Fairview Financial, LLC

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Investment Advisor Brochure

(Form ADV Part 2A)

Revised 01/01/2017

This brochure provides information about the qualifications and business practices of Fairview Financial, LLC. If you have any questions about the content of this brochure, please contact us at 704-916-7646 and/or pj@fairviewfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Additional information about Fairview Financial, LLC also is available on the SEC's website at www.Advisorinfo.sec.gov. The searchable IARD/CRD # for Fairview Financial, LLC is 122287.

References throughout this document to "registered" or "registered investment advisor" indicate registration with the state securities commission, not to a skill or training level of the firm or individual.

ITEM 2 MATERIAL CHANGES

Since the last Fairview Financial, LLC ("Fairview Financial") disclosure brochure dated January 1, 2016, there have been no material changes to address in this section:

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ITEM 4 ADVISORY BUSINESS

A. DESCRIPTION OF THE ADVISORY FIRM

Fairview Financial, LLC, ("*Fairview Financial*" or "*Advisor*") is a Registered Investment Advisor regulated by the State of North Carolina and has been in operation since 2002. Fairview Financial is headquartered in Charlotte, North Carolina. The Advisor is independently owned and operated by Paul M. Jeffrey, Managing Member and Chief Compliance Officer of the Advisor.

B. TYPES OF ADVISORY SERVICES

Fairview Financial offers professional Investment Management Services and financial planning services. The Advisory Representative of Fairview Financial is *not* a Registered Representative of any broker/dealer firm and does not accept commissions in return for the recommendation or implementation of securities recommendations. *"Advisory Representatives"* are those persons who are authorized to provide financial or investment advice on behalf of the Advisor. Fairview Financial only accepts compensation for advisory services through a percentage of assets under management and thus the Advisor's compensation consists solely of advisory service fees paid by its clients.

Paul M. Jeffrey separately holds an active insurance license and if clients purchase insurance products he accepts normal commissions paid by insurance companies. These commissions are paid directly to Paul M. Jeffrey and not to Fairview Financial. Clients are welcome but are never obligated to implement insurance coverage or products and where insurance is desired, clients are welcome to ulitize any agent, product or company they may choose, entirely at their own discretion.

The Advisor is not a broker/dealer or custodial firm. Transactions in securities are executed by the preferred custodial firm of the Advisor as listed in Item 12 of this Brochure.

The Advisor can provide customized services to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. Fairview Financial specializes in providing customized investment management combined with financial planning solutions (where desired) with an emphasis on exchange-traded fund portfolio construction, management and supervisory services, which are delivered on a discretionary basis.

In conjunction with investment management we also offer comprehensive financial planning which can include assistance with such issues as: Retirement, education savings, general tax, risk management and estate planning. Financial planning is provided as part of our overall services and no additional fee is imposed for this component. Clients can request to initiate financial planning services throughout the engagement. The financial planning advice provided may include recommendations for updates and reviews and these services can be requested at the client's discretion. It is important that clients promptly notify the Advisor if there has been a change in their financial situation in the event the advice or plan needs to be amended. If the financial planning services are not desired, there is no reduction in the investment management fee and the planning services cannot be credited, assigned or transferred.

The Advisor may offer a complimentary general consultation to discuss services available, to give a prospective client time to review services desired, and to determine the possibility of a potential Client-Advisor relationship. Services begin only after the client and Advisor formalize the relationship with a properly executed Client Agreement.

After the formal engagement and depending upon the scope of the engagement, the Advisor and client will share in a data gathering and discovery process in an effort to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. Fairview Financial's investment management service is based in part upon this prior-established client profile and an investment policy statement and is personalized based on investment objectives and risk tolerance.

Primarily we use exchange traded funds (ETFs) however traditional no-load mutual funds and (rarely) individual securities may also be utilized. Please refer to Item 8 of this Brochure for more information. Insurance products such as fixed or fixed indexed annuities, offered through Paul M. Jeffrey as an independent insurance agent, are often included in our financial plans in order to reduce risk and are taken into consideration when formulating investment strategy recommended by Fairview Financial.

Fairview Financial also specializes in 401(k) plan advisory services including plan investment advice, general administrative and management advisory services for small company retirement plans. This service includes but is not limited to Investment Policy Statement development, consultation with Investment Committees, investment monitoring and review services, non-discretionary and discretionary investment management and assisting with certain aspects of 401k plan administration. Market timing is not a component of our 401(k) plan services. When providing advice in connection with retirement plan investments, the advice and recommendations prepared by the Advisor are limited to plan offerings and service providers.

C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

Investment advisory services offered by Fairview Financial are not limited to the areas of specialization as described in the preceding section. The Advisor's services are tailored to the individual needs of clients. Customization is generally accomplished by adjusting the allocations within the client's overall investment strategy to the various components of which it is comprised. This customization takes into account holdings in insurance products which may be included in order to reduce risk. Clients may impose reasonable restrictions on investing in certain types of securities.

D. WRAP FEE PROGRAMS

Fairview Financial provides in-house, private investment management and does not manage or sponsor a wrap fee program. Additionally Fairview Financial does not recommend or utilize any "wrap fee" programs.

E. AMOUNTS OF ASSETS UNDER MANAGEMENT

As of the Advisor's fiscal year end (December 31, 2016), Fairview Financial managed $15,692,428 across 60 individual client relationships on a discretionary basis and $6,216,083 in 2 accounts which are managed on a non-discretionary basis. The grand total of fiscal year end assets under management was: $21,908,511 across 62 individual client relationships. The accounts managed on a discretionary basis are owned by high net worth and non-high net worth individuals and includes 1 or more pension or profits sharing plans. The remaining assets managed on a non-discretionary basis are owned by pension or profit sharing plans.

ITEM 5 FEES AND COMPENSATION

Fairview Financial is only compensationed for advisory services by its clients via an asset-based fee as per the following schedule. All fees are deducted from the client's custodial accounts with proper authorization. The Advisor delivers invoices to clients for investment management fees but does collect fees directly from clients. Fees are not charged in advance of services.

