

Item 1 - Cover Page

Saltbox Financial LLC

30 Market St.

Newburyport, MA 01950

Form ADV Part 2A – Firm Brochure

Phone: (978) 572-2071

August 15, 2022

This brochure provides information about the qualifications and business practices of Saltbox Financial LLC. If you have any questions about the contents of this brochure, please contact Saltbox Financial at (978) 572-2071 or by e-mail to: info@saltboxfinancial.co. The information in this brochure has not been approved or verified by the U. S. Securities and Exchange Commission nor by any state securities authority.

Saltbox Financial LLC is a registered investment advisor in the Commonwealth of Massachusetts, New Hampshire and Louisiana. Registration of an investment advisor does not imply any level of skill or training. The advisor's oral and written communications, such as this brochure, provide a potential client with information. Using the facts supplied, they can make a decision about whether to become a client of the advisor.

Additional information about *Saltbox Financial LLC* is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 - Material Changes

Current Changes

The date of the last previous annual update to the *Saltbox Financial LLC* Form ADV Part 2A - Firm Brochure was February 23, 2022. The following changes have been made to this version of the Disclosure Brochure:

- We have added Leslie Modica as a registered investment advisor of the firm.

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 130882.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (978) 572-2071 or info@saltboxfinancial.co.

Item 3 - Table of Contents

Item 1 - Cover Page	1
Item 2 - Material Changes	1
Item 3 - Table of Contents	2
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	6
Item 6 – Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients	8
Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss	8
Item 9 – Disciplinary Information	10
Item 10 – Other Financial Industry Activities and Affiliations	11
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12 – Brokerage Practices	14
Item 13 – Review of Accounts	17
Item 14 – Client Referrals and Other Compensation	18
Item 15 – Custody	18
Item 16 - Investment Discretion	19
Item 17 – Voting Client Securities	20
Item 18 – Financial Information	21
Item 19 – Requirements for State-Registered Advisors	21
Item 1 - Cover Page – Vera Kelsey-Watts	23
Item 2 – Educational Background and Business Experience	23

<u>Item 3 – Disciplinary Information</u>	26
<u>Item 4 – Other Business Activities</u>	26
<u>Item 5 – Additional Compensation</u>	26
<u>Item 6 – Supervision</u>	26
<u>Item 7 – Requirements for State-Registered Advisers</u>	27
<u>Item 1 - Cover Page – Phuong Luong</u>	27
<u>Item 2 – Educational Background and Business Experience</u>	28
<u>Item 3 – Disciplinary Information</u>	31
<u>Item 4 – Other Business Activities</u>	31
<u>Item 5 – Additional Compensation</u>	31
<u>Item 6 – Supervision</u>	32
<u>Item 7 – Requirements for State-Registered Advisers</u>	32

Item 4 – Advisory Business

Saltbox Financial LLC is a fee-only financial planning firm that specializes in providing financial planning and investment advisory services to individuals and families. *Saltbox Financial LLC* is owned by Vera Kelsey-Watts. Vera Kelsey-Watts is the Chief Compliance Officer. The firm was originally established in 1999. *Saltbox Financial* provides services to meet each client's unique personal situation, including investment recommendations as well as tax and estate considerations, risk management, and retirement planning. *Saltbox Financial LLC* offers services to two types of clients: **Investment management** clients and **Hourly** clients.

Retainer services. For clients looking for comprehensive financial planning and supervision of their investment portfolio, the firm offers a retainer relationship. For an annual fee calculated either as a percentage of assets under management, or a flat fee based on total value of assets under management, clients receive comprehensive planning and investment management.

Comprehensive planning involves reviewing the client's retirement preparation, cash flow, assets and liabilities, college planning, investments, insurance analysis, estate planning, charitable giving, and taxes. Since *Saltbox Financial LLC* sells no insurance or investment products, the advice is always objective.

Investment management consists of the creation of customized investment portfolios appropriate to the client's personal life circumstances and risk tolerance. Careful research is done by the advisor to select mutual funds that have strong long-term performance, exceptional fund managers, and low operating expenses. Actively managed stock and bond mutual funds, index funds, exchange traded funds (ETFs), and individual bonds are included in client portfolios.

