



This brochure provides information about SoundView Advisors, Inc. (“SoundView Advisors” or “SoundView”, “we” or “our”) qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at (206) 682-7713 or by email at [info@soundviewadvisors.com](mailto:info@soundviewadvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about SoundView Advisors, Inc. is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select “investment adviser firm” and type in our firm name). Results will provide you both Part 1 and 2 of our Form ADV and Form CRS.

We are a Registered Investment Advisor Firm. Our registration does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

#### **ITEM 1 – COVER PAGE ADV PART 2 A**

JANUARY 1, 2022

CRD #: 114437

[WWW.SOUNDVIEWADVISORS.COM](http://WWW.SOUNDVIEWADVISORS.COM)

[INFO@SOUNDVIEWADVISORS.COM](mailto:INFO@SOUNDVIEWADVISORS.COM)

1441 WEST BAY DRIVE, SUITE 201  
OLYMPIA, WASHINGTON 98502  
(360) 867-9890

1000 SECOND AVENUE, SUITE 3550  
SEATTLE, WA 98104  
(206) 682-7713

---

**ITEM 2 – MATERIAL CHANGES**

This brochure, dated January 1, 2022, has been prepared by SoundView Advisors to meet SEC requirements. This section of the brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the public disclosure website (IAPD) [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The brochure have had the following material changes since the document dated January 1, 2021.

Item 4 - Chief Compliance Officer is now Nate Porter.

---

**ITEM 3 – TABLE OF CONTENTS**

Item 1 – Cover Page ADV Part 2 A .....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents .....	3
Item 4 – Advisory Business.....	4
Item 5 – Fees and Compensation .....	5
Item 6 – Performance-Based Fees and Side-By-Side Management .....	7
Item 7 – Types of Clients .....	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	8
Item 9 – Disciplinary Information .....	9
Item 10 – Other Financial Industry Activities and Affiliations.....	9
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	10
Item 12 – Brokerage Practices .....	11
Item 13 – Review of Accounts .....	15
Item 14 – Client Referrals and Other Compensation.....	16
Item 15 – Custody.....	16
Item 16 – Investment Discretion .....	17
Item 17 – Voting Client Securities .....	17
Item 18 – Financial Information .....	17

---

## ITEM 4 – ADVISORY BUSINESS

### 4a: Firm Description

SoundView Advisors (fka Stoltenberg & Associates) was established in January 2007 by Bruce Stoltenberg and Kevin L. Slater, CFP®, CEO. Bruce retired from the firm in 2016. The firm's home office is located in Olympia, with an additional office in downtown Seattle.

### 4a1: Principal Members

- Kevin L. Slater, CEO: Mr. Slater may be contacted by telephone at (206) 682-7713 or by email at [Kevin.Slater@soundviewadvisors.com](mailto:Kevin.Slater@soundviewadvisors.com).
- Kevin M. Rigg, Treasurer, Vice President and CFO: Mr. Rigg may be contacted by telephone at (206) 682-7713 or by email at [Kevin.Rigg@soundviewadvisors.com](mailto:Kevin.Rigg@soundviewadvisors.com).
- Nate Porter, COO, Chief Compliance Officer and Secretary: Mr. Porter may be contacted by telephone at (206) 682-7713 or by email at [Nate.Porter@soundviewadvisors.com](mailto:Nate.Porter@soundviewadvisors.com).

### 4b: Types of Advisory Services

SoundView Advisors offers a variety of investment advisory services to our clients. We work with you to identify your investment goals and objectives, as well as risk tolerance, in order to create an initial portfolio allocation designed to complement your financial goals and objectives. We may create a portfolio consisting of, but not limited to exchange traded funds, no-load funds and/or load-waived funds (front-end commissions will not be charged although account custodians will, in some cases assess transaction fees).

Each portfolio will be initially designed to meet a particular investment goal, which SoundView Advisors has determined to be suitable to your circumstances. Once the appropriate portfolio has been determined, we will review the portfolio investments at least monthly and rebalance the account at least annually based upon your individual needs, stated goals and objectives. SoundView Advisors' strategy, generally, is to seek to meet your investment objectives while providing you with access to personal advisory services.

In certain circumstances, we may recommend or work with sub-advisors, in which case we will work closely with you to tailor the solution to meet your needs. In addition to our investment advisory services, SoundView Advisors offers you financial planning. We will prepare a written financial plan for all financial planning clients. The plan considers all of your assets, liabilities, goals and objectives and includes gathering all information necessary to provide you with appropriate and agreed upon services, which may include one or more of the following:

- Investment Strategies
- Investment Policy Statements
- Financial Independence
- Retirement Planning
- Risk Management
- Tax Planning
- Estate Planning

- Capital Needs Analysis
- Employee Stock Option Planning

You are encouraged to review your plans on a regular basis.