Schedule of Advisory Fees

Multi-Strategy Program (MSP):	**Amount Under Management**	**Fee**
Annual Fee Schedule:	Balances up to $2,000,000	1.00%
	$2,000,001 to $4,000,000	0.75%
	$4,000,001 +	0.50%
401(k) Plan Advisory Services:		
Annual Fee Schedule	All accounts	Negotiable

In certain circumstances, at our discretion, advisory fees may be negotiable based upon terms of service, prior relationships, the nature and complexity of services to be provided, as well as related account holdings. The fees charged are calculated as described above based on total managed account values at the end of the day on the 15th of each month and are billed monthly in arrears. This monthly fee is calculated at the rate of 1/12 of the annual percentage rate. The billable balance is determined by the Client's custodial firm. Advisory fees for all private accounts are charged in the last 2 weeks of each month based upon the fair market value of the assets in the portfolio as of the 15th day of the current month.

Fees begin from the date that the Advisor's agreement is signed and funds are deposited or the account transfer process has begun. Where services are initiated at any time other than the beginning of a billing period, the fee will be prorated.

The monthly fee is 1/12th of the applicable annual fee percentage specified in the table above (for example, if the annual fee is 1.00%, the monthly fee is 0.08333% of the fair market value of the account as of the 15^{th} day of the month.) Additional deposits to the account are subject to the same fee procedures.

Advisory fees for 401(k) plan accounts are charged quarterly, in arrears. Each quarterly fee is determined by using $1/4^{th}$ of the annual fee rate as negotiated and the account value as of the end of the prior quarter. The client's custodian determines the account value. Fees begin from the date that the Advisor's agreement is signed and a new account is established or the account transfer process has begun. Where services are initiated at any time other than the beginning of a billing period, the fee will be prorated. Additional deposits to the account are subject to the same fee procedures.

During the course of any engagement, the Advisor reserves the right to modify the fee with 30 days written notice where the nature and complexity of the portfolio or services to be provided are modified. This may be the case when the client's circumstances have changed. Clients are welcome to discontinue services at any time.

With clients' written authorization, fees will be automatically deducted from the custodial account pursuant to the Client Agreement. Clients can expect to receive monthly or quarterly fee statements setting forth the fee calculation and proposed deduction. Clients will not be required nor can they choose to pay fees in advance but fee deductions will be terminated when the client agreement is terminated. Clients may not opt to be billed separately for advisory fees. If the designated account(s) do not contain sufficient funds to pay advisory fees, the client can leave standing orders to deduct fees via other accounts.

The client's custodian shall include in their monthly statements entries indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the Advisor. While the Advisor makes every effort to ensure fee calculations are calculated properly, it is important to note that custodial firms do not verify advisory fees. Clients should review their custodial statements carefully. If a client should have any questions or concerns in connection with an advisory fee deduction or other statement data, they should promptly contact Fairview Financial. If at any time during the engagement, the client fails to receive the regular statements produced by the custodian, it is important for the client to promptly notify Fairview Financial and the custodial firm. Clients must promptly report address and email changes to their custodian and the Advisor to help ensure that important account and service information is received.

FEES ASSOCIATED WITH INVESTING

Clients are responsible for the payment of all third party fees associated with investing. Clients may pay transaction and brokerage commission to their broker/dealer or other service providers ("*Financial Institution[s])* as well as any fees associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, retirement plan, trust fees, and all such applicable third party fees, deferred sales charges, oddlot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions). All fees paid to the Advisor for advisory services are separate from the fees and expenses charged to shareholders of ETF's or mutual fund shares offered by mutual fund companies.

If a mutual fund previously purchased by or selected by a client should impose a sales charge, a client may pay an initial or deferred sales charge. Fairview Financial does not receive any portion of these investment-related fees. Such charges, fees and commissions are exclusive of and in addition to the Advisor's fees. A complete explanation of the expenses charged by a mutual fund or ETF is contained in the respective mutual fund prospectus. Clients are encouraged to read each prospectus and securities offering document.

ITEM 6 PERFORMANCE BASED FEES & SIDE-BY-SIDE MANAGEMENT

We do not offer performance based fee arrangements and thus do not engage in side by side management.

ITEM 7 TYPES OF CLIENTS

We provide our advisory services to individuals, pension, profit sharing and other corporate plans, trusts, estate or charitable organizations, corporations and other business entities.

We do not require any minimums for opening or maintaining an account. However, the Advisor seeks a minimum relationship size (total family or related accounts) of at least $250,000.

If an account is subject to the Employee Retirement Income Security Act of 1974, as amended, ("*ERISA*"), the Advisor acknowledges that Advisor is a fiduciary within the meaning of the Act and the ERISA Client is a named fiduciary with respect to the control or management of the assets in the Account. In each instance, the Client will agree to obtain and maintain a bond satisfying the requirements of Section 412 of ERISA and to include the Advisor and the Advisor's principals, agents, and employees under those insured under that bond and will deliver to the Advisor a copy of the governing plan documents.

If the Account assets for which the Advisor provides services represent only a portion of the assets of an employee benefit plan, Client will remain responsible for determining an appropriate overall diversification policy for the assets of such plan.

Fairview Financial reserves the right to decline to offer services to any person or firm at its sole discretion.

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

A. METHODS OF ANALYSIS

Primarily, Fairview Financial provides investment management using mutual fund portfolios in order to provide strategic and dynamic asset allocation. In this respect our process begins by screening for potential selections using extensive data provided by various industry sources. We identify potential investments based on our proprietary criteria. Groups of funds meeting the initial criteria are selected for monitoring, additional research and comparison.

We actively maintain these groups by continually reviewing a wide range of data with respect to each fund and its relative performance within the group. The groups are categorized by asset class and the investment's potential for inclusion into a component of our portfolios. On a regular basis we repeat our screening process which at times results in new candidates added to our various lists. As the lists expand the funds that we deem to be the least attractive are dropped from consideration.

