

The Investment Advisors of Fairway Investment Group are dually Registered Representatives with Advisory Services offered through LPL Financial, member FINRA/SIPC, and securities offered through Paradigm Equities, Inc., member FINRA/SIPC.

Item 1 Cover Page



Registered As

# Fairway Investment Group, LLC

Doing Business As: Fairway Investment Group

Registered Investment Adviser

1216 Kendale Blvd. | East Lansing, MI 48823

(800) 292-1950 – phone

(517) 337-5594 – fax

[www.meafs.com](http://www.meafs.com) - website

**December 31, 2020**

**NOTICE TO PROSPECTIVE CLIENTS: READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY**

All the material within this Brochure must be reviewed by those who are considering becoming a client of our firm. This Brochure provides information about the qualifications and business practices of Fairway Investment Group, LLC doing business as Fairway Investment Group. If you have any questions about the contents of this Brochure, please contact us at (800) 292-1950.

In accordance with federal and state regulations, this Brochure is on file with the appropriate securities regulatory authorities as required. The information provided within this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States, or by the United States Securities and Exchange Commission. 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. Fairway Investment Group is registered as an investment adviser in the State of Michigan. Registration of a registered investment adviser does not imply any level of skill or training. Additional information about Fairway Investment Group also is available on the SEC's Web Site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Fairway Investment Group, LLCs CRD number is: 149034.

Item 2 – Material Changes

Since its last annual update of March 31<sup>st</sup>, 2020, Fairway Investment Group has not had any material changes.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Disclosure Brochure may be requested by contacting us at (800) 292-1950 or by email at [meafinancial@mea.org](mailto:meafinancial@mea.org)

Additional information about Fairway Investment Group is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Fairway Investment Group who are registered, or are required to be registered, as Investment Advisor Representatives of Fairway Investment Group.

Item 3 – Table of Contents

**Contents**

Item 1 Cover Page ..... 1

Item 2 – Material Changes ..... 2

Item 3 – Table of Contents ..... 3

Item 4 – Advisory Business ..... 4

    Asset Management ..... 4

    Optimum Market Portfolios Program (OMP) ..... 5

    Personal Wealth Portfolios Program (PWP) ..... 6

    Model Wealth Portfolios Program (MWP) ..... 6

    Manager Access Select Program ..... 7

    Guided Wealth Portfolios (GWP) ..... 7

    Fees ..... 8

Item 5 – Fees and Compensation ..... 8

Item 6 – Performance-Based Fees and Side-by-side Management ..... 11

Item 7 – Types of Clients ..... 11

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss ..... 12

Item 9 – Disciplinary Information ..... 14

Item 10 – Other Financial Industry Activities and Affiliations ..... 15

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ..... 15

Item 12 – Brokerage Practices ..... 16

Item 13 – Review of Accounts ..... 18

Item 14 – Client Referrals and Other Compensation ..... 19

Item 15 – Custody ..... 19

Item 16 - Investment Discretion ..... 20

Item 17 – Voting Client Securities ..... 20

Item 18 – Financial Information ..... 20

Item 19 – Requirements for State Registered Advisers ..... 20

#### Item 4 – Advisory Business

Fairway Investment Group, LLC is a wholly owned subsidiary of MEA Financial Services. MEA Financial Services is wholly owned by the Michigan Education Association, a labor organization advocating for education professionals throughout Michigan. Fairway Investment Group began in 2008.

Fairway Investment Group provides fee based investment advisory services for compensation primarily to the MEA membership and their families. Fairway also provides services to individual clients and high-net worth individuals based on the individual goals, objectives, time horizon, and risk tolerance of each client. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Investment Advisor Representatives (IAR) are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a particular client are dependent upon the representative that is working with the client. Advisors are instructed to consider the individual needs of each client when recommending an advisory platform. Investment strategies and recommendations are tailored to the individual needs of each client.

