
Vista Capital Partners
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March 31, 2024

This Brochure provides information about the qualifications and business practices of Vista Capital Partners. If you have any questions about the contents of this Brochure, please contact us at 503-772-9500. 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.

Vista Capital Partners is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Vista Capital Partners also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

There have been no material changes made to Vista Capital Partners' ("Vista") Part 2A Brochure since its prior Annual Amendment filing on March 31, 2023. ANY QUESTIONS: Vista's Chief Compliance Officer, John Convery remains available to address any questions regarding this Part 2A.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide other ongoing disclosure information about material changes as necessary.

Currently, our Brochure may be requested by contacting John Convery, 503-772-9500 or john@vistacp.com.

Additional information about Vista is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Vista who are registered, or are required to be registered, as investment adviser representatives of Vista.

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Item 4 – Advisory Business

Vista (formed in January 2001) is a fee-only investment advisor based in Portland, Oregon. We specialize in investment and wealth management for clients with more than \$2,000,000 million to invest. Vista strives for investment success through a disciplined, repeatable investment philosophy that utilizes index funds to maximize long-term returns by minimizing costs and taxes. We focus on true sources of returns, not on stock-picking or market-timing, by structuring portfolios to benefit from smarter combinations of asset classes.

We advise clients on other important areas of their financial lives, including retirement planning, concentrated positions, college savings plans and charitable giving. As each client's financial "quarterback", we work closely with their advisors in the areas of insurance, estate planning and taxes to develop a comprehensive wealth management plan to meet their goals.

Vista prepares a custom Investment Policy Statement for each client based on their particular situation and manages their money according to this Statement. Clients may always impose restrictions on investing in certain securities or types of securities.

As of 12/31/2023, Vista managed \$2,445,045,898 discretionary assets.

Michael O'Reilly, Douglas Johanson, and Dougal Williams are the principal owners of Vista, with Michael owning 24%, Douglas and Dougal each owning 18% of the firm. John Convery owns 10%, Robert Greenman owns 9%, Lindsey Williams owns 8%, Douglas Post owns 7%, Tana Thomson owns 4%, and Julia Tierney, Andrew Darkins and Jonathon Gannon each own 1% of the firm.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services. To the extent specifically requested by the client, Vista shall generally provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Vista will generally provide such consulting services inclusive of its advisory fee set forth at Item 5 below (exceptions may occur based upon assets under management, special projects, etc. for which Vista shall charge a separate planning fee). **Please Note:** Vista **does not** serve as an attorney, accountant or insurance agent, and no portion of our services should be construed as legal, accounting or insurance services. Accordingly, Vista **does not** prepare estate planning documents or tax returns, nor does it sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment

implementation purpose. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Vista and/or its representatives. **Please Note:** If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Please Note: Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Vista recommends that a client roll over their retirement plan assets into an account to be managed by Vista, such a recommendation creates a conflict of interest if Vista will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, Vista serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. **No client is under any obligation to rollover retirement plan assets to an account managed by Vista. Vista's Chief Compliance Officer, John Convery, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

Client Obligations. In performing its services, Vista shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Vista if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Vista's previous recommendations and/or services.

Please Note-Use of Mutual and Exchange Traded Funds: Most mutual funds and exchange traded funds are available directly to the public. Thus, a prospective client can obtain many of the funds that may be utilized by Vista independent of engaging Vista as an investment advisor. However, if a prospective client determines to do so, he/she will not receive Vista's initial and ongoing investment advisory services. **Please Note-Use of DFA Mutual Funds:** Vista utilizes mutual funds issued by Dimensional Fund Advisors ("DFA"). DFA funds are generally only available through registered investment advisers. Thus, if the client was to terminate Vista's services, and not transition to another adviser who utilizes DFA funds,

restrictions regarding additional purchases of, or reallocation among other, DFA funds will generally apply. In addition, Vista representatives may be invited to DFA sponsored events on a gratis or discounted basis-see Item 12. **Vista's Chief Compliance Officer, John Convery, remains available to address any questions that a client or prospective client may have regarding the above.**

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Vista) will be profitable or equal any specific performance level(s).

