

Part 2A of Form ADV: Firm Brochure

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This brochure provides information about the qualifications and business practices of Westport Strategies Advisors, LLC, ("*Westport*"). If you have any questions about the contents of this brochure, please contact us at 781-848-1212 or krbubeck@beaconcompliance.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Westport is in the process of registering as a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Westport will be available on the SEC's website upon approval of our application at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 163577.

Item 2 Material Changes

This is the initial filing of this document.

After our initial filing of this brochure, future versions of this section will provide a summary of new and updated material changes, if any, to the brochure since the last update of the brochure.

Pursuant to SEC Rules, we will provide you with one or more of the following:

- An updated annual brochure along with a summary of material changes which will be provided within 120 days of the close of our business fiscal year if there have been interim amendments or material changes during the course of the previous business year. Our business fiscal year end is December 31st.
- A summary of material changes within 120 days of the close of our business fiscal year that includes an *offer* to provide a copy of the full annual updated brochure and information on how you may obtain the brochure from us if there has been an interim amendment or material change during the previous business year.
- An interim amendment to the brochure if new information in response to Item 9 of Part 2A regarding disciplinary information is available.
- An interim amendment resulting from any material change that could affect the relationship between you and us.

We will provide, *free of charge*, a new brochure any time at your request, or as may become necessary based on material changes as outlined above.

You may request our brochure by contacting our office at 781-848-1212.

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Item 4 Advisory Business

Our firm has applied for registration and anticipates becoming an SEC-registered investment adviser with its principal place of business located in Massachusetts. The firm began conducting business in 2012.

There is one principal shareholder owning more than 25% of our firm. The shareholder is:

- Westport Strategies, LLC, a Massachusetts limited liability company.

As used in this brochure, the words “we,” “our” and “us” refer to Westport and the words “you”, “your” and “client” refer to you as either a client or prospective client of our firm.

INVESTMENT CONSULTING AND SUPERVISORY SERVICES

Our firm provides ongoing non-discretionary investment consulting services and non-discretionary or discretionary investment supervisory services to various types of retirement plans and deferred compensation plans on behalf of institutional clients. In its capacity as a registered investment advisor we offer the following services:

Consulting Services

- Fiduciary services with respect to investment consulting services involving the selection and monitoring of investment funds inside COLI, BOLI and other similar products in accordance with the requirements of an SEC registered investment advisor.
- Asset Fund Monitoring providing performance measurement and evaluation including reporting of performance against corresponding benchmarks, expense ratios, and portfolio allocation returns
- Provide assistance in creating and maintaining an Investment Policy Statement (“IPS”) for deferred compensation and non-qualified defined contribution plans
- Investment Performance and Evaluation including mapping reviews of investment alternatives based on options available within the applicable insurance product for plans informally funded by COLI, BOLI, and mutual funds, if applicable
- Provide assistance in responding to government audit, government request for information, or legal proceedings involving clients as it pertains to consulting services provided

These services are available individually or can be combined based on your requirements.

None of our consulting services include the actual process of managing your assets. When you utilize our firm only for consulting services we will not have discretion to implement any recommendations, hire or terminate managers, create or execute transactions, or perform any service that may be considered to be investment management in nature.

Investment Supervisory Services for Retirement Plans – We provide non-discretionary investment supervisory services to retirement plans and their fiduciaries. The investment

supervisory services can be offered in addition to the various consulting services outlined in the preceding section.

In a non-discretionary relationship we can provide oversight and supervision of the following: a) rebalancing trades on behalf of the plan through the Carrier or Trust, and b) the allocation of assets or changes to the allocation of any asset class in accordance with the allocation ranges or specific target allocations for each asset class as established by the retirement plan's investment guidelines. All non-discretionary services can only be performed with written instructions provided in advance.

In a discretionary relationship we can cause the creation of trades and the reallocation of assets to be made based upon your previous instructions to us in accordance with your investment policy statement.

General Information – Regardless of the type of agreement we enter into, we will not begin performing any consulting or investment supervisory services on your behalf until we enter into a written investment consulting or supervisory agreement with you.

The agreement will detail the nature of our relationship, including any discretion granted to us, the fees to be charged, how and when the fees will be paid, and other important terms and conditions of the investment consulting or supervisory relationship between us.

We may, at our discretion, employ an SEC registered investment advisor to act as a sub-advisor to us to assist in the performance of any or all of the services outlined in any investment consulting or supervisory agreement we may have with you.

