

Item 1 - Cover Page



Wrap Program Brochure

Registered As

Fairway Investment Group, LLC
Doing Business As: Fairway Investment Group
Michigan Registered Investment Adviser
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May 2025

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

This wrap fee program brochure provides information about the qualifications and business practices of Fairway Investment Group, LLC (“Fairway”). If you have any questions about the contents of this brochure, please contact Fairway at (800) 292-1950 or meafinancial@mea.org. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration does not imply a certain level of skill or training. Additional information about Fairway is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

The SEC amended the format of the disclosure document required to be delivered to clients by Investment Advisers. This Brochure dated May 2025 is a new disclosure document prepared using the new format and its requirements.

Since its last annual update of March 25, 2024, Fairway Investment Group, LLC (“Fairway”) has had no 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.

Our Disclosure Brochure may be requested by contacting us at (800) 292-1950 or meafinancial@mea.org.

Item 3 - Table of Contents

Contents

Item 1 - Cover Page	1
Item 2 - Material Changes.....	2
Item 3 - Table of Contents	3
Item 4 - Services, Fees, and Compensation	4
Item 5 – Account Requirements and Types of Clients	6
Item 6 – Portfolio Manager Selection and Evaluation	7
Item 7 – Client Information Provided to Portfolio Managers	13
Item 8 – Client Contact with Portfolio Managers	15
Item 9 – Additional Information	15
Item 10 – Requirements for State Registered Advisers	20

Item 4 - Services, Fees, and Compensation

Services

Fairway offers asset management services based on the individual needs of the client. This Brochure provides a description of the Wrap Programs sponsored by LPL Financial and offered by Fairway. For more information about Fairway's other investment advisory services, please contact Fairway for a copy of a similar brochure that describes such services or go to www.adviserinfo.sec.gov.

Fairway provides guidance on strategist selection and ongoing performance monitoring. Fairway provides advice that is tailored to the individual needs of the client based on the investment objective chosen by the client and Best Interest considerations.

Fairway provides asset management services on a non-discretionary basis.

Assets for program accounts are held at LPL Financial ("LPL") as custodian. LPL also acts as executing broker/dealer for transactions placed in program accounts, and provides other administrative services as described throughout this Brochure.

As of December 31, 2024, the Fairway has \$69 million assets under management.

Fees

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

<u>Wrap Program</u>	<u>Annual Percentage of Assets Charge</u>
Optimum Market Portfolio (OMP)	1.0%
Model Wealth Portfolio (MWP)	1.5 %
Guided Wealth Portfolio (GWP)	0.85 %

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

In the Wrap Program (sponsored by LPL and offered by Fairway) clients pay LPL an annual advisory fee, paid on a quarterly basis (for advisory services and execution of transactions). Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee. The advisory fee is negotiable between the client and the Investment Adviser Representative ("IAR") and is set out in the Investment Advisory Agreement. The advisory fee is a percentage based on the value of all assets in the account, including cash holdings. The maximum advisory fee in Wrap Programs we offer is 1.5%. The advisory fee may be higher than the fee charged

by other investment advisers for similar services. The advisory fee is paid to LPL and is shared between Fairway and its IARs. Fairway does not accept performance-based fees for program accounts.

The advisory fee is deducted from the account by LPL as the custodian of assets based on a written authorization from the client. LPL calculates and deducts the advisory fee quarterly in advance. If the Investment Advisory Agreement is terminated before the end of the quarterly period, client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

For Wrap Program accounts, clients pay a single asset based fee for advisory services. This fee also covers most transaction costs and certain administrative and custodial costs associated with the client's investments. If clients expect to trade infrequently or to pursue a "buy and hold" strategy, the Wrap Program may cost the client more than paying for the program's services separately, and you may want to consider a brokerage relationship rather than an advisory relationship.

Other Types of Fees and Charges

Program accounts will incur additional fees and charges from parties as noted below. These fees and charges are in addition to the advisory fee paid to LPL. Fairway does not share in any portion of these third party fees.

LPL, as the sponsor, custodian and execution service provider on Wrap Program accounts, will impose certain fees and charges. LPL notifies clients of these charges at account opening and makes available a list of these fees and charges on its website at <https://www.lpl.com/disclosures.html>. LPL will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by third parties that apply to investments in program accounts. Some of these fees and charges are described below, but are not limited to:

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay a program fee to LPL. Client will also pay Fairway the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using the management services of Fairway and by making their own investment decisions.
- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.
- Although only no-load and load-waived mutual funds can be purchased in a program account, client should understand that some mutual funds pay asset based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.