Schwab. As discussed below at Item 12, Vista recommends that Schwab serve as the broker-dealer/custodian for client investment advisory accounts. Broker-dealers such as Schwab charge brokerage commissions and/or transaction fees for effecting securities transactions. In addition to Vista's investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). The fees charged by Schwab, as well as the charges imposed at the mutual fund and exchange traded fund level, are in addition to Vista's advisory fee referenced in Item 5 below.

Portfolio Activity. Vista has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Vista will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Vista determines that changes to a client's portfolio are neither necessary nor prudent. Of course, as indicated below, there can be no assurance that investment decisions made by Vista will be profitable or equal any specific performance level(s).

Sub-Advisers. Vista can engage sub-advisers to assist with the management of client accounts.

Item 5 – Fees and Compensation

Fees are generally negotiable and may vary from the schedule listed below.

Vista's standard fee schedule is as follows:

Annual Fee

.90% of the first \$2,000,000
.75% of the next \$3,000,000
.60% of the next \$5,000,000
.45% of the next \$10,000,000
.30% of the amount over \$20,000,000

Annual Fee - Institutional Client

.65% of the first \$5,000,000
.50% of the next \$5,000,000
.35% of the next \$10,000,000
.25% of the amount over \$20,000,000

The specific manner in which fees are charged by Vista is established in a client's written Account Agreement with Vista. Vista will include the entire market value of any margined assets when computing its advisory fee. Accordingly, Vista's fee shall be based upon a higher margined account value, resulting in Vista earning a correspondingly higher advisory fee.

Vista will generally bill its fees on a quarterly basis. Clients will be billed in arrears each calendar quarter. Upon clients' authorization, Vista shall directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any earned, unpaid fees will be due and payable.

Vista's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Vista's fee, and Vista shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Vista considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

Vista does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Vista provides portfolio management services to individuals, trusts, estates, corporations and business entities, corporate pension and profit-sharing plans, charitable institutions, foundations, and endowments.

Vista generally requires a minimum of \$2 million of assets to be placed under its management to commence an engagement. However, Vista may waive this requirement and/or charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). Please Note: As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS: Vista's Chief Compliance Officer, John Convery, remains available to address any questions that a client or prospective client may have regarding advisory fees.**

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

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Vista) will be profitable or equal any specific performance level(s). Investing in securities involves risk of loss that clients should be prepared to bear.

Vista begins by developing a complete understanding of each client’s financial goals, tolerance for risk, time horizon, and income needs. Based on this information, Vista writes an investment plan, designed to deliver the greatest chance of achieving long-term success. A key feature of the investment plan is the asset allocation—the way in which assets will be divided between different investments (stocks, bonds, real estate, cash). Academic studies have shown asset allocation to be the most important determinant of investment return and risk (these two characteristics always go hand in hand). Investing in capital markets involves uncertainty. It requires giving up a great deal of control and subjects investors to sudden, severe and upsetting short-term drops in the price of their investments. However, with risk comes the potential for higher returns over time, which actually reduce other risk—the risk of failing to reach real-life, long-term goals and the risk of inflation eroding principal.

Investing in stocks comes with a risk of loss. For example, the well-known Standard & Poor’s 500 Stock Index has posted negative returns 27% of the calendar years from 1926-2023. However, this risk of loss diminishes over time, as only 12% of all five-year periods resulted in losses. Over all fifteen-year periods, returns were positive 100% of the time. Diversification is another method of reducing the risk of loss. Vista constructs investment portfolios consisting of U.S. stocks, international stocks (developed and emerging markets), U.S. and international real estate (via income-producing real-estate investment trusts, also known as REITs), bonds, and cash or cash equivalents (for example, money market funds). The work of Nobel Prize-winning economists has shown that combining such asset classes in a portfolio has historically resulted in higher returns with less risk, as compared to non-diversified portfolios.