All investments involve some level of risk. Investments will only be implemented or recommended when consistent with your investment policy statement.

AMOUNT OF MANAGED ASSETS

As of 04/16/2012, our firm does not have any client assets under management.

As of 04/16/2012 our firm does not have any client assets under advisement. Assets under advisement generally refer to those assets for which we have entered into a consulting relationship but for which we do not have either discretionary or non-discretionary authority over the assets.

Item 5 Fees and Compensation

Our compensation is exclusively fee based, fully disclosed and paid directly by the client, either directly or from commissions generated by the underlying insurance products.

CONSULTING SERVICES

Fixed fee consulting services are offered on an annual basis and are paid in arrears at the end of each full year.

Annual Retainer Fees

We offer an annual full-retainer fee relationship. The fee for the retainer services may be charged on a pre-determined fixed fee arrangement negotiated on a case-by-case basis depending upon the scope and complexity of the services requested. Our minimum annual fee is \$5000.

INVESTMENT SUPERVISORY SERVICES

Non-discretionary and discretionary supervisory services are offered on either a fixed fee or percentage of assets under management fee basis.

Investment Supervisory Services for Deferred Compensation or Non-Qualified Plans

We will charge fees based upon a percentage of assets under management or on a fixed fee basis. Fees will be determined based on the scope of the services and your needs and will be negotiated individually and set forth in the investment supervisory agreement between you and our firm. Our minimum annual fee is \$5000.

General Information

Fees may be negotiable on a client-by-client basis depending on a number of factors, including the type and nature of services to be provided, the amount of assets to be managed, complexity of services required and/or anticipated future additional assets. The specific annual fee schedule for all types of services is identified in the contract between us.

If you are paying a fee based on the amount of assets under management, your fee will be calculated on a quarterly basis and is paid in arrears. To calculate the fee we take the value of all assets in your portfolio as of the last day of the preceding quarter and multiply that amount by the fee percentage which results in an annualized fee. The annualized fee is then divided by four to arrive at the quarterly fee you will be charged.

The sample calculation of an investment supervisory fee based on a percentage of assets is as follows:

Assets under Management as of 12/31	=	\$1,000,000
Fee Percentage	=	1%
Annualized Fee Amount	=	\$ 10,000
Quarterly Fee is one-fourth of Annual Fee	=	\$ 2,500

In the event our agreement with you begins at any time other than the first day of a calendar quarter, the fee for the initial period will be pro-rated based on the number of days in the quarter that the agreement is effective.

In the event this agreement is terminated for any reason by either of us, the fee shall be pro-rated for any portion of a quarter that the portfolio is being managed by us. This prorated period would include any notice required to be given in accordance with your investment management agreement.

The fee that you are being charged by us for investment supervisory services of your assets

is exclusive of, and in addition to, brokerage commissions, transaction fees, custodial fees, and any other related costs and expenses. We do not receive any portion of these commissions, fees, other costs and expenses.

A portion, or all of your assets that we or a sub-advisor manages may be invested in mutual funds, exchange traded funds or other pooled investment vehicles as allowed by your account and in accordance with the terms of your investment supervisory agreement. Each of those investments may charge an annual internal management fee as outlined in their prospectus. This management fee is deducted directly from the account balance you have invested in that specific fund. We do not receive any of these fees. These fees represent additional fees that you are paying above that being charged by us.

Accordingly, you should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by you and to thereby evaluate the investment supervisory services provided.

Compensation for Sale of Securities

Westport and its affiliates may act as both broker–dealer and registered investment advisor to sponsors of non–ERISA plans.

Westport and/or its affiliates may separately advise the plan sponsor on strategies for hedging plan liabilities, which may include the purchase of insurance products or mutual funds. Westport's affiliates may receive compensation for the purchase of these products. Clients do have the option to purchase investment products that affiliates of Westport recommend through other brokers or agents that are not affiliated with Westport.

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

Our firm does not charge performance-based fees or engage in Side-By-Side Management.

Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account.

Item 7 Types of Clients

Our firm provides consulting and supervisory services to the following types of clients:

- Deferred Compensation Plans
- Non-Qualified Defined Contribution Plans
- Institutional Clients

Generally, we require a minimum annual fee.

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

METHODS OF ANALYSIS

We attempt to match the investment options, usually mutual funds, available within the insurance plan to those available from the company's 401k plan selected by the participants.