Further information regarding fees assessed by a mutual fund is available in the appropriate prospectus, which is available upon request from the Fairway or from the product sponsor directly.

Other Important Considerations

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.
- The advisory fee also may cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.
- The IAR recommending the program to the client receives compensation as a result of the client's participation in the program. The amount of this compensation may be more or less than what the IAR would receive if the client participated in other LPL programs, programs of other Investment Advisers or paid separately for investment advice, brokerage and other client services. Therefore, the IAR may have a financial incentive to recommend a program account over other programs and services.
- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker/dealers or other investment firms not affiliated with Fairway.

Item 5 – Account Requirements and Types of Clients

Fairway 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 | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

LPL Financials' Wrap Programs account minimums are as follows:

- Optimum Market Portfolios Program (OMP): \$10,000 (in certain circumstances, the minimum may be lower).
- Model Wealth Portfolios Program (MWP): Generally, \$25,000 but can be different according to the strategist or program manager.
- Guided Wealth Portfolio (GWP): \$5,000.

Fairway IARs are dual licensed as Registered Representatives for the Broker Dealer Paradigm Equities, Inc. During client onboarding, advisory clients must complete a Qualification for Broker Dealer or Advisory Assessment to determine if advisory services are in the Best Interest of the client (e.g., a “buy and hold” client may be better suited using Broker Dealer services in lieu of advisory services). If client facts change, a Fairway IAR may advise an advisory client to end advisory services and purchase investment products from Paradigm Equities, Inc.

Item 6 – Portfolio Manager Selection and Evaluation

Fairway does not select, review or recommend other investment advisers or portfolio managers other than those offered by LPL. Fairway, through its IARs, is responsible for the investment advice and management offered to clients.

The IAR provides guidance on strategist selection and ongoing performance monitoring. Each client will complete an Investor Profile Questionnaire (“IPQ”), to determine their investment objective and assist the IAR in determining the correct asset allocation. Fairway and its IARs provide advice that is tailored to the individual needs of the client based on the investment objective indicated by the IPQ completed by the client before opening each account. The Wrap Programs sponsored by LPL Financial are directed 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 IPQ, the program, portfolio manager or strategist selected.

Through LPL Financial, Fairway is able to offer the following wrap-fee programs which are sponsored and managed by LPL Financial:

□ **Optimum Market Portfolios (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. IARs 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 IPQ 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 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 standard for OMP. For all accounts under \$10,000, systematic ACH contributions must be in place for at least \$25 per year.

In OMP, clients invest in Portfolios designed by LPL's Research Department. LPL Research designs different types of Portfolios for OMP to meet the varying needs of clients. The IAR selects the Portfolio and provides advice based on the client's individual needs. LPL receives a portion of the Account Fee for the Portfolio design services of LPL Research. LPL and its IARs do not accept performance-based fees under OMP.

□ **Model Wealth Portfolios Program (MWP)**

MWP offers clients a professionally managed mutual fund asset allocation program. Fairway IARs 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 IAR 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 generally \$25,000 but can be different according to the strategist or program manager. Each client will complete an IPQ 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.

LPL makes available Portfolios designed by LPL, third party Portfolio Strategists, including Subadvisers, Institutional Strategists and the applicable IAR. LPL reviews on a periodic basis Institutional Strategists and IARs acting as Portfolio Strategists on MWP.

In addition, LPL selects and reviews on a periodic basis the third party Portfolio Strategists available on MWP. A third party Portfolio Strategist may provide services to LPL and the Program as a Subadviser. In addition to deciding on the securities and asset allocation for a Portfolio, Subadvisers are responsible for determining when and how to execute transactions and selecting broker-dealers through which to execute transactions. LPL uses information provided by the third party Portfolio Strategist and also may use independent, third party data sources when evaluating such Portfolio Strategist. Third party Portfolio Strategist performance information is not calculated on a uniform and consistent basis. LPL does not review performance information to determine or verify its accuracy and does not calculate third party Portfolio Strategist performance. However, LPL provides clients with individual performance information. Performance information distributed is compiled by LPL using third party portfolio accounting and reporting software. Client performance information is calculated on a uniform and consistent basis using a time weighted basis. Performance information is intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to investment indices.