Our focus is on ultimately selecting funds which we deem to be the most appropriate available for each of the components of our strategy. Before a fund is selected for actual use in client portfolios we conduct additional research using information available in the individual fund prospectus, research prepared by others and information found on the respective fund company website. Furthermore we generally speak directly with investment company representatives for additional insights. Funds we have selected for client portfolios are reviewed on a regular basis and compared to the alternative choices within our groupings in consideration of the potential for an exchange.

In addition to the research and analysis we conduct regarding specific investments, we also broadly monitor and analyze global economic, political and social trends as well as new developments. These macoeconomic factors influence our asset allocation decisions and are monitored on a continuous basis.

Also, again on a continuous basis, we monitor a broad range of market trends through the use of charting software. Specifically we follow trends in each of these categories: broad equity and fixed income, foreign exchange, commodities, international equities, emerging market equities, emerging market fixed income, equity sectors and volatility measures. What we deem to be significant changes in the market trends we follow also influence our asset allocation decisions.

When from time to time we invest directly into an individual security (we buy a stock or bond or a similar instrument) we primarily use fundamental analysis and other qualitative and quantative factors in an effort to measure intrinsic value. In this situation we also rely on research prepared by others and on chart trend analysis in conjuction with our market opinions developed using the process as described above.

B. INVESTMENT STRATEGIES

Our primary approach is an individually customized, managed portfolio of mutual funds. We select, combine, monitor and manage the components of your portfolio.

Overall our program may include open-ended funds, closed-ended funds, exchange-traded funds (ETFs) or similar instruments. They may be index funds (or funds described as passively managed) or actively managed funds or a blend of both. Furthermore, at times, individual securites may also be utilized in order to enhance the primary mutual fund-based strategy. Portfolios may be diversified over a broad range of asset classes or concentrated in equities, depending upon the investor's stated goals, objectives and risk tolerance - and at times on market conditions. *It is important to know that we take into consideration client assets not managed by Fairview Financial, including Fixed or Fixed-indexed Annuities, when determining an appropriate level of risk for each client.*

Over the long term our program *may seek to* enhance returns over those which may be received when a static asset allocation strategy is employed and is designed to do so through dynamically adjusting asset allocation in response to market conditions and in an attempt to avoid severe market declines.

The components of our strategy are as follows: **Passive Equities**, **Active Equities**, **Dynamic Allocation** and **Income & Risk Mitigation**. Portfolios are customized and managed based on the dynamic weightings of these components which are tailored to individual client investment objectives, risk tolerance and to our assessment of market conditions. **Not all clients will have a weighting in each component** and exposure to the individual components can be tailored or limited based on investment policy. **Component exposure may vary based on market conditions**. *It is important to note that client reports do not segregate investments into the component parts of our strategy and all components may be aggregated into a single account or across a group of accounts owned by an individual, a family or other entity. We are able to provide details of how our strategy is implemented within your actual account(s) upon request.*

The **Passive Equities** component is the primary component for most portfolios and is dedicated to low-cost equity index funds (passive funds) in an effort to achieve the expected return of the capital markets pertaining to equities. Generally we diversify globally but overweight domestic markets. Traditional open-end funds may be combined with ETFs in order to effectively and efficiently gain broadly diversified equity market exposure. Trading is infrequent and we are not attempting to time the market but instead are aiming for the returns *of* the market. *Nonetheless, if our overall assessment of market conditions is such that we deem it is important to reduce risk for all clients, we may move assets from this component into our risk mitigation component.* The main advantage of this strategy is that (when engaged) it can reasonably be assured that the returns will closely follow market returns (after accounting for relatively low fees), however this works in both ways and the passive nature of this component means that there is no protection against adverse market conditions - unless we choose to move assets out of this component.

Our **Active Equities** component is based on the concept that fundamental analysis can be effective and that actively managed equity mutual funds may improve upon the basic returns of the capital markets. We select funds with long track records of consistent returns in excess of the market returns in their respective categories; as well as fees which are low compared to their peers. Additionally we lean towards low turnover funds where the managers prefer longer term positions and the performance is truly based on effective fundamental analysis. Clients can expect exposure to a very limited number of funds and infrequent trading - with an allocation which may be global, domestic or specific to an individual sector. Diversification is substantially less than our passive component in that the individual funds tend to have an exposure to a much smaller number of stocks. This component is where we may at times attempt to enhance performance by directly purchasing individual equities. O*nce again, if our overall assessment of market conditions is such that we deem it is important to reduce risk for all clients, we may move assets from this component into our risk mitigation component.* With this strategy the advantage is that fund managers have the opportunity to out-perform an equity market sector through effective fundmental analysis and they have the option of raising cash during unfavorable market conditions in anticipation of better buying opportunities at lower prices. However, effective fundamental analysis is difficult and outperforming a benchmark index consistently, and over a longer term, is something that is achieved by few managers. Also reliance on historical performance can prove unsuccessful since management styles tend to move in and out of favor and what worked in the past may not work under a constantly evolving financial environment. Furthermore, if we buy an individual stock directly it adds additional risk.

The **Dynamic Allocation** component is dedicated to ETFs. This strategy is designed to deliver risk controls for down markets and participation in up markets - through market timing. Asset allocation can vary dramatically from 100% in equities to 100% in short-term fixed income. Trading may be frequent at times and infrequent at other times, based on market conditions. All asset classes available through ETFs are considered for use. The upside of this approach is that when markets turn unfavorable we can react quickly to reduce risk. The limitation is that market timing can be very difficult to execute effectively and consistently.

