



ATX
Portfolio Advisors

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**Part 2A Appendix 1
of Form ADV:
Wrap Fee Program
Brochure
March 6, 2023**

This wrap fee program brochure provides information about the qualifications and business practices of ATX Portfolio Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 512-537-5955, or via email at Jeff.Weeks@atxadvisors.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.

ATX Portfolio Advisors, LLC is a registered investment advisory firm. Registration of an investment advisory firm does not imply a particular level of skill or training.

Additional information about ATX Portfolio Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2

Material Changes

Annual Update

The Material Changes section of this Wrap Fee Brochure (“Brochure”) will be updated annually or when material changes occur since the previous release of this brochure. This Item discusses only specific material changes that are made to this brochure and provides our clients with a summary of such changes.

Material Changes since the Last Update

Since its last amendment filed on March 25, 2022, ATX Portfolio Advisors made the following material changes:

- Changes to the fee schedule.
- Changes to our model breakdown
- Addition of Interactive Brokers as a custodian

Additional Information

Additional information about ATX Portfolio Advisors, LLC is available via the SEC’s website www.adviserinfo.sec.gov. The SEC’s website also provides information about any persons affiliated with us who are registered or are required to be registered as investment adviser representatives (“IAR”).

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Services, Fees, and Compensation

FIRM INFORMATION

ATX Portfolio Advisors, LLC (“ATX,” “we,” “us,” “our”), a limited liability company formed in 2014, is a registered investment advisory firm located in Austin, Texas. We have been a registered investment advisory firm since 2014.

PRINCIPAL OWNERS

ATX is owned and controlled by Jeff Weeks, its Managing Member and Chief Compliance Officer.

WRAP FEE PROGRAM

Our Wrap Fee Program Wrap Fee Program is designed to provide ongoing asset management services and investment execution for one all-inclusive fee. This program enables clients to pursue their investment objectives with us as a manager all in one consolidated model portfolio. As part of this service, a portfolio is created, consisting of individual stocks, bonds, exchange-traded funds (“ETFs”), options, mutual funds, and other public securities or investments. Portfolios will be designed to meet a particular investment goal, determined to be suitable for the client’s circumstances. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client’s individual needs, stated goals, and objectives. Clients’ accounts may be managed on a discretionary or non-discretionary basis.

Furthermore, we may determine that opening an account with a third-party manager or sub-advisor is in the client’s best interests. Utilizing a third-party may allow clients to obtain portfolio management services that typically require higher minimum account sizes outside of the program. The manager selected will have the discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by you. Due to the nature of these programs, each manager is required to provide clients with a separate disclosure document. Clients should carefully review this document for important and specific program details, including details on the charges and fees they will incur.

Model Portfolios

ATX offers six distinct model portfolios with twenty-four variants based upon the amount invested and/or the tax emphasis of the model portfolio. The six models are the Income Portfolio, Balanced Portfolio, Growth and Income Portfolio, Growth Portfolio, Aggressive Growth Portfolio, and All Equity Portfolio. Variations include “Municipal” Portfolios that substitute tax-free municipal bonds for taxable accounts and “50” Portfolios which are designed for portfolios below \$200,000.

Income Portfolio

The Income Target Portfolio seeks to provide risk-averse investors safe fixed-income investments to provide steady income with lower risks than equity portfolio models. The models allocate 70% of assets to fixed income products, 18% of assets to US equity markets, 6% to International equity markets, 3% of assets to emerging equity markets, and 3% of assets to Global REIT(s). The primary goal of this model portfolio is to manage risk and reduce the possibility of loss.

Balanced Portfolio

The Balanced Target Portfolio typically maintains a neutral mix of 50% of assets to fixed income products, and 50% to a mix of equities, commodities & global REIT(s). The primary goal of this model is to balance capital appreciation and income with more emphasis on income over a medium to long time frame.

Growth and Income Portfolio

The Growth and Income Target Portfolio typically maintains a neutral mix of 40% of assets to fixed income products, and 60% to a mix of equities, commodities & global REIT(s). The primary goal of this model is to seek growth and income.

Growth Portfolio

The Growth Target Portfolio typically maintains a neutral mix of 30% of assets to fixed income, and 70% to a mix of equities, commodities & global REITs. The primary goal of this model is to seek growth with a tolerance for large market fluctuations and increased risk of loss over a long period of time.

Aggressive Growth Portfolio

The Aggressive Growth Portfolio typically maintains a neutral mix of 20% of assets to fixed income, and 80% to a mix of equities, commodities & global REITs. The primary goal of this model is to seek substantial growth with a tolerance for large market fluctuations and increased risk of loss over a long period of time.

