

# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2A – Firm Brochure**

February 17, 2025

### **Item 1 – Cover Page**

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 LLC* at (978) 572-2071 or by e-mail to: [info@saltboxfinancial.co](mailto: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. It is also registered in the States of Colorado and New Hampshire, and notice-filed in the State of Texas. 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 decide 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](http://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 22, 2024. The following changes have been made to this version of the Disclosure Brochure:

- Item 4 – Advisory Business: We have clarified the description of our Financial Planning Services, and have included a description of our Tax Preparation Services. We have added information regarding the use of Outside Managers.
- Item 5 – Compensation and Fees: We have clarified our hourly and fixed fee arrangements for Financial Planning Services, and we have added information regarding our fees for Tax Preparation Services.
- Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss: We have added a description of Climate Risk, the threat that global climate change could negatively impact economic growth, inflation and investment returns.
- Item 12 – Brokerage Practices: We have clarified the description of how we work with our qualified custodians, Altruist Financial, LLC and Charles Schwab & Co., Inc. Some jurisdictions in which we are registered consider services and benefits we receive from qualified custodians to be soft dollar benefits. In such cases, all soft dollar benefits are considered eligible research or brokerage services.
- Item 13 – Review of Accounts: Typically, we do not provide ongoing monitoring or review of a client's financial plan, unless the client engages our services for a review.

Note that we may have made other changes that are editorial in nature, to correct grammatical or typographical errors, to provide additional information or clarifications, or to correct formatting issues. We do not consider these changes to be material.

### 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](mailto:info@saltboxfinancial.co).

## Item 3 – Table of Contents

<b>Form ADV Part 2A – Firm Brochure .....</b>	<b>1</b>
Item 1 – Cover Page.....	1
Item 2 – Material Changes .....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation.....	6
Item 6 – Performance-Based Fees and Side-By-Side Management .....	9
Item 7 – Types of Clients .....	9
Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss .....	9
Item 9 – Disciplinary Information .....	11
Item 10 – Other Financial Industry Activities and Affiliations.....	11
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Item 12 – Brokerage Practices.....	14
Item 13 – Review of Accounts .....	16
Item 14 – Client Referrals and Other Compensation .....	16
Item 15 – Custody .....	16
Item 16 - Investment Discretion .....	17
Item 17 – Voting Client Securities.....	18
Item 18 – Financial Information .....	18
Item 19 – Requirements for State-Registered Advisors .....	19
<b>Form ADV Part 2B – Firm Brochure Supplement for Vera Kelsey-Watts .....</b>	<b>20</b>
<b>Form ADV Part 2B – Firm Brochure Supplement for Leslie Modica.....</b>	<b>24</b>
<b>Form ADV Part 2B – Firm Brochure Supplement for Allie Henke.....</b>	<b>28</b>
<b>Form ADV Part 2B – Firm Brochure Supplement for Jordyn Middlebrooks .....</b>	<b>30</b>
<b>Form ADV Part 2B – Firm Brochure Supplement for Kamerynn Bonn .....</b>	<b>33</b>
<b>Form ADV Part 2B – Firm Brochure Supplement for Jenna Rodrigues.....</b>	<b>36</b>

## 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 LLC* 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 financial planning and investment management services as described below.

### **Comprehensive Wealth Management**

For clients looking for financial planning and supervision of their investment portfolio, the firm offers an ongoing engagement for an annual fee calculated as a percentage of assets under management. Clients receive financial planning and investment management. There is no additional fee for financial planning.

*Financial planning* involves reviewing relevant areas of the client's current financial position, such as retirement preparation, cash flow, assets and liabilities, college planning, investments, insurance analysis, estate planning, charitable giving, and taxes. It is an interactive process in which the client and the advisor work together to achieve short- and long-term life goals. The client's particular goals and concerns are addressed, and strategies are developed to meet these needs.

*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.

### *Nationwide Life Insurance Company*

In limited circumstances, and when appropriate based on a client's financial circumstances, *Saltbox Financial LLC* may recommend an adviser-managed annuity for a client's portfolio. These annuities are offered by Nationwide Life Insurance Company's through its Advisory Solutions program. Adviser-managed annuities allow us to manage the investment component of the annuity on a discretionary basis.

