



**Christian Investment Advisors, Inc.  
d/b/a  
CIS Wealth Management Group**

**Form ADV Part 2A - Disclosure Brochure**

**March 29, 2019**

This Disclosure Brochure provides information about the qualifications and business practices of Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group ("CIS"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (830) 609-6986.

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

Additional information about CIS and its advisory persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group**

**CRD No: 165811**

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**[www.ciswealth.com](http://www.ciswealth.com)**

## **Item 2 - Material Changes**

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Since our last filing on 03/29/2018, we have no material changes to disclose:

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### About This Document

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of CIS.

CIS believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for CIS:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **165811** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (830) 609-6986.

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## **Item 4 - Advisory Services**

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### **A. Firm Information**

Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group ("CIS"), is a Registered Investment Advisor located in the State of Texas, which is organized as a corporation under the laws of the State of Texas. Christian Investment Advisors, Inc. was established in October 2012, as a sole proprietorship that was owned and operated by Robert N. Barber and was formerly known as "Robert N. Barber d/b/a Christian Investment Advisors". Christian Investment Advisors, Inc. was reincorporated as a corporation in April 2017, and continues to be owned and operated by Robert N. Barber. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by CIS.

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

CIS offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations and corporate clients primarily in Texas and other states in the U.S. (each referred to as a "Client").

#### Account Portfolio Management

CIS provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. CIS works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. CIS will then construct a portfolio internally or using third-party managers. CIS constructs portfolios consisting primarily of equities, mutual funds and/or exchange-traded funds ("ETFs") to achieve the Client's investment goals. The Advisor may also offer other investment types as necessary to meet the needs of its Clients.

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

CIS strives to implement a Biblically Responsible Investing overlay into investment strategies whenever feasible. Biblically Responsible Investing works to integrate Scriptural guidelines with an investment portfolio. This method looks for companies to invest in that are making a positive impact on our society, as well as applying screening processes to avoid those that do not. If a company traded on a public exchange is publicly known to violate Biblical principles, Biblically Responsible Investing strives to stay clear from buying those companies directly through a separate managed account or indirectly through a mutual fund.

This process is applied to our strategic allocation models. Screens are not applied to the use of index exchange-traded funds and tactical mutual funds. CIS may use third party sources and internal processes to screen investments.

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

CIS will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will CIS accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

#### Managed Account Programs

CIS may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client's selected custodian (the "Program Sponsor"). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. CIS will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add CIS's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The overall fee (including the Advisor's Investment Advisor Fee) will not exceed 2.5% annually. CIS does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than CIS's Investment Advisory Fee (described in Item 5). The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, CIS and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

#### Selection of Other Advisors

CIS may periodically recommend and refer clients to unaffiliated money managers or investment advisors at CIS's discretion or Client's request. Through this arrangement, the Client will then enter into an advisory agreement with that sub-advisor to which that sub-advisor will assist and advise the Client in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such sub-advisor services, the sub-advisor will receive an investment advisory fee, billed based on the fee schedule the Client establishes with the unaffiliated money manager[s] or investment advisor[s].

CIS will receive a portion of the investment advisory fee for the solicitation and referral of the Client to the sub-advisor, and may assist the Client in completing their Client questionnaire and account opening paperwork. CIS may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship.

The Client, prior to entering into an agreement with unaffiliated money manager[s] or investment advisor[s], will be provided with the advisor's Form ADV 2 (or a brochure that makes the appropriate disclosures).

#### Financial Planning

CIS will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. CIS may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging CIS to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – CIS, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – CIS will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – CIS will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – CIS will provide investment management and ongoing oversight of the Client's portfolio and overall account.

### **D. Assets Under Management**

As of March 29, 2019, CIS managed assets for 300 clients in the amount of approximately \$82,540,198 in client assets. We manage all these assets solely on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 - Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of CIS and the Client.

### **A. Fees for Advisory Services**

#### Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. The initial pro-rated quarterly advisory fee may be charged in arrears and the beginning of the following quarter. Investment Advisory Fees range from maximum of 2.00% to 0.50% based on the following schedule:

Assets Under Management	Annual Rate
Up to \$100,000	2.00%
\$100,001 to \$1,000,000	1.25%
\$1,000,001 to \$2,000,000	1.00%
\$2,000,001 to \$5,000,000	0.75%
Over \$5,000,000	0.50%

At the sole discretion of the Advisor, the investment advisory fees may be negotiable. Criteria used to determine these fees include but is not limited to; current local industry comparison, size of the portfolio, complexity, and scope of the services to be rendered.