The **Income & Risk Mitigation** component is designed to provide meaningful reduction of risk or increased levels of income when and where appropriate. Not all clients will have exposure to this component based on individual objectives, goals and risk tolerance. It is important to understand that we take into consideration client holdings outside of those managed by Fairview Financial (and this often means Fixed Annuities or Fixed-Indexed Annuities) when determining how much additional exposure to this component is required in order to achieve an appropriate overall level of risk. In most cases we limit investing here to mutual funds and trading tends to be infrequent unless we are temporarily adding exposure due to adverse equity market conditions. Even when we deem equity market conditions to be favorable clients may have a static exposure to this component (based again on objectives, goals and risk tolerance). We consider a wide range of fund categories including, but not limited to, fixed income, alternative investments, commodities, asset allocation funds, real estate funds, limited partnerships and equity income funds. In our opinion a high degree of flexibility is advantegous when seeking investment income or risk mitigation - especially in a low interest rate environment. Since risk and return are related it is important to understand that reducing or mitigating risk will have an impact on the potential for returns. Total returns may also be limited when an investment is focused on generating income. Furthermore investments which may historically have low correlation to equity markets (which is important when attempting to diversify effectively) may prove to have more correlation than expected during times of severe economic stress.

Diversification does not assure a profit or protect against loss in declining markets. The Advisor's primary strategy may include components which at times may involve frequent trading (but this trading tends be weekly or monthly and not on a daily basis). Therefore, the costs associated with trading will be higher in this strategy than in more static strategies and these costs have an impact on investment returns. There is no assurance the portfolios will achieve their objectives.

Clients should be aware that sales of investments may result in taxable gain(s) or loss(es) to the client. Also, the sale of investments to maintain the client asset allocation policy may cause taxable gain(s) or loss(es) to the client. While the Advisor makes every effort to take these matters into consideration in the delivery of its services, the client must understand that Fairview Financial does not render tax advice and is not responsible for the tax consequences to the client as a result of account transactions. Clients are encouraged to consult their tax Advisor about tax consequences as a result of transactions or any particular investment held in their account.

Investment Strategy regarding 401(k) plan advisory services:

In consultation with plan sponsors, or with an investment committee, we will develop a suitable list of investment options for the plan. Our recommendations typically will include a very wide range of assets classes and typically will include primarily, but not exclusively, index or passive mutual funds. Additionally we may recommend 3 to 5 model portfolios with varying degrees of risk which will be managed by us on a non-discretionary basis.

C. MATERIAL RISKS INVOLVED

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear. The Advisor takes the position that no single strategy can be relied upon to outperform the market. Even some of the most conservative appearing investments carry risks.

Mutual fund investing involves risk. Some mutual funds have more risk than others. The investment return and principal value will fluctuate and shares, when sold may be worth more or less than the original cost. There is no assurance a fund's objectives will be achieved. The risks associated with each fund are explained more fully in each fund's respective prospectus.

We believe the material risks involved in our strategy and in reliance on mutual funds in general are as follows:

- Investing in mutual funds may prove to be less effective and more expensive than investing directly in stocks or bonds and may have adverse tax consequences.
- Actively managed funds may fail to outperform an equivalent less expensive index fund.
- Diversification with respect to asset classes may fail to provide a measure of protection from downside risk in situations when all or most asset classes are declining at the same time.
- Fund manager attempts to re-allocate fund portfolios to more favorable asset allocation models may fail.
- Partial reliance on historical returns when selecting funds may prove to be an ineffective strategy.
- A portfolio diversified by asset class which includes fixed income components may not perform well during extended periods of rising interest rates and increasing levels of inflation and our efforts to mitigate risk may prove ineffective due to higher rates and inflation.
- Our efforts to protect portfolios from severe losses in down markets by moving to a defensive asset allocation may prove to be poorly timed and ineffective and efforts to reinvest when markets recover may also prove to be poorly timed and ineffective.
- The various expenses of managing the portfolios may not be justified by the performance of the portfolios relative to lower risk investments or similar investments with lower expenses.

We believe the material risks involved in the reliance of a 401(k) plan on our investment advice are as follows:

- The indexed or passive fund investment lineup chosen in consultation with us may fail to perform as well as fully managed funds.
- Market risk typical of all investments in mutual funds.
- Asset allocation of the model portfolios may prove to be disadvantageous based on market conditions and especially on the trend in interest rates and asset allocation changes to the model portfolio may prove to be poorly timed.
- If fund choices are replaced due to poor performance, the replacement fund may fail to perform at an improved level.

As noted in the preceding section, the Advisor relies on third parties for the provision of market statistics, performance, volatility, fund detail and related information, and although these parties are generally reliable and reputable, there may be inaccuracies or discrepancies in the data that are beyond the Advisor's control.

ITEM 9 DISCIPLINARY INFORMATION

Fairview Financial nor Paul M. Jeffrey have ever had any legal or disciplinary events to address in this section (no arbitrations, no license or registration suspensions or revocations).

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

Neither Fairview Financial nor its representatives are registered as a broker/dealer or as Representatives of a broker/dealer.

B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR OR A COMMODITY TRADING ADVISOR

Neither Fairview Financial nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Advisor.

C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST

The Advisor is a fee-only Registered Investment Advisor. Neither Fairview Financial nor its representatives have any material relationships that would present a possible conflict of interest with our clients with the exception that Paul Jeffrey is separately engaged as an independently licensed insurance agent, and in such capacity, may recommend, on a fully disclosed basis, the purchase of insurance related products. Insurance products generally include normal commissions paid by insurance companies. Clients are welcome but are never obligated to purchase insurance through Paul Jeffrey.

Fairview Financial does not operate and does not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

Fairview Financial does *not* maintain registration relationships with any of the following:

- broker-dealer, municipal securities dealer, or government securities dealer or broker;
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund);
- other investment Advisor or financial planner;
- futures commission merchant, commodity pool operator, or commodity trading Advisor;
- banking or thrift institution;
- lawyer or law firm;
- insurance company or agency;
- Accounting firm or accountant;
- pension consultant;
- real estate broker or dealer;
- sponsor or syndicator of limited partnerships.

