

**March 30, 2020**



Smart Portfolios, LLC  
17865 Ballinger Way NE  
Seattle, WA 98155  
(206) 686-3636  
[www.smartportfolios.com](http://www.smartportfolios.com)

## **BROCHURE SUPPLEMENT**

This brochure supplement provides information about Bryce James, Keith Campbell, Scott Sampson, and Mark Bergeron, and supplements the Smart Portfolios' brochure. You should have received a copy of that brochure. Please contact Bryce James, Chief Operating Officer, (206) 686-3644 or [bjames@smartportfolios.com](mailto:bjames@smartportfolios.com) if you did not receive Smart Portfolios' brochure or if you have any questions about the contents of this supplement.

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

# Bryce James

---



## **Educational Background and Business Experience**

Bryce James, born November 6, 1959, has over thirty-three years of hands-on investment experience. For the past 14 years Mr. James has served as president of Smart Portfolios, LLC, an institutional money management firm which he founded. Previously, Mr. James was a partner and founder of Shield Investment Advisors, a fixed-income fund of hedge funds. Prior to Shield Investment Advisors, Mr. James was a Senior Vice President with Morgan Stanley.

Mr. James has spent most of his career as a portfolio manager and consultant to corporations, trusts, retirement plans, ESOPs and ultra-high net worth individuals. He specializes in building custom trading algorithms, financial content delivery systems, and performance measurement software solutions.

Mr. James has been a principal and senior officer in several start-up companies, in addition to founding a non-profit angel investment organization called Investment Forum.

Mr. James holds a B.S. in Accounting, Finance and Marketing from Central Washington University.

## **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. James. There are no such events.

## **Other Business Activities**

Registered investment advisers are required to disclose all material facts regarding certain business activities that would be material to your evaluation of Mr. James. Mr. James is founder and president of Portfolio Mason, an online risk management and portfolio building suite of tools for the financial industry.

## **Additional Compensation**

Mr. James does not receive economic benefits for providing advisory services, other than the regular salary paid by Smart Portfolios, LLC.

## **Supervision**

Smart Portfolios, LLC provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of the firm's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The firm's Chief Compliance Officer, Bryce James, is primarily responsible for the implementation of the firm's policies and procedures and overseeing the activities of the firm's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of Smart Portfolios, LLC have any questions regarding the

applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the firm's supervision or compliance practices, please contact Mr. James at (206) 686-3644.

# Keith Campbell

---



## **Educational Background and Business Experience**

Keith Campbell is responsible for implementing Smart Portfolio's quantitative asset allocation model. This includes code development, research, portfolio management and trade execution.

Mr. Campbell holds a master's degree in financial engineering from the University of Michigan. Prior to joining Smart Portfolios, Mr. Campbell was Head of Portfolio Construction and founding member of Reign Capital Management, a Managed Futures Commodity Trading Advisor (CTA).

In total, Mr. Campbell has over thirteen years of financial industry experience. He also served as a quantitative systems developer for Rotella Capital Management, CTA, and as a credit risk analyst for Bank One. He also holds a BS in Industrial Engineering from Purdue University and began his career with 2 years of engineering/manufacturing with General Electric.

## **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Campbell. There are no such events.

## **Other Business Activities**

Registered investment advisers are required to disclose all material facts regarding certain business activities that would be material to your evaluation of Mr. Campbell. Mr. Campbell is a partial owner in Portfolio Mason and spends a small amount of time working for Portfolio Mason.

## **Additional Compensation**

Mr. Campbell does not receive economic benefits for providing advisory services, other than the regular salary paid by Smart Portfolios, LLC.

## **Supervision**

Smart Portfolios, LLC provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of the firm's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The firm's Chief Compliance Officer, Bryce James, is primarily responsible for the implementation of the firm's policies and procedures and overseeing the activities of the firm's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of Smart Portfolios, LLC have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the

Chief Compliance Officer. Should a client have any questions regarding the firm's supervision or compliance practices, please contact Mr. James at (206) 686-3644.

# J. Scott Sampson

---



## Educational Background and Business Experience

J. Scott Sampson was born in 1950. He received an AB in Psychology from University of California, Berkeley in 1972. Mr. Sampson has been the Principal of Sampson Investment Management, an investment advisory firm, since May 1993.