### *Use of Outside Managers*

In limited circumstances, and when appropriate based on a client's financial circumstances, *Saltbox Financial LLC* may recommend a third-party investment manager

(Outside Manager) for certain portfolio management services, to manage all or a part of the client's portfolio. *Saltbox Financial LLC* will assist the client in selecting an appropriate asset allocation model, interacting with the Outside Manager, and monitoring the services provided by the Outside Manager to ensure that maintaining the investment account with the Outside Manager remains appropriate. Generally, *Saltbox Financial LLC* has the discretion to select the appropriate strategy for the client's investment account. Once *Saltbox Financial LLC* has selected the appropriate strategy, the Outside Manager will manage the client's account on a discretionary basis. *Saltbox Financial LLC* encourages the client to review the disclosure brochure of the Outside Manager for more details regarding the Outside Manager's services and fees. *Saltbox Financial LLC's* review process and analysis of Outside Managers is discussed further in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss below.

### *Multi-Bank Securities, Inc.*

In limited circumstances, and when appropriate based on a client's financial circumstances, we may recommend fixed-income securities that are traded through Multi-Bank Securities, Inc. ("MBS"), a fixed-income broker-dealer registered with the United States Securities and Exchange Commission ("SEC"), and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). MBS clears trades as a prime broker through Charles Schwab & Co., Inc. ("Schwab").

### **Financial Planning**

Financial planning services (as described above) are also offered separate from investment management services, for an hourly or fixed fee. Depending on the client's needs we may provide a comprehensive financial plan, or a limited-scope review of specific topics or questions. For these financial planning services, *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. Upon the client's request *Saltbox Financial LLC* can provide assistance with the implementation of financial planning recommendations for an hourly fee.

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.

## Tax Preparation Services

Clients who engage our Comprehensive Wealth Management or Financial Planning Services may, but are not required to, engage *Saltbox Financial LLC* to provide tax preparation services for an additional fee. *Saltbox Financial LLC* will prepare individual federal and state income tax returns. Clients will be required to enter into a new engagement for each tax year. *Saltbox Financial LLC* does not provide tax preparation services to individuals who are not current clients.

## Assets Under Management

As of December 31, 2024, *Saltbox Financial LLC* manages \$84,931,055 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. *Saltbox Financial LLC*, in its sole discretion, may reduce or waive its fees. The specific fee that a client will pay is outlined in the advisory agreement between the parties.

### Financial Planning Fees

Financial Planning Services are provided on either an hourly or fixed fee basis. Hourly fee arrangements are typically used for ongoing relationships, and fixed fee arrangements are typically used for one-time projects.

**Hourly Fees:** Clients are billed at the rate of:

- Principal Advisor: \$350 per hour
- Associate Advisor: \$275 per hour

Hourly fees are due at the close of each meeting, and appointments range from 30 to 90 minutes. We recommend that hourly clients check in for annual reviews of their finances, because recommendations may differ given changes in life circumstances, the economy, and the financial markets. Hourly engagements will remain in effect until terminated. Either party may terminate the engagement upon written notice to the other party.

**Fixed Fees:** Fees are based on the complexity of the client's financial planning needs, but typically range between \$500-\$10,000. Fees are typically due upon completion of the project. Fixed fee engagements are typically terminated automatically upon completion of the project.

## Comprehensive Wealth Management Fees

**Comprehensive Wealth Management** 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 multiplied by the applicable annual rate and divided by four (4). Cash flows (deposit into or withdrawals from an account) of 20% or more of the account value will be prorated. 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*. In addition, we reserve the right to offer fee discounts or waivers at our discretion.

The Comprehensive Wealth Management Fee will be deducted from the client's account(s) and paid directly to the advisor by the qualified custodian. Clients will provide necessary authorization to the qualified custodian to deduct the advisor's and pay them to the advisor. *Saltbox Financial LLC* will send each client an invoice reflecting the formula used to calculate the fee, the amount of assets under management on which the fee is calculated, and the time period covered by the fee. Clients are encouraged to review these invoices and compare them to the account statements received from the qualified custodian to verify that appropriate fees are being deducted from the client's account(s). Clients are encouraged to contact the advisor with any questions or concerns about an invoice.

Clients' account(s) may be aggregated in a "household" for purposes of determining the fee breakpoints outlined in the table above. A household includes accounts held by Client, Client's spouse or partner, minor children, or adult children residing in Client's residence. A household also includes accounts in which any of the above-described persons have control, are a beneficiary, or otherwise have beneficial ownership.