#### Managed Accounts Programs

Fees for Clients participating in managed accounts programs will include CIS's Investment Advisory Fee above, plus the Program Sponsors Fee.

#### Selection of Other Advisors

For Clients referred to an unaffiliated investment advisor, the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to CIS. Please see Item 14 for additional details.

#### Financial Planning

CIS offers financial planning services on an hourly basis ranging from \$100 to \$500 per hour or on a fixed fee basis ranging from \$500 to \$10,000, depending on the scope, complexity and duration of services to be provided. The Advisor will provide an estimate for total hours to complete an engagement prior to entering into a financial planning agreement, which may be negotiable depending on the nature and complexity of each Client's circumstances. The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

#### *Open Retainer*

An Open Retainer Program provides holistic/comprehensive financial planning for a fixed monthly fee. Clients will have six to twelve scheduled meetings during the Initial Year (see below), depending on the individual situation, and generally three or four scheduled meetings during Renewal Years (see below). Meetings may be conducted by telephone or email, as needed, not to exceed two hours per month.

Services provided may encompass potential areas of focus, including but not limited to: identifying current and future expenses, cash flow, insurance review and needs analysis, employee benefits, retirement plan review, investment review, retirement planning, income planning strategies, social security, estate planning, long-term care planning, and tax planning.

We charge a monthly retainer fee of up to \$500 which shall be negotiable depending upon certain circumstances. Retainer fees shall be paid in advance, in monthly installments. With assets under management of \$1,000,000 or more, the ongoing monthly retainer fee may be waived at the adviser's discretion. Retainer fees may be paid by check made payable to Christian Investment Advisors, Inc., via ACH debit from the client's checking account, via credit card, or by direct debit from the client's account at the custodian. Your financial planning agreement will detail the amount of the fee you will pay, the frequency with which the fee shall be paid and the payment method you select.



Initial Year of Open Retainer:

Scheduled meeting topics are listed below. CIS will schedule meetings to cover those topics relevant to you, such as:

- Identifying Current and Future Expenses
- Insurance Review and Needs Analysis
- Investment Review, including Employer Plans
- Retirement Planning
- Social Security
- Estate Planning
- Cash Flow
- Employee Benefits
- Tax Planning
- Income Planning Strategies
- Long Term Care
- Increasing Cost of Health Care

Renewal Years of Open Retainer:

Renewal Years of Open Retainer - Typical scheduled meetings:

- Identifying Current and Future Expenses
- Insurance Review and Needs Analysis
- Investment Review, including Employer Plans
- Retirement Planning
- Social Security
- Estate Planning
- Cash Flow
- Employee Benefits
- Tax Planning
- Income Planning Strategies
- Long Term Care
- Increasing Cost of Health Care

Open Retainer fees are calculated based on the Client's(s') total income, assets, and overall complexity of their financial situation. Fees are always disclosed in advance of entering into the financial planning agreement.

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

### Account Portfolio Management

CIS is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with CIS, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

### Unaffiliated Money Management

In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. CIS will assist the Client with the termination and transition as appropriate.



## Financial Planning

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at anytime by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

## **C. Fee Billing**

### Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with CIS at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting CIS to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Client may also request to be billed directly for Investment Advisory Fees in lieu of the automatic account deduction.

### Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced 50% upon execution of the Financial Planning and Consulting Agreement and 50% upon receipt of the agreed upon deliverable. Advance payments will only be collected for services that will be completed in less than six months.

## **D. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than CIS, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by CIS is separate and distinct from these custodian and execution fees.

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

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

CIS does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above. CIS does not receive 12(b)1 fees from mutual fund sponsors on managed assets.

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

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

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

## **Item 7 - Types of Clients**

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CIS offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations and corporations in Texas and other states. The relative percentage each type of Client is available on CIS's Form ADV Part 1. These percentages will change over time. CIS generally does not impose a minimum account size for establishing a relationship.

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

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

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

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

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

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

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

*Technical analysis* is used for analyzing various economic and market trends. These trends, both short- and long-term, are used for determining specific trade entry and exit points and broad economic analysis. These trends may include put/call ratios, pricing trends, moving averages, volume, and changes in volume, among many others. Indicators used by the Advisor do not speak to the financial health of a particular issuer. Rather, indicators are used to gauge market sentiment regarding a given issue. Technical Analysis and Charting will be used primarily for the timing of a particular trade, and not security selection. More details on the Advisor's review process are included in Item 13.