Hourly planning. For those interested in an interactive process in which the client and the advisor work together to achieve short- and long-term life goals, *Saltbox Financial LLC* offers hourly planning. The

client's particular goals and concerns are addressed and strategies are developed to meet these needs. Hourly planning covers financial planning areas such as cash flow management, debt management, college expenses, retirement, investment, home buying and tax planning. *Saltbox Financial LLC's* role is to make basic investment and planning recommendations. The client is not required to follow any recommendations made by the advisor; he or she is solely responsible for implementing or not implementing the advisor's recommendations.

The advisor and client will enter into an agreement that details the scope of the relationship and responsibilities of both parties. Advice and services provided to the client under such an agreement are tailored to the stated objectives of the client(s).

Saltbox Financial LLC does not sell investment products or insurance and it does not accept commissions on any transactions. The advisor does not pay referral or finder's fees, nor does it accept such fees from other firms. *Saltbox Financial LLC* does not participate in wrap fee programs.

Payment for hourly planning is due at the close of each meeting, and appointments range from one to two hours. The overall initial cost depends greatly on the degree of complexity of the client's finances. The advisor recommends that hourly clients check in for annual reviews of their finances, since recommendations may differ given changes in life circumstances, the economy, and the financial markets.

As of September 2, 2021 *Saltbox Financial LLC* manages \$ 57,936,413 on a discretionary basis only.

Item 5 – Fees and Compensation

Since *Saltbox Financial LLC* is a fee-only financial advisory firm that does not sell investment or insurance products, its non-negotiable fee structure is very simple.

Hourly clients are billed at the rate of \$260 per hour.

Compensation is due and payable at the end of each appointment or the completion of a project.

Retainer clients pay an annual fee based on a percentage of the value of their assets under management. The rates are calculated as follows:

Total assets under management	Fee calculated on a percentage of assets under management
\$300,000 - \$1,000,000	1.00%
\$1,000,001 – \$3,000,000	0.90%
\$3,000,001 – \$5,000,000	0.80%
\$5,000,001 +	0.70%

The fee is calculated based on the balance of assets under management at the close of the quarter and timing of fund arrival within the quarter multiplied by the applicable annual rate and divided by four (4). Fees are guaranteed for two years and are reassessed on the two year anniversary of the contract. Fees are invoiced quarterly in arrears. Clients may be grandfathered in at a rate based on the rate charged at the time they signed a contract with Saltbox Financial LLC. Tax preparation services are available to both types of clients, at an additional fee.

Additional Expenses

In addition to the fees listed above, clients may incur certain other fees and charges as they do their own implementing of the advisor's recommendations. Such charges can be imposed by custodians, brokers, and third-party investment costs, 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. Mutual funds and exchange traded funds charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to the advisor's fee.

Either party may terminate an agreement, without penalty, at any time upon 30-days written notice. Any fees for meeting time or work that has been completed but not yet paid by the client will be due and payable. *Saltbox Financial LLC* does charge a cancellation fee of 1 hour of advisor's time for appointments cancelled with less than 24 hours notice.

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

Saltbox Financial LLC 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

Saltbox Financial LLC provides financial planning and investment advisory services to any individual, couple or family. We have no minimum net worth, asset or income requirement.

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

The main sources of information the advisor relies upon when researching and analyzing securities include traditional research materials such as financial newspapers and magazines, annual reports, prospectuses, as well as research materials prepared by others, company press releases, and corporate rating services. The advisor also subscribes to various professional publications deemed to be consistent and supportive of *Saltbox Financial LLC's* investment philosophy.

The advisor approaches investment portfolio analysis and implementation based on internal factors such as the client's tax situation, overall risk tolerance, current financial situation, and personal goals and aspirations. After identifying these items, the client's portfolio is structured around his or her individual needs, while aiming to minimize the negative effects of external factors such as interest rates, market performance, and the U.S. economy as a whole.

In general, the advisor recommends no-load mutual funds (i.e., mutual funds that have no sales fees), exchange traded funds, U.S. government securities, money market accounts, certificates of deposit, and individual bonds (corporate, agency, and municipal). In the course of providing investment advice, the advisor may address issues related to other types of assets that the client may already own.

Investing in any type of security involves a risk of potential loss that clients should be made aware of and prepared to bear. While *Saltbox Financial LLC* will use its best judgment and good faith efforts in rendering services to clients, clients must understand that not every investment decision or recommendation made by the advisor will be profitable. The advisor cannot ever warrant or guarantee any particular level of account performance, or that any account will be profitable over time. The client must be willing to assume all the market risk involved, and must understand that investment decisions are always subject to the vagaries of financial markets as well as to economic, political, and business risks.