The individuals associated with Fairway Investment Group are appropriately licensed, and authorized to provide advisory services on behalf of Fairway Investment Group. Not all products or services are available to be offered by all Investment Advisor Representatives as determined by their licensing. Individuals associated with Fairway Investment Group are also Registered Representatives of Paradigm Equities, an SEC registered broker/dealer, a member of the Financial Regulatory Authority ("FINRA") and the Securities Investors Protection Corporation ("SIPC"). Fairway uses LPL Financial for custody and clearing services. Any securities transactions for Fairway Investment Group shall be directed to LPL Financial for execution. Fairway Investment Group and LPL Financial are not affiliated legal entities.

Any and all material conflicts of interest are disclosed herein.

#### Asset Management

Fairway Investment Group through its Investment Advisor Representatives provides ongoing investment advice and management of assets in the client's custodial Strategic Wealth Management (SWM) account held at LPL Financial. Strategic Wealth Management is the name of the custodial account offered through LPL to support investment advisory services provided to our clients by Fairway Investment Group. More specific account information and acknowledgements are further detailed on the account application.

Investment Advisor Representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds (“ETFs”), variable annuity subaccounts, real estate investment trusts (“REITs”), equities, and fixed income securities. The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist clients in attempting to meet their financial goals.

Accounts are reviewed on a regular basis and rebalanced as necessary according to each client’s investment profile.

A minimum account value of \$10,000 is generally required for the program. In certain instances, Fairway Investment Group will permit a lower minimum account size.

Clients may restrict investing in certain securities or types of securities as the client maintains discretion over the account. Fairway does not offer discretionary services to clients.

Fairway Investment Group sponsors a wrap fee program through the SWM II account type with LPL. A wrap fee program is offered so that the client does not pay any transaction or trading costs. This program is different than the other programs offered by LPL in that the client has discretion over the account and can consult with the advisor on security purchases or sales. The portfolios of the other programs offered are set by a program manager or strategist. The client is able to select which program or strategist they prefer. Rather than selecting the individual securities in the portfolio, the client’s portfolio is determined by the risk tolerance based on the Investor Profile Questionnaire and the program or strategist selected. These portfolios typically have a program or strategist fee separate from the advisory fee.

Fairway Investment Group offers asset management on a non-discretionary basis. As of December 2020, the firm has \$25 million of assets under management.

#### **Optimum Market Portfolios Program (OMP)**

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Investment Advisor Representative will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective.

Each client will complete an Investor Profile Questionnaire, or document similar in nature, to assist the IAR in determining the correct asset allocation. IAR will recommend a mutual fund asset allocation portfolio designed by LPL consistent with the client’s investment objective. LPL

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will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account.

A minimum account value of \$10,000 is required for OMP.

### Personal Wealth Portfolios Program (PWP)

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds and equity and fixed income securities.

Each client will complete an Investor Profile Questionnaire, or document similar in nature, to assist the IAR in determining the correct asset allocation. IAR will recommend to the client a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. IAR will also have discretion for selecting third party money managers (PWP Advisors) or mutual funds within each asset class of the model portfolio.

A minimum account value of \$250,000 is required for PWP.

### Model Wealth Portfolios Program (MWP)

MWP offers clients a professionally managed mutual fund asset allocation program. Fairway Investment Group investment advisor representatives will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. The Investment Advisor Representative will initiate the steps necessary to open an MWP account and recommend a model portfolio and strategist designed consistent with the client's stated investment objective. LPL's Research Department or the selected strategist is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts.

The account minimum is set by the program manager or strategist.

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Each client will complete an Investor Profile Questionnaire, or document similar in nature, to assist the IAR in determining the correct asset allocation. IAR will have recommend a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective.

### Manager Access Select Program

Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. Advisor will assist client in identifying a third party portfolio manager (Portfolio Manager) from a list of Portfolio Managers made available by LPL. The Portfolio Manager manages client's assets on a discretionary basis. Advisor will provide initial and ongoing assistance regarding the Portfolio Manager selection process.