All Equity Portfolio

The All Equity Portfolio typically maintains a neutral mix of 100% of equity markets, using a mix of equities, commodities & global REITs. The primary goal of this model is to seek substantial growth with a tolerance for large market fluctuations and increased risk of loss over a long period of time.

Fee Schedule

We are compensated for providing our Wrap Fee Program by charging an asset management fee. The asset management fee is based on the total assets under management.

The below ranges are the standard fee ranges that are typically charged.

Fee-Only (When You're Up) Fee Schedule (includes comprehensive financial planning)	
First \$1,000,000	1.25%
Next \$4,000,000	1.00%
Next \$5,000,000	0.75%
Next \$10,000,001 and up	0.50%

Fee-Only Fee Schedule	
First \$1,000,000	0.75%
Next \$4,000,000	0.50%

Next \$5,000,000 and up	0.25%
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The fee billing will be pre-determined in writing in the investment advisory agreement that is executed by you and ATX. Wrap Fee Program fees are payable quarterly in arrears. Our Wrap Fee Program fees are annual fees and may be negotiable up to the amount paid for an initial financial plan for the first year. ATX will waive the Fee-Only (When Your Up) if your account value is worth less (net withdrawals, deposits, and fees) than the previous quarter. Payments are due on the first day of the new billing quarter and are based on the account's asset value as of the last business day of the prior billing quarter. The fee for the prior quarter is billed and payable within ten (10) days after the end of the prior quarter, based on the value of your account on the last business day of that billing quarter. We will deduct our asset management fee only when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. The qualified custodian will deliver an account statement to you at least quarterly, which will show all disbursements from your account. We urge you to review all statements for accuracy.

Either party may terminate the investment advisory agreement by providing 30-day advance written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable up to and including the effective date of termination.

Notwithstanding the above, if we do not deliver the appropriate disclosure statement to you at least 48 hours prior to you entering into any written or oral advisory contract with this us, then you have the right to terminate the contract without penalty within five (5) business days after entering into the contract.

WRAP FEE PROGRAM COSTS

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. Your fee is bundled with our costs for executing transactions in your account(s). This may result in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

OTHER TYPES OF FEES AND EXPENSES

You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange-traded fund, which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

Schwab, TD Ameritrade, and Interactive Brokers has eliminated commissions for online trades of equities, ETFs, and options (subject to \$0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities, we will not have to pay any commissions to Schwab, TD Ameritrade, and Interactive Brokers. We encourage you to review Schwab's, TD Ameritrade's, or Interactive Brokers pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If

you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account, please refer to the most recent pricing schedules available at:

schwab.com/aspricingguide

<https://www.tdameritrade.com/pricing.html>

<https://www.interactivebrokers.com/en/pricing/commissions-home.php>

ITEM 5

Account Requirements and Types of Clients

We provide our investment advisory services to:

- Individuals
- High Net Worth Individuals
- Trusts
- Estates
- Charitable organizations
- Corporations
- Endowments
- Other business entities

A minimum account size of \$50,000 is required for opening an account with us. The account size may be negotiable on a case-by-case basis.

ITEM 6

Portfolio Manager Selection and Evaluation

PORTFOLIO MANAGERS

Our Wrap Fee Program is managed by ATX. We do not utilize a subadvisor or other third-party manager.

ADVISORY BUSINESS

Asset Management Services:

We provide asset management services in which we manage your custodial accounts and provide you with continuous and ongoing supervision of your custodial accounts. Our services provide additional investment opportunities among stocks, bonds, mutual funds, exchange-traded funds (ETFs), Real Estate Investment Trusts (REITs), options, and additional securities.

Financial Planning and Consulting Services:

We provide various financial planning services that find ways to help you understand your overall financial situation and help you set financial objectives. We accomplish this by helping you review your financial goals, tax planning strategies, asset allocation, risk management, retirement planning, and other areas and objectives. Generally, such financial planning and consulting services will involve preparing a financial

plan based on your financial goals and objectives. We will summarize our services to you in a written plan which will typically include general recommendations for a course of action or specific actions to be taken by you. Implementation of the recommendations will be at your discretion. We provide our financial planning and services on as an ongoing, comprehensive annual plan.