For exposure to these asset classes, Vista invests primarily in index funds. An index fund is a basket (portfolio) of stocks which owns most or all of the securities in a market or market sector. In the management of an index fund, no attempt is made to pick “attractive” over “unattractive” securities or to time the market. Rather, by owning all the securities in the market sector an index fund mimics the market’s performance. Index funds generally enjoy lower investment costs (management fees, transaction costs, and tax costs) as compared to “actively managed” funds. Consequently, index funds deliver superior long-term performance compared to the majority of actively managed funds.

Over time, differences in performance of the various asset classes will cause them to drift from their allocation targets. A disciplined rebalancing strategy restores the portfolio’s target allocation once a minimum or maximum threshold has been exceeded. This disciplined process serves to keep risk at the appropriate level while minimizing trading costs and taxable gains.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Vista or the integrity of Vista's management. Vista has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Vista is not actively engaged in a business other than giving investment advice. Vista does not sell products or services other than investment advice to clients.

Item 11 – Code of Ethics

Vista has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Vista must acknowledge the terms of the Code of Ethics annually, or as amended.

Vista anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it may recommend to clients or prospective clients, the purchase or sale of securities in which Vista, its affiliates and/or clients, directly or indirectly, have a position of interest.

Vista's employees and persons associated with Vista are required to follow Vista's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Vista and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Vista's clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Vista 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. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Vista's clients. In addition, the

Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Vista and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Vista's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Vista will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Vista's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting John Convery.

Vista also makes the following pledge to clients:

We believe our clients give us something more valuable than their money to manage; they give us their trust and confidence. We take this responsibility seriously and are dedicated to providing uncompromising financial stewardship.

We will:

- Always put **your** interests first.
- Adhere to the highest standards of ethical behavior and fiduciary responsibility.
- Accept no compensation that would impair our ability to give unbiased advice.
- Communicate candidly with you regarding all aspects of your financial life.
- Invest our personal assets in a manner consistent with yours.
- Continually educate ourselves regarding financial markets - both past and present.
- Keep a long-term perspective.
- Employ a team of talented, hardworking and friendly professionals.
- Help you set realistic goals and instill the discipline necessary to achieve them.
- Remain vigilant about minimizing fund expenses, transaction costs, and taxes.

It is Vista's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Vista will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as

principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 - Brokerage Practices

In the event that the client requests that Vista recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Vista to use a specific broker-dealer/custodian), Vista generally recommends that investment management accounts be maintained at Charles Schwab & Co. Inc (*"Schwab"*). Prior to engaging Vista to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Vista setting forth the terms and conditions under which Vista shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Vista considers in recommending *Schwab* (or any other broker-dealer/custodian to clients) include historical relationship with Vista, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Vista's clients shall comply with Vista's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Vista determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Vista will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Vista's investment management fee. Vista's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

Non-Soft Dollar Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Vista may receive from *Schwab* (or another broker-dealer/custodian, investment manager, platform or fund sponsor) without cost (and/or at a discount) support services and/or products, certain of which assist Vista to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Vista may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Vista in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist Vista in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Vista to manage and further develop its business enterprise.

Vista's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab* as a result of this arrangement. There is no corresponding commitment made by Vista to *Schwab* or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

Vista's Chief Compliance Officer, John Convery, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

Directed Brokerage: Vista does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Vista will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Vista. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account

than would otherwise be the case. **Please Note:** In the event that the client directs Vista to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Vista. Higher transaction costs adversely impact account performance. **Please Also Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

To the extent that Vista provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless Vista decides to purchase or sell the same securities for several clients at approximately the same time. Vista may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Vista's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Vista shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 – Review of Accounts

Most portfolios are managed by a team, typically consisting of a lead advisor and advisor. Each client service team is responsible for overseeing all investment advisory activities on a daily basis and ensuring accounts are managed according to the client’s agreed upon investment policy.