A minimum account value of \$50,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be lower or higher.

### Guided Wealth Portfolios (GWP)

Guided Wealth Portfolios offers clients a digital investment experience for those that wish to invest and still have access to an advisor but might not need the constant face to face relationship, but will still have access to professionally managed portfolios. Clients are put on a "glidepath" depending on their age and account objective. A glidepath will automatically adjust their asset allocation to match their objective. GWP models are managed by LPL. Glidepaths may tilted toward fixed income, balanced, or equity, depending on the account objective.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for GWP accounts.

A minimum account value required for GWP is \$5,000. There may be a small account balance fee if your account is under \$10,000 charged by LPL.

The account fee charged to the client for each advisory program is negotiable, subject to the following maximum account fees:

<u>Advisory Program</u>	<u>Annual Percentage of Assets Charge</u>
Asset Management	2.5%
OMP	2.5%
PWP	2.5%
MWP	2.0%
Manager Access Select	2.5%
GWP	1.0%

## Fees

Account fees are payable quarterly in advance. Clients may terminate the agreement without penalty for a full refund of Fairway Investment Group's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days written notice.

### Item 5 – Fees and Compensation

The specific manner in which fees are charged by the firm is established in a client's written agreement between the client and Fairway Investment Group – up to 2.5% of assets under management. LPL Financial provides accounts that require discretionary trading by LPL. Fairway does not allow for discretionary trading by any of its Investment Adviser Representatives. The firm's annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under the firm's management to be charged quarterly in advance, and Fairway Investment Group representatives may at their discretion negotiate a fee in accordance with the above fee schedule.

In the event that a client desires, a client can engage certain representatives of the firm, in their individual capacities as Registered Representatives of Paradigm Equities, Inc., an SEC registered and FINRA/SIPC member broker-dealer, to implement investment recommendations on a commission basis.

Paradigm Equities, as well as the firm's representatives, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

The recommendation that a client purchase a commission product from Paradigm Equities presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Paradigm Equities. Fairway's Chief Compliance Officer, Cody Collier is available to address any questions that a client or prospective client may have regarding this conflict of interest.

LPL Financial charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds,

commissions are charged for individual equity and debt securities transactions). LPL enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. LPL Financial commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by LPL Financial may be higher or lower than those charged by other custodians and broker/dealers. Clients may direct their brokerage transactions at a firm other than LPL Financial. Advisory fees are generally not reduced to offset commissions or markups. Any charges levied by LPL are retained by LPL, no commission amounts are passed onto Fairway Investment Group, LLC or its representatives.

When dealing with investment advisory clients and services, Investment Advisor Representatives have an affirmative duty of care, loyalty, honesty and good faith to act in the best interests of its clients. Investment Advisor Representatives should fully disclose all material facts concerning any conflict that does arise with these clients, and should avoid even the appearance of a conflict of interest.

Fairway and its Investment Advisor Representatives must abide by honest and ethical business practices including, but not be limited to:

- Not inducing trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account
- Making recommendations with reasonable grounds to believe that they are appropriate based on the information furnished by the client
- Not borrowing money or securities from, or lending money or securities to a client
- Not placing an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state

Fairway and its Investment Advisor Representatives will:

- Allocate securities in a manner that is fair and equitable to all clients
- Not effect agency-cross transactions for client accounts

All Investment Advisor Representatives of Fairway Investment Group are required to sign an acknowledgment of their understanding and acceptance of these terms.

Please note, clients may purchase investment products recommended by our firm through other, non-affiliated broker dealers or agents.

When the firm's representatives sell an investment product on a commission basis, the firm does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, Fairway Investment Group

representatives do not also receive commission compensation for such advisory services (However, a client may engage the firm to provide investment management services for an advisory fee and also purchase an investment product from the firm's representatives on a separate commission basis.