D. SELECTION OF OTHER ADVISORS OF MANAGERS AND HOW THIS ADVISOR IS COMPENSATED FOR THOSE SELECTIONS

Fairview Financial does not engage unaffiliated independent managers or advisors as part of the investment management process.

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

A. CODE OF ETHICS

Purpose

Fairview Financial's Code of Ethics sets forth a standard of business conduct required of all employees. It mandates honest and ethical conduct at all times.

This code supplements the policies and procedures contained in our *Compliance Manual*.

It reflects our values of impeccable business and personal ethics, respect, teamwork, innovation, and excellence.

Standards of Business Conduct

We recognize our fiduciary obligation to each client. This means that we shall act in the client's best interest at all times, and the client's interest shall always be placed ahead of our interests.

The code sets out ideals for ethical conduct premised on the fundamental principles of openness, integrity, honesty and trust. We place the highest value on ethical conduct. Employees should live up not only to the letter of the code, but also to the ideals of outstanding investment advisory business.

Employees of our firm shall comply with both the letter and the spirit of all applicable federal and state securities laws. Our code is designed to guard against violations of securities laws and to protect our reputation. Fairview Financial is dedicated to compliance with all applicable rules and regulations.

Employees are held personally accountable for learning, endorsing, promoting and applying this code to their own conduct and work.

Employees shall adhere to the compliance policies stipulated in our Compliance Manual. Employees shall review the Compliance Manual and acknowledge their review in writing.

Conflicts of Interest

Fairview Financial, LLC and its employees are expected to avoid situations where their personal interests could conflict or appear to conflict with their fiduciary responsibilities to clients. All conflicts of interest shall be disclosed to clients.

Employees should avoid any investment, interest, association or other relationship that interferes, might interfere, or might be thought to interfere, with the independent exercise of good judgment. Any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest must be disclosed to the Chief Compliance Officer.

Supervised persons are not permitted, in connection with the purchase or sale, directly or indirectly, of a security held or to be acquired by a client:

- To defraud such client in any manner;
- To mislead such client, including by making a statement that omits material facts;
- To engage in any act, practice or course of conduct that operates or would operate as a fraud or deceit upon such client;
- To engage in any manipulative practice with respect to such client; or
- To engage in any manipulative practice with respect to securities, including price manipulation.

B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

Fairview Financial does not recommend that clients buy or sell any security in which any of Advisor's related persons have a material financial interest unless the security falls under the exceptions detailed below under Item 11.D.Footnotes (1) & (2).

C. INVESTING PERSONAL MONIES IN THE SAME SECURITIES AS CLIENTS

It is our expressed policy that representatives may not purchase or sell any individual stock or bond prior to a substantially identical transaction(s) being implemented for an advisory account such that the advisory representative benefits from the transaction(s) placed on behalf of the advisory account.

D. TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENTS' SECURITIES

Fairview Financial and its Advisory Representatives acknowledge the Advisor's fiduciary responsibility to place the investment needs of clients ahead of the Advisor and its staff. The interests of clients are held in the highest regard. At no time will the

Advisor or any related person receive an added benefit or advantage over clients with respect to these transactions. The Advisor and its associated persons will not place itself in a position to have added benefit as a result of advice given to clients.

As these situations represent a conflict of interest, we have established the following restrictions in order to ensure our fiduciary responsibilities:

1) A Director, officer or advisory representative shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her affiliation with Fairview Financial, LLC, unless the information is also available to the investing public on reasonable inquiry. No person shall prefer his or her own interest to that of the advisory clients. (1) (2)
2) All clients, either through the disclosures herein or by separate notice, are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.
3) We require that all individuals must act in accordance with all applicable regulations governing registered investment advisory practices.
4) Any individual not in observance of the above may be subject to termination.

Footnotes

(1) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of our clients trade in sufficiently broad markets to permit transactions by clients or by Advisor's related persons to be completed without an appreciable impact on the markets of the securities. Under these circumstances, exceptions are made to the policies stated above which restrict Advisor's related persons from investing in the same securities as clients.

(2) Open-end mutual funds and/or the investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share, specific to the date of purchase of redemption. As such, transactions in mutual funds and/or variable insurance products by the advisory representative are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by our investment policies and procedures.

In accordance with applicable regulations, we also maintain and enforce written policies reasonably designed to prevent the misuse of material non-public information by us or any person associated with us.

ITEM 12 BROKERAGE PRACTICES

A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

Fairview Financial does not execute securities transactions. Our clients' managed assets must be maintained in an account at a "qualified custodian", generally at a broker/dealer or bank. The selected custodial firm will hold client assets in a brokerage account and will buy and sell securities when we direct them to (via the Advisor's discretionary authority if granted by the client). The Advisor does not take custody of securities and does not take custody of funds except for the Advisor's limited access to funds as needed to deduct agreed upon investment management fees via custodial accounts and only when the client has provided proper authorization. Fairview Financial will not open a custodial account for clients; clients enter into an account agreement directly with their selected custodian.

We recommend and participate in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. We receive some benefits from TD Ameritrade through participation in this program (please see the disclosure under item 12.A.1 below for an explanation of these benefits). The benefits received by us and our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

We choose to work with TD Ameritrade because of the benefits they provide to our clients. We consider criteria such as the custodian's financial strength, level of service, access to investment products, trade execution and their fee schedule. Periodically we compare the costs and benefits of doing business with TD Ameritrade with other custodians of similar scope and scale to ensure that their services are competitive.

Trading errors which may occur as a result of our discretionary management of your accounts at TD Ameritrade are handled such that the Advisor has full responsibility for re-imbursing clients for any loss. Any gains resulting from trading errors are retained by the Advisor in an error account which can be used to off-set losses which may occur in the future.

Broker dealers or custodians used by corporate retirement plans are selected in conjunction with plan sponsors and investment committees. We make recommendations regarding broker dealers and custodians but do not have discretionary authority in this respect. Broker dealers or custodians are selected for corporate retirement plans on a case by case basis, in consultation with the plan sponsor, such that a best-fit solution is chosen for a particular plan.

1. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

Fairview Financial may receive business incentives, research, products (such as software), and discounts on products or services other than execution from a broker/dealer in connection with client securities transactions. These benefits are known as "soft dollars".

Section 28(e) of the Securities Exchange Act of 1934, as amended (15 U.S.C. § 78bb (e)), establishes a safe harbor for money managers who use client funds to purchase brokerage and research services for their managed accounts. Under Section 28(e), a money manager is protected from liability for a breach of fiduciary duty solely on the basis of having paid more than the lowest commission rate for "brokerage and research services provided by a broker-dealer," the manager determines in good faith that the amount of the commission is reasonable in relation to the value of such services

Fairview Financial participates in the TD Ameritrade institutional program for independent Registered Investment Advisors as noted in Item 12.A. While there is no direct linkage between the investment advice given and the participation in a custodial firm's institutional program, economic benefits are received by the Advisor which would not be otherwise, if the Advisor did not give advice to clients.

In fulfilling its duties to its clients, Fairview Financial endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the Advisor's receipt of economic benefits from a broker-dealer/custodian creates a conflict of interest since these benefits may influence the Advisor's choice of broker-dealer over another broker-dealer that does not furnish similar fee benefits, software access/discounts, systems support, back office administrative support or other services.

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

<u>Services that may not directly benefit clients</u> are those products and services that TD Ameritrade makes available to the Advisor but may not directly benefit our clients or their accounts. These products and services assist the Advisor in managing and administering our clients' accounts and include investment research (both the broker/dealers' and that of third parties). We may use this research to service all or some substantial number of our clients' accounts, including those maintained away from the broker/dealer providing the research. In addition to research, these service providers also make available software and other technology that provides access to client account data (such as duplicate trade confirmations and account statements); facilitates trade execution and allocation of orders for multiple accounts; provides pricing and other market data, facilitates payment of advisory fees from client accounts and assists with back-office functions, recordkeeping and client reporting.

<u>Services that generally benefit only the Advisor</u> are those other benefits intended to help the Advisor manage and further develop its business enterprise. These services include marketing support, practice management advice, compliance notifications and online business development resources.

2. BROKERAGE FOR CLIENT REFERRALS

We do not receive client referrals from any broker dealer.

3. CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE

Directed brokerage is not applicable to our business model. Since we only have an arrangement with TD Ameritrade for custodial services clients are not able to direct trades to any other broker-dealer or custodian.

B. AGGREGATION (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

Transactions for each client generally will be effected independently, unless the Advisor decides to purchase or sell the same securities for several clients at approximately the same time. The Advisor may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among the Advisor's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Due to the individualized nature of services, however, large orders of securities are not always consistent with the nature of the Advisor's services. Aggregation is undertaken in firms processing large orders of securities in order to realize more effective trade execution and the cost efficiencies that come from executing larger order sizes. In each case, the Advisor strives to allocate investment opportunities or trades among its clients in a manner that is fair and equitable and based upon the client investment objectives.

Under situations where we elect to make a strategic adjustment which will effect most client portfolios, the purchase or sale of securities may be aggregated. When this practice involves open-ended mutual funds, which price after the close of markets at 4:00pm, the aggregation is a convenience for us and is not of any consequence to clients. When exchange traded funds or other securities are purchased or sold in aggregate, all clients purchasing or selling the security receive the same average price. Advisor's procedure is to use TD Ameritrade's block trading service to facilitate the aggregation of all trades and the allocation to individual accounts, which is completed before 6:00pm ET on the day of the trade. The Advisor shall not receive any additional compensation or remuneration as a result of the aggregation.

ITEM 13 REVIEW OF ACCOUNTS

A. FREQUENCY AND NATURE OF PERIODIC REVIEWS

Investment Management Services involve continuous and ongoing services to include frequent monitoring and internal review of portfolio assets on a quarterly, monthly, or perhaps a more frequent basis. The frequency of and processes for the internal portfolio reviews is most often dependent upon the nature and complexity of the portfolio and at the discretion of the Advisor. Reviews may also occur at the time of significant deposits or withdrawals. Reviews generally entail analyzing securities, sensitivity to various markets, investment results and other factors. The Advisor may also review a portfolio if the client's asset allocation deviates over the target acceptable limits, at which time portfolio action is considered.

Clients will be contacted periodically by their advisory representative to review each client's financial status, goals and objectives as set forth in their investment policy statements. Individual reviews (with clients) are conducted as requested by the client, at the Advisor's discretion, or according to the interval agreed upon in the Client Agreement. The timing of reviews conducted with clients are guided by the client's stated objectives or at the Advisor's discretion. In addition, *clients are obligated to contact the Advisor when there exists a real or potential change in the clients' financial condition*. This prompt notification gives the Advisor the opportunity to review the clients' new information and as a result the Advisor and client can help ensure the investment strategies continue to be appropriate based on client's data and stated objectives.

B. REVIEWERS

Reviews are conducted by Paul Jeffrey.

C. FACTORS THAT WILL TRIGGER NON-PERIODIC REVIEWS OF CLIENT ACCOUNTS

The timing of Internal portfolio reviews may also be guided by the underlying assets of the portfolio, individual circumstances as reasonably known by the Advisor, market conditions and the request of the client.

Reviews may be triggered by material market, economic or political events. Reviews may occur as a result of significant deposits or withdrawals, reported changes in the client's financial situation (which may include but are not limited to: Termination of employment, physical relocation, inheritance or retirement).

D. CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED TO CLIENTS

Clients can expect to receive confirmation statements from all transactions and a monthly/quarterly statement, directly from their custodial firm. The custodian's quarterly reports detail account value, net change, portfolio holdings, and all account activity.

