

Firm Brochure
(Part 2A of Form ADV)

Fairfield Financial Advisors, Ltd.

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This brochure provides information about the qualifications and business practices of Fairfield Financial Advisors, Ltd. If you have any questions about the contents of this brochure, please contact us at: 781-431-1119, or by email at: info@fairfieldfinadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Fairfield is available on the SEC's website at www.adviserinfo.sec.gov.

Fairfield is a registered investment adviser with the SEC. Such registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

The purpose of this Item 2 is to disclose material changes that have been made to this Brochure since the last annual update of this Brochure.

Since the filing of our last annual updating amendment, dated March 29, 2022, the following material changes to report:

- Jane King has replaced Lori Colella as the firm's Chief Compliance Office in March, 2023.

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Item 4 Advisory Business

Firm Description

Fairfield Financial Advisors, Ltd., ("Fairfield") was founded in 1993. We are organized as a corporation under the laws of the Commonwealth of Massachusetts. Jane V. King is the 100% stockholder.

Fairfield provides personalized confidential financial planning and investment management to individuals, families, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow analysis, investment tax planning, insurance review, investment management, planning for education funding, retirement planning, and estate planning.

Fairfield is a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted. All fees are paid by the client.

Asset Management Services

Investment advice is provided, with the client making the final decision on investment selection, unless it has been agreed upon between Fairfield and the client, and upon the client's request, that Fairfield take discretion. Fairfield does not typically take discretion but may do so upon mutual agreement between the client and Fairfield. Fairfield does not hold client assets as custodian. Fairfield receives a limited power of attorney from clients to place trades with the client's custodian which, in most cases, is Charles Schwab & Co.

An initial evaluation of a client's financial situation is provided to the client. Periodic reviews are provided to clients as reminders of the specific courses of action that need to be taken. More frequent reviews occur but are communicated to the client only if changes are recommended.

Fairfield is available to meet with other professionals that the client may care to engage such as lawyers, accountants, insurance agents, etc. Any possible conflicts of interest for Fairfield with such engagement of professionals will be disclosed to the client in the unlikely event they occur.

The initial meeting with Fairfield, which may be in person or by telephone, serves to determine the extent to which financial planning and investment management may be beneficial to the client.

Client assets are invested primarily in no-load mutual funds and individual common stocks, usually through Charles Schwab & Co. Mutual fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Brokerage companies may charge a transaction fee for the purchase of some funds.

Individual bonds and exchange-traded funds may be purchased or sold through Charles Schwab. The brokerage firm charges a fee for stock and bond trades. Fairfield does not receive any compensation, in any form, from fund companies or brokerage firms.

Investments may also include: equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable annuities, and mutual funds shares), and U. S. government securities.

Initial public offerings (IPOs) are not available through Fairfield.

Fairfield also advises clients with respect to financial planning, taxation issues, trust services, and estate planning. This service, which may include delivery of a written financial plan or a subset thereof, may be provided at the request of an asset management client to assist the client and/or our firm in formulating and/or explaining the investment recommendations we provide. Fairfield does not charge a fee for these services.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Assets Under Management

As of December 31, 2022, we provided continuous management services for \$225,230,219 in client assets on a non-discretionary basis.

Tailored Relationships

The goals and objectives of each client determine the portfolio design. Clients may impose restrictions on investing in certain securities or types of securities.

Item 5 Fees and Compensation

Asset Management Services

The annual Advisory Service Agreement fee is based on a percentage of the client's investable assets, unless otherwise specified, according to the following schedule:

Annual Fee Schedule

Assets Under Management	Annual Fee
First \$899,999	1.50%
From \$900,000 to \$2,000,000	1.25%

From \$2,000,001 to \$5,000,000	1.00%
From \$5,000,001 to \$10,000,000	0.75%
Above \$10,000,000	0.50%

Fairfield will aggregate family accounts for the calculation of management fees, unless otherwise requested by the client. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Fairfield charges its advisory fee in the last month of each calendar quarter. The fee is based on the account's closing market value as of the last day of the preceding month. In other words, the fee is based on the closing market value at the end of the second month of each quarter. The fee charged compensates us for services rendered and will be rendered during the quarter in which the fee is charged.

Fairfield, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Fee Billing

Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing, but the client may arrange to receive a physical copy of the invoice and pay by check.

Termination of Agreement

A client may terminate the Asset Management agreement at any time by notifying Fairfield in writing. A client is responsible for any unpaid fees as of the termination date. The client will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means the client will incur advisory fees only in proportion to the number of days in the quarter for which they are a client. If a client has pre-paid advisory fees that we have not yet earned, the client will receive a prorated refund of those fees.

Fairfield may also terminate the Asset Management agreement at any time by notifying the client in writing.