TAILORING OF ADVISORY SERVICES

ATX offers the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the individual client's financial background information which outlines a client's current financial situation such as income, net worth, and risk tolerance levels. This information is essential in the development of a client-specific plan in the selection of investments that matches restrictions, needs, and targets. On a case-by-case basis, our clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent us from properly servicing the client's account, or if the restrictions would require us to deviate from our standard suite of services, we reserve the right to end the relationship. We may request additional information and documentation such as current investments, tax returns, insurance policies, and estate plan. We will discuss your investment objectives, needs, and goals, but you must inform us of any changes. Unless directed by you, we do not independently verify any information provided to us by you or your attorney, accountant, or other professionals.

PARTICIPATION IN WRAP FEE PROGRAMS

Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc. Generally, we do not manage wrap fee accounts in a different fashion than non-wrap fee accounts; however, certain client accounts may be managed differently based on the size and nature of the account and/or the client's investment objectives and risk tolerance.

In our wrap fee program, your fee is bundled with our costs for executing transactions in your account(s). This may result in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge any performance-based fees, which are fees based on a share of capital gains on or capital appreciation of your assets.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

We use various methods of analysis and investment strategies, including the following:

Modern Portfolio Theory - Modern portfolio theory (MPT) is a risk-averse theory that involves the construction of portfolios to maximize and optimize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. According to the theory, it's possible to

construct an "efficient frontier" of optimal portfolios offering the maximum possible expected return for a given level of risk.

Investment Strategies

When formulating investment advice or managing client assets, we will use the following investment strategies. There are inherent risks associated with each of these strategies.

Long-Term Strategy - A long-term strategy may not take advantage of short-term gains or may experience more volatility over the life of the portfolio.

Short-Term Strategy - A short-term strategy may incur more trading and brokerage costs and runs the risk that certain anticipated market movements do not occur, resulting in the client holding a security for longer than intended.

Your accounts are managed separately with your underlying investment strategies, restrictions, or investment limitations defined within the investment advisory agreement.

VOTING CLIENT SECURITIES

As a matter of firm policy and practice, if requested, we will vote proxies on behalf of Clients in accordance with the company's board of director's recommendations. Clients can make an election to retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios at the time of account opening or upon request of the Advisor thereafter. The Advisor will not be required to take any action or render any advice with respect to any securities held in the Account, which are named in or subject to class action lawsuits. The Advisor will, however, forward to the Client any information the Firm receives regarding class action legal matters involving any security held in the Account and discuss such information if the Client so desires.

ITEM 7

Client Information Provided to Portfolio Managers

We are required to describe the information about you that we communicate to your portfolio manager(s) and how often or under what circumstances we provide updated information. Our firm communicates with your portfolio manager(s) on a regular basis as needed (daily, weekly, monthly, etc.) to ensure your most current investment goals and objectives are understood by your portfolio manager(s). In most cases, we will communicate such information as part of our regular investment management duties. Nevertheless, we will also communicate information to your portfolio manager(s) when you ask us to when market or economic conditions make it prudent to do so, etc.

ITEM 8

Client Contact with Portfolio Managers

Clients are always free to directly contact us with any questions or concerns they have about their portfolios or other matters. If a subadvisor or third-party manager is utilized, clients will be provided with the disclosure brochure and may contact them accordingly

Additional Information

DISCIPLINARY INFORMATION

As of the date of this brochure, we have not been subject to any disciplinary, legal, or regulatory events related to past or present investment clients. There has been no disciplinary, legal, or regulatory events related to us or any of our management persons.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Financial Industry Activities

Neither ATX nor its management persons are registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Neither ATX nor its management persons are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.

Affiliations

Jeff Weeks serves as a Board Member to the Eanes Education Foundation, which is a fundraising organization benefitting the Eanes Independent School District. This accounts for approximately 2% of his time. He also serves as Treasurer of the Eanes Education Foundation Endowment, which raises and manages funds for the benefit of the Eanes Education Foundation. This accounts for approximately 3% of his time.

Selection of Other Investment Advisers

We do not recommend or select other investment advisers for our clients.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

ATX has developed a code of ethics that will apply to all of our supervised persons. We and our IARs must act in a fiduciary capacity when providing investment advisory services to you. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. ATX has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our insider trading, and personal securities transactions policies and procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will acknowledge that they have read, understand, and agree to comply with our Code of Ethics.

Our Code of Ethics is available to clients and prospective clients upon request.

Recommendations Involving a Material Financial Interest

Neither we nor any related person recommend to clients or buys or sells for clients' accounts securities in which we or a related person has a material financial interest.