In connection with monitoring investment funds held in a client's plan, Westport utilizes a variety of third party databases that provide detailed information about investment funds, including performance, fees and expenses, portfolio holdings information, and other statistical analysis. Westport may also obtain portfolio information and statistical data directly from the investment fund's adviser.

RISK of LOSS

Investments in most any type of securities involve the risk of loss. There can be no assurance that a particular plan will meet its investment objectives. The types of risks that you may experience include;

- **Loss of Principal Risk**
- **Interest Rate Risk**
- **Market Risk**
- **Inflation Risk**
- **Currency Risk**
- **Liquidity Risk**
- **Business Risk**
- **Financial Risk**

Past performance of any security does not guarantee future results.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to your evaluation of our advisory business or the integrity of our management personnel.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Our principal executive officer and other employees are qualified as registered representatives or investment advisor representatives. Some individuals act in the capacity as both registered representatives and investment advisor representatives. Additionally certain individuals may be licensed as insurance agents or brokers for one or more insurance companies.

When acting as Investment Advisor Representative, individuals associated with Westport

operate under a strict fiduciary standard. Apart and aside from Westport's fee for investment consulting and investment supervisory services, when acting in both an investment advisor representative and registered representative capacity, individuals associated with Westport are said to be acting in a "dual capacity".

Clients should be aware that the receipt of additional compensation itself may create a conflict of interest. Westport has adopted certain procedures to mitigate the effect of these conflicts, including the proactive disclosure, on a client-specific basis, of the existence of any dual capacity situations.

Registered representatives associated with Westport act in that capacity under the supervision of FAS Corp., a broker –dealer and member firm of FINRA.

Investment advisor representatives and registered representatives of Westport may also be associated with Westport Strategies, LLC (not to be confused with Westport Strategies Advisors, LLC) the parent of Westport Strategies Advisors, LLC. Westport Strategies, LLC, provides asset/liability management and administrative services to institutional clients.

In the future if any additional conflict were to arise with regard to any current or new financial industry activities or affiliations, including the receipt of compensation from those sources we would;

- Disclose in this section to you the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation in addition to our firm's stated consulting or supervisory fees;
- Disclose to you that you are not obligated to purchase recommended investment products from our employees or affiliated companies;
- Require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- Periodically monitor any outside employment activities of our employees to verify that any conflicts of interest continue to be properly addressed by our firm.

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

CODE of ETHICS

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

We feel that our firm and its employees owe a duty of loyalty, fairness and good faith towards all of our clients, and have an obligation to adhere not only to the specific provisions of our Code of Ethics but to the general principles that guide the Code of Ethics.

The purpose of our Code of Ethics is to reinforce the fiduciary principles that govern the

conduct of our firm and the actions of our advisory personnel. Each member of the firm is instructed to act in the best interests of all of our clients, to avoid any real or potential conflicts of interest, and to conduct their personal activities with the utmost of integrity.

Our Code of Ethics has been distributed to all members of the firm. The following is a summary of the policies contained in our Code of Ethics:

- Standards of Business Conduct
- Compliance with Federal Securities Law
- Review and/or Approval of Personal Securities Transactions of Certain Persons
- Ability to Purchase the Same Securities Recommended to or Owned by Firm Clients Subject to Approval
- Obligation to Report Violations and Enforcement of Sanctions Where Necessary
- Annual Employee Certification Required

Our Code of Ethics includes policies and procedures for the review of proposed transactions, quarterly securities reporting, initial and annual securities holdings reports that must be submitted by the firm's access persons, and restrictions on the acceptance of significant gifts and the reporting of gifts and business entertainment items incurred by our personnel. Our code also provides for oversight, enforcement and recordkeeping provisions.

Our Code of Ethics also prohibits the use of material non-public information. We do not believe that we have any particular access to non-public information, however, employees are reminded such information, if received, may not be used in any manner.

You may receive a free copy of our Code of Ethics by sending your request to [krebbeck@beaconcompliance.com](mailto:krbubeck@beaconcompliance.com), or by calling us at 781-848-1212.

INTEREST in CLIENT TRANSACTIONS

Our firm does not participate in Principal Trades or in Agency Cross transactions. Principal transactions are those where our firm, acting on behalf of our own account, buys or sells a security to you or another client. An Agency Cross transaction is one in which our firm acts as a broker for both the buyer and seller of a security.

