

Part 2A of Form ADV

Walsh Financial Solutions, LLC

5610 Ward Rd, Ste 300
Arvada, CO 80002

(303) 252-0852

www.walshfinancialsolutions.com

January 22, 2024

This brochure provides information about the qualifications and business practices of Walsh Financial Solutions, LLC (“we” or “the Firm”). If you have any questions about the contents of this brochure, please contact us at (303) 252-0852 or at info@walshfinancialsolutions.com.

The information in this brochure has not been approved nor verified by the United States Securities and Exchange Commission (SEC) nor by any state securities authority.

Walsh Financial Solutions, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Walsh Financial Solutions can be found on the SEC’s website at www.adviserinfo.sec.gov using Walsh Financial Solutions’ CRD No. 133589.

Item 2 – Material Changes

We update all necessary information in this brochure annually. When material changes occur, a summary of those changes will be identified here.

Since the date of our last annual update, January 31, 2023, the following material changes have occurred:

- For our Financial Planning clients, we changed our invoicing from in advance to in arrears, as further disclosed in Item 5.

For further details regarding the updates or changes listed above, or for a free copy of our Firm Brochure, please contact our office at (303) 252-0852 or info@walshfinancialsolutions.com or visit our website, www.walshfinancialsolutions.com, and click on Form ADV Part 2.

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Advisory Services offered through Walsh Financial Solutions or Vanderbilt Advisory Services.

Securities offered through Vanderbilt Securities, LLC. Member: FINRA, SIPC. Registered with MSRB.

Walsh Financial Solutions and Vanderbilt Securities, LLC are separate and unaffiliated entities.

Clearing agent: Fidelity Clearing & Custody Solutions. Insurance Services offered through Vanderbilt Insurance and other agencies.

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For additional information on services, disclosures, fees, and conflicts of interest, please visit www.vanderbilftg.com/disclosures

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Item 4 – Advisory Business

Walsh Financial Solutions was founded in 2004 and is owned 100% by Jennefer Walsh.

At Walsh Financial Solutions, we provide personalized investment advisory services to clients in the form of financial planning.

We created our financial planning services to provide objective advice on the fundamentals of financial planning. We believe that clients receive relevant and quality financial planning advice and guidance when we perform a thorough analysis, present comprehensive recommendations, and develop a plan for continual improvement.

As fiduciaries, Walsh Financial Solutions always acts in good faith and in the best interests of our clients. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are a fiduciary 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 Walsh Financial Solutions makes money creates some conflicts with your interests, so Walsh Financial Solutions operates under a special rule that requires us to act in your best interest and not put our interests ahead of yours.

We offer two (2) financial planning programs that are tailored by your individual needs, objectives, and circumstances. These programs blend both financial and life conversations; and, they are designed to examine your financial picture, in parts or in its entirety.

Depending upon your needs, within our programs, you will receive one (1) or more of the following financial planning services:

- Written Goals and Execution Plans
- Cash Flow Organization and Planning
- Debt Reduction Strategies and Debt Repayment Planning
- Saving Strategies and Accumulation Planning
- Document Organization
- Employee Benefits Review
- Risk Assessment (Including Medical, Property, Liabilities, Disability, Life, and Longevity)
- Investment Portfolio Design and Maintenance
- Financial Independence Strategies and Retirement Planning
- Tax Efficiency Strategies and Tax Planning
- Estate and Legacy Planning

You have sole responsibility for determining whether to implement any of our financial planning recommendations; you are not required to implement any of our recommendations or otherwise conduct business through Walsh Financial Solutions.

Financial Counseling

We provide a Financial Counseling engagement to individuals and couples that includes general financial assistance or a second opinion. This is a project-based engagement where the client seeks the advice of a professional but prefers to implement the changes independently.

This program includes an informational interview by phone, pre-meeting financial analysis, one (1) meeting where we present our recommendations relating to one (1) or two (2) of the selected financial planning services, and a written action plan if requested. The engagement will end at our presentation of the recommendations and our delivery of any mutually agreed-upon deliverables.