Additional Fees and Expenses

As part of our investment advisory services to the client, we may invest, or recommend that the client invest in mutual funds and exchange traded funds. The fees paid by the client to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a fund management fee and other fund expenses. A client will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom the client's account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost incurred by a client, the client should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

IRA Rollover Considerations

As part of our investment advisory services to the client, we may recommend that the client withdraw the assets from their employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on the client's behalf. If the client elects to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee to the client as set forth in the agreement that the client executed with our firm. This practice may present a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to the client for the purpose of generating fee based compensation rather than solely based on the client's needs. The client is under no obligation, contractually or otherwise, to complete the rollover. Moreover, if the client does complete the rollover, the client is under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, the client should consider the costs and benefits of:

1. Leaving the funds in the client's employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage the client to speak with their CPA and/or tax attorney.

If the client is considering rolling over retirement funds to an IRA for us to manage here are a few points to consider before doing so:

1. Determine whether the investment options in their employer's retirement plan address their needs or whether the client might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. The client's current plan may have lower fees than our fees.
 - a. If the client is interested in investing only in mutual funds, they should understand the cost structure of the share classes available in their employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. The client should understand the various products and services of which to take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to the client in their plan.
4. The client's current plan may also offer financial advice.
5. If the client keeps their assets titled in a 401k or retirement account, the client could potentially delay their required minimum distribution beyond age 72.
6. The client's 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. The client may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If the client owns company stock in their plan, they may be able to liquidate those shares at a

lower capital gains tax rate.

10. The client's plan may allow them to hire us as the manager and keep the assets titled in the plan name.

It is important for the client to understand the differences between these types of accounts and to decide whether a rollover is best for them. Prior to proceeding, the client may contact our office with any questions.

Item 6 Performance-Based Fees

Performance-based fees are fees that are not based on a share of the capital gains or capital appreciation of managed securities. Fairfield does not use a performance-based fee structure or side-by-side management.

Item 7 Types of Clients

Description

Fairfield currently provides investment advice to individuals, high net worth individuals, families, trusts, estates, and pension and profit sharing plans. Fairfield may also provide services to small businesses, charitable organizations, corporations and other business entities.

Client relationships vary in scope and length of service.

Account Minimums

Fairfield does not require a minimum dollar amount to open an account and maintain an advisory account.

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

Methods of Analysis

Security analysis method includes fundamental analysis which is the evaluation of a security based on the intrinsic value of the business including, but not limited to, its growth in earnings and sales revenue, its market share, financials, management quality, and its competitive advantage. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the U.S. Securities and Exchange Commission.

Other sources of information that Fairfield may use include, but are not limited to, Morningstar Principia mutual fund information, Morningstar Principia stock information, Charles Schwab & Company's "SchwabLink" service, and various other sources available via the internet.

Investment Strategies

The primary investment strategy used on client accounts is a strategic asset allocation approach. This means that the firm recommends actively-managed funds, common stocks, fixed income securities, and exchange-traded funds as the core investments. Money market positions, passively-managed indices, or other investment instruments are incorporated when requested by a client and/or deemed to be a strategic fit by Fairfield.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations, and confirmed or modified by annual Investment Policy Statements completed by the client. The client also may change these objectives by communication with us at any time.

Investment strategies will include long-term purchases, and short-term purchases.

Risk of Loss

All investment strategies have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment values to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the current or forecasted economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many investors are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value of its stock.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Financial Industry Activities

Fairfield is registered as an investment advisor with the U.S. Securities and Exchange Commission.

Jane King, as president of Fairfield, is a member of the National Association of Personal Financial Advisors (NAPFA).

Jane King also maintains a current membership with the Financial Planning Association (FPA).

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

Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to act in your interests at all times and to satisfy our fiduciary duty of honesty, good faith, and fair dealing with you. The employees of Fairfield have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Fairfield and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades in such securities. Employees must comply with the provisions of the Fairfield *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of Fairfield is Lori A. Colella. All employee trades are documented in the trade blotter, and subject to review by the Chief Compliance Officer and Jane V. King. Personal trading reviews are undertaken to determine that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Additionally, our firm or persons associated with our firm may buy or sell the same securities that we recommend to clients or securities in which clients are already invested. A conflict of interest may exist in such cases because we have the ability to trade ahead of the client and potentially receive more favorable prices than the client will receive. To mitigate this conflict of interest, it is our policy that neither our firm or persons associated with our firm shall have priority over clients' account in the purchase or sale of securities. Since most employee trades are relatively small mutual fund trades, equity trades, or exchange-traded fund trades, these trades do not affect the securities markets.

Item 12 Brokerage Practices

Selecting Brokerage Firms

We recommend the brokerage and custodial services of Charles Schwab & Co. In all cases, the recommended Custodian is a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation.

