



Sound Portfolio Advisors, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: February 29, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Sound Portfolio Advisors, LLC (“Sound Portfolio” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (860) 536-8992.

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

Additional information about Sound Portfolio and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 125511.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Sound Portfolio. For convenience, the Advisor has combined these documents into a single disclosure document.

Sound Portfolio believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Sound Portfolio encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes made to this Disclosure Brochure since the last filing and distribution to Clients.

Future Changes

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

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 125511. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (860) 536-8992.

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Item 4 – Advisory Services

A. Firm Information

Sound Portfolio Advisors, LLC (“Sound Portfolio” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Connecticut. Sound Portfolio was founded in 1999 and is owned and operated by Theodore L. Parker (President, Chief Compliance Officer, and Managing Member) and Bryan J. Watts (Advisor and Member). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Sound Portfolio.

B. Advisory Services Offered

Sound Portfolio offers investment advisory services to individuals, high net worth individuals, trusts, and estates (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith towards each Client and seeks to mitigate potential conflicts of interest. Sound Portfolio's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Sound Portfolio provides customized investment advisory solutions for its Clients. This is achieved through personal Client contact and interaction while providing discretionary investment management and related advisory services pursuant to a written investment management agreement. Sound Portfolio works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Sound Portfolio will then construct an investment portfolio consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client's investment goals. The Advisor may also utilize individual stocks and/or bonds as appropriate to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client's legacy investments based on portfolio fit and/or tax considerations.

Sound Portfolio will select, recommend and/or retain mutual funds on a fund by fund basis. Due to specific custodial and/or mutual fund company constraints, material tax consideration, and/or systematic investment plans, Sound Portfolio will select, recommend and/or retain a mutual fund share class that does not have trading costs but do have higher internal expense ratios than institutional share classes. Sound Portfolio will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client's financial objectives and stated investment guidelines.

Sound Portfolio's investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Sound Portfolio will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client.

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

Retirement Plan Accounts – When deemed to be in the Client's best interest, the Advisor will recommend that a Client rollover its retirement plan account into an account managed by the Advisor. In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act

of 1974 (“ERISA”). Such a recommendation creates a conflict of interest if the Advisor earns a new (or increases its current) advisory fee as a result of the rollover. No Client is under any obligation to roll over retirement plan assets to an account managed by the Advisor.

At no time will Sound Portfolio accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

C. Client Account Management

Prior to engaging Sound Portfolio to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Sound Portfolio, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Sound Portfolio will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – Sound Portfolio will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Sound Portfolio will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

Sound Portfolio does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Sound Portfolio.

E. Assets Under Management

As of December 31, 2023, Sound Portfolio manages \$115,909,407 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
First \$1,000,000	1.00%
Next \$1,000,000	0.85%
Amounts above \$2,000,000	0.50%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Sound Portfolio Clients will be independently valued by the Custodian. Sound Portfolio will conduct periodic reviews of the Custodian’s valuations.

Certain Sound Portfolio Clients pay investment advisory fees pursuant to a different schedule under a legacy fee agreement.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total client assets under management with Sound Portfolio at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value, and the methodology used to calculate the fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by Sound Portfolio to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties other than Sound Portfolio in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account currently meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by Sound Portfolio are separate and distinct from these custody and execution fees.

In addition, all fees paid to Sound Portfolio for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Sound Portfolio, but would not receive the services provided by Sound Portfolio, which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Sound Portfolio to fully understand the total fees to be paid. Additionally, as noted above, the Advisor will select share classes that do not have trading costs but do have higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Sound Portfolio may be compensated for its investment management services at the end of the quarter after services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Sound Portfolio does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account other than the investment advisory fees noted above.

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

Sound Portfolio does not charge performance-based fees for its investment advisory services. The fees charged by Sound Portfolio are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. Sound Portfolio does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Sound Portfolio offers investment advisory services to individuals, high net worth individuals, trusts, and estates. The amount of each type of Client is available on Sound Portfolio's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Sound Portfolio generally requires a minimum relationship size of \$500,000 to implement its investment process. This minimum may be waived at Sound Portfolio's discretion.