Following are Lead Advisors and the number of clients they serve:

Andrew Darkins, CFP: 78 clients	Doug L. Post, CFP: 74 clients	Dougal Williams, CFA: 37 clients
Jess Allison, CFP: 64 clients	Jonathan T. Gannon, CFP: 65 clients	Julia Tierney, CFP: 60 clients
Lindsey W. Williams: 49 clients	Lyndsi Stender CFP: 58 clients	Robert Greenman, CFP: 39 clients
Vanessa DeHaan, CFP, CPA:39 clients		

Detailed reports of account holdings and performance and other information are provided to clients on a quarterly basis. Clients also receive a monthly statement from the custodian.

Vista will manage each client’s portfolio using a customized Investment Plan.

Understanding the Client – Investment Plan

- Vista makes every effort to gain a complete understanding of a client’s objectives, income requirements, risk tolerance, liquidity requirements, time horizon, tax considerations, unique needs and preferences, allowable investments and investment restrictions. Other topics which are addressed, as needed, in the Investment Plan include: retirement planning, estate planning, insurance, education costs and cash-flow management and how these areas impact/tie into the management of the portfolio. This information is obtained via client interviews and conversations. Vista has a suitability questionnaire/information sheet that is filled out in this process and the results are documented in a written Investment Plan that includes the recommended asset allocation. After presenting the Investment Plan, Vista waits for the client to sign and return a letter of approval before investing the assets. The original Investment Plan and approval letter are saved in the client’s file as well as scanned into Vista’s electronic record system.
- The Investment Plan is discussed with the client at each account review, a minimum of annually, to ensure the plan is still appropriate.
- Changes/Comments regarding other parts of the Investment Plan are clearly noted in our database (currently CRM Notes).
- A new Investment Plan is written as circumstances warrant.

Monitoring the Account

- Asset Allocation - Vista's portfolio management system generates a daily report, identifying any portfolios which have drifted outside the minimum / maximum range from their respective target asset allocations. The system's "dashboard" alerts Vista advisors to rebalance these portfolios, trimming overweight positions and replenishing underweight positions with the proceeds.
- Cash Balances for Income Clients –Advisors monitor daily reports which summarize the cash balances for those clients taking regular income withdrawals.
- Cash Balances for Fees – Cash balances are reviewed prior to fees being withdrawn each quarter to ensure there are sufficient funds available.
- No single individual security (funds excluded) will make up more than 10% of a client's total investable assets with Vista, unless client approval is obtained.
- Individual investments, along with overall investment strategy are monitored and discussed on a company-wide basis at weekly investment meetings attended by a select number of investment advisor professionals. All investment advisor professionals meet monthly to review key decisions and practices.

In addition to monitoring accounts on a regular basis, Vista also takes seriously its responsibility to keep clients informed and knowledgeable regarding their portfolios.

Review Procedures

- Vista's goal is to have an Account Review with each client no less than once a year. Account reviews are initiated by Vista and performed on a systematic basis. Face-to-face account reviews are the best way to ensure accounts are being managed in a manner consistent with each client's expectations. Lead Advisors and Advisors prepare thoroughly for each account review. At a minimum, Lead Advisor and Advisors are prepared to discuss the following items with each client:
 - Asset allocation
 - Current investments
 - Performance
 - Trading activity
 - Current Market Conditions
 - Contributions and Withdrawals

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- Taxes
 - Financial Planning (i.e. retirement/cash-flow planning)
 - Review of the Investment Plan to include any changes in the client investment objectives.

If the client is unable or unwilling to meet, the Lead Advisor and Advisor will make a comprehensive review of the account and communicate any relevant questions or comments to the client via phone or email. This information will be noted in CRM.

- Clients are contacted via e-mail or phone, to review any account activity or major, market-moving event.
- Reports are sent quarterly detailing asset allocation, investments and performance.

Item 14 – *Client Referrals and Other Compensation*

As indicated at Item 12 above, Vista may receive from Schwab without cost (and/or at a discount), support services and/or products. Vista's clients do not pay more for investment transactions effected and/or assets maintained at Schwab as result of these arrangements. There is no corresponding commitment made by Vista to Schwab, or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. **Vista's Chief Compliance Officer, John Convery, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.**

Vista does not compensate any non-employee for client introductions. Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 15 – Custody

Vista does not custody any assets of clients. All assets are held in custody at Charles Schwab & Co. Inc.