Investing involves the assumption of risk, including:

Financial Risk: which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

Market Risk: which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

Political and Governmental Risk: which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

Interest Rate Risk: which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

Call Risk: which is the risk that your investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.

Default Risk: which is the risk that the issuer is unable to pay the contractual interest or principal on the investment promptly or at all.

Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.

Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

Item 9 – Disciplinary Information

Criminal or Civil Actions

Saltbox Financial LLC and its advisors have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Saltbox Financial LLC and its advisors have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Saltbox Financial LLC and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of *Saltbox Financial LLC* or the integrity of its advisors.

Item 10 – Other Financial Industry Activities and Affiliations

No *Saltbox Financial LLC* employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No *Saltbox Financial LLC* employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Saltbox Financial LLC does not have any related parties. As a result, we do not have a relationship with any related parties.

Saltbox Financial LLC only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

Saltbox Financial LLC avoids material conflicts of interest. The firm does not receive any third party direct monetary compensation (i.e., commissions, 12b-1 or other fees) from brokerage firms (custodians) or mutual fund companies.

Some additional services and non-direct monetary or other forms of compensation may be offered and provided to the advisor as a result of the firm's relationships with custodian(s) and/or providers of mutual fund products. For example, Vera may be invited to attend educational conferences sponsored by brokerage firms, custodians, or mutual fund

companies. The services and benefits provided to *Saltbox Financial LLC* by brokerage firms or mutual fund providers do not materially affect the investment management recommendations made to clients. However, in the interest of full disclosure of any potential conflicts of interest, we will discuss the possible conflicts here.

Saltbox Financial LLC believes that its business methodologies, principles, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest. Clients should always be aware that no set of rules can possibly anticipate or relieve all potential conflicts of interest. With this in mind, the advisor will disclose to clients any material conflict of interest relating to the firm, its representatives, or any employees, which might possibly be expected to impair the rendering of unbiased and objective advice.

Code of Ethics

Saltbox Financial LLC has adopted the Fiduciary Oath of the National Association of Personal Financial Advisors (NAPFA) as its Code of Ethics. The advisors and all supervised persons must acknowledge the terms of the Fiduciary Oath annually, or as amended. The following is the oath, as originally signed by Vera Kelsey-Watts on December 5, 2016.

Fiduciary Oath

The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client. The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor.

The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product. The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.

Following the NAPFA Fiduciary Oath means I shall:

- Always act in good faith and with candor.

- Be proactive in disclosing any conflicts of interest that may impact a client.
- Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product.

CFP Board Standards of Professional Conduct

Vera Kelsey-Watts, CFP® is also subject to the CFP Board Standards of Professional Conduct Code of Ethics and Professional Responsibility. These Principles are general statements expressing the ethical and professional ideals certificants and registrants are expected to display in their professional activities. The Principles form the basis of CFP Board's Rules of Conduct, Practice Standards and Disciplinary Rules, and these documents together reflect CFP Board's recognition of certificants' and registrants' responsibilities to the public, clients, colleagues and employers.

- Principle 1 – Integrity: Provide professional services with integrity.
- Principle 2 – Objectivity: Provide professional services objectively.
- Principle 3 – Competence: Maintain the knowledge and skill necessary to provide professional services competently.
- Principle 4 – Fairness: Be fair and reasonable in all professional relationships. Disclose conflicts of interest.
- Principle 5 – Confidentiality: Protect the confidentiality of all client information.
- Principle 6 – Professionalism: Act in a manner that demonstrates exemplary professional conduct.
- Principle 7 – Diligence: Provide professional services diligently.

Participation or Interest in Client Transactions and Personal Trading

Saltbox Financial LLC's advisors are allowed to recommend the purchase of a stock or mutual fund in which she owns shares. In such an event, the client is always informed of the potential conflict of interest, and would always have the choice of investing in that

particular asset or not. Since Hourly clients manage their own accounts and execute their own buy and sell orders, sometimes the advisor may recommend a non-affiliated broker-dealer to the client; again, the choice is always up to the client and has no monetary value to the advisor. If a broker-dealer recommendation is made, it will be based on good customer service, reliable performance of transactions requested, and reasonable commission rates.