Fees are prorated based on the number of days services are provided during the initial billing period for services commenced at any time other than the beginning of a calendar quarter. The prorated fee for the initial billing period is based on the value of the account when services commence, and is due immediately.

## *Nationwide Life Insurance Company*

When an advisor-managed variable annuity is held in a client's portfolio, the value of the annuity is included in the value of the client's assets under management for purposes of calculating the Comprehensive Wealth Management fee.

## *Outside Manager Fees*

When an Outside Manager is used to manage all or a portion of a client's investment portfolio, the Outside Manager charges an additional fee which varies based on the investment strategy used. The additional fee will be discussed with the client before the investment strategy is deployed with the Outside Manager. Additional information regarding the Outside Manager's services and fees is outlined in the Outside Manager's disclosure brochure.

## *Multi-Bank Securities, Inc.*

When we place trades in fixed-income securities with Multi-Bank Securities, Inc. ("MBS"), a transaction fee of \$25 per trade is imposed by MBS. This fee is paid by the client. *Saltbox Financial LLC* does not receive any portion of this fee.

## **Tax Preparation Fees**

Tax preparation services are available to Financial Planning and Comprehensive Wealth Management clients, at an additional fee. *Saltbox Financial LLC* prepares individual Federal and State income tax returns, estate tax returns, and trust returns. We do not prepare any corporate, or non-profit tax returns. Fees begin at \$500; additional fees may apply depending on the complexity of the return (e.g., additional state tax returns, schedules, forms, reports, extensions, etc.). Payment of fees is due upon filing and acceptance of returns by the taxing authorities. If additional assistance is needed following the filing and acceptance of the returns (e.g., follow-up communications with the client and/or taxing authorities, resolution of issues, or additional research), *Saltbox Financial LLC* will provide such services upon the client's request at the hourly rate of \$350 per hour. We reserve the right to waive or discount hourly fees at our discretion.

## **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.



## **Termination**

*Saltbox Financial LLC* is required to provide clients with a copy of this brochure to clients at or before the time the client enters into an advisory agreement. If a client has not received this brochure at least 48 hours prior to signing an advisory agreement, the client may terminate the advisory agreement within five (5) business days of signing the agreement without incurring any penalties and advisory fees.

Either party may terminate the engagement upon written notice to the other party. 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.

When fees are paid in arrears, no refunds are given upon termination. However, if fees are paid in advance, any unearned fees will be refunded upon termination.

## **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 also serve charitable organizations. 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 industry publications, webinars, presentations, newsletters, annual reports, prospectuses, company press releases, and corporate rating services, as well as research materials prepared by others. The advisor conducts direct interviews with fund managers and private equity founders. 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 mutual funds, exchange traded funds, alternative investments, U.S. government securities, and fixed income investments. In the course of providing investment advice, the advisor may address issues related to other types of assets that the client may already own.

As described in Item 4 – Advisory Business above, *Saltbox Financial LLC* may recommend the use of an Outside Manager to manage all or a portion of a client's investment portfolio. *Saltbox Financial LLC's* analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Manager in an attempt to determine if that Outside Manager has demonstrated an ability to invest over a period of time and in different economic conditions. *Saltbox Financial LLC* monitors the Outside Manager's underlying holdings, strategies, concentrations and leverage as part of its overall periodic assessment.

**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:**

**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.

**Catastrophic Events Risk:** which is the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages.

**Climate Risk:** Climate risk is the threat that global climate change could negatively impact economic growth, inflation and investment returns.

**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.

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

**Geopolitical Risk:** which is the risk of financial and market loss because of political decisions or disruptions in a particular country or region.

**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.

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

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

**Legal or Legislative Risk:** which is the risk that legislative changes or court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**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.

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

## **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.

As described in Item 4 above, when appropriate based on a client's financial circumstances, *Saltbox Financial LLC* may recommend an Outside Manager for certain portfolio management services. When an Outside Manager is used, the client will generally incur additional fees. However, as a fiduciary, *Saltbox Financial LLC* will only recommend the use of an Outside Manager when it is in the client's best interest.

## **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. Because Financial Planning 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 Comprehensive Wealth Management 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 Comprehensive Wealth Management 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.

*Saltbox Financial LLC* does not manage any proprietary funds or private investments; therefore we do not have any material financial interest in any investments that may be used in client portfolios. We do not engage in agency cross transactions or principal transactions.