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

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (830) 609-6986.**

## **Item 9 - Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving CIS or any of its employees.** CIS and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **165811** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Robert N. Barber by selecting the Investment Adviser Representative and entering Mr. Barber's Individual CRD# **2279678** in the field labeled "Individual CRD Number".

## **Item 10 - Other Financial Industry Activities and Affiliations**

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### **A. Broker Dealer Affiliation**

#### Broker-Dealer Affiliation

Advisory Persons, Robert Barber and Nathaniel Morris, are also registered representatives of Cetera Advisor Networks LLC., a registered broker-dealer (CRD No. CRD#13572), member FINRA, SIPC (herein "Cetera"). In their separate capacity as registered representatives, advisory persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisor or its advisory persons. Neither the Advisor nor its advisory persons will earn investment advisory fees in connection with any services implemented in an advisor person's separate capacity as a registered representative where commissions are earned. Generally, recommendations made by CIS to its Clients are implemented by advisory persons in their role as an Investment Adviser Representatives of the Advisor, not in their role as a Registered Representatives of Cetera. In no circumstances will CIS earn an advisory fee and a commission on the same investment. In the event that an advisory person earns a commission on an investment, the advisory fee will be waived by CIS.

## **B. Other Affiliations**

Neither CIS nor its advisory persons are registered, or have an application pending to register, as a futures commission merchant ("FCM"), commodity pool operator ("CPO"), a commodity trading advisor ("CTA"), or an associated person of any such entity.

## **C. Insurance Agency Affiliation**

Advisory Persons of CIS, may serve as insurance professionals, which is separate from their role with the Advisor. As an insurance professional, an advisory person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation and always have a right to implement any recommendations made by the Advisor or its advisory persons. CIS only offers products that it believes are in the client's best interest.

## **D. Selection of Other Advisors**

As noted in Item 4, the Advisor may select unaffiliated money managers to assist with the implementation of a Client's investment strategy. In such arrangements, the Advisor will receive a portion of the investment advisory fees collected by the unaffiliated money managers from the Client. The Advisor will not charge its own investment advisory fee for assets referred to an unaffiliated money manager.

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

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

CIS has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with CIS. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. CIS and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of CIS associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. CIS has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (830) 609-6986.

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

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

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

CIS allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that the trades made by our employees could impact the value of trades made on behalf of Clients or positions maintained in Client accounts. As fiduciaries, we must disclose this potential conflict and mitigate it through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

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

While CIS allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades do not occur at the same time. CIS will place trades only after Client orders have been placed and filled.

**At no time, will CIS or any associated person of CIS, transact in any security to the detriment of any Client.** Monthly review of associated persons account transactions will be conducted to ensure compliance.

### **Item 12 - Brokerage Practices**

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

CIS does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize CIS to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, CIS does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where CIS does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by CIS. CIS may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. CIS does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

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

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **CIS does not participate in soft dollar programs sponsored or offered by any broker-dealer.** CIS does receive technology software and support that is related to operational functions and is to the benefit of all advisors and clients.
- 2. Brokerage Referrals** - CIS does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- 3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where CIS will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, CIS will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

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

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. CIS will execute its transactions through an unaffiliated broker-dealer selected by the Client. CIS may aggregate orders in a block trade or trades when securities are



purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 - Review of Accounts**

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

Accounts are monitored on a regular and continuous basis by an investment advisor representative of CIS. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

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

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

### **C. Review Reports**

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

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

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### **A. Compensation Received by CIS**

CIS may refer Clients to unaffiliated money managers, as detailed in Item 4. In such arrangements, CIS has a conflict of interest in that CIS will receive a portion of the unaffiliated money manager's fee collected from the Client for the referral of the Client and the ongoing relationship management support provided by CIS. To mitigate this conflict of interest, CIS will not charge investment advisory fees on assets referred to an unaffiliated manager under such arrangements. Also refer to Item 4.

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

CIS does not engage paid solicitors for Client referrals.

## **Item 15 - Custody**

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CIS does not accept or maintain custody of any Client accounts except for the direct deduction of quarterly advisory fees, refer to Item 5C. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct CIS to utilize that custodian for the Client's security transactions. CIS encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 - Investment Discretion**

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CIS generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by CIS. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by CIS will be in accordance with each Client's investment objectives and goals.