In the case of Retainer clients, the advisor, or individuals associated with the advisor, may buy and sell some of the same securities for their own accounts that the advisor buys and sells for Retainer clients. When appropriate, the advisor will purchase or sell securities for clients before purchasing or selling the same securities for the advisor's own account. The Code of Ethics (Fiduciary Oath) ensures that personal securities transactions will not interfere with making decisions in the best interest of advisory clients while, at the same time, allowing *Saltbox Financial LLC*'s principal or other employees to invest in a personal account.

In summary: *Saltbox Financial LLC* will disclose to advisory clients any material conflict of interest relating to the advisor, its representatives or employees, which could reasonably be expected to hinder the rendering of unbiased and objective advice. The advisor will notify clients in advance of its policies in respect to persons trading for their own accounts, including the potential conflict of interest that arises when recommending to clients securities in which the firm or its principal holds a position.

Item 12 – Brokerage Practices

Saltbox Financial LLC currently has arrangements with TD Ameritrade Institutional ("TD Ameritrade"), Altruist Corp. ("Altruist"), and Charles Schwab Corporation (Charles Schwab). These are the unaffiliated qualified custodian whereby *Saltbox Financial LLC* would suggest you custody your accounts. TD Ameritrade and Altruist are independent SEC-registered broker-dealers and a members of FINRA and SIPC.

The advisor may use its discretion when recommending TD Ameritrade or Altruist to a client. Nevertheless, a client is never obligated to make his or her own transactions through a broker-dealer recommended by the advisor. When recommending a broker-dealer, the advisor will comply with its fiduciary duty to obtain the best execution per the Securities Exchange Act of 1934, taking into account such relevant factors as:

- Cost of a transaction.
- The broker-dealer's facilities, reliability, financial responsibility, and reputation.
- The ability of the broker-dealer to carry out transactions, particularly with regard to such aspects as timing, order size, and proper execution of orders.
- The research and related brokerage services provided by a broker-dealer to the advisor, notwithstanding that the advisor's account may not be the direct or exclusive beneficiary of such services.
- Any other factors the advisor considers to be relevant.

Saltbox Financial LLC does not receive soft dollar benefits from broker-dealers.

Saltbox Financial LLC does not receive client referrals from broker-dealers.

Saltbox Financial LLC does not aggregate trade orders.

Products & Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like ours. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services

help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis and at no charge to us as long as we maintain a total of at least \$10 million of our clients' assets in accounts at Schwab.

Services that Benefit Client

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access, or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit clients or their account(s).

Services that May Not Directly Benefit Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit the client or their account(s). These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Irrespective of direct or indirect benefits to our client through Schwab, we strive to enhance the client's experience, help reach their goals and put their interests before that of our firm or its associated persons.

Item 13 – Review of Accounts

Saltbox Financial LLC is responsible for reviewing and assessing all financial recommendations made to retainer clients. Retainer clients receive recommendations for changes to their portfolios periodically during the term of their contract with *Saltbox Financial LLC*. Factors triggering a change in recommendations may include changes in the performance of an investment, significant changes in the client's financial condition, the need to rebalance or adjust the asset allocation, or significant economic developments.

If the client maintains one or more brokerage account(s), the broker-dealer will provide the client with a complete statement of each account at least quarterly, but usually monthly. The periodic statement will include a list of all assets held in the account, asset current values as compared to the previous statement, and a report of all transactions affecting the account, including any additions or withdrawals.

Item 14 – Client Referrals and Other Compensation

Saltbox Financial LLC is a fee-only financial planning firm and does not sell insurance or investment products, nor does it accept commissions as a result of any product recommendations. The advisor does not pay referral or finder's fees, nor does it accept such fees from other firms.

Item 15 – Custody

Saltbox Financial LLC does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which *Saltbox Financial LLC* directly debits their advisory fee:

- i. *Saltbox Financial LLC* will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to *Saltbox Financial LLC*, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Clients may authorize *Saltbox Financial LLC* to disburse funds from their accounts to third parties without obtaining written consent for each individual transaction. Clients often provide this authorization to

facilitate the movement of assets between household accounts that are not identically titled, such as a joint account and an Individual Retirement Account (IRA), but authorization can also be provided to other third parties.

Where Saltbox Financial LLC has the ability to transfer assets between non-identically titled accounts and has limited discretion as to the amount or timing of such transfers, the following practices and safeguards will be met:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 - Investment Discretion

Retainer Clients: For client accounts where we provide investment management services, we do maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is optional and explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm trading authority over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the Client.