Participation or Interest in Client Transactions

There may be instances where an IAR will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which an IAR, its affiliates, or other clients may also have a position or interest. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis. Generally, in such circumstances, the affiliated and client accounts will share execution costs equally. Completed trade orders will be allocated according to the instructions from the initial trade order. Partially filled trade orders will be allocated on a pro-rata basis. Any exceptions will be explained in the trade order.

Personal Trading

Employees are permitted to have personal securities accounts as long as personal investing practices are in line with fiduciary standards and regulatory requirements and do not conflict with their duty to ATX and our clients. ATX monitors and controls personal trading through pre-approval of all personal securities transactions or blackout periods imposed upon employees trading in the same securities as ATX. We forbid any officer or employee, either personally or on behalf of others, to trade on material, nonpublic information, or to communicate such information to others in violation of the law.

REVIEW OF ACCOUNTS

Periodic Reviews

We review wrap fee program accounts no less than annually. These accounts will be reviewed by Jeff Weeks. Accounts are reviewed to evaluate asset allocation, investment strategy and objectives, cash balance, and performance, as well as the general economic outlook and current investment trends.

Review Triggers

We conduct periodic reviews to evaluate the current market, economic and political events and how these may affect client accounts. Additional reviews may be triggered by these events or by events in the client's financial or personal status.

Regular Reports

Wrap fee program clients will receive advisory account reports no less than quarterly. These reports show asset value by cash balances, security, unit cost, total cost, current per share values, etc. Clients are urged to review the quarterly reports provided by us with those provided by their custodian and notify us of any differences. Clients are encouraged to phone or email us as often as they deem necessary to receive information regarding the investment tactics and strategies being followed.

CLIENT REFERRALS AND OTHER COMPENSATION

If Client was introduced to ATX by a solicitor, Client acknowledges that ATX may pay that solicitor a referral fee, which will not result in any additional charge to Client.

Client acknowledges receipt at the time of his solicitation by the solicitor of the following documents:

- The written solicitor disclosure statement disclosing the terms of the solicitation arrangement between ATX and the solicitor, including the solicitor's compensation, and

- ATX's brochure, Part 2 of Form ADV.

FINANCIAL INFORMATION

We are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

We are currently not in, nor have been historically in a financially precarious situation or the subject of a bankruptcy petition.

ECONOMIC BENEFITS

Schwab, TD Ameritrade, and Interactive Brokers provide ATX with access to its institutional trading and custody services, which are typically not available to Schwab, TD Ameritrade, and Interactive Brokers retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to advisors. Schwab's, TD Ameritrade's, and Interactive Brokers services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab's TD Ameritrade's, and Interactive Brokers also makes available to ATX other products and services that benefit ATX but may not benefit its clients' accounts. These benefits may include national, regional, or ATX specific educational events organized and/or sponsored by Schwab Advisor Services, TD Ameritrade or TD Ameritrade, or Interactive Brokers. Other potential benefits may include occasional business entertainment of personnel of ATX by Schwab Advisor Services, TD Ameritrade or TD Ameritrade, or Interactive Brokers personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist ATX in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of ATX's fees from its client's accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of ATX's accounts, including accounts not maintained at Schwab Advisor Services, TD Ameritrade, and Interactive Brokers. Schwab Advisor Services, TD Ameritrade, and Interactive Brokers also make available to ATX other services intended to help ATX manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance, and marketing. In addition, Schwab, TD Ameritrade, and Interactive Brokers may make available, arrange and/or pay vendors for these types of services rendered to ATX by independent third parties. Schwab Advisor Services, TD Ameritrade, and Interactive Brokers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the

fees of a third-party providing these services to ATX. While, as a fiduciary, ATX endeavor to act in its clients' best interests, ATX's recommendation/requirement that clients maintain their assets in accounts at Schwab, TD Ameritrade, and Interactive Brokers may be based in part on the benefit to ATX of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, TD Ameritrade, or Interactive Brokers which may create a potential conflict of interest.

Schwab, TD Ameritrade, and Interactive Brokers has eliminated commissions for online trades of equities, ETFs, and options (subject to \$0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities, we will not have to pay any commissions to Schwab, TD Ameritrade, or Interactive Brokers. We encourage you to review Schwab's, TD Ameritrade's, and Interactive Brokers' pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account, please refer to Schwab's most recent pricing schedules available at schwab.com/aspricingguide.

ITEM 10 Requirements for State-Registered Advisers

MATERIAL RELATIONSHIPS WITH ISSUERS OF SECURITIES

Neither ATX nor its IARs has any relationship or arrangement with issuers of securities