Financial Planning

We provide a Financial Planning engagement to individuals and couples that includes in-depth and personalized financial analysis, recommendations, and written action plans through initial and ongoing planning, service, and support. Unlike a Financial Counseling engagement, which is short in duration, this engagement has an annual renewable term.

We are proud to offer The Walsh Financial Solutions 5 Step Financial Planning Process, and all of our financial planning services that may be applicable, to our Financial Planning clients.

For new clients, the initial process consists of three (3) to six (6) meetings, depending on the complexity of your financial situation. The meetings could include areas such as our: Inspiration, Short-Term Financial Planning, Long-Term Financial Planning, Insurance Planning, Investment Planning, and Estate Planning meetings.

From there, we coordinate ongoing review meetings in which we monitor and adjust your financial plans accordingly. For renewing clients, we typically assemble two (2) to four (4) times per year.

With our Financial Planning clients, we strongly encourage continued dialogue regarding their financial matters throughout the service term.

Wrap Fee Programs

Walsh Financial Solutions does not participate in wrap fee programs.

Assets

As of December 31, 2023, Walsh Financial Solutions does not manage client assets on a discretionary basis nor on a non-discretionary basis. We offer only financial planning services.

Item 5 – Fees and Compensation

For individuals and couples who are interested in learning more about how our services may be beneficial for them, we provide a complimentary Orientation Meeting. In this informational interview, we detail our background and qualifications, introduce The Walsh Financial Solutions 5 Step Financial Planning Process, review the different levels of service, define what makes up a mutually rewarding relationship, and discuss our fee schedule.

When you engage our services, we will communicate your fee with you. We may request clarification for items that affect the fee calculation; however, once your fee is presented, it is non-negotiable.

Financial Counseling

The fee for Financial Counseling is \$250.00 per service hour, billed in 15 minute increments. We require a minimum of 3 service hours per consultation to properly administer financial advice. We provide an estimation of service hours before we render any work or advice.

Should the scope or complexity of the consultation change within the course of our work, we will notify you and seek your approval for additional time.

We invoice upon engagement and a deposit of 50% of the estimated fee is expected at that time. The balance will be due upon our presentation of the recommendations, our delivery of any mutually agreed-upon deliverables, and your receipt of a final billing statement.

Financial Planning

The fee for Financial Planning reflects our commitment to deliver sound advice relating to your entire financial life. As such, we believe that the complexity of your financial situation can be estimated, and a flat fee can be calculated, using your Income (your Adjusted Gross Income from your most recent Federal Income Tax Return) and your Net Worth (your Assets minus your Liabilities).

In our calculation, Net Worth includes all assets owned by you: cash, securities, retirement accounts, cash value of life or other insurance products, and real estate (including primary home), less outstanding liabilities: mortgages or other debt. Net Worth will not include items such as Donor Advised Fund balances, business assets and liabilities, nor personal property such as household goods, collectibles, or jewelry.

We will calculate your flat fee according to the following formula:

- Income 1.00%, plus
- Net Worth from \$0 to \$2,500,000 0.50%, or
- Net Worth from \$2,500,001 to \$10,000,000 0.25%, or
- Net Worth for \$10,000,001 and over 0.10%

For new advisory contracts, your fee will be determined according to the above schedule after we meet with you and collect your financial documents and information. Prior to engagement, we will provide you with a Net Worth Statement and a Fee Calculation for the purpose of setting forth your Financial Planning fee. We set the flat fee upon engagement, for a 12-month rolling period.

If you wish to reengage our services after the initial 12-month rolling period, we will offer an extended advisory contract, with an extended flat fee, to you for the remainder of the calendar year. Your extended flat fee will equal: your original flat fee, prorated from the date that we extended our advisory contract to December 31st, based upon a January through December calendar year.

For renewing advisory contracts, we will use the Net Worth Statement provided to you in the prior service term for the purposes of recalculating and setting forth your Financial Planning fee for the new service term. If your net worth information, or a recent Federal Income Tax Return, was not provided to us in the prior service term, we will use our discretion to adjust and set forth your Financial Planning fee for the new service term based on the scope and complexity of the service(s) that we anticipate providing to you. We set the flat fee, annually, upon engagement in January, for the current calendar year.