Best Execution

Fairfield, in almost all cases, executes trades through Charles Schwab & Co. and periodically reviews the execution of trades to ascertain that the client is getting best execution. We believe that Schwab provides quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided, including the value of the provider's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. We believe that Schwab's commissions and brokerage fees are reasonable; nevertheless, in recognition of the value of Schwab provides, the client may pay higher commissions and/or trading costs than those that may be available elsewhere. Fairfield does not

receive any portion of the trading fees.

Research and Other Soft Dollar Benefits

We do not have any soft dollar arrangements.

Economic Benefits

Fairfield receives research products and services from Schwab which is used for the benefit of all Fairfield's clients. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, the client should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge. The selection of Schwab as a custodian for clients is not determined or affected by this service or product.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

We routinely require that our clients direct our firm to execute transactions through Schwab. As such, we may be unable to achieve the most favorable execution for the client's transactions and the client may pay higher brokerage commissions than they might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Block Trades

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, clients may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for the client and the client may pay higher commissions, fees, and/or transaction costs than other clients.

Mutual Fund Share Classes

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration cost, tax implications, and other factors. When the fund is available for purchase at net asset value, we will purchase, or recommend the purchase of, the fund at net asset value. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

Item 13 Review of Accounts

Account reviews are performed regularly by Jane V. King, President. Account reviews are performed more frequently when market conditions dictate.

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's personal situation.

Each client receives a monthly statement directly from the custodian. Account reviews by the firm consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive written communications on at least an annual basis which may include a net worth statement, portfolio evaluation, and a summary of objectives and progress towards meeting those objectives.

Item 14 Client Referrals and Other Compensation

Fairfield may receive client referrals from clients or legal or other financial professionals. The firm does not compensate referring parties for these referrals.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

Item 15 Custody

Account Statements

The client's independent custodian will directly debit the client's account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from the clients' accounts causes our firm to exercise limited custody over client funds or securities. We do not have physical custody of any of the clients' funds and/or securities. Client funds and securities will be held with a bank, broker-dealer or other qualified custodian. Clients will receive account statements from the qualified custodian(s) holding the clients' funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Clients may be provided with net worth statements. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning and overview discussions where the exact values of assets are not material to the financial planning tasks.

Wire Transfer and/or Standing Letter of Authorization

Our firm, or persons associated with our firm, may effect wire transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization. An adviser with authority to conduct such third party wire transfers has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a

- transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
 5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
 6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
 7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

Trustee Services

Jane V. King, of Fairfield, serves as trustee to certain accounts for which we provide investment advisory services. Jane King's capacity as trustee gives our firm custody over the advisory accounts for which the individual serves as trustee. These accounts will be held with a bank, broker-dealer, or other qualified custodian. If Fairfield acts as trustee for any of a client's accounts, the client will receive account statements from the qualified custodian(s) holding the client's funds and securities at least quarterly. The client should carefully review account statements for accuracy. Client accounts for which Jane King serves as Trustee will be examined on a surprise basis each calendar year by an independent public accountant whose fees are paid by Fairfield.

Item 16 Investment Discretion

Discretionary Authority for Trading

Fairfield does not take discretion unless requested by the client and mutually agreed upon by the client and Fairfield. Fairfield does not have the authority to determine, without obtaining client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold for those accounts for which Fairfield does not take discretion.

For all accounts, discretionary or non-discretionary, Fairfield does not receive any portion of the transaction fees or commissions paid by the client to the custodian. If a client enters into non-discretionary arrangements with our firm, we will obtain the client's approval prior to the execution of any transaction for the client's account(s). The client has an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

In order to buy or sell securities on the client's behalf, the client must first sign our discretionary management agreement and the appropriate trading authorization forms. The client may grant our firm discretion over the selection and amount of securities to be purchased or sold for their account(s) without obtaining their consent or approval prior to each transaction. The client may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for their account(s). For example, the client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security.

Limited Power of Attorney

Fairfield receives a limited power of attorney from clients to place trades with the client's custodian which, in most cases, is Charles Schwab & Co.

For all accounts, discretionary or non-discretionary, Fairfield does not receive any portion of the transaction fees or commissions paid by the client to the custodian.

Item 17 Voting Client Securities

Fairfield does not vote proxies on securities. Clients are expected to vote their own proxies as shareholders of the applicable securities, and are responsible for exercising their rights as shareholders. At the client's request, we may offer advice to the client regarding corporate actions and the exercise of your proxy voting rights.

In most cases, clients receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to the client by mail. When clients authorize our firm to contact them by electronic mail, we would forward any electronic solicitations to vote proxies; however, the voting decision remains with the client as shareholder.

Item 18 Financial Information

Fairfield does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Fairfield does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance of receiving the advisory service.

We have not filed a bankruptcy petition at any time in the past ten years.