Retirement Rollovers-No Obligation/Conflict of Interest: A client leaving an employer typically has four options (and may engage in a combination of these options): 1) leave the money in his former employer's plan, if permitted, 2) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, 3) rollover to an Individual Retirement Account (IRA), or 4) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

SoundView Advisors may recommend an investor roll over plan assets to an IRA managed by SoundView Advisors. As a result, SoundView Advisors may earn an asset-based fee; however, a recommendation that a client or prospective client leave their plan assets with their old employer will result in no compensation. SoundView Advisors has an economic incentive to encourage an investor to roll plan assets into an IRA that SoundView Advisors will manage.

There are various factors that SoundView Advisors may consider before recommending a rollover, including but not limited to: i) the investment options available in the plan versus the investment options available in an IRA, ii) fees and expenses in the plan versus the fees and expenses in an IRA, iii) the services and responsiveness of the plan's investment professionals versus those of SoundView Advisors, iv) required minimum distributions and age considerations, and vi) employer stock tax consequences, if any. No client is under any obligation to roll over plan assets to an IRA managed by SoundView Advisors.

#### **4c: Client Tailored Relationships and Restrictions**

As a fiduciary, SoundView Advisors always acts solely in your best interests. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions regarding the investments made in your portfolio. Restrictions on trading which, in our opinion, are not in your best interest cannot be honored and if forced, may result in the termination of our agreement.

#### **4d: Wrap Fee Program**

SoundView Advisors does not sponsor nor provide portfolio management services through a wrap fee program.

#### **4e: Assets under Management (AUM)**

SoundView Advisors, as of December 31, 2021, has \$287,832,119 in discretionary reportable Assets under Management and \$26,600,804 in non-discretionary reportable Assets under Management. The total regulatory Assets under Management is \$314,432,923.

### **ITEM 5 – FEES AND COMPENSATION**

#### **5a: Fee Schedules**

SoundView Advisors ("Advisor") provides discretionary investment advisory services for an annual retainer fee, which is calculated as a percentage of assets under management.

The annual retainer fee schedule for advisory services is:

<b>Assets Under Management</b>	<b>Annual Fee (%)</b>
Less than \$1,500,000	1.00%
Next \$1,500,000 to \$3,000,000	0.75%
Next \$3,000,001 and above	0.50%

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported are valued at the last reported sale price on the principal market in which they are traded. The above fees may be negotiable in special circumstances. Minimum fee is \$1,250/quarter for any new clients as of 2013. We occasionally waive the minimum fee in cases of financial hardship or a long term relationship between the client and the firm.

The annual fee for investment management services provided are based upon a percentage (%) of the market value of the Assets under management in accordance with the fee schedule in the Agreement signed by the client. We consider cash to be an asset class and part of Assets under management and subject to the same fee calculation as the client's non-cash investments.

The fee includes the time and activities necessary to work with your attorney and/or accountant in reaching agreement on solutions, as well as assisting them in implementation of all appropriate documents. We are not responsible for attorney or accounting fees charged to you as a result of the above activities.

Compensation for our services will be calculated in accordance with the terms of your Advisory Agreement. We may modify the terms of the Agreement upon 30 days written notice to you, and as prescribed in the Agreement. We, along with all Investment Advisors are required to disclose to their clients that lower fees for comparable services may be available from other sources.

## **5b: Fee Payments Options**

### **Investment Management Fees**

SoundView Advisors shall charge an annual fee based upon a percentage of the market value of the assets being managed. The annual fee shall be charged quarterly, based upon the market value of the assets at the start of trading, the first day of the quarter (Jan 1, Apr 1, Jul 1, Oct 1). Our fees are generally paid directly from your account by the custodian when we submit an invoice to them. If there is insufficient cash in your account to pay your fees, an equal balance of securities in your portfolio may be sold to pay our fee. In rare cases, SoundView will instead directly invoice our clients for payment.

## **5c: Third Party Fees**

You are responsible for the payment of all third party fees (i.e. sub-advisor, custodian fees, mutual fund fees, transaction fees, private placement fee, etc.). Those fees are separate and distinct from the fees we charge. See Item 12 – Brokerage Practices for more information about brokerage transactions.