We may, in our sole discretion, increase or decrease your flat fee, as calculated above, after taking your unique circumstances and needs into consideration. If the fee that we assign to your engagement varies from a fee using the calculation above, we will communicate this adjustment to you prior to engagement.

We require a minimum Financial Planning fee of \$2,500.00 for individuals, and \$4,000.00 for couples, to properly administer financial advice.

We invoice quarterly, in arrears, and your payment is expected in full upon receipt of a billing statement.

Fees Related to Investing

If you choose to implement our advisory representatives' recommended investment and/or account changes as part of our Investment Portfolio Design and Maintenance service, you may incur other types of fees or expenses imposed by third parties other than Walsh Financial Solutions, including those charged by your account custodian. These include, but are not limited to: mutual fund 12b-1 fees, mutual fund management fees and administrative expenses, mutual fund transaction charges, deferred sales charges on previously purchased mutual funds transferred into an account, variable annuity expenses, IRA and qualified retirement plan fees, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, hedge fund and managed futures investment management fees, managed futures investor servicing fees, fees relating to American Depository Receipts, other custodian fees, and other charges required by law. These charges are independent and separate from the fee charged by Walsh Financial Solutions.

You may also incur brokerage or transaction costs for trade executions that are independent and separate from the fee charged by Walsh Financial Solutions. These charges are set out in your custodian's account application, are usually small and incidental to the purchase or sale of the security or investment product, and are paid to your custodian. We believe that the selection of the security or investment product is more important than the nominal fee that your custodian charges to buy or sell it.

Please see Item 12 for information regarding our brokerage practices.

Payment of Fees

You may pay your fee by check.

There will be a late payment fee for any unpaid balance that is greater than 90 days overdue. The late payment fee will equal: 3% of the balance due. It will be assessed each month until the balance is paid in full.

We will turn over any account that is greater than 180 days overdue to a collection agency or to our attorneys for further action. You will be responsible for paying the principal sum due, plus all costs and fees associated with the collection of such unpaid balance, including, but not limited to: collection agency fees, reasonable attorney's fees, interest on the outstanding balance, and any and all collection costs, court costs, filing fees, and judgment execution costs.

Fee Offset Payment Arrangements

If your advisory contract includes our Risk Assessment or Investment Portfolio Design and Maintenance service, our advisory representatives may make specific investment management, security, investment product, or insurance product recommendations to you based on your need for such services or products.

Advisory representatives of Walsh Financial Solutions are separately registered as advisory representatives of Vanderbilt Advisory Services, licensed as registered representatives of Vanderbilt Securities, a full-service broker-dealer, member FINRA/SIPC, and are also independent insurance agents, appointed with various insurance companies. In this capacity, they can provide investment management services for clients and sell securities, investment products, and insurance products to clients and receive compensation from clients, Vanderbilt Advisory Services, Vanderbilt Securities, or the respective investment or insurance product sponsor in the form of investment advisory fees, commissions, trails, 12b-1 fees, or other compensation. These charges are independent and separate from the financial planning fee charged by Walsh Financial Solutions. The receipt of this independent and separate compensation creates a conflict of interest and it may affect the advisory representatives' judgement when they recommend investment and/or account changes.

If agreed upon by you and Walsh Financial Solutions, we will credit your financial planning fee by any investment advisory fees, commissions, trails, 12b-1 fees, or other compensation received by our advisory representatives in their separate roles as Vanderbilt Advisory Services Investment Adviser Representatives, Vanderbilt Securities Registered Representatives, or independent insurance agents, thereby avoiding this conflict of interest. This is referred to as a Fee Offset Payment Arrangement.

If the total of the investment advisory fees, commissions, trails, 12b-1 fees, or other compensation received by our advisory representatives is greater than your financial planning fee, Walsh Financial Solutions will issue a nonrefundable credit to you in the amount of the overpayment. You may apply your credit toward future financial planning services; credits are available for use in the subsequent one (1) calendar year.