We do not recommend to you or other clients that you take a position in a security in which our firm, our employees, or our related persons has a material financial interest.

PERSONAL TRADING

Our Code of Ethics is designed to assure that the personal securities transactions by our employees, and the activities and interests of our employees will not interfere with:

- Making decisions in your best interests; and
- Implementing such decisions while, at the same time, allowing our employees to invest for their own accounts.

Westport does not provide investment advice to you on individual securities. As such, our employees are permitted to buy or sell individual securities without prior approval.

Our employees may also purchase, without prior approval, open-end and closed-end mutual funds for whom we are unaffiliated, exchange traded funds for whom we are unaffiliated, direct obligations of the U.S. Government, banker's acceptances, bank certificates of deposit, commercial paper, high quality short term debt instruments, and money market funds.

We have established the following policies and procedures as part of our Code of Ethics to ensure we comply with our regulatory obligations and to provide you, other clients, and other potential clients, with full and fair disclosure of such conflicts or potential conflicts of interest:

- No principal or employee of our firm may put his or her own interest above the interest of your account(s).
- No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is based on information received because of his or her employment unless the information is available to the investing public.
- We may ban or otherwise require prior approval for any IPO or private placement investments by any employee or related persons of the firm.
- We maintain a list of what we consider to be "Covered" or "Reportable" securities holdings, if any, for our firm, our employees, and anyone associated with our firm that has access to our client's investment holdings. This person is referred to as an "Access Person".
- Any individual who violates any of the above restrictions may be subject to varying levels of disciplinary action including termination.
- We will maintain all records regarding personal securities transactions as is detailed in Rule 204A-1 of the Investment Advisors Act of 1940.

Item 12 Brokerage Practices

RESEARCH and SOFT DOLLAR BENEFITS

Our firm does not maintain soft dollar arrangements or agreements with any broker-dealer.

BROKERAGE for CLIENT REFERRALS

Our firm does not receive or participate in any program whereby we receive client referrals in exchange for using any particular broker-dealer.

DIRECTED BROKERAGE

Not applicable to our firm.

TRADE AGGREGATION and ALLOCATION

Not applicable to our firm.

Item 13 Review of Accounts

CONSULTING SERVICES

Performance Monitoring and Evaluation

Your accounts are monitored for investment performance, with in-depth reports generally prepared and presented to you each calendar quarter.

Investment Screening and Selection

We will, in accordance with our investment consulting agreement perform a mapping review of investment alternatives based solely on the universe of available options within the applicable insurance product.

Item 14 Client Referrals and Other Compensation

Our firm does not engage solicitors or pay any related or non-related persons for referring potential clients to our firm.

Item 15 Custody

Our firm does not have actual or constructive custody of any client account.

Item 16 Investment Discretion

We do not have discretionary or non-discretionary authority over your account if you utilize us solely for consulting purposes.

When we provide investment supervisory services, you will authorize us to have either discretionary or non-discretionary authority over the account, depending on the individual investment supervisory agreement.

You may grant us discretionary or non-discretionary authority and you may revoke that authority at any time with written notice.

Generally, our discretionary authority will be limited to the ability to do the following without contacting you:

- Determine the specific investments to buy or sell;

For accounts with non-discretionary authority, we can submit orders to buy or sell for execution only after receiving written instructions from you to do so.

In all cases either type of discretion is to be used in a manner consistent with the stated investment objectives for your account.

When we select securities and determine the amounts of those securities to buy or sell we will observe the investment policies and any limitations or restrictions which you may have given us to follow.

You give us discretionary or non-discretionary authority when you sign an investment supervisory agreement with our firm, and you may limit this authority by giving us written instructions in advance of entering into an agreement. You may also limit this authority at any time after entering into an agreement while that agreement remains in effect by once again providing us with written instructions. These limitations and other instructions will become a part of your permanent file.

Item 17 Voting Client Securities

We are not be responsible for voting proxies or other corporate actions solicited by issuers of securities held in your account.

You will retain the right and the responsibility to vote proxies or corporate actions as you deem appropriate.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

If we maintain discretionary authority for your account or are deemed to have actual or constructive custody of your assets or we collect fees as described in the preceding paragraph we are required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations.

Our firm has no financial circumstances to report. Additionally, our firm has not been the subject of a bankruptcy proceeding at any time during the past ten years.