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

A. Methods of Analysis

Sound Portfolio primarily employs an Asset Allocation approach in developing investment strategies for its Clients. Asset Allocation is the implementation of an investment strategy that attempts to balance risk versus reward by adjusting the percentage of each asset in an investment portfolio according to the investor's risk tolerance, goals, and investment time frame. The three main asset classes - equities, fixed-income, and cash and equivalents - have different levels of risk and return, so each will behave differently over time. The focus is on the characteristics of the overall portfolio. Such a strategy contrasts with an approach that focuses on individual assets. In addition to the three main asset classes, Sound Portfolio also evaluates the relative valuation of more discrete asset classes, such as Large Cap vs. Small Cap equities, International vs. Domestic equities, and so on.

While an Asset Allocation approach helps the Advisor construct appropriate investment strategies, it does not guarantee that the investment portfolio will increase in value. Specific assets used in the strategy may lose value and may have negative investment performance. Sound Portfolio monitors economic conditions and asset class values to determine if adjustments are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

B. Risk of Loss

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

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

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

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily; therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Past performance is not a guarantee of future returns. Investing in securities and other investments involves a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Sound Portfolio or its management persons. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 125511.

Item 10 – Other Financial Industry Activities and Affiliations

The sole business of Sound Portfolio is to provide investment advisory services to its Clients. Neither Sound Portfolio nor its Advisory Persons are involved in other business endeavors. Sound Portfolio does not maintain any affiliations with other firms other than contracted service providers to assist with the servicing of its Client's accounts.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading

A. Code of Ethics

Sound Portfolio has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Sound Portfolio ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Sound Portfolio and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of Sound Portfolio's Supervised Persons to adhere not only to the specific

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provisions of the Code but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (860) 536-8992.

B. Personal Trading with Material Interest

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

C. Personal Trading in Same Securities as Clients

Sound Portfolio allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls), gifts and entertainment, outside business activities, and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades or by trading based on material non-public information. This risk is mitigated by Sound Portfolio requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Sound Portfolio allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Sound Portfolio, or any Supervised Person of Sound Portfolio, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Sound Portfolio does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Sound Portfolio to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Sound Portfolio does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

While Sound Portfolio does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Sound Portfolio. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Sound Portfolio may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

Sound Portfolio will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Sound Portfolio maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

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

1. **Soft Dollars** – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Sound Portfolio does not participate in soft dollar programs sponsored**

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or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.

2. **Brokerage Referrals** – Sound Portfolio does not receive any compensation from any third party in connection with the recommendation for establishing an account.
3. **Directed Brokerage** – All Clients are serviced on a “directed brokerage basis,” where Sound Portfolio will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client transactions are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). Sound Portfolio will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Sound Portfolio will execute its transactions through the Custodian as authorized by the Client. Sound Portfolio may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts on the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients’ accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Theodore Parker, CCO of Sound Portfolio. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

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

C. Review Reports

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

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Sound Portfolio

Sound Portfolio is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. Sound Portfolio does not receive commissions or other compensation from product sponsors, broker-dealers, or any unrelated third party. Sound Portfolio may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet

the goals of its Clients. Likewise, Sound Portfolio may receive non-compensated referrals of new Clients from various third parties.

Participation in Institutional Advisor Platform

Sound Portfolio has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Sound Portfolio. As a registered investment advisor participating on the Schwab Advisor Services platform, Sound Portfolio receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client’s funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and financial support to Sound Portfolio that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Sound Portfolio believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Compensation for Client Referrals

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

Item 15 – Custody

Sound Portfolio does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor’s fees. All Clients must place their assets with a “qualified custodian.” Clients are required to engage the Custodian to retain their funds and securities and direct Sound Portfolio to utilize that Custodian for the Client’s security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by Sound Portfolio to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

Item 16 – Investment Discretion

Sound Portfolio generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed

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to by Sound Portfolio. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Sound Portfolio will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

Neither Sound Portfolio nor its management has any adverse financial situations that would reasonably impair the ability of Sound Portfolio to meet all obligations to its Clients. Neither Sound Portfolio nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. Sound Portfolio is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



Form ADV Part 2B – Brochure Supplement

for

**Theodore L. Parker, CFP®
President and Chief Compliance Officer**

Effective: February 29, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Theodore L. Parker CFP®, (CRD# 2362925) in addition to the information contained in the Sound Portfolio Advisors, LLC (“Sound Portfolio” or the “Advisor,” CRD# 125511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sound Portfolio Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (860) 536-8992.