## **Item 17 - Voting Client Securities**

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

## **Item 18 - Financial Information**

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

## **Item 19 - Requirements for State Registered Advisors**

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### **A. Educational Background and Business Experience of Principal Officer**

The CEO/Founder of CIS is Robert N. Barber. Information regarding the formal education and background of Mr. Barber is included in Item 2 of Part 2B below.

### **B. Other Business Activities of Principal Officer**

Mr. Barber has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

### **C. Performance Fee Calculations**

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

### **D. Disciplinary Information**

*There are no legal, civil or disciplinary events to disclose regarding CIS or Mr. Barber.*





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

**for**

**Robert N. Barber  
Owner**

**March 29, 2019**

This Brochure Supplement provides information about the background and qualifications of Robert N. Barber (CRD# **2279678**) in addition to the information contained in the Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group ("CIS" or the "Advisor" - CRD #165811) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the CIS Disclosure Brochure or this Brochure Supplement, please contact us at (830) 609-6986.

Additional information about Mr. Barber is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

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The Owner of CIS is Robert N. Barber. Mr. Barber, born in 1962, is dedicated to serving Client accounts of CIS. Mr. Barber attended Texas State University in San Marcos, TX from 1980 to 1984 (No degree attained). Additional information regarding Mr. Barber's employment history is included below.

### Employment History:

Owner, Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group	04/2017 to Present
Registered Representative, Cetera Advisor Networks, LLC.	11/2017 to Present
Owner, Robert N. Barber d/b/a Christian Investment Advisors	10/2012 to 04/2017
Registered Representative, Girard Securities Inc.	07/2012 to 10/2017
Investment Advisor Representative, Legacy Wealth Counselors	07/2012 to 03/2013
Registered Representative, NEXT Financial Group	08/2005 to 06/2012
Registered Representative, LPL Financial Services	06/1998 to 08/2005

## Item 3 - Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Barber.*

However, we do encourage you to independently view the background of Mr. Barber on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **2279678** in the field labeled "Individual CRD Number".

## Item 4 - Other Business Activities

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Mr. Barber has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

## Item 5 - Additional Compensation

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Mr. Barber has additional business activities where compensation is received. These business activities are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

## Item 6 - Supervision

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Mr. Barber serves as the CEO of CIS and is supervised by Nathaniel A. Morris, the Chief Compliance Officer. Mr. Morris can be reached at (830) 609-6986.

## Item 7 - Requirements for State Registered Advisors

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Mr. Barber does not have any additional information to disclose.



## **Form ADV Part 2B - Individual Disclosure Brochure**

**for**

**Nathaniel Morris  
Chief Compliance Officer & Investment Advisor**

**March 29, 2019**

This Brochure Supplement provides information about the background and qualifications of Nathaniel Morris (CRD# **4657148**) in addition to the information contained in the Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group ("CIS" or the "Advisor" CRD #165811) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CIS's Disclosure Brochure, please contact us at (830) 609-6986.

Additional information about Nathaniel Morris is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

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Nathaniel Morris is the Head of Investment/Client Services and the Chief Compliance Officer of CIS. Mr. Morris, born in 1976, is dedicated to serving the Clients of CIS. Mr. Morris earned an Associate Degree in Practical Theology from Christ for the Nations Institute in 1996. Additional information regarding Mr. Morris' employment history is included below.

### **Employment History:**

Chief Compliance Officer & Investment Advisor, Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group	04/2017 to Present
Registered Representative & Designated Supervisor, Cetera Advisor Networks LLC	11/2017 to Present
Chief Compliance Officer & Investment Advisor, Christian Investment Advisors	10/2012 to 04/2017
Registered Representative, Girard Securities Inc	07/2012 to 10/2017
Investment Advisor, Legacy Wealth Counselors	07/2012 to 03/2013
Registered Representative, NEXT Financial Group	08/2005 to 06/2012
Registered Administration, LPL Financial Services	05/2002 to 08/2005

## **Item 3 - Disciplinary Information**

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Morris.*

However, we do encourage you to independently view the background of Mr. Morris on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4657148** in the field labeled "Individual CRD Number".

## **Item 4 - Other Business Activities**

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Mr. Morris has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

## **Item 5 - Additional Compensation**

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Mr. Morris has additional business activities where compensation is received. These business activities are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

## **Item 6 - Supervision**

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Mr. Morris serves as an Investment Advisor, the Head of Investment/Client Services and the Chief Compliance Officer of CIS. Mr. Morris can be reached at (830) 609-6986.

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

## **Item 7 - Requirements for State Registered Advisors**

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Mr. Morris does not have any additional information to disclose.