Fees for customized and participant advisory services are typically based on the value of assets under management and will vary by engagement. The amount of the fee will be set out in the client agreement executed by the client at the time the relationship is established. The advisory fee is negotiable between the Investment Advisor Representative and the client, and is payable either in advance or in arrears as described in the client agreement. LPL is responsible for calculating and deducting advisory fees from client accounts held at LPL. Client will provide LPL with written authorization to deduct fees and pay the advisory fees to Fairway Investment Group. The advisory fee is paid directly by LPL to Fairway Investment Group (not the individual). Fairway Investment Group will then share the advisory fee with its advisors/associated persons. A custom program account may be terminated according to the client agreement. If the client agreement provides for payment in advance, the agreement will state how the client can obtain a refund of any pre-paid fee if the agreement is terminated before the end of the billing period.

In certain cases, LPL may serve as the broker/dealer on transactions in a customized advisory account. In such case, LPL may charge the client transaction charges in connection with trade execution through LPL. The transaction charges will be clearly stated in the client agreement executed by the client at the time the relationship is established. If the custom advisory services apply to variable annuities for which the Investment Advisor Representative receives trail compensation, such trail fees generally will be used to offset the advisory fee. In most cases, however, a third party broker dealer will provide trade execution. In such case, the broker-dealer may charge clients commissions, markups, markdowns and/or transaction charges.

Fairway Investment Group and its Investment Advisor Representatives receive compensation as a result of a client's participation in an LPL program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what Fairway Investment Group or the Investment Advisor Representative would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

LPL serves as program sponsor, investment advisor and broker/dealer for the LPL advisory programs. Fairway Investment Group and LPL may share in the account fee and other fees associated with program accounts.

Lower fees for comparable services may be available from other sources.

Investment Advisor Representatives may also be licensed insurance agents. In the capacity of an insurance agent, they may recommend the purchase of certain insurance-related products on a commission basis.

The purchase of securities and/or insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Investment Advisor Representative of the firm. Clients may purchase investment products recommended by investment advisory representatives through other, non-affiliated broker/dealers or insurance agents. Such conflicts are subject to review by the Chief Compliance Officer for consistency with the firm's Code of Ethics.

#### Item 6 – Performance-Based Fees and Side-by-side Management

Neither the firm nor any supervised persons accepts performance-based fees, fees based on a share of capital gains, or on the capital appreciation of assets. Fairway Investment Group does not provide advisory services to such clients as a hedge fund or other pooled investment vehicles.

#### Item 7 – Types of Clients

The advisory services offered by Fairway Investment Group are available for individuals, specifically MEA members and their families, individual retirement accounts ("IRAs"), banks and thrift institutions, pension and profit sharing plans, including plans subject to Employee Retirement Income Security Act of 1974 ("ERISA"), trusts, estates, charitable organizations, state and municipal government entities, corporations and other business entities.

However, the firm generally provides investment advice to individuals and high net worth individuals as well as trusts, estates and small businesses. The firm is currently not working with other types of clients or pursuing them as prospects but would not turn away any opportunities that may arise.

For LPL's Financial Sponsored Advisory Programs account minimums are as follows:

- Asset Management: \$10,000 (in certain circumstances, the minimum may be lower)
- Optimum Market Portfolios Program (OMP): \$10,000
- Personal Wealth Portfolios Program (PWP): \$250,000
- Model Wealth Portfolios Program (MWP): Generally \$25,000 but can be different according to the strategist or program manager
- Manager Access Select Program (MAS): \$100,000 (in certain instances, the minimum account size may be lower or higher)
- Guided Wealth Portfolio (GWP): \$5,000

For customized advisory services, any required minimum account value will be set out in the client agreement.

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

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds (“ETFs”), mutual funds and other public and private securities or investments.

The client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client’s individual needs, stated goals and objectives.