All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. While we take measures to ensure the fees charged are accurate, it is your responsibility to ensure the amount of fee charged is correct. In addition to statements sent by us, you will receive statements directly from these brokers, custodians or mutual funds or other investments you hold. We strongly urge you to compare these statements for accuracy.

## **5d: Fee Payments**

### **Investment Management Fees**

Our fees are paid quarterly, as discussed in Item 5b above, and are determined by taking 25% of the percentage rate we charge annually multiplied by the market value of the account on the last business day of the prior quarter. The market value is the sum of the values of all assets in the account, not adjusted by any margin debt. Fees for partial quarters at the commencement or termination of our agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter. Quarterly fee adjustments for the addition or removal of significant assets will be performed on a case by case basis.

### **5.d.1: Termination**

Either we or our clients can terminate our agreement upon receipt of written notice to the other party, to include written agreement to changes by you.

When an agreement is terminated, we will refund any pre-paid, unearned fees. Fees for partial quarters will be calculated based on the number of days the assets were managed in the quarter. Refunds will be made within 15 calendar days of the effective date of termination.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. Custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good-faith estimate of these fees.

## **5e: Other Investment Compensation**

We do not accept commissions for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

SoundView Advisors does not charge advisory fees determined directly by the performance of funds or securities in your account.

## **ITEM 7 – TYPES OF CLIENTS**

SoundView Advisors generally provides asset management and financial planning services to the following types of clients:

- Individuals
- High-Net-Worth Individuals

### **Minimum Account Size**

SoundView Advisors does not have an account minimum. However, our minimum fee is usually appropriate only for clients with significant assets and/or income.

## ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### 8a: Analysis

SoundView Advisors uses multiple sources of information to obtain analysis and strategies. They include sources such as financial newspapers, financial magazines, research prepared by others, corporate rating services, prospectuses, company press releases, annual reports and filings with the SEC.

### 8b: Investment Strategies

Investments are selected using the following criteria:

- Past risk-adjusted performance and expense ratios relative to other investments within the same asset class having similar investment objectives.
- Degree of correlation and overlap between investment selections.
- Possible inclusion of passive investments, mechanical or quantitative screens, in addition to active management.
- Continuity of fund management and consistency of research processes.
- Compatibility of a fund's investment approach and strategy with our firm's top down view of the market and economic environment.

Investments are evaluated regularly to:

- Ensure that portfolios continue to match Clients' risk tolerance and time frame;
- Assess the performance and the strategy of the managers.

### 8c: Risk of Loss

All investments include a risk of loss. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

We will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by SoundView Advisors with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any unauthorized act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.



## **ITEM 9 – DISCIPLINARY INFORMATION**

### **9a: Civil or Criminal Actions**

SoundView Advisors and its managers have never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

### **9b: Administrative Enforcement Proceedings**

SoundView Advisors and its managers have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

### **9c: Self-Regulatory Organization Enforcement Proceedings**

SoundView Advisors and its managers have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, we have never been found in violation of self-regulatory agencies rules such that we were barred, suspended, limited in advisory functions or fined.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **10a: Broker Dealers and Registered Representatives**

SoundView Advisors is not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer.

### **10b: Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither SoundView Advisors nor our employees hold any of the above registrations.

### **10c: Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither SoundView Advisors nor our employees have any material relationships in other financial businesses like insurance or accounting.

We will disclose any material conflict of interest relating to SoundView Advisors, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Milestone Development Company (“Milestone”) creates LLCs, of which it is the managing member, for the acquisition and management of commercial real estate. The owners of Milestone are also clients of SoundView Advisors. On occasion, we may refer clients to Milestone to invest in programs that they have structured. Thus, a potential conflict of interest exists between our interests and those of the advisory clients. We will disclose this conflict of interest prior to any client investing in a Milestone program. You, however, are under no obligation to purchase any products through Milestone as recommended by SoundView Advisors. There are no referral fees paid to SoundView Advisors for any clients referred to Milestone. Any clients referred to SoundView by partners of Milestone are based on their personal relationship with SoundView Advisors and the Milestone partners do not receive any compensation for those referrals.

## **10d: Selection of Other Advisors and How this Advisor is Compensated for those Selections**

SoundView Advisors is not compensated for the selection of other advisors.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **11a: Code of Ethics Description**

We have adopted a Code of Ethics that governs a number of potential conflicts of interest we have when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you and to stress the importance of a culture of compliance within our firm.

An additional benefit of our Code of Ethics is to detect and prevent violations of securities laws, including our obligations we owe to you.