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 Altruist Financial, LLC ("Altruist") and Charles Schwab & Co., Inc. (Charles Schwab). Based on the client's needs, *Saltbox Financial LLC* may recommend clients use Altruist or Charles Schwab as the qualified custodian for the client's accounts. Charles Schwab and Altruist are independent SEC-registered broker-dealers and members of FINRA and SIPC, and are not affiliated with *Saltbox Financial LLC*.

Although *Saltbox Financial LLC* may recommend a particular custodian, the client has the discretion to decide whether to do so and will open their accounts directly with the custodian by entering into an account agreement directly with them. *Saltbox Financial*

*LLC* does not open accounts for clients, although we may assist clients in doing so. If clients do not wish to place their assets with one of the custodians with which *Saltbox Financial LLC* has an established relationship, we cannot manage your account for you on a discretionary basis.

Through its participation in the adviser programs offered by these custodians, *Saltbox Financial LLC* receives various benefits, provided without cost or at a discount, that may not be available to retail customers. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research related products and tools; pricing and market data; access to software, technology or services; attendance at educational conferences and events; consulting on technology, compliance or other business matters; access to industry publications. Some of these products and services may benefit you directly, while others may benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

The availability of these services does not depend on the number or value of brokerage transactions directed to the custodian. These services are available to all advisers who participate in the custodial programs, and are not provided in exchange for us directing client trades to the custodian. Some jurisdictions in which *Saltbox Financial LLC* is registered may consider these services and benefits to be soft dollar arrangements. In such cases, all soft dollar benefits are considered eligible research or brokerage services. The receipt of these benefits from the custodians creates a potential conflict of interest as we may have an incentive to recommend you maintain your account with a specific custodian. However, we strive to recommend the custodian that is most appropriate for you based on your individual needs.

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 client referrals from broker-dealers.

*Saltbox Financial LLC* does not aggregate trade orders. Transactions are executed in each client's account on an individual basis.

*Saltbox Financial LLC* does not allow directed brokerage arrangements. All transactions are executed with the qualified custodian that holds the client's account.

### **Item 13 – Review of Accounts**

*Saltbox Financial LLC* is responsible for reviewing and assessing all financial recommendations made to Comprehensive Wealth Management clients. These 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. On at least an annual basis, *Saltbox Financial LLC* will offer clients the opportunity to meet to review their financial circumstances and investment objectives.

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.

For financial planning clients, *Saltbox Financial LLC* does not typically provide ongoing monitoring or review of the client's financial plan, unless the client engages our services for a review.

### **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:

- *Saltbox Financial LLC* will send a copy of its invoice to the custodian at the same time that it sends the client a copy.



- The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- The client will prove 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.

Custodians may allow clients to authorize *Saltbox Financial LLC* to disburse funds from their accounts to internal or external accounts using a Standing Letter of Authorization (SLOA). As a matter of policy, *Saltbox Financial LLC* will only use SLOAs to facilitate first-party transfers (i.e., transfers between internal or external accounts with the same account holder, or checks distributed to the client at the client's address of record). SLOAs may not be used for third-party transfers; clients must authorize each third-party transfer request.

## **Item 16 - Investment Discretion**

*Comprehensive Wealth Management 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.

*Financial Planning 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* acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it or for which it is deemed to have proxy voting authority. *Saltbox Financial LLC* will vote proxies on behalf of a client solely in the best interest of that client and has established general guidelines for voting proxies. *Saltbox Financial LLC* can also abstain from voting if, based on factors such as expense or difficulty of the exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances can vary, *Saltbox Financial LLC* can vote in a manner that is contrary to the general guidelines if it believes that doing so would be in a client's best interest to do so. If a proxy proposal presents a conflict of interest between *Saltbox Financial LLC* and a client, then *Saltbox Financial LLC* will disclose the conflict of interest to the client prior to the proxy vote and, if participating in the vote, will vote in accordance with the client's wishes.

Clients can obtain a complete copy of the proxy voting policies and procedures by contacting *Saltbox Financial LLC* in writing and requesting such information. Each client can also request, by contacting *Saltbox Financial LLC* in writing, information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the client during the prior annual period.