Clients may receive quarterly telephone updates from their advisory representative. At mid-year and year-end each client receives a simplified summary report for all their accounts with Fairview Financial. The Advisor may produce written reports, financial plans or post-meeting communications as agreed to at engagement or at the Advisor's discretion.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)

Fairview Financial does not receive any economic benefit, directly or indirectly from any third party in connection with advice rendered to the Advisor's clients other than the general business-related benefits from custodial firms as outlined in Item 12 of this Brochure.

B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS

Fairview Financial does not directly or indirectly compensate any person for client referrals who is not part of Fairview Financial's advisory personnel.

ITEM 15 CUSTODY

The Advisor will only have access to custodial accounts in order to implement trades, to service the accounts, to transfer funds between like-titled accounts and to deduct contractually agreed upon investment advisory fees and only with appropriate client authorization, as described in Item 5.

In each instance where fee deduction occurs, it is important that clients receive custodial statements directly. If clients find that statements are not being received directly or if there is a change of address, they must promptly contact Fairview Financial and TD Ameritrade.

Fairview Financial does not hold ("custody") client accounts (funds or securities). Client accounts are held at TD Ameritrade Member FINRA/SIPC,/NFA. Clients will receive regular and customary account statements from the custodian and should carefully review those statements.

Individual accounts receive monthly statements from their custodian TD Ameritrade. Fairview Financial prepares and delivers simplified summary statements of client accounts on a semi-annual basis in addition to statements provided by the custodian. It is important for clients to carefully compare the information on the custodian's statement with the information on our summary statements.

In all cases, clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities. Execution of transactions and custody of client funds and securities are services provided by the client's selected brokerage/custodial services provider(s).

ITEM 16 INVESTMENT DISCRETION

We will have discretionary authority to determine, without obtaining specific client consent, the securities to be bought or sold and the amount of securities to be bought or sold. Before this authority is assumed clients must execute Advisor's Discretionary Management Agreement which includes a limited power of attorney clause.

We do not have the authority to determine, without obtaining specific client consent, the broker dealer or custodian to be used; or the commission rates paid. We reasonably believe that TD Ameritrade's blend of execution services, commission and transaction costs, as well as professionalism will allow us to seek best execution and competitive prices.

Fairview Financial provides advice to corporate retirement plans on both a discretionary and a non-discretionary basis based on the specific client relationship.

ITEM 17 VOTING CLIENT SECURITIES

Clients will retain the right to vote all proxies which are solicited for securities held in the account. Advisor is precluded from voting proxies for securities held in the account and will not be required to take any action or render advice with respect to the voting of proxies. Clients will receive their proxies or other corporate communications directly from the custodian however they have the option, through the TD Ameritrade account application, to suppress these communications. The Advisor will not provide an opinion regarding proxies.

ITEM 18 FINANCIAL INFORMATION

A. BALANCE SHEET

The billing of clients happens in arrears so we have no prepayments and are not required to furnish a balance sheet.

B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR THE ADVISOR'S ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS

We also do not have any financial conditions which would impair our ability to meet contractual commitments to clients.

C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS

Fairview Financial and its Members have never been a party to a bankruptcy petition.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISORS

The following biographical information is provided for our principal executive officers:

Name	Title	D.O.B.	Formal Education	Business Background
Paul M Jeffrey	President	1/04/59	BA-Economics, Harvard	**2002-Present** President- Fairview Financial, LLC **1999-2002** FirstVP-Wachovia Securities
Sharyn M Jeffrey	Office Manager	9/23/60	Attended UNC-Charlotte, Major in Criminal Justice and Psychology	**2011-Present** Office Manager- Fairview Financial, LLC **2003-2009** VP & Administrative Group Head-Wachovia Securities

Additionally Paul Jeffrey is a Certified Financial Planner™ and an Accredited Investment Fiduciary (AIF®). Please refer to the Brochure Supplement below for more information regarding these certifications.

Outside Business Activities
Please refer to the ADV 2B form(s) that follows.

Performance-Based Fees.
As outlined in Item 6 of this Brochure, the Advisor's fees are not "performance based" (based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract).

Disciplinary / Disclosure Information
Paul M. Jeffrey has no legal or disciplinary events to address in this section (no arbitrations, no license or registration suspensions or revocations).

Relationships or Arrangements with Issuers of Securities.
Advisor does not have any relationships or arrangements with issuers of securities.

PRIVACY POLICY

We do not sell your personal information.

As a state regulated Registered Investment Advisor, Fairview Financial is covered under the definition of a "financial institution" in the Federal Gramm-Leach-Bliley Act (the "*Act*"). The Advisor is therefore subject to Act as well as the rules of privacy imposed on Investment Advisors and other financial services firms. The Advisor is also subject to the Privacy Rules established by the State of North Carolina.

Privacy of nonpublic personal information is an issue that the staff of Fairview Financial takes seriously.

To maintain compliance with Privacy Rules, every broker, dealer, investment company and investment Advisor is required to adopt policies and procedures reasonably designed to safeguard customer and consumer records and information. Fairview Financial has adopted a Privacy Policy to protect clients and consumers.

In its role as Investment Advisor, Fairview Financial routinely collects nonpublic personal information from clients and prospective clients. This information generally will include but is not limited to:

- Information provided from applications, forms and other information provided to us either verbally or in writing, and include but are not limited to your name, address, phone number, account information, social security number, assets, employment, income and debt;
- Information about your transactions, accounts, trading activity and parties to transactions; health and beneficiary information (such as may pertain to investment planning issues);
- Information from other outside sources;
- Any other data that is deemed to be nonpublic personal information as defined by the Act and state privacy rules.

Fairview Financial values our clients' trust and confidence. We will never sell the nonpublic personal information we obtain from consumers or clients.

All information provided by clients or prospective clients to Fairview Financial, (including the Advisor's personnel), and information and advice furnished by the Advisor to clients, shall be treated as confidential and shall not be disclosed to unaffiliated third parties, except as directed by clients with written authorization, by application to facilitate the investment advisory services offered by the Advisor via an unaffiliated financial services provider (such as the client's custodial firm or broker/dealer), or as required by any rule, regulation or law to which the Advisor or its staff may be subject.