The firm uses a combination of fundamental and technical analysis, cyclical analysis in order to formulate investment advice when managing assets. Depending on the analysis the firm will implement a long or short term trading strategy based on the particular objectives and risk tolerance of a particular client.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis concentrates on factors that determine a company’s value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** involves the analysis of past market data; primarily price and volume. Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Please note, investing in securities involves risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results.

The firm's methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations such as:

- **Market Risk** - the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Interest Rate Risk** - the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk** - the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Mutual Funds** - Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).
- **Equity** - investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.
- **Fixed income** - investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential

risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

- **Exchange Traded Funds (ETFs)** - An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.
- **Annuities** - are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.
- **Non-U.S. securities** - present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

#### Item 9 – 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 an advisory firm or the integrity of a firm’s management.

Any such disciplinary information for the company and the company’s Investment Advisor Representatives would be provided herein and publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>.

9A. Neither Fairway Investment Group, LLC, nor any of its employees has had any criminal or civil action against it/them.

9B. Neither Fairway Investment Group, LLC, nor any of its employees, has any administrative proceeding before the SEC or any federal or state regulatory agency.

9C. Neither Fairway Investment Group, LLC, nor any of its employees, has had any proceeding before a Self-regulatory organization (SRO).

Item 10 – Other Financial Industry Activities and Affiliations

While Fairway's only business activity is acting as an investment advisor, Fairway is a wholly owned subsidiary of MEA Financial Services which also owns Paradigm Equities, Inc., a FINRA and SIPC member broker/dealer. Fairway's Manager/Executive Director is also the Executive Director of MEA Financial Services. Fairway's Manager/Executive Director does not transact, but may solicit investment advisory business on behalf of Fairway Investment Group.

Investment Advisor Representatives are also Registered Representatives of Paradigm Equities Inc., an SEC registered and FINRA/SIPC member broker/dealer and affiliate under common control under of MEA Financial Services. Clients may choose to engage an Investment Advisor Representative in their capacity as a Registered Representative of the unaffiliated LPL Financial broker/dealer, to implement investment recommendations on a commission basis.

Representatives of our firm are insurance agents/brokers. They may offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation that the Investment Advisor Representative may earn and may be perceived that it may not necessarily be in the best interests of the client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer.

Neither Fairway Investment Group nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Fairway Investment Group does not utilize nor select third-party investment advisers. All assets are managed by Fairway Investment Group.

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

Fairway Investment Group maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

The Code of Ethics includes guidelines regarding personal securities transactions of its employees and Investment Advisor Representatives. The Code of Ethics permits employees and Investment Advisor Representatives or related persons to invest for their own personal accounts in the same or different securities that an Investment Advisor Representative may purchase for clients in program accounts. This presents a potential conflict of interest because trading by an employee or Investment Advisor Representatives in a personal securities account

in the same or different security on or about the same time as trading by a client could potentially disadvantage the client. Fairway Investment Group addresses this conflict of interest by requiring in its Code of Ethics that employees and Investment Advisor Representatives report certain personal securities transactions and holdings to the Chief Compliance Officer for review.

An investment adviser is considered a fiduciary. 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. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes 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 sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction being implemented for an advisory account, thereby preventing an employee from benefiting from transactions placed on behalf of advisory accounts.

Neither Fairway Investment Group nor its Investment Advisor Representatives or related persons recommends to clients or buy or sells for client's account, securities for which they have a material financial interest.

#### Item 12 – Brokerage Practices

Fairway Investment Group receives support services and/or products from LPL Financial, many of which assist the Fairway Investment Group to better monitor and service program accounts maintained at LPL Financial. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support

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- computer hardware and/or software
- other products and services used by Advisor in furtherance of its investment advisory business operations

These support services are provided to Fairway Investment Group based on the overall relationship between Fairway Investment Group and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involves the execution of client transactions as a condition to the receipt of services. Fairway Investment Group will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Fairway Investment Group to LPL Financial or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement.