It is important to note that, except for Subadvisers, third party Portfolio Strategists provide the Portfolios to LPL, and it is LPL that has discretion for trade implementation and execution in MWP accounts. Therefore, Portfolios submitted to LPL by third party Portfolio Strategists may represent activity that has already been implemented on behalf of other clients of such Portfolio Strategists. Because of this fact and because LPL (and not the third party Portfolio Strategist) has discretionary authority to implement trades, performance of an MWP account will differ from the performance of such Portfolio Strategist's discretionary accounts.

□ **Guided Wealth Portfolio (GWP)**

Guided Wealth Portfolios offers clients a digital investment experience for those that wish to invest and still have access to an IAR and professionally managed portfolios, but do not need as much contact with their IAR. 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 charged by LPL if your account is under \$10,000

In GWP, clients invest in Model Portfolios designed by LPL Research. LPL Research provides various types of advisory services. LPL Research provides research recommendations on asset allocation and ETFs and mutual funds. LPL Research provides investment advice on ETF and mutual fund selection and allocation through other LPL advisory programs, such as Optimum Market Portfolios, Personal Wealth Portfolios and Model Wealth Portfolios. LPL Research also reviews and recommends outside portfolio management firms for LPL's separately managed account wrap program, Manager Select.

Based upon a client's risk tolerance as indicated in the IPQ, the client is assigned an investment allocation track (currently conservative, moderate or aggressive) for a Retirement Goal or a Major Purchase Goal, the purpose of which is to slowly rotate the client's equity exposure allocation to fixed income exposure and cash over time. LPL Research created these tracks using academic research on optimal retirement allocations, the industry averages as calculated by Morningstar for the target date fund universe, and input from other third parties.

You may contact your financial advisor or visit the following website to obtain a copy of the wrap fee program brochure:

<https://lplfinancial.lpl.com/disclosures/lpl-financial-firm-brochure-and-program-forms-foradvisory-services.html>

An IAR recommending the wrap fee program receives compensation as a result of a client's participation in the program. The amount of this compensation may be more than what the person would receive if the client participated in other programs or paid separately for investment advice, brokerage, and other services. Therefore, IARs may have a financial incentive to recommend the wrap fee program over other programs or services.

There may be additional fees on assets held in the wrap program, such as mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers. A more detailed description of these fees and circumstances is detailed above in Item 4 above.

For more information about the IAR of Fairway managing the account, a client should refer to the Brochure Supplement for the IAR, which client should have received along with this Brochure at the time client opened the account.

LPL performs certain administrative services for Fairway and its clients, including generation of quarterly performance reports for program accounts. Client will receive an individual quarterly performance report, which provides performance information on a time weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

Fairway does not accept or charge fees for performance results or side-by-side management.

Methods of Analysis and Investment Strategies

Wrap Fee Managers may utilize varying methods of investment strategies, including but not limited to:

- ***Alternative Strategy Mutual Funds.*** Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity.
- ***Closed-End Funds.*** Client should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
- ***Exchange-Traded Funds (ETFs).*** ETFs are typically investment companies that are legally classified as open end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the “spread.” The spread varies over time based on the ETF’s trading volume and market liquidity, and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.
- ***Exchange-Traded Notes (ETNs).*** An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer’s ability to pay. In addition, the trading price of the ETN in the secondary market may be adversely impacted if the issuer’s credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and may therefore carry specific risks.
- ***Leveraged and Inverse ETFs, ETNs and Mutual Funds.*** Leveraged ETFs, ETNs and mutual funds, sometimes labeled “ultra” or “2x” for example, are designed to provide a multiple of the underlying index’s return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs, ETNs and mutual funds.

Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to as tracking error. Continual re-setting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and are generally not appropriate as an intermediate or long-term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax-efficient than more traditional ETFs, ETNs and mutual funds.

- **Options.** Certain types of option trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.
- **Structured Products.** Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

- ***Hedge Funds and Managed Futures.*** Hedge and managed futures funds are available for purchase in the program by clients meeting certain qualification standards. Investing in these funds involves additional risks including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and the lack of liquidity and performance volatility. In addition, these funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing important tax information. Client should be aware that these funds are not liquid as there is no secondary trading market available. At the absolute discretion of the issuer of the fund, there may be certain repurchase offers made from time to time. However, there is no guarantee that client will be able to redeem the fund during the repurchase offer.