Mr. Sampson has been a CERTIFIED FINANCIAL PLANNER™ since 2003. Certified Financial Planner Board of Standards, Inc. (“CFP Board”) owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the “CFP® marks”). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board’s initial and ongoing certification requirements.

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 86,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete a 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 or an accepted equivalent, including [completion of a financial plan development capstone course](#), and attain a Bachelor’s Degree from an accredited college or university. CFP Board’s financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct*, which put clients’ interest first; acknowledge CFP Board’s right to enforce them through its *Disciplinary Rules and Procedures*; comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual’s background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual’s employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board’s Code of Ethics and Standards of Conduct and to acknowledge CFP Board’s right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.
- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the [terms and conditions of certification with CFP Board](#) and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may [verify an individual's CFP®](#) certification and background through the CFP Board. The verification function will allow you to verify an individual’s certification status, CFP Board’s disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through [FINRA’S BrokerCheck](#) and the [SEC’s Investment Adviser Public Disclosure databases](#), which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

### **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Sampson. There are no such events.

### **Other Business Activities**

Registered investment advisers are required to disclose all material facts regarding certain business activities that would be material to your evaluation of Mr. Sampson. Mr. Sampson currently has no outside business activities.

### **Additional Compensation**

Mr. Sampson does not receive economic benefits for providing advisory services, other than the regular salary paid by Smart Portfolios, LLC.

### **Supervision**

Smart Portfolios, LLC provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of the firm's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The firm's Chief Compliance Officer, Bryce James, is primarily responsible for the implementation of the firm's policies and procedures and overseeing the activities of the firm's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of Smart Portfolios, LLC have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the firm's supervision or compliance practices, please contact Mr. James at (206) 686-3644.



# Mark Bergeron

---



## Educational Background and Business Experience

Mark Bergeron, born January 13, 1949, has over thirty-nine years of investment and financial planning experience with firms such as Quantum Planning & Investment Group, U.S. Bank, and ICM Asset Management out of Spokane, and The Adviser Source and WLFB, Inc., in Puget Sound. Mr. Bergeron has served as the Director of Financial Planning of Smart Portfolios, LLC since April of 2019, and as President of his own boutique RIA, WLFB, Inc., in Bellevue, Washington since 1997. Mr. Bergeron has been specializing in financial planning since 1980. Mr. Bergeron holds both a B.A. and an M.A. in History from Washington State University.

Mr. Bergeron has been a CERTIFIED FINANCIAL PLANNER™ since 1982.

Certified Financial Planner Board of Standards, Inc. (“CFP Board”) owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the “CFP® marks”). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board’s initial and ongoing certification requirements.

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 86,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete a 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 or an accepted equivalent, including [completion of a financial plan development capstone course](#), and attain a Bachelor’s Degree from an accredited college or university. CFP Board’s financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and
- Ethics – Agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct*, which put clients’ interest first; acknowledge CFP Board’s right to enforce them through its *Disciplinary Rules and Procedures*; comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual’s background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual’s employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board’s Code of Ethics and Standards of Conduct and to acknowledge CFP Board’s right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.
- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the [terms and conditions of certification with CFP Board](#) and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may [verify an individual's CFP®](#) certification and background through the CFP Board. The verification function will allow you to verify an individual’s certification status, CFP Board’s disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through [FINRA’S BrokerCheck](#) and the [SEC’s Investment Adviser Public Disclosure databases](#), which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

### **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Bergeron. There are no such events.

### **Other Business Activities**

Mr. Bergeron, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Bergeron to purchase insurance products on a commission basis. The recommendation by Mr. Bergeron that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Bergeron. Clients are reminded that they may purchase insurance products recommended by Mr. Bergeron through other, non-affiliated insurance agents.

Mr. Bergeron is the owner, President and compliance officer of WLFB Inc., an investment advisory firm that delegates investment management services to third party money managers.

### **Additional Compensation**

Mr. Bergeron's annual compensation is based, in part, on the amount of assets under management and the number of clients that Mr. Bergeron introduces to the firm. Accordingly, Mr. Bergeron has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

### **Supervision**

Smart Portfolios, LLC provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of the firm's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The firm's Chief Compliance Officer, Bryce James, is primarily responsible for the implementation of the firm's policies and procedures and overseeing the activities of the firm's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of Smart Portfolios, LLC have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the firm's supervision or compliance practices, please contact Mr. James at (206) 686-3644.