Fairway Investment Group has an arrangement with LPL Financial. LPL Financial offers to independent investment advisers non-soft dollar services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some non-soft dollar benefits from LPL Financial through our participation in the program.

LPL Financial may make certain research and brokerage services available at no additional cost to our firm. These services may be directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by LPL Financial may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by LPL Financial to our firm in the performance of our investment decision-making responsibilities.

Although the non-soft dollar investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

As a result of receiving the services Fairway Investment Group may have an incentive to continue to use or expand the use of LPL Financial services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with LPL and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

LPL Financial charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). LPL enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at

nominal transaction charges. LPL Financial commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by LPL Financial may be higher or lower than those charged by other custodians and broker/dealers.

Clients may pay a commission to LPL Financial that is higher than another qualified broker/dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker/dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Neither we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected. We routinely recommend that a client directs us to execute through a specified broker/dealer. Our firm recommends the use of LPL Financial. Each client that chooses LPL Financial will be required to establish an account if not already done. Please note that not all advisers have this requirement.

Clients may direct their brokerage transactions at a firm other than LPL Financial. However, we may be unable to achieve more favorable executions of client transactions. Client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Fairway Investment Group, LLC does not maintain custody and therefore cannot aggregate client purchases or sales through block trading.

#### Item 13 – Review of Accounts

For those clients to whom Fairway Investment Group provides investment supervisory services, account reviews are conducted on an ongoing basis by Cody Collier, the Chief Compliance Officer. All Fairway Investment Group clients are advised that it remains their responsibility to advise Fairway Investment Group of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their Investment Advisor Representative on an annual basis.

Cody Collier, the Chief Compliance Officer, may also conduct account reviews based on the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and by client request.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker/dealer, custodian and/or program sponsor for the client accounts. Fairway Investment Group may also provide a written periodic report summarizing account activity and performance.

#### Item 14 – Client Referrals and Other Compensation

Fairway Investment Group receives a non-cash economic benefit from LPL Financial for reimbursement of support related services. Please see detailed discussion of the categories of marketing related expenses and potential conflicts of interest in Item 12 Brokerage Practices.

Fairway Investment Group and employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with Investment Advisor Representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients. Product sponsors may also pay for, or reimburse Fairway Investment Group for the costs associated with, education or training events that may be attended by Fairway Investment Group employees and Investment Advisor Representatives and for Fairway Investment Group sponsored conferences and events.

Fairway Investment Group does not have agreements in place to pay solicitors a portion of advisory fees. Fairway Investment Group does not directly or indirectly compensate any person who is not a supervised person for client referrals.

There are no other economic benefits provided by someone who is not a client for providing investment advice.

Fairway does not receive or accept compensation of any form for client referrals.

#### Item 15 – Custody

Fairway Investment Group does not have actual or constructive custody of client funds. LPL Financial will serve as the custodian of client assets on behalf of the Fairway Investment Group. Fairway Investment Group may also provide advisory services on assets held at different third party custodians.

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Fairway Investment Group urges you to carefully review the statements provided by the custodian and compare such official custodial records to the account statements that may be provided by Fairway Investment Group.

LPL Financial as the custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated. Clients provide authorization to LPL Financial permitting advisory fees to be deducted from client advisory account. LPL Financial calculates the advisory fees and deducts them from client's account every quarter.

### Item 16 - Investment Discretion

Should Fairway Investment Group assume discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming Fairway Investment Group as the client's attorney and agent in fact, granting Fairway Investment Group full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the Advisory account. Currently, Fairway Investment Advisor Representatives may not act in a discretionary manner with regard to client accounts.

### Item 17 – Voting Client Securities

Fairway Investment Group does not vote client proxies but third party money managers selected by LPL may vote proxies for clients in the portfolio managed by the third party. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Fairway Investment Group at (800) 292-1950 to discuss any questions they may have with a particular solicitation.