If you do not grant this limited investment discretion, your IAR will be required to contact you and get affirmation regarding our investment recommendations, such as the security being recommended, the number of shares, whether the security should be bought or sold before implementing changes in your account.

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, it is critical that you respond promptly. If we do not receive a response to our request immediately, the timing of trade implementation may lead to an adverse impact where we may not achieve the optimal trading price.

On a case by case basis, you may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth or included as an attachment to the investment advisory agreement.

Hourly Clients: The advisor's sole function is to make investment and planning recommendations to the client. The advisor therefore does not exercise discretion.

Item 17 – Voting Client Securities

Saltbox Financial LLC does not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on

corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

Item 18 – Financial Information

Saltbox Financial LLC never asks for or collects prepayment for its services. As stated in Item 5, Retainer clients are billed quarterly in arrears, and Hourly clients are billed at the end of each consultation or the completion of a project.

Since registered investment advisors are required to provide the public with certain information or disclosures about their financial condition, this is to state that *Saltbox Financial LLC* 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 – Requirements for State-Registered Advisors

Vera Kelsey-Watts is the sole owner and principal for Saltbox Financial LLC. For information regarding 's educational background and business experience, please see the brochure supplement supplied as Part 2B.

Disciplinary Information

Saltbox Financial's IARs are not subject to any arbitration claim or found liable in a civil, self-regulatory, or administrative proceeding.

Other Business Activities

Please see the brochure supplement supplied as Part 2B.

Performance Based Fees

Saltbox Financial's IARs do not currently charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

Material Disciplinary Disclosures

No advisor at *Saltbox Financial LLC* has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Vera Kelsey-Watts has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Material Relationships That Management Persons Have With Issuers of Securities

Saltbox Financial LLC nor Vera Kelsey-Watts, have any relationship or arrangement with issuers of securities.

Additional Compensation

Vera Kelsey-Watts does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through *Saltbox Financial LLC*.

Item 1 - Cover Page – Vera Kelsey-Watts

Saltbox Financial LLC

30 Market St.

Newburyport, MA 01950

Form ADV Part 2B – Firm Brochure Supplement

Vera Kelsey-Watts (CRD# 6276017)

Phone: (978) 572-2071

August 8, 2022

This Brochure Supplement provides information for Vera Kelsey-Watts that supplements the Saltbox Financial LLC brochure. You should have received a copy of that brochure. Please contact us at (978) 572-2071 or info@saltboxfinancial.co if you did not receive Saltbox Financial's Brochure or if you have any questions about the contents of this supplement.

Additional information about Vera Kelsey-Watts is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Vera Kelsey-Watts

Born: 1985

Educational Background

2010 – B.A., Economics, Sarah Lawrence College

2013 – Financial Planning Certificate, Boston University

Business Experience

2021 – Present, Saltbox Financial LLC, Owner and Principal Advisor

2018 – 2020, Peace of Money LLC, Owner and Principal Advisor

2014 – 2017, Peace of Money, Financial Advisor

2012 – 2013, Peace of Money, Associate Planner

Professional Designations, Licensing and Exams

CFP (Certified Financial Planner)®: 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 71,000 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 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.

National Association of Personal Financial Advisors: Vera is a NAPFA-Registered Advisor – www.napfa.org

Item 3 – Disciplinary Information

No advisor at *Saltbox Financial LLC* has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4 – Other Business Activities

Vera Kelsey-Watts is not involved with any outside business activities.

Item 5 – Additional Compensation

Vera Kelsey-Watts does not receive any additional compensation.

Item 6 – Supervision

Vera Kelsey-Watts is the Owner and Chief Compliance Officer of *Saltbox Financial LLC* is responsible for supervising the investment advisory activities of the investment adviser representatives. Vera Kelsey-Watts monitors and reviews all forms of written communications that the investment adviser representatives provide to clients. Vera Kelsey-Watts can be contacted via telephone at (978) 572-2071 and via email at vera@saltboxfinancial.co.

Item 7 – Requirements for State-Registered Advisers

- A. Vera Kelsey-Watts has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.
- B. Vera Kelsey-Watts has not been the subject of a bankruptcy petition.