Vista shall have the ability to deduct its advisory fee from the client's custodial account on a quarterly basis. Clients are generally provided with account transaction confirmation notices, and a written summary account statement directly from Schwab, at least quarterly. **Please Note:** To the extent the Vista provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Vista with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of Vista's advisory fee calculation.

Item 16 – Investment Discretion

Vista usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Vista observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Vista's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Vista in writing.

Block trades: Vista may bunch transactions for two or more clients if it is determined that the block trade is in the best interests of each client participating in the order and is consistent with Vista's duty to obtain best execution. The terms negotiated for the block trade will apply equally to all participating clients. The price of the securities purchased or sold in a block trade shall be at the average share price for all the transactions of the clients in that security on a given day, with all transactions costs shared on a pro rata basis.

Trade allocation: Every effort will be made to assure all clients involved in a block trade receive an execution the same day. In the event that block trade is not completely executed in one day, the trades will be allocated pro rata across accounts.

Trade errors: In the event of a trade error, the client will be made whole regardless of the cost to Vista. Vista will not benefit from trade errors that result in the purchase/sale of securities that have increased in value.

Item 17 – Voting *Client* Securities

Unless the client specifically requests otherwise, Vista will accept responsibility to vote proxies on behalf of the client. Vista will vote in the client's best interests, in a manner that maximizes the value of the client's investment. Vista will never put its own interests ahead of the client's. The client may, if they wish, direct Vista as to how they would like their proxy voted. If the account is subject to ERISA guidelines, proxies will be voted based solely on what maximizes the value of the client's investment (regardless of input from the client).

Vista does not anticipate there will be any occasions in which there will be a conflict of interest between Vista's best interests and those of the client. If a conflict occurs, however, Vista will disclose the conflict to the client and obtain client consent before voting.

Vista will consider the following factors prior to voting a proxy:

- How long a client is expected to hold the shares
- Size of the client's position in the stock
- Costs involved in the proposal

In general, it is expected Vista will accept the recommendation of the company's management as to how to vote the proxy. In general, Vista doesn't anticipate owning a stock unless it has confidence that management is acting in a way that maximizes long-term shareholder value.

Clients may obtain records of how Vista voted their proxies by calling or writing Vista at any time. Clients may also request a copy of our Proxy voting policy and procedures.

The chief compliance officer or chief investment officer will make the voting decision. Vista's chief compliance officer or chief investment officer or designee will be responsible for monitoring corporate actions and organizing and submitting proxies on time.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Vista's financial condition. Vista has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Business Continuity Plan

Vista has developed a Business Continuity Plan to maintain contact with you in the event of emergencies, natural disasters, communications interruptions, loss of internet services,

office fire, theft of computers, or other situations that interrupt our normal business operations.

If we find it necessary to temporarily move our operations, we will attempt to notify you by telephone or email. Please understand that this make take from 24 to 48 hours.

A complete copy of our Business Continuity Plan may be viewed in our office during regular business hours.

ANY QUESTIONS: Vista's Chief Compliance Officer, John Convery, remains available to address any questions regarding this Part 2A.



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Brochure Supplement A, Michael J. O'Reilly

Michael J. O'Reilly

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Michael J. O'Reilly that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael J. O'Reilly is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Michael J. O'Reilly, Born 1964

Partner

Bachelor of Science - Political Science - University of Oregon

(2001 -present) Principal, Lead Advisor, Client Service and Business Development

6 years (1993-2000) experience, marketing and client service for IMS Capital Management

5 years experience at Xerox Corporation in sales and marketing

2 years experience in investment management marketing and client services

Series 2 Securities License

Series 65 Uniform Investment Advisor Law Examination

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. O'Reilly is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

The Firm's day-to-day operations are supervised by its Managing Director and COO, John Convery. John Convery also acts as the firm's Chief Compliance Officer (CCO). Dougal Williams acts as the Chief Investment Officer. All investment strategies are discussed and approved by the Vista investment committee.