Additional information about Mr. Parker is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or individual CRD# 2362925.

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Item 2 – Educational Background and Business Experience

Theodore L. Parker, born in 1959, is dedicated to advising Clients of Sound Portfolio as the President and Chief Compliance Officer. Mr. Parker earned a Master's degree in International Business and Finance from Fletcher School at Tufts University in 1985. Mr. Parker also earned a Bachelor's degree in Political Science from Reed College in 1982. Additional information regarding Mr. Parker's employment history is included below.

Employment History:

President and Chief Compliance Officer, Sound Portfolio Advisors, LLC	11/1999 to Present
Advisor, Ameriprise Financial Services, LLC	1997 to 1999
Vice President, JP Morgan Chase Bank	1985 to 1997

Mr. Parker holds the Certified Financial Planner (CFP) designation. The CFP® certification is recognized in the United States and a number of other countries for its high standard of professional education, stringent code of conduct and standards of practice, and ethical requirements that govern professional engagements with clients.

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 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 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; 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 ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years
- *Ethics* – Follow the *Standards of Professional Conduct*, which require CFP® professionals to provide financial planning services at a fiduciary standard of care.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Parker. Mr. Parker has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Parker.

You may independently view the background of Mr. Parker on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2362925.

Item 4 – Other Business Activities

Mr. Parker is dedicated to the investment advisory activities of Sound Portfolio's Clients. Mr. Parker does not have any other business activities.

Item 5 – Additional Compensation

Mr. Parker is dedicated to the investment advisory activities of Sound Portfolio's Clients. Mr. Parker does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Parker serves as the President and Chief Compliance Officer of Sound Portfolio. Mr. Parker can be reached at (860) 536-8992.



Form ADV Part 2B – Brochure Supplement

for

**Bryan J. Watts, CFP®
Financial Advisor**

Effective: February 29, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Bryan J. Watts, CFP®, (CRD# 5170706) in addition to the information contained in the Sound Portfolio Advisors, LLC (“Sound Portfolio” or the “Advisor,” CRD# 125511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sound Portfolio Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (860) 536-8992.

Additional information about Mr. Watts is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or individual CRD# 5170706.

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Item 2 – Educational Background and Business Experience

Bryan J. Watts, born in 1985, is dedicated to advising Clients of Sound Portfolio as a Financial Advisor. Mr. Watts earned a Bachelor of Arts degree in Economics from Boston College in 2007. Additional information regarding Mr. Watts's employment history is included below.

Employment History:

Financial Advisor, Sound Portfolio Advisors, LLC	02/2018 to Present
Director, BondEdge Solutions	03/2015 to 02/2018
Institutional Sales, FactSet Research Systems	07/2007 to 03/2015

Mr. Watts holds the Certified Financial Planner (CFP) designation. The CFP® certification is recognized in the United States and a number of other countries for its high standard of professional education, stringent code of conduct and standards of practice, and ethical requirements that govern professional engagements with clients.

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 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 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; 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 ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years;
- *Ethics* – Follow the *Standards of Professional Conduct*, which require CFP® professionals to provide financial planning services at a fiduciary standard of care.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Watts. Mr. Watts has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Watts.

You may independently view the background of Mr. Watts on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5170706.

Item 4 – Other Business Activities

Mr. Watts is dedicated to the investment advisory activities of Sound Portfolio's Clients. Mr. Watts does not have any other business activities.

Item 5 – Additional Compensation

Mr. Watts is dedicated to the investment advisory activities of Sound Portfolio's Clients. Mr. Watts does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Watts serves as a Financial Advisor of Sound Portfolio and is supervised by Theodore Parker, the Chief Compliance Officer. Mr. Parker can be reached at (860) 536-8992.

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

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Privacy Policy

Effective: February 29, 2024

Our Commitment to You

Sound Portfolio Advisors (“Sound Portfolio” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Sound Portfolio (also referred to as “we,” “our,” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

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

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

Why you need to know?

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

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What information do we collect from other sources?

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

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Clients’ personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations.	Yes	No
Marketing Purposes Sound Portfolio does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Sound Portfolio or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Sound Portfolio does not disclose and does not intend to disclose non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

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

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (860) 536-8992.