Item 1 - Cover Page – Phuong Luong

Saltbox Financial LLC
30 Market St.
Newburyport, MA 01950

Form ADV Part 2B – Firm Brochure Supplement

Phuong Luong (CRD# 6815665)
Phone: (978) 572-2071

August 8, 2022

This Brochure Supplement provides information for Phuong Luong that supplements the Saltbox Financial LLC brochure. You should have received a copy of that brochure. Please contact us at (978) 572-2071 or info@saltboxfinancial.co if you did not receive Saltbox Financial's Brochure or if you have any questions about the contents of this supplement.

Additional information about Phuong Luong is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Phuong Luong

Born: 1985

Educational Background

2007 – Bachelor of Arts in Environmental Studies and Education,
Dartmouth College

2010 – Masters in Special Education, Boston University

Business Experience

04/2021 – Present, Saltbox Financial LLC, Investment Adviser
Representative

11/2020 – Present, Morningstar, Contributor

10/2017 – Present, Boston University Financial Planning Program, Online
Tutor

09/2019 – 07/2021, Robasciotti & Associates, Inc DBA Robasciotti &
Philipson, Investment Strategist

07/2017 – 04/2021, Just Wealth, LLC, Founder and Financial Planner

10/2017 – 04/2019, United Way of Mass Bay, Trainer

10/2015 – 06/2017, Compass Working Capital, Director of Financial
Services

Professional Designations, Licensing and Exams

CFP (Certified Financial Planner)®: 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 71,000 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 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

No advisor at *Saltbox Financial LLC* has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4 – Other Business Activities

Phuong Luong is a tutor for the Boston University Financial Planning Program. She spends approximately 7 hours per week in this role.

Phuong Luong is a Contributing Writer at Morningstar, a financial services company. She spends approximately 2 hours per week in this role.

Item 5 – Additional Compensation

Phuong Luong does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through *Saltbox Financial LLC*.

Item 6 – Supervision

Vera Kelsey-Watts is the Owner and Chief Compliance Officer of *Saltbox Financial LLC* is responsible for supervising the investment advisory activities of Phuong Luong. Vera Kelsey-Watts monitors and reviews all forms of written communications that the investment adviser representatives provide to clients. Vera Kelsey-Watts can be contacted via telephone at (978) 572-2071 and via email at vera@saltboxfinancial.co.

Item 7 – Requirements for State-Registered Advisers

- A. Phuong Luong has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.
- B. Phuong Luong has not been the subject of a bankruptcy petition.

Item 1 - Cover Page – Leslie Modica

Saltbox Financial LLC

44 4th Street Apt. 1
Dover, NH 03820

Form ADV Part 2B – Firm Brochure Supplement

Leslie Modica (CRD# 7592658)

Phone: (978) 572-2071

August 8, 2022

This Brochure Supplement provides information for Leslie Modica that supplements the Saltbox Financial LLC brochure. You should have received a copy of that brochure. Please contact us at (978) 572-2071 or info@saltboxfinancial.co if you did not receive Saltbox Financial's Brochure or if you have any questions about the contents of this supplement.

Additional information about Leslie Modica is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Leslie Modica

Born: 1984

Educational Background

2006 – Bachelor of Science in Journalism, Bachelor of Science in Political Science

Business Experience

01/2022 – Present, Saltbox Financial LLC, Associate Financial Planner

06/2021 – Present, Festina Lente, Server

10/2021 – 1/2022, Saltbox Financial LLC, Independent Contractor

08/2018 – 08/2021, Franklin Oyster House, Assistant General Manager

11/2014 – 02/2019, Atlantic Grill, Server/Bartender

Item 3 – Disciplinary Information

No advisor at Saltbox Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4- Other Business Activities

Leslie Modica is a server at Festina Lente. She works here one day per week and spends approximately 32 hours per month in this role.

Item 5 – Additional Compensation

Leslie Modica does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through *Saltbox Financial LLC*.

Item 6 – Supervision

Vera Kelsey-Watts is the Owner and Chief Compliance Officer of *Saltbox Financial LLC* is responsible for supervising the investment advisory activities of Leslie Modica. Vera Kelsey-Watts monitors and reviews all forms of written communications that the investment adviser representatives provide to clients. Vera Kelsey-Watts can be contacted via telephone at (978) 572-2071 and via email at vera@saltboxfinancial.co.

Item 7 – Requirements for State-Registered Advisers

- A. Leslie Modica has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.
- B. Leslie Modica has not been the subject of a bankruptcy petition.