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Brochure Supplement B, Dougal Williams

Dougal Williams

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Dougal Williams that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Dougal Williams is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Dougal Williams, Born 1974

Chief Investment Officer, Lead Advisor and Partner

Bachelor Arts- Economics (Honors) and Spanish (Honors), Phi Beta Kappa – University of Oregon

(07/2004 – present) Lead Advisor, Vista Capital Partners

(2002-2004) experience as Investment Analyst and Portfolio Manager, Allen Trust Company

Member of CFA Society of Portland and past president

Chartered Financial Analyst designation (CFA Charterholder since 2005)

Series 65 Uniform Investment Advisor Law Examination

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Williams is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement C, Robert D. Greenman

Robert D. Greenman

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Robert D. Greenman that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert D. Greenman is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Robert D. Greenman, born 1980

Chief Growth Officer, Lead Advisor and Partner

Bachelor of Arts – Economics - Occidental College

(2011-present) Lead Advisor and Advisor, Vista Capital Partners

(2007-2011) experience as Client Service Officer at Great Northern Asset Management

(2004-2007) experience as Chief Compliance Officer and Chief Operations Officer at Mengis Capital Management

Certified Financial Planner (since June 2010)

Series 65 Uniform Investment Advisor Law Examination

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 is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Greenman is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

The Firm's day-to-day operations are supervised by its Managing Director and COO, John Convery. John Convery also acts as the firm's Chief Compliance Officer (CCO). Dougal Williams acts as the Chief Investment Officer. All investment strategies are discussed and approved by the Vista investment committee.

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Brochure Supplement D, Lindsey Williams

Lindsey Williams

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Lindsey Williams that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Lindsey Williams is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Lindsey Williams, Born 1975

Chief Client Officer, Lead Advisor and Partner

Masters Business Administration – Univ. of North Carolina Kenan-Flager Business School

Bachelor of Arts – Business Administration – University of Washington

(02/2005 – present) Lead Advisor, Vista Capital Partners

(2002) experience as trader for Accrete Capital LLC

(1997-2001) experience as research analyst and fund administrator for Merrill Lynch

Series 65 Uniform Investment Advisor Law Examination

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mrs. Williams is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement E, Douglas L. Post

Douglas L. Post

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Douglas L. Post that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Douglas L. Post is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Douglas L. Post, Born 1974

Lead Advisor and Partner

Masters Business Administration – Univ. of Southern California Marshall School of Business

Bachelor of Science - Business Management and Marketing – Cornell University

(10/07 – present) Lead Advisor and Advisor, Vista Capital Partners

7 months experience as lead analyst for Washington Mutual

(2004-2007) experience as financial analyst for Obsidian Finance

(1997-2002) experience as senior consultant for CSC Consulting

Series 65 Uniform Investment Advisor Law Examination

Certified Financial Planner (CFP since November 2011)

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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 80,000 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 is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Post is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement F, Julia Tierney

Julia Tierney

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Julia Tierney that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Julia Tierney is available on the SEC's website at www.adviserinfo.sec.gov

Item 2- Educational Background and Business Experience

Julia Tierney, Born 1986

Directory of Legacy Planning, Lead Advisor and Partner

Bachelor of Arts- Business Administration - University of Oregon

(03/2015 - present) Lead Advisor and Advisor, Vista Capital Partners

(01/2013 - 03/2015) Client Service Administrator, Vista Capital Partners

(11/2010 - 01/2013) Client Service Assistant, Pacific Continental Bank

(08/2009 - 11/2010) Teller, Wells Fargo Bank

Series 65 Uniform Investment Advisor Law Examination

Certified Financial Planner (CFP since September 2015)

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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
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- 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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Ms. Tierney is involved in the CENTS program providing pro bono financial planning services.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement G, Andrew Darkins

Andrew Darkins

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Andrew Darkins that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Andrew Darkins is available on the SEC's website at www.adviserinfo.sec.gov

Item 2- Educational Background and Business Experience

Andrew Darkins, Born 1985

Director of Client Experience, Lead Advisor and Partner

Bachelor of Science- Political Science – Oregon State University

(08/2016 – present) Lead Advisor and Advisor, Vista Capital Partners

(06/2015 – 07/2016) Client Service Associate, North Ridge Wealth Advisors

(06/2008 – 05/2015) Finance Director/Campaign Manager, Various Political Campaigns

Series 65 Uniform Investment Advisor Law Examination

Certified Financial Planner (CFP since August 2018)

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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.