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. Investing in securities involves the risk of loss that clients should be prepared to bear.

Voting Client Securities

Fairway does not accept authority to vote client securities. Clients retain the right to vote all proxies that are solicited for securities held in the account. Clients will receive proxies or other solicitations from the custodian of assets. If clients have questions regarding the solicitation, they should contact Fairway or the contact person that the issuer identifies in the proxy materials. In addition, Fairway does not accept authority to take action with respect to legal proceedings relating to securities held in the account.

Item 7 – Client Information Provided to Portfolio Managers

In the Wrap Program, Fairway is responsible for assigning clients to a portfolio manager based on client objectives identified in the IPQ and Best Interest considerations aligning with the objectives of a selected portfolio manager. Portfolio managers have no role in reviewing a Fairway client's IPQ. Fairway and its IARs will obtain the necessary financial data from the client and assists the client in setting an appropriate investment objective for the account. Fairway and the IAR obtains this information by having the client complete an Investment Advisory Agreement and other documentation such as the IPQ. Clients are encouraged to contact Fairway or the IAR if there have been any changes in the client's financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Client should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Client should further be aware that achievement of the stated investment objective is a long-term goal for the account.

Fairway's policy requires an annual client meeting (one review every 12 months) to determine if there have been any changes in the client's financial situation, investment objectives, or restrictions. In addition, the meeting should incorporate the account performance, appropriateness of the account, and any other information determined pertinent to the client situation. The annual meeting may occur by phone, in person, via e-mail, or via video conference and documentation will be maintained to evidence that at a minimum the following topics were reviewed:

- The client's financial status
- Risk Tolerance
- Time Horizon
- Investment Objective and Goals
- Asset Allocation and/or Account Holdings

Additionally, on an annual basis, IARs should review the performance of the client's advisory account and investment objectives.

Fairway also offers a non-wrap fee program: Strategic Wealth Management (SWM)

☐ **SWM**

Strategic Wealth Management (SWM) is a comprehensive, open architecture, fee-based investment platform. Fairway through its IARs provides ongoing investment advice and management on 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 by Fairway to our clients. More specific account information and acknowledgements are further detailed on the Account Agreement.

IARs 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 indicated on the IPQ completed by the client before the account is opened. Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's evolving investment profile.

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

Assets managed in a wrap fee account may be managed differently from a non-wrap fee account. Fairway may charge a higher fee, up to 1.5%. Clients participating in this non-wrap fee program may be responsible for all charges, including but not limited to, transaction costs, sales charges, or other applicable fees or expenses.

Fairway Investment Group through its IARs provides ongoing investment advice and management of assets in the client's custodial Strategic Wealth Management (SWM) account held at LPL Financial. IARs provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), real estate investment trusts ("REITs"), and equities. Under the SWM account arrangement, all transaction and trading costs can be passed on to the client or absorbed by the IAR. This transactional arrangement will be agreed upon by the client and IAR during the account opening process. The IAR shall retain the ability to change who pays the charges at any time after account

opening using the following process: no client signature is needed if the IAR decides to pay the charges. A client signature is required if the IAR chooses to have the client pay the charges.

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.

Each client will complete an Investor Profile Questionnaire (“IPQ”), to determine their investment objective and assist the IAR in determining the correct asset allocation. The IAR will recommend an asset allocation portfolio based on the client’s investment objective as defined by the IPQ and Best Interest considerations.

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.

Although SWM clients do not pay a transaction charge for transactions in a program account, clients should be aware that Fairway pays LPL transaction charges for the transactions. The transaction charges paid by Fairway vary based on the type of transaction (e.g., mutual fund, equity or fixed income security). Because Fairway pays the transaction charges in program accounts, there is a conflict of interest. Clients should understand that the cost to Fairway of transaction charges may be a factor that the Fairway considers when deciding which securities to select and how frequently to place transactions in a program account.

Item 8 – Client Contact with Portfolio Managers

Client should contact their IAR at any time with questions regarding program account.

Item 9 – Additional Information

Disciplinary Information

IARs are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm, an IAR, or the integrity of a firm’s management team.