## **Item 18 – Financial Information**

*Saltbox Financial LLC* never asks for or collects prepayment for its services. As stated in Item 5, Comprehensive Wealth Management clients are billed quarterly in arrears, and Financial Planning 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 LLC*'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 LLC*'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*.

# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2B – Firm Brochure Supplement for Vera Kelsey-Watts**

(CRD# 6276017)

February 17, 2025

### **Item 1 - Cover Page**

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](mailto:info@saltboxfinancial.co) if you did not receive *Saltbox Financial LLC'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](http://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. 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 *Code of Ethics and Standards of 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 *Code of Ethics and Standards of Conduct*, which 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](http://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 other 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*. Supervision of her activities is administered through the application of written policies and procedures. She acknowledges that she will adhere to and abide by such written policies

and procedures, as well as applicable federal and state securities laws, and industry professional standards.

Vera Kelsey-Watts is responsible for supervising the investment advisory activities of the firm and its 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](mailto:vera@saltboxfinancial.co).

### **Item 7 – Requirements for State-Registered Advisers**

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.

Vera Kelsey-Watts has not been the subject of a bankruptcy petition.

# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2B – Firm Brochure Supplement for Leslie Modica**

(CRD# 7592658)

February 17, 2025

### **Item 1 - Cover Page**

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](mailto:info@saltboxfinancial.co) if you did not receive *Saltbox Financial LLC'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](http://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

- 2022 – Present, Saltbox Financial LLC, Associate Financial Planner
- 2021 – 2022, Saltbox Financial LLC, Independent Contractor
- 2018 – 2021, Franklin Oyster House, Assistant General Manager
- 2014 – 2019, Atlantic Grill, Server/Bartender

#### 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. 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 *Code of Ethics and Standards of 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 *Code of Ethics and Standards of Conduct*, which 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: Leslie is a NAPFA- Registered Advisor – [www.napfa.org](http://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**

Leslie Modica does not engage in any other business activities.

### **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](mailto:vera@saltboxfinancial.co).

## **Item 7 – Requirements for State-Registered Advisers**

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.

Leslie Modica has not been the subject of a bankruptcy petition.

# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2B – Firm Brochure Supplement for Allie Henke**

(CRD# 7266409)

February 17, 2025

### **Item 1 - Cover Page**

This Brochure Supplement provides information for Allie Henke 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](mailto:info@saltboxfinancial.co) if you did not receive *Saltbox Financial LLC's* Brochure or if you have any questions about the contents of this supplement.

Additional information about Allie Henke is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

### Allie Henke

Born: 1998

#### Educational Background

- 2020 – Bachelor of Business Administration from Lake Superior State University

#### Business Experience

- 2024 – Present, Saltbox Financial LLC, Operations and Paraplanning Associate
- 2020 – 2023, RBC Wealth Management, Registered Client Associate

## 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 proceedings.

## Item 4- Other Business Activities

Allie Henke does not engage in other business activities.

## Item 5 – Additional Compensation

Allie Henke 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 Allie Henke. 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](mailto:vera@saltboxfinancial.co).

## Item 7 – Requirements for State-Registered Advisers

Allie Henke has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.

Allie Henke has not been the subject of a bankruptcy petition.

# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2B – Firm Brochure Supplement for Jordyn Middlebrooks**

(CRD# 7905120)

February 17, 2025

### **Item 1 - Cover Page**

This Brochure Supplement provides information for Jordyn Middlebrooks 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](mailto:info@saltboxfinancial.co) if you did not receive *Saltbox Financial LLC's* Brochure or if you have any questions about the contents of this supplement.

Additional information about Jordyn Middlebrooks is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

### Jordyn Middlebrooks

Born: 1993

#### Educational Background

- 2016 – Master of Science in Management from University of Florida
- 2015 – Bachelor of Science in Psychology from University of Florida

#### Business Experience

- 10/2024 – Present, Obran Capital Advisors LLC, Client Service Associate
- 04/2024 – Present, *Saltbox Financial LLC*, Investment Adviser Representative
- 01/2024 – Present, Reimagine Wealth LLC, Founder and Managing Member
- 2022 – 2023, LineVision, Technical Program Manager
- 2019 – 2022, National Instruments, Sr. Program Manager
- 2016 – 2019, VMware, Employee Advisor

## 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 proceedings.

## Item 4- Other Business Activities

Jordyn Middlebrooks is the Founder, Owner and Managing Member of Reimagine Wealth LLC in Austin, Texas. Jordyn Middlebrooks devotes 40 hours per week to freelance work with Reimagine Wealth which provides back office and operational support for financial professionals as well as coaching and healing services for individuals wanting to heal their relationship with money.

