminate conflicts of interest with non-commissioned investment advisory services provided to Clients.
- President of Colson Financial Group, Inc., Lakewood, Colorado, a financial planning and investment management firm, from October 1991 to the present.

Designations: Ronald Scott Colson, CFP®, MBA, President has earned the following designation(s) and is in good standing with the granting authority:

- Certified Financial Planner® (CFP®), granted 1993.03.15 by the CFP Board.

The following is an explanation of the Certified Financial Planner® (CFP®) designation: The Certified Financial Planner™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CFP® DISCLOSURE OF DISCIPLINARY EVENTS

Ronald Scott Colson, CFP®, MBA, President is required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory or administrative proceedings in which any employees or management personnel of the Advisor were found liable or against whom an award was granted.

The Advisor, the Advisor's management personnel and the Advisor's employees have no reportable disciplinary events to disclose.

As previously disclosed in "Other Financial Industry Activities and Affiliations" (Item 10), neither the Advisor nor the Advisor's management personnel have a relationship or arrangement with any issuer of securities.

(end of SEC Form ADV Part 2A)