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

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

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

Neither Fairway Investment Group, LLC, nor any of its employees, has had any proceeding before a Self-Regulatory Organization (SRO).

Other Financial Industry Activities and Affiliations

While Fairway's only business activity is acting as an Investment Adviser, 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 investment advisory business on behalf of Fairway Investment Group.

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

IARs 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 IAR 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.

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 IARs. The Code of Ethics permits employees and IARs or related persons to invest for their own personal accounts in the same or different securities that an IAR may purchase for clients in program accounts. This presents a potential conflict of interest because trading by an employee or IARs 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 IARs report certain personal securities transactions and holdings to the Chief Compliance Officer for review.

An Investment Adviser and its IARs are considered fiduciaries. 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, its IARs, nor related persons recommend to clients, or buy or sells for client account, securities for which they have a material financial interest.

Review of Accounts

For those clients to whom Fairway Investment Group provides advisory services, account reviews are conducted on an ongoing basis by their individual IAR subject to review by Jason Diotte, Director of Advisory Services and Jacob Fox 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 IAR on an annual basis.

Jacob Fox, 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.

Client Referrals and Other Compensation

Fairway 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 Brokerage Practices.

Fairway 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 IAR, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients.

Product sponsors may also pay for, or reimburse Fairway for the costs associated with, education or training events that may be attended by Fairway employees and IARs and for Fairway sponsored conferences and events.

Fairway does not have agreements in place to pay solicitors a portion of advisory fees. Fairway 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.

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 been the subject of a bankruptcy petition.

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.

Brokerage Practices

Fairway receives support services and/or products from LPL Financial, many of which assist the Fairway 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
- computer hardware and/or software
- other products and services used by IAR in furtherance of its investment advisory business operations

These support services are provided to Fairway based on the overall relationship between Fairway 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 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 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 has an arrangement with LPL Financial wherein 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 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 with 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 affect 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. 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 affected. Our firm uses 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 maintain outside accounts not managed by Fairway and direct their brokerage transactions at a firm other than LPL Financial. Fairway may be unable to achieve more favorable executions of client transactions than other firms. 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.

Item 10 – Requirements for State Registered Advisers

While Fairway's only business activity is operating as a Registered Investment Adviser, Fairway's principal managers' business activities involve something other than activities and services through Fairway. 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. Fairway and Paradigm Equities, Inc., a registered broker dealer, are affiliates under common control of MEA Financial Services, a licensed insurance agency. All IARs of Fairway are licensed insurance agents as well as registered securities agents. While acting in these capacities, commissions are paid either directly or indirectly to Fairway for selling these products.

Jason T. Diotte

Born 1973

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

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

IAR/Director of Advisory Services - Fairway Investment Group, LLC – 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 65* (*by virtue of passing the Series 66 exam) licenses.

Bruce M. Reaume

Born 1969

Manager/Executive Director – Fairway Investment Group, LLC – 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, has a BA in English Literature and a BAA in Economics from Central Michigan University.

Michelle A. Shipman

Born 1970

Secretary - Fairway Investment Group, LLC - 10/2008 - Present
Financial and Operations Principal - Paradigm Equities, Inc. - 3/2006 - Present
Supervisor of Administrative Operations - MEA Financial Services - 9/2005 – Present

Michelle has 23 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.

Jacob P. Fox

Born 1994

Chief Compliance Officer – Fairway Investment Group, LLC – 03/2024 – Present
Director of Compliance – MEA Financial Services – 11/2022 – Present
Chief Compliance Officer – Paradigm Equities, Inc. – 06/2023 - Present

Jacob has worked in the financial services industry since 2022. Jacob has been working for MEA Financial Services since 2022. Jacob has a BA (double major History and Political Science) from Alma College, and a Juris Doctorate Degree from Michigan State University College of Law. Jacob holds the SIE, Series 7, 24, 51, 63* and 65* licenses (*by virtue of passing the Series 66 exam), Accident and Health, Life, and Variable Annuities licenses, is a member in good standing of the State Bar of Michigan.

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

Fairway 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 as the Secretary. When necessary, she will take minutes in meetings that concern Fairway, and do other clerical work for Fairway. Michelle does solicit business on behalf of Paradigm Equities, Inc.

No supervisors or executive officers of Fairway have been involved in any arbitration or other dishonest or illegal practice.

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.