We reconcile client fees and credits annually; and, we will provide an accounting of your offset to you annually. You may, however, engage the same service or purchase the same product through any investment adviser representative, registered representative, or insurance agent that you choose; in which case, our Fee Offset Payment Arrangement will not apply.

Other Payment Options

If agreed upon by you and Walsh Financial Solutions, your fee can be paid via an online merchant service provider, in installments or in its entirety. If a systematic payment schedule is set up for you, for your convenience, we will require written authorization from you prior to the first scheduled payment. The merchant service provider will send an invoice to you prior to placing the charge to your credit card. And,

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we will notify you at the time of payment that a payment has taken place. We will not have access to your credit card information nor will the information be available to us.

Termination and Refunds

Our advisory contract may be terminated at any time, by you or by Walsh Financial Solutions, by giving written notice to the other party. Termination will be effective immediately upon receipt of such notice.

If you terminate our advisory contract within five (5) business days of its signing, you will receive a full refund of all fees paid in advance without penalty. If you terminate our advisory contract after five (5) business days of its signing, we will calculate and retain any prepaid and earned fees according to our Early Termination Fee Schedule. We will promptly refund any prepaid and unearned fees to you.

Early Termination: Earned Fees

- Financial Counseling
 - \$250.00 per service hour, billed in 15 minute increments
- Financial Planning: New Advisory Contracts
 - \$250.00 per service hour, billed in 15 minute increments
- Financial Planning: Extended Advisory Contracts
 - Your extended flat fee, prorated from the date that we extended our advisory contract to the date of termination, based upon a January through December calendar year
- Financial Planning: Renewing Advisory Contracts
 - Your flat fee, prorated from January 1st to the date of termination, based upon a January through December calendar year

Otherwise, our financial planning services terminate on the End Date specified in our advisory contract.

Walsh Financial Solutions reserves the right to terminate any advisory contract where a client willfully conceals, or refuses to provide, pertinent information about their financial situation when it is necessary and appropriate, in our judgment, to properly administer financial advice. In addition, we reserve the right to stop work for any client whose unpaid balance is more than ninety (90) days overdue.

Third-Party Consulting

We believe that successful financial planning incorporates all available resources. As your financial advocate, we may request collaboration with other professional advisers, such as accountants or attorneys, to ensure that your entire professional team is working together. If we determine that work is deemed necessary by a CPA, attorney, and/or other professional adviser, we will require your pre-approval. Your respective adviser will invoice you directly.

Item 6 – Performance-Based Fees and Side-By-Side Management

Walsh Financial Solutions and our advisory representatives do not accept performance-based fees (such as a share of capital gains on or capital appreciation of the assets of a client) or side-by-side management.

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Item 7 – Types of Clients

Walsh Financial Solutions typically provides services to individuals, couples, families (generational planning), qualified retirement plans, trusts, and small businesses.

Because our services are customized for each client's situation, they vary in terms and/or scope.

We do not require a minimum dollar value of assets to start or maintain a client relationship.

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

If our advisory contract includes our Investment Portfolio Design and Maintenance service, our advisory representatives will analyze your investment accounts held outside of Vanderbilt Advisory Services or Vanderbilt Securities; and, they will craft individualized investment portfolio recommendations for you, taking your specific financial goals and investment objectives into consideration.

You will be asked to complete a risk tolerance questionnaire to help define your investment objectives, risk tolerance, and investment time frames. Common investment objectives include: preserving existing assets, providing ongoing income, protecting purchasing power, seeking long-term growth, or pursuing aggressive growth. You may change your investment objectives at any time.

Our investment strategies may include: strategic or tactical asset allocation. Generally, a strategic asset allocation approach passively invests in a fixed allocation among several broad asset classes over the long-term and periodically rebalances, while a tactical asset allocation approach actively adjusts a portfolio's strategic asset allocation based on short-term market forecasts.

The components of our investment portfolio recommendations may include a fundamental mix of stocks, bonds, and cash. And, the investment portfolio recommendations may specifically include a combination of: individual stocks, mutual funds, exchange traded funds (ETFs), annuities, alternative investments, municipal or corporate bonds, CDs, money markets, or other liquid assets. We may recommend model investment portfolios if the models match your investment objectives. You may impose restrictions on investing in certain securities, types of securities, or investment products.

The methods of analysis that we use in our investment buy/sell disciplines may include, but are not limited to: macro-economic analysis, fundamental analysis, or technical analysis.

Our advisory representatives may coordinate with you and/or your tax adviser before presenting their recommended investment and/or account changes. While we may take tax consequences into account when formulating our recommendations, tax minimization is a secondary goal to selecting proper investments.

While advice is provided to you, you make the final decision on investment selection.

Our advisory representatives use a variety of sources of data to conduct their economic, market, and investment analysis, such as: financial periodicals, economic and market research materials prepared by others, subscription services, corporate rating services, annual reports, prospectuses, company conference

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calls and press releases, and other United States Securities and Exchange Commission filings. Other sources of information that they use include: Morningstar Advisor Workstation and the Internet.

Our advisory representatives compare all portfolios against published benchmark portfolios of similar stock and bond ratios for performance and volatility.

We believe that diversification within a portfolio can help to reduce downside volatility and we believe that investment portfolios should have a mix of asset classes and securities within each class. However, asset allocation does not ensure a profit or protect against loss; and, asset allocation may not be appropriate for everyone.

Our advisory representatives will do their best to tailor a portfolio that matches your investment objectives, risk tolerance, and investment time frames, but this is not guaranteed. Walsh Financial Solutions does not represent, warrant, guarantee, or imply that the services or methods of analysis employed by our advisory representatives can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. Market fluctuations, interest rate changes, inflation, economic downturns, and individual security performance are some of the possible exposures. Our advisory representatives' investment portfolio recommendations are designed to mitigate exposures to the various risks; but, investing in securities or investment products involves the risk of loss and you must be prepared to bear losses that may result.

Item 9 – Disciplinary Information

Walsh Financial Solutions and our advisory representatives have not been involved in any legal or disciplinary events.

Item 10 – Other Financial Industry Activities and Affiliations

Jennefer Walsh is separately registered as an advisory representative of Vanderbilt Advisory Services. In this capacity, she may recommend and provide investment management services to clients of Walsh Financial Solutions and receive compensation from Vanderbilt Advisory Services in the form of investment advisory fees. Clients receiving investment management services from Ms. Walsh in her role as a Vanderbilt Advisory Services Investment Adviser Representative will receive certain disclosure documents (e.g., Form ADV, Form CRS, client agreement) from Vanderbilt Advisory Services prior to engaging in these services. Ms. Walsh spends approximately 40% of her time on this activity.

Jennefer Walsh is separately licensed as a registered representative of Vanderbilt Securities. In this capacity, she may recommend and sell securities or investment products to clients of Walsh Financial Solutions and receive compensation from Vanderbilt Securities or the respective investment product sponsor in the form of commissions, trails, 12b-1 fees, or other compensation. Clients purchasing securities or investment products from Ms. Walsh in her role as a Vanderbilt Securities Registered Representative will receive certain disclosure documents (e.g., prospectus, Form CRS, Brokerage Compensation and Conflicts Disclosure (BCCD), brokerage account agreement) from Vanderbilt Securities and/or the respective investment product sponsor prior to conducting such transactions. Ms. Walsh spends approximately 15% of her time on this activity.

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Jennefer Walsh is also separately licensed as an independent insurance agent, appointed with various insurance companies. In this capacity, she may recommend and sell insurance products to clients of Walsh Financial Solutions and receive compensation from the respective insurance product sponsor in the form of commissions, trails, or other compensation. Clients purchasing insurance products from Ms. Walsh in her role as an independent insurance agent will complete an insurance application and receive certain disclosure documents (e.g., prospectus) from the respective insurance product sponsor prior to conducting such transactions. Ms. Walsh spends approximately 5% of her time on this activity.

Walsh Financial Solutions has an established set of policies and procedures that addresses these potential conflicts of interest. And, at all times, Walsh Financial Solutions and our advisory representatives will act in your best interest and act as fiduciaries in carrying out services to you.

Walsh Financial Solutions is independently owned and operated and is not affiliated with any custodian, broker-dealer, investment product sponsor, or insurance product sponsor. If our advisory contract includes our Risk Assessment or Investment Portfolio Design and Maintenance service, our advisory representatives may make specific investment management, security, investment product, or insurance product recommendations to you based on your need for such services or products; although, you may engage the same service or purchase the same product through any investment adviser representative, registered representative, insurance agent, custodian, broker-dealer, investment product sponsor, or insurance product sponsor that you choose.

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

Walsh Financial Solutions operates within a strict Code of Ethics which sets out ideals for ethical conduct premised on the fundamental principles of honesty, integrity, and professionalism. As fiduciaries, we have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of our clients at all times. We will provide a copy of our Code of Ethics to you upon request.

We exercise care in maintaining the confidentiality of any of your confidential information, except where disclosure is authorized or legally mandated.

Our advisory representatives do not recommend securities or investment products to clients in which they, Walsh Financial Solutions, or any related person, has a material financial interest.

Our advisory representatives may invest in the same security or investment product for their personal accounts that they recommend to you. This creates a potential conflict of interest. It is our express policy that they must place your interests ahead of their own when making personal investments.

Item 12 – Brokerage Practices

Walsh Financial Solutions is independently owned and operated and is not affiliated with any custodian or broker-dealer. If our advisory contract includes our Investment Portfolio Design and Maintenance service, our advisory representatives may make specific custodian or broker-dealer recommendations to you based on your need for such services; although, you may implement their recommended investment and/or account changes through any custodian or broker-dealer that you choose.

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Our advisory representatives recommend custodians and broker-dealers for client transactions based on the proven integrity and financial responsibility of the firms and the best execution of orders at reasonable commission rates.

Our advisory representatives may recommend that you hold your investments within an independent custodial account, such as with Vanderbilt Advisory Services or Vanderbilt Securities, a full-service broker-dealer, member FINRA/SIPC. Vanderbilt Financial Group (the marketing name for Vanderbilt Securities and its affiliates) is a business that serves independent investment advisory representatives and registered representatives. Our advisory representatives are separately registered as advisory representatives of Vanderbilt Advisory Services and registered representatives of Vanderbilt Securities.

Vanderbilt Financial Group provides research (both proprietary and created and developed by third parties), and other products or services to our advisory representatives that are generally available on an unsolicited basis at no charge to them. They may use this research to service all or a substantial number of our clients' accounts, wherever they are held. While there is no direct linkage between the investment advice that they give to you and their recommendation to use Vanderbilt Financial Group, research or other products or services may be provided to them by Vanderbilt Financial Group that will not be provided to them if you select another custodian or broker-dealer.

Walsh Financial Solutions, our advisory representatives, and related persons, do not receive client referrals from custodians, broker-dealers, or third-parties; therefore, we do not take client referrals into account when selecting or recommending them.

If you engage our advisory representatives to implement their recommended investment and/or account changes in their separate roles as Vanderbilt Advisory Services Investment Adviser Representatives or Vanderbilt Securities Registered Representatives, National Financial Services (NFS) will be used. As investment adviser representatives of Vanderbilt Advisory Services and registered representatives of Vanderbilt Securities, they are required to use the services of NFS when acting in this capacity. Vanderbilt Securities has a wide range of approved securities and investment products for which it performs due diligence. Vanderbilt Securities Registered Representatives are only permitted to sell these products. You may experience custodial fees or brokerage commissions that are different than the fees or commissions that are charged by other custodians or broker-dealers.

Item 13 – Review of Accounts

We recommend that you have your financial plan reviewed and updated at least annually and/or when you experience a significant change in your circumstances. Financial planning reviews and updates generally include: an updated Net Worth Statement, updated financial projections, our recommendations for helping you reach your financial goals, and any other topic that you wish to explore.

To ensure that your investment accounts are continuing to support your financial goals and investment objectives, we recommend that you have them reviewed and rebalanced at least annually and/or when you experience a significant change in your circumstances. Investment account reviews and updates generally include: an analysis of asset allocation, diversification, risk levels, performance, and suitability and our recommended investment and/or account changes.

Jennefer Walsh conducts the financial planning and investment account reviews for our clients.

You will receive periodic communications from Walsh Financial Solutions, on at least an annual basis. These communications may be verbal or written.

Item 14 – Client Referrals and Other Compensation

Walsh Financial Solutions has been fortunate to receive many client referrals over the years. The referrals came from current clients, accountants, estate planning attorneys, real estate agents, mortgage professionals, employees, and other similar sources. Neither Walsh Financial Solutions, nor any related person, directly or indirectly, compensate any outside party for client referrals.

Likewise, neither Walsh Financial Solutions nor our related persons receive any compensation for client referrals from outside parties, including any of the professional advisers that we may recommend.

Walsh Financial Solutions employees may occasionally receive minimal economic benefits from independent custodians, investment product sponsors, insurance product sponsors, and other non-clients. Such benefits typically occur in the normal course of business or are a part of our due diligence. These benefits may take the form of: meals and entertainment, computer linkages, discounts from selected software vendors, gifts of nominal value at conventions or holiday seasons, access to industry publications, and shared expenses for travel and lodging for attendance at educational and due diligence meetings. Walsh Financial Solutions and our advisory representatives are very sensitive to conflicts of interest and we do not believe that any of these nominal economic benefits negatively influence our objectivity or our sense of fiduciary responsibilities.

Item 15 – Custody

Walsh Financial Solutions does not have custody of your funds or securities.

Item 16 – Investment Discretion

Walsh Financial Solutions does not accept discretionary authority to manage securities accounts on your behalf.

Item 17 – Voting Client Securities

Walsh Financial Solutions does not have authority to vote client securities.

You will receive your proxies or other solicitations directly from your custodian or from a transfer agent.

You are responsible for making all proxy voting decisions and you are expected to vote your own securities. It is not Walsh Financial Solutions' custom or practice to advise on or take action regarding voting client securities.

Item 18 – Financial Information

Walsh Financial Solutions does not require nor solicit prepayment of more than \$500.00 in fees per client six (6) months or more in advance of providing services; therefore, we are not required to include a balance sheet for our most recent fiscal year.

Walsh Financial Solutions and our advisory representatives have not been the subjects of a bankruptcy petition at any time.

Item 19 – Requirements for State-Registered Advisers

Jennefer Walsh, CFP® is the Principal Executive Officer of Walsh Financial Solutions.

Please see Ms. Walsh's Brochure Supplement, Item 2, for information regarding her formal education and business background.

Please see Ms. Walsh's Brochure Supplement, Item 4, for information regarding her other business activities along with the time spent.

Walsh Financial Solutions and our advisory representatives do not accept performance-based fees (such as a share of capital gains on or capital appreciation of the assets of a client) or side-by-side management.

None of our advisory representatives have been involved in: an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500.00 involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

None of our advisory representatives have been involved in: an award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

Unless otherwise described in response to Item 10 of this brochure, advisory representatives of Walsh Financial Solutions do not have relationships or arrangements with any issuer of securities that is not listed in Item 10 of this brochure.

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Advisory Services offered through Walsh Financial Solutions or Vanderbilt Advisory Services.

Securities offered through Vanderbilt Securities, LLC. Member: FINRA, SIPC. Registered with MSRB.

Walsh Financial Solutions and Vanderbilt Securities, LLC are separate and unaffiliated entities.

Clearing agent: Fidelity Clearing & Custody Solutions. Insurance Services offered through Vanderbilt Insurance and other agencies.

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For additional information on services, disclosures, fees, and conflicts of interest, please visit www.vanderbiltfg.com/disclosures