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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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Darkins is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement H, Jonathan T. Gannon

Jonathan T. Gannon

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Jonathan Gannon that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan Gannon is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Jonathan T. Gannon, Born 1990

Director of Financial Planning, Lead Advisor and Partner

Bachelor of Arts- Finance- Washington State University

(09/2017 – present) Lead Advisor, Advisor Vista Capital Partners

(2014-2017) Associate Director, Cornerstone Advisors, Inc.

(2012-2014) Various Roles, Key Bank

Certified Financial Planner (CFP since July 2016)

Series 65 Uniform Investment Advisor Law Examination

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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;
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- 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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Gannon is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

The Firm's day-to-day operations are supervised by its Managing Director and COO, John Convery. John Convery also acts as the firm's Chief Compliance Officer (CCO). Dougal Williams acts as the Chief Investment Officer. All investment strategies are discussed and approved by the Vista investment committee.



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Brochure Supplement I, Patrick Yazhari

Patrick Yazhari

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Patrick Yazhari that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Patrick Yazhari is available on the SEC's website at www.adviserinfo.sec.gov

Item 2- Educational Background and Business Experience

Patrick Yazhari, Born 1992

Advisor

Bachelor of Science – Finance – Oregon State University

(07/2019 – present) Advisor, Vista Capital Partners

(08/2015 – 07/2019) Trading Associate, Ferguson Wellman Capital Management

Certified Financial Planner (CFP since July 2018)

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 80,000 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 is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Yazhari is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement J, Lyndsi Stender

Lyndsi Stender

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Lyndsi Stender that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Lyndsi Stender is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Lyndsi Stender, Born 1991

Lead Advisor and Advisor

Bachelor of Science – Applied Mathematics - University of Oregon

(01/2022 – present) Lead Advisor, Vista Capital Partners

(11/2019 – present) Advisor, Vista Capital Partners

(04/2018 – 10/2019) Paraplanner, Aldrich

(10/2016– 02/2018) Investment Associate, Ferguson Wellman Capital Management

Certified Financial Planner (CFP since April 2018)

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”).

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- 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.

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Ms. Stender is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

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Brochure Supplement K, Vanessa DeHaan

Vanessa DeHaan

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Vanessa DeHaan that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Vanessa DeHaan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Vanessa DeHaan, Born 1985

Advisor

Bachelor of Business Administration –Finance & Accounting (Summa cum Laude)- Loyola University Chicago

(06/2020 – present) Advisor, Vista Capital Partners

(10/2014 – 07/2015) Risk and Compliance Associate, Aequitas Capital

(05/2010 – 02/2014) Audit Project Manager, Northern Trust Asset Management

(09/2007 – 05/2010) Audit Senior, Deloitte

Certified Public Accountant (CPA since December 2008), Certified Financial Planner (CFP since April 2020)

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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:

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Ms. DeHaan is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

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Brochure Supplement L, Cara Miller

Cara Miller

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Cara Miller that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Cara Miller is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Cara Miller, Born 1987

Advisor

Bachelor of Arts – Business Administration and Chinese – University of Oregon

Certificate of Global Management – University of Oregon

(12/2021 – present) Advisor, Vista Capital Partners

(10/2019 – 12/2021) Senior Relationship Manager, Cable Hill Partners

(03/2017 – 10/2019) Relationship Manager, Cable Hill Partners

Chartered Retirement Planning Counselor®

Certified Financial Planner (since November 2021)

Series 65 Uniform Investment Advisor Law Examination

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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:

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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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Ms. Miller is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

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Brochure Supplement M, Terrence Daniel

Terrence “TJ” Daniel

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Terrence Daniel that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Terrence Daniel is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Terrence “TJ” Daniel Jr., Born 1994

Advisor

Bachelor of Arts – Applied Business, Economics and Society- University of Oregon

(12/2020 – present) Advisor, Vista Capital Partners

(12/2019 – 12/2020) Licensed Relationship Manager- KeyBank

(8/2018 – 10/2019) Financial Representative- WestPac Wealth Partners

Certified Financial Planner (since March 2023)

Series 7 Financial Industry Regulatory Authority

Series 63 North America Securities Administrators Association

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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.