### Item 18 – Financial Information

Fairway Investment Group does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time has Fairway Investment Group been the subject of a bankruptcy petition.

### Item 19 – Requirements for State Registered Advisers

While Fairway's only business activity is acting as an investment advisor, Fairway's principal managers' business activities involve something other than activities and services through Fairway Investment Group. All managers are licensed insurance agents as well as registered securities principals. As such, all managers/principals are responsible for supervision of daily

activities of both MEA Financial Services, an insurance agency, and Paradigm Equities, Inc., a registered broker dealer. Registrant and Paradigm Equities, Inc., a registered broker/dealer, are affiliates under common control of MEA Financial Services, a licensed insurance agency. All associated persons of Registrant are licensed insurance agents as well as registered securities agents. While acting in these capacities, commissions are paid either directly or indirectly to Registrant for selling these products.

**Cody E. Collier**

*Born 1989*

Chief Compliance Officer – Fairway Investment Group – 07/2017 – Present

Senior Manager of Investments – MEA Financial Services – 01/2016 – Present

Chief Operations Officer – Paradigm Equities, Inc. – 01/2016 – Present

Cody has been in the financial services industry since 2013. He received his Bachelor of Science from Michigan State University. Cody holds the following industry licenses: Series 7, 66, 24, 26, & 51, and Life, Accident and Health Insurance License.

**Jason T. Diotte**

*Born 1973*

Field Services Manager – Paradigm Equities, Inc. – 01/2016 - Present

Registered Representative – Paradigm Equities, Inc. – 01/2016 - Present

Investment Advisor Representative/Director of Advisory Services Fairway Investment Group – 01/2016 – Present

Jason has been in the financial services industry since 2002. He has a BA in Religious Studies from the University of Iowa. Jason holds his Life, Accident and Series 7, 24, 63 and 66 Licenses

**Bruce M. Reaume**

*Born 1969*

Manager/Executive Director – Fairway Investment Group – 01/2016 – Present

Executive Director – MEA Financial Services – 01/2016 – Present

President – Paradigm Equities, Inc. – 01/2011 - Present

Bruce has worked in the financial services industry since 1998. Bruce has been working for MEA Financial Services since 2002. He holds the Series 7, 63, 24 and 53 licenses and has a BAA in Economics from Central Michigan University.

**Michelle A. Shipman**

*Born 1970*

Secretary - Fairway Investment Group - 10/2008 - Present

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Financial and Operations Principal - Paradigm Equities, Inc. - 3/2006 - Present  
Supervisor of Administrative Operations - MEA Financial Services - 9/2005 – Present

Michelle has 19 years of experience in the insurance industry. She received her Bachelor of Arts Degree in Marketing from Michigan State University and holds the Property and Casualty, Life, Variable, Accident and Health, and Series 28 licenses.

All individuals that render investment advisory services on behalf of the Registrant must have obtained, at a minimum, FINRA Series 6, 63/65 or 7, 66 licenses. In addition, Registrant and all individuals are required to meet the registration and/or licensing standards for the state(s) in which they do business.

Fairway Investment Group is a wholly owned subsidiary of MEA Financial Services. MEA Financial Services also has another subsidiary, Paradigm Equities, Inc., an introducing broker/dealer. Michelle Shipman is the Financial Operations Professional for Paradigm Equities. She is also listed on the corporate charter for Fairway Investment Group the Secretary. When necessary, she will take minutes in meetings that concern Fairway Investment Group, and do other clerical work for Fairway Investment Group. Michelle does solicit business on behalf of Paradigm Equities, Inc.

No supervisors or executive officers of Fairway Investment Group have been involved in any arbitration or other dishonest or illegal practice claiming damages in excess of \$2,500.

No supervisors or executive officers of Fairway Investment Group have been involved in any civil or administrative proceeding involving a self-regulatory organization.