Our Code of Ethics is comprehensive, is distributed to each employee at the time of hire, and annually thereafter (if there are changes). We also supplement the Code of Ethics with annual training and on-going monitoring of employee activity. A complete copy of our Code of Ethics will be supplied to you, free of charge, if you request it.

SoundView Advisors' Code of Ethics includes the following:

- Requirements related to the confidentiality of your personal, business and financial information
- Prohibitions on insider trading (if we are in possession of material, non-public information)
- Reporting of gifts and business entertainment
- Pre-clearance of employee and firm transactions
- Reporting (on an on-going and quarterly basis) all personal securities transactions (what we call “reportable securities” as mandated by regulation)
- On an annual basis, we require all employees to re-certify to our Code of Ethics, identify members of their household and any account to which they have a beneficial ownership (they “own” the account or have “authority” over the account), securities held in certificate form and all securities they own at that time

### **11b, c & d: Participation or Interest in Client Transactions**

SoundView Advisors, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for you. We will always buy or sell from your accounts before we buy or sell from our own accounts. In some cases SoundView Advisors, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans defined for you.

SoundView Advisors will always maintain full disclosure with you to ensure that you can make informed decisions. We will always evaluate our activity from the view of our clients to assure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

—

## ITEM 12 – BROKERAGE PRACTICES

### 12a: Selecting Brokerage Firms

#### The Custodian and Brokers We Use

SoundView Advisors does not maintain custody of the assets we manage for you. Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We are independently owned and operated and not affiliated with any of the custodians that we work with. The custodians will hold your assets in a brokerage account and buy and sell securities when we instruct them to. You may keep your existing custodian or we may recommend one for you. Should you accept our recommendation, you will enter into an account agreement directly with them. We do not open the account for you.

#### How We Select Brokers/Custodians to Recommend

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below and in Item 14

Recommending a broker-dealer may create a conflict of interest. Accordingly, we have established the following restrictions in order to ensure our fiduciary responsibilities:

- A director, officer, associated person, or employee of SoundView Advisors shall not buy or sell securities for her/his personal portfolio where her/his decision is substantially derived, in whole or in part, by reason of her/his employment unless the information is also available to the investing public or reasonable inquiry. No person of SoundView Advisors shall prefer her/his or her own interest to that of yours.
- We maintain a list of all securities holdings for ourself and anyone associated with our advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer of SoundView Advisors.

- We emphasize your unrestricted right to select and choose your own broker or dealer.
- We require that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- Any individual not in observance of the above may be subject to termination.

#### Pershing Advisor Solutions

SoundView Advisors may recommend/require that clients establish brokerage accounts with Pershing Advisor Solutions LLC (“PAS”) of One Pershing Plaza, 95 Christopher Columbus Drive, Jersey City, New Jersey 07399, a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although SoundView Advisors may recommend/require that clients establish accounts at PAS, it is the client's decision to custody assets with PAS. SoundView Advisors is independently owned and operated and not affiliated with PAS.

#### Your Custody and Brokerage Costs

For our clients' accounts it maintains, PAS generally does not charge separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your PAS account. In addition to commissions PAS charges the client a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your PAS account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have PAS execute most trades for your account.

#### Products and Services Available to Us from PAS

PAS provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to PAS retail customers. PAS also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. PAS' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Here is a more detailed description of PAS' support services:

#### Services that Benefit You

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

#### Services that May Not Directly Benefit You.

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

- provide access to client account data (such as duplicate trade confirmations and account statements);

- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

#### Services that Generally Benefit Only Us.

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

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

PAS may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. PAS may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. PAS may also provide us with other benefits such as occasional business entertainment of our personnel.

#### Our Interest in Schwab's Services

The availability of these services from PAS benefits us because we do not have to produce or purchase them. We don't have to pay for PAS' services so long as we maintain a minimum level of client assets in accounts at PAS. Beyond that, these services are not contingent upon us committing any specific amount of business to PAS in trading commissions or assets in custody. The minimum asset level may give us an incentive to recommend that you maintain your account with PAS based on our interest in receiving PAS' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of PAS as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of PAS' services (based on the factors discussed above – see “How We Select Brokers/Custodians to Recommend”) and not PAS' services that benefit only us. We have well in excess of the minimum level in client assets under management, and do not believe that maintaining those assets at PAS in order to avoid paying PAS quarterly service fees presents a material conflict of interest.