Jordyn Middlebrooks is employed as a Client Service Associate with Obran Capital Advisors LLC. She devotes approximately 32 hours per month to supporting Obran Capital Advisors LLC's client service delivery and internal processes. *Saltbox Financial LLC* and Obran Capital Advisors LLC do not serve the same clients; therefore, there is no potential or actual conflict of interest presented by this activity.

## Item 5 – Additional Compensation

Jordyn Middlebrooks 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 Jordyn Middlebrooks. 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](mailto:vera@saltboxfinancial.co).

## **Item 7 – Requirements for State-Registered Advisers**

Jordyn Middlebrooks has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.

Jordyn Middlebrooks has not been the subject of a bankruptcy petition.



# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2B – Firm Brochure Supplement for Kamerynn Bonn**

(CRD# 7358790)

February 17, 2025

### **Item 1 - Cover Page**

This Brochure Supplement provides information for Kamerynn Bonn 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](mailto:info@saltboxfinancial.co) if you did not receive *Saltbox Financial LLC's* Brochure or if you have any questions about the contents of this supplement.

Additional information about Kamerynn Bonn is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

### Kamerynn Bonn

Born: 1993

#### Educational Background

- 2015, Bachelor of Arts in History, North Carolina State University

#### Business Experience

- 12/2024 – Present, *Saltbox Financial LLC*, Investment Adviser Representative
- 2023 – 2024, *Cetera Investment Advisers LLC*, Investment Adviser Representative
- 2022 – 2024, *Cetera Advisor Networks LLC*, Registered Representative
- 2021 – 2024, *Matt Logan, Inc.*, Operations Specialist
- 2021 – 2022, *Cetera Advisor Networks*, Operations Specialist
- 2019 – 2021, *Semmax Financial Group*, Case Preparations Specialist, Client Service and Transfer Specialist

## 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 proceedings.

## Item 4- Other Business Activities

Kamerynn Bonn does not engage in any other business activities.

## Item 5 – Additional Compensation

Kamerynn Bonn 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 Kamerynn Bonn. 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](mailto:vera@saltboxfinancial.co).

## **Item 7 – Requirements for State-Registered Advisers**

Kamerynn Bonn has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.

Kamerynn Bonn has not been the subject of a bankruptcy petition.

# Saltbox Financial LLC

(CRD #130882)

110 Haverhill Road, Suite 307

Amesbury, MA 01913

Phone: (978) 572-2071

## **Form ADV Part 2B – Firm Brochure Supplement for Jenna Rodrigues**

(CRD# 6867774)

February 17, 2024

### **Item 1 - Cover Page**

This Brochure Supplement provides information for Jenna Rodrigues 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](mailto:info@saltboxfinancial.co) if you did not receive *Saltbox Financial LLC's* Brochure or if you have any questions about the contents of this supplement.

Additional information about Jenna Rodrigues is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

### Jenna Rodrigues

Born: 1992

#### Educational Background

- 2014, Bachelor of Arts in Biology, Hartwick College

#### Business Experience

- 1/2025 – Present, *Saltbox Financial LLC*, Tax Manager and Paraplanner
- 06/2023 – 03/2024, *Illumination Wealth*, Senior Associate Financial Planner
- 10/2021 – 06/2023, *Illumination Wealth*, Associate Financial Planner
- 03/2021 – 10/2021, *Thrivent*, Practice Support Associate
- 06/2018 – 03/2021, *Thrivent*, Insurance Office Professional
- 10/2017 – 06/2018, *Thrivent*, Office Professional
- 07/2015 – 06/2017, *Through These Doors*, Dating Violence Educator
- 08/2014 – 07/2015, *Jesuit Volunteer Corp*, Jesuit Volunteer

## 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 proceedings.

## Item 4- Other Business Activities

Jenna Rodrigues does not engage in any other business activities.

## Item 5 – Additional Compensation

Jenna Rodrigues 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 Jenna Rodrigues. 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](mailto:vera@saltboxfinancial.co).

## **Item 7 – Requirements for State-Registered Advisers**

Jenna Rodrigues has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.

Jenna Rodrigues has not been the subject of a bankruptcy petition.