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CIS Wealth Management Group  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203  
[www.ciswealth.com](http://www.ciswealth.com)



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

**for**

**Mary Jo Lyons  
Investment Advisor**

**March 29, 2019**

This Brochure Supplement provides information about the background and qualifications of Mary Jo Lyons (CRD#2996229) in addition to the information contained in the Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group ("CIS" or the "Advisor" - CRD #165811) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the CIS Disclosure Brochure or this Brochure Supplement, please contact us at (830) 609-6986.

Additional information about Mrs. Lyons is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Mary Jo Lyons is an Investment Advisor Representative of CIS. Mrs. Lyons, born in 1958, is dedicated to serving Client accounts of CIS. Mrs. Lyons attended Del Mar College and Texas AM Corpus Christi 1976 to 1980 with a degree in Business Administration with a concentration in Marketing. Mrs. Lyons has been a Certified Financial Planner Practitioner since September 2004. Additional information regarding Mrs. Lyons ' employment history is included below.

### Employment History:

Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group – Investment Advisor Representative/Financial Planner	05/2017 to Present
Begay & Associates - Client Service Manager, A private wealth advisory practice of Ameriprise Financial Services, Inc.	10/2013 to 10/2016
MJL Financial Inc., Owner/Founder	01/2013 to 10/2013
Independent Financial Planner, DBA – Preferred Financial Strategies	10/2010 to 12/2012
TIAA-CREF INDIVIDUAL & INSTITUTIONAL SERVICES, LCC	2004 to 2010
Lead Performance Consultant – Charlotte, NC (2009 to 2010)	
Business Training Strategist – Charlotte, NC (2007 to 2009)	
Financial Planning Specialist – Charlotte, NC (2006 to 2007)	
Wealth Management Advisor – Denver, CO (2004 to 2006)	
CHARLES SCHWAB, Denver, CO	1997 to 2004
Investment Consultant, Schwab Private Client – Denver, CO (2001 to 2004)	
Investment Specialist II, Phone Based Advice Team – Austin, TX (2001)	
Training Specialist, Corporate Training – Austin, TX (1999 to 2001)	
Investment Specialist I, Branch Network, Houston, TX (1998 to 1999)	
Registered Representative, National Investor Services, Orlando, FL (1997 to 1998)	

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mrs. Lyons.*

However, we do encourage you to independently view the background of Mrs. Lyons on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **2996229** in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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Mrs. Lyons has additional business activities that are detailed below.

As an Advisory Person of CIS, Mrs. Lyons may serve as an insurance professional, which is separate from their role with the Advisor. As an insurance professional, an advisory person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This will cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation and always have a right to implement any recommendations made by the Advisor or its advisory persons. CIS only offers products that it believes are in the client's best interest.

Mrs. Lyons is not a registered representative of Girard Securities, Inc.

#### **Item 5 - Additional Compensation**

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Mrs. Lyons has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

#### **Item 6 - Supervision**

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Mrs. Lyons serves as an Investment Advisor Representative of CIS and is supervised by Nathaniel A. Morris, the Chief Compliance Officer. Mr. Morris can be reached at (830) 609-6986.

#### **Item 7 - Requirements for State Registered Advisors**

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Mrs. Lyons does not have any additional information to disclose.



## Privacy Policy

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March 29, 2019

### Our Commitment to You

Christian Investment Advisors, Inc. d/b/a CIS Wealth Management Group ("CIS") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. CIS (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

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

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

### Why you need to know?

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

### What information do we collect from you?

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

### What sources do we collect information from in addition to you?

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

### How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
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<p><b>Servicing our Clients</b>  We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations; and</li> <li>• Credit reporting, etc.</li> </ul>	<p>CIS may share this information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Administrators</b>  We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	<p>CIS may share this information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Marketing Purposes</b>  CIS does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where CIS or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	<p>CIS does not share personal information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Authorized Users</b>  In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p>	<p>CIS does share personal information.</p>	<p>Clients can limit the Advisors ability to share.</p>
<p><b>Information About Former Clients</b>  CIS does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	<p>CIS does not share personal information regarding former clients</p>	<p>Clients can limit the Advisors ability to share.</p>
<p><b>How do we protect your information?</b></p>		
<p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p>		
<p>Our employees are advised about CIS's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p>		
<p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.</p>		
<p><b>Changes to our Privacy Policy.</b></p>		

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

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

**Questions:** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (830) 609-6986.