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Daniel is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

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Brochure Supplement N, Jessica R. Allison

Jessica R. Allison

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

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Additional information about Jessica R. Allison is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Jessica R. Allison, born 1989

Lead Advisor

Bachelor of Arts – Business Administration - University of Washington

(2021-present) Lead Advisor and Advisor, Vista Capital Partners

(2018-2021) experience as Advisor at Brighton Jones

(2014-2017) experience as Client Service Associate at Brighton Jones

Certified Financial Planner (since August 2019)

Series 65 Uniform Investment Advisor Law Examination

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Ms. Allison is not actively engaged in any other business activities.

Item 5- Additional Compensation

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Brochure Supplement O, Eric Yan

Eric Yan

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Eric Yan that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Eric Yan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Eric Yan, born 1984

Advisor

Bachelor of Science – Psychology- University of Oregon

(2022-present) Advisor, Vista Capital Partners

(2018-2023) experience as an Advisor at Cable Hill Partners, LLC

(2017-2018) experience as a Correspondence Representative at Wells Fargo

(2013-2016) experience as an Investment Counselor at Fisher Investments

(2012-2013) experience as a Client Relations Analyst at Franklin Templeton

Certified Financial Planner (since March 2023)

Series 66 Uniform Combined State Law Examination

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- 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.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Yan is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

Item 6 - Supervision

The Firm's day-to-day operations are supervised by its Managing Director and COO, John Convery. John Convery also acts as the firm's Chief Compliance Officer (CCO). Dougal Williams acts as the Chief Investment Officer. All investment strategies are discussed and approved by the Vista investment committee.



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Brochure Supplement P, Joseph A. Rayburn

Joseph A. Rayburn

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Joseph A. Rayburn that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph A. Rayburn is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Joseph A. Rayburn, born 1991

Advisor

Bachelor of Arts – Business Administration/Finance- Pacific Lutheran University

(2022-present) Advisor, Vista Capital Partners

(2014-2023) experience as an Investment Counselor, Client Service Associate, Fisher Investments

Certified Financial Planner (March 2023)

Series 66 Uniform Combined State Law Examination

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 is a 170 question, multiple choice test that consists of two 3 hour sessions over one day. It 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.

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Rayburn is not actively engaged in any other business activities.

Item 5- Additional Compensation

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Brochure Supplement Q, Emily G. Genor

Emily G. Genor

Vista Capital Partners

9755 SW Barnes Rd, Suite 595

Portland OR 97225

503-772-9500

March 31, 2024

This Brochure Supplement provides information about Emily G. Genor that supplements the Vista Capital Partners Brochure. You should have received a copy of that Brochure. Please contact John Convery, if you did not receive Vista Capital Partners' Brochure or if you have any questions about the contents of this supplement.

Additional information about Emily G. Genor is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Emily, G. Genor, born 1977

Advisor

Master of Business Administration –Finance- University of Portland

Bachelor of Business Administration –Finance- University of Portland

(2023-present) Advisor, Vista Capital Partners

(1/2023-3/2023) Financial Advisor, UBS

(2016-2017) Sr. Registered Client Service Associate, UBS

(2015-2016) Analyst, Morgan Stanley

Certified Financial Planner (April 2023)

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mrs. Genor is not actively engaged in any other business activities.

Item 5- Additional Compensation

Vista may compensate Vista employees for referrals of clients that hire Vista as a result of their relationship with the employee. This bonus amount may vary over time. Vista does not charge clients introduced by a Vista employee fees or costs greater than the fees or costs Vista charges its advisory clients, who were not introduced by a Vista employee and who have similar portfolios under management with Vista.

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