#### Charles Schwab & Co.

We may recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

#### Your Custody and Brokerage Costs

For our clients' accounts it maintains, Schwab generally does not charge separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your

Schwab account. Schwab's commission rates applicable to our client accounts were based on our commitment to maintain \$10 million of our clients' assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be if we had not made the commitment. In addition to commissions Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

#### Products and Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab. Here is a more detailed description of Schwab's support services:

##### Services that Benefit You.

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

##### Services that May Not Directly Benefit You.

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

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

##### Services that Generally Benefit Only Us.

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

These services include:

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

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

#### Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as we keep a total of at least \$10 million of client assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services (based on the factors discussed above – see "How We Select Brokers/Custodians to Recommend") and not Schwab's services that benefit only us. We have well in excess of \$10 million in client assets under management, and do not believe that maintaining at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

#### 12.b: Sales Aggregation

SoundView Advisors does not typically aggregate sales. Client accounts are managed independently so trade aggregation is of limited availability. When we do aggregate transactions, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price obtained. Stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise you in writing of any purchase or disposition of instruments for the account with respect to any such aggregated transaction. We will direct that confirmations of any transactions effected for the account will be sent, in conformity with applicable law, to you.

## ITEM 13 – REVIEW OF ACCOUNTS

### 13a: Periodic Reviews

Accounts are reviewed by Kevin Slater, Kevin Rigg, or Ben Jennings, Investment Adviser Representatives of the firm. Portfolios are monitored as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. The maximum number of accounts assigned to a reviewer is 60.

You will receive your financial plans and recommendations at time of service. We encourage you to have at least bi-annual reviews of your financial plans. Depending on the type of financial planning service requested, we will meet with you on a regular basis, typically annually, to discuss any potential changes to your financial plan.

### **13b: Review Triggers**

More frequent reviews are triggered by a change in your investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in economic climate. However, at a minimum, your accounts will be reviewed quarterly.

### **13c: Regular Reports**

All of our investment advisory and financial planning clients receive reports on the composition, allocation, and performance of their accounts. These reports are received annually at the client's annual meeting or upon request. You will also receive standard account statements from your custodian on a monthly basis.

Quarterly performance reports and various daily reports (cash balance, allocation, holdings, period performance) are available electronically via the client portal.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

### **14a: Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

We receive an economic benefit from custodians, including Pershing and Charles Schwab, in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at the same custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of a custodian's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### **14b: Compensation to Non-Advisory Personnel for Client Referrals**

SoundView Advisors does not directly or indirectly compensate any person for client referrals.

## **ITEM 15 – CUSTODY**

SoundView Advisors clients' accounts are held by a qualified custodian and other than to withdraw advisory fees, SoundView Advisors shall have no liability to you for any loss or other harm to any property in the account. This includes harm to any property in the account resulting from the insolvency of the custodian or any unauthorized acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. It's important that you understand that SIPC provides only limited protection for the loss of property held by a broker-dealer. As a fiduciary, we will always act in the your best interest and in doing so, the above does not limit or modify our duty to you. Custodial statements will include fees charged by SoundView Advisors.

You must receive at least quarterly account statements from your qualified custodian. If you are not receiving at least quarterly custodial account statements, please contact us at the number on the cover page of this brochure.

For accounts where the client requests the use of third party SLOAs, the firm is deemed to have custody



of client funds or securities. SoundView Advisors is not required to obtain a surprise annual examination of client assets; however, we are required to list these accounts in Item 9 of ADV Part 1.

#### **ITEM 16 – INVESTMENT DISCRETION**

SoundView Advisors asks our clients to give us discretionary authority to execute transactions without our client's prior approval. These transactions may include the purchase and selling of securities, arranging for payments or generally acting on your behalf in most matters necessary to the handling of your account. Limits are within the guidelines of the client's Investment Policy Statement and any exceptions to that policy will be reviewed by the CIO.

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

#### **ITEM 17 – VOTING CLIENT SECURITIES**

Our clients retain the authority to proxy vote. You should ensure that proxy ballots are mailed directly to you by selecting this option on your custodial application forms. You are welcome to delegate said proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate forms. Should you have any questions regarding proxy voting or related matters, please contact us.

#### **ITEM 18 – FINANCIAL INFORMATION**

##### **18a: Balance Sheet**

SoundView Advisors does not solicit prepayment of more than \$1,200 in fees per client six (6) months in advance.

##### **18b: Financial Conditions**

SoundView Advisors has no financial issues that could impair our ability to carry out our fiduciary duty to our clients.

##### **18c: Bankruptcy Petition**

SoundView Advisors has not been the subject of a bankruptcy petition.