Fairview Financial maintains clients records in a controlled environment and records (electronic and otherwise) are only available to authorized persons of the Advisor who have a need to access client information in order to deliver advisory services, provide administrative support, or to respond to client requests. The Advisor has made reasonable efforts and conducts periodic tests to ensure that its electronic network is hack-proof.

Fairview Financial's position on protecting non-public personal information extends beyond the life of the Advisory Agreement. Client information is retained in a protected manner for the time period required by regulators (five years from the data of last use) and thereafter is safely destroyed via in-house shredding or a contracted secure shredding service. Should you advisory representative terminate his or her associated with Fairview Financial, no information will leave Fairview Financial without your written authorization requesting records be transferred.

Consumers (who are not clients) who provide information during an initial consultation or for other purposes but do not go on to become clients of the Advisor also receive privacy protection. Original information will be promptly returned in person or via the mail if the Advisor's services are not engaged. Alternatively, if nonpublic personal information is contained in copies of documents, notes or some other media, this information will be securely filed for a period of up to one year (depending upon likelihood of engagement) before being shredded in-house or via our secure shredding service.

Clients are encouraged to discuss any questions regarding Fairview Financial' privacy policies and procedures with Paul Jeffrey, Managing Member and Chief Compliance Officer.

Paul M Jeffrey

CRD# 1371168

Fairview Financial, LLC

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Brochure Supplement

(Form ADV Part 2B)

Revised 01/01/2017

This brochure supplement provides information about Paul M Jeffrey that supplements the Fairview Financial, LLC Advisor Brochure (Form ADV Part 2A). You should have received a copy of that brochure. Please contact Fairview Financial, LLC if you did not receive the firm's brochure or if you have any questions about the content of this supplement.

Additional information about Paul M Jeffrey is also available on the SEC's website at www.Advisorinfo.sec.gov.

<u>Item 2</u> Educational Background and Business Experience

Paul M Jeffrey, AIF – Owner, President, Chief Compliance Officer

Paul Jeffrey, born in 1959 founded Fairview Financial, LLC in 2002. Prior to starting the firm, from 1999 to 2002, Paul was a First Vice President with Wachovia Securities (now Wells Fargo) in Charlotte, NC. Prior to this employment Paul was a VP-Investments at Paine Webber (now UBS). Both at Wachovia and PaineWebber, Paul worked as a traditional full-service broker dealer representative and developed long term business relationships with clients in need of wealth management services.

Paul began his career in the financial services industry at Merrill Lynch immediately after graduating from Harvard in 1983 where he earned a BA in Economics. In 1994 he moved to Charlotte, NC from Toronto Canada and is now has dual US/Canadian citizenship.

Paul received the Certified Financial Planner™ certification in 2015. The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). CFP® professionals must master nearly 100 integrated financial planning topics including investment planning, tax planning, retirement planning, estate planning, risk management, insurance planning and financial management. In addition to completing a comprehensive financial planning curriculum approved by CFP Board, or equivalent academic coursework, CFP® professionals are required to pass a comprehensive 6-hour certification exam and to have completed a minimum of 3 years experience in the personal financial planning process. Continuing education is required and practitioners must abide by a strict code of professional conduct.

Additionally Paul Jeffrey is an Accredited Investment Fiduciary (AIF). The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. The certification is administered by the Center for Fiduciary Studies, LLC (an FI360 company).

To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of FI360.

<u>Item 3</u> Disciplinary Information

Paul Jeffrey has no record of regulatory or disciplinary events. His registration records contain no information that would be material to a client's or prospective client's evaluation of Mr. Jeffrey or the integrity of his practice.

<u>Item 4</u> Other business activities

In addition to his responsibilities with Fairview Financial, LLC Paul works as an independent insurance agent and is licensed in several states include North Carolina and

South Carolina. This activity is often conducted using the facilities of Fairview Financial. Clients are welcome but are never obligated to implement insurance coverage or products and where insurance is desired, clients are welcome to ulitize any agent, product or company they may choose, entirely at their own discretion.

Item 5 Additional compensation

Other than salary, Paul Jeffrey does not receive any economic benefit from any person, company or organization, either directly or indirectly, in exchange for providing clients with advisory services through Fairview Financial.

Separate from the advisory practice, Mr. Jeffrey receives normal commissions from various insurance companies.

Item 6 Supervision

As the Managing Member and Chief Compliance Officer of Fairview Financial, Paul Jeffrey maintains a vested interest in the firm's internal compliance and risk management program. Paul Jeffrey is sole investment advisory representative of the firm and there are no other representatives providing investment advice under his supervision. Paul Jeffrey is in charge of supervising the day-to-day activities of the Advisor and its administrative personnel. The Advisor's supervisory system establishes clear lines of authority, accountability and responsibility.

Fairview Financial, LLC at times engages outside legal and compliance counsel in order to aid in the compliance of Paul's activities.

Clients are welcome to contact Mr. Jeffrey with questions or concerns in connection with the Advisor's services, staff monitoring or the Advisor's internal compliance program. Mr. Jeffrey's contact information is listed on the cover page of ADV Part 2A and ADV 2B.

Item 7 Requirements for State-Registered Advisors

1. Paul Jeffrey ***has not*** been involved in any of the events listed below.
    a. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:
        i. An investment or an investment-related business or activity;
        ii. Fraud, false statements, or omissions;
        iii. Theft, embezzlement, or other wrongful taking of property;
        iv. Bribery, forgery, counterfeiting, or extortion; or
        v. Dishonest, unfair or unethical practices.
    b. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
        i. An investment or an investment-related business or activity;
        ii. Fraud, false statements, or omissions;
        iii. Theft, embezzlement, or other wrongful taking of property;
        iv. Bribery, forgery, counterfeiting, or extortion; or
        v. Dishonest, unfair or unethical practices.
2. Paul Jeffrey ***has not*** been the subject